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Dear Planning Policy Team

**Land off Axial Way, Colchester  
Representation to the Regulation 18 Consultation on the new Local Plan**

I write on behalf of Industrial Property Investment Fund (IPIF) who is managed by Legal & General Investment Management (LGIM).

IPIF has a large freehold interest in land to the north of Axial Way. Within the current Local Plan IPIF's land interest falls within the 'North Colchester and Severalls Strategic Economic Area' designation. However, within the Regulation 18 document for the new Local Plan the draft policies map does not seem to include a similar designation. This seems odd given the wording of draft Policy E1 (Protection of Employment) which talks about defined employment designations. These representations therefore seek clarification from the Council on this particular matter.

The background to these representations is that IPIF has identified an opportunity to develop two parcels of land within their holding to deliver additional employment floorspace. This would contribute to both current and emerging policy aspirations for employment land and uses and help to address an identified need. Clarity on the emerging policy situation is therefore key to this.

Below I set out a brief summary of the site and surrounding area before turning to specific comments on the consultation document.

**1. Site Location and Context**

IPIF's freehold interest in the land north of Axial Way comprises two main parcels of land outlined in red in Figure 1 below. The entire area shaded in red represents land within IPIF's freehold ownership, while the smaller areas shaded in yellow are outside IPIF's ownership. The land splitting the two main parcels is owned by Colchester City Council.

The eastern parcel predominantly comprises landscaped open space associated with the large industrial unit located immediately to the north. This area includes a number of mature trees around its perimeter, with a particularly dense tree line along the eastern boundary. A vehicular access from Axial Way to the south crosses the site, providing access to the industrial unit.

The western parcel comprises a cluster of smaller rectangular industrial and commercial units arranged around internal estate roads with service yards and car parking positioned adjacent to each unit.





*Figure 1: Site Location – Land North of Axial Way*

### Surrounding Area

The surrounding context is characterised by a mix of employment and residential uses. To the north, the site adjoins a substantial industrial building with associated car parking and hardstanding, beyond which lies the A12. To the south, Axial Way runs broadly east to west, with the grounds of Colchester Rugby Football Club situated on the opposite side of the road. To the east, the site is bordered by a relatively new residential development, with smaller industrial units and residential blocks located further beyond. To the west, the site is enclosed by additional industrial estates, reinforcing the area’s established employment character.

The site benefits from excellent connectivity. Junction 28 of the A12 is approximately 700 metres to the west, providing direct access to the strategic road network. Colchester Station lies around 2.9 kilometres to the south, offering frequent rail services to London Liverpool Street, Ipswich, and Clacton-on-Sea. Public transport provision is strong, with multiple bus stops along Axial Way serving Severalls Park and Colchester City Centre; two stops are located within a ten-minute walk of the site’s access point.

A hybrid planning application (LPA Ref. 190665) was approved by Colchester City Council for the redevelopment of land south of Axial Way, known as Colchester Northern Gateway. The consent includes a healthcare campus of approximately 5 hectares, comprising up to 300 older people’s homes (C3), a 4,300 sqm private acute surgical hospital (C2), a 1,200 sqm medical centre (D1), a 3,600 sqm 75-bed care home (C2), and up to 45,100 sqm of office space (B1a). It also permits up to 350 homes (C3) alongside ancillary retail and food uses. Based on the approved plans, the land immediately south of Axial Way, opposite the IPIF freehold, is designated for healthcare and residential development.

### **Comments on the Colchester City Council Preferred Options Local Plan**

#### Policies Map

Within the current Local Plan IPIF’s land holding lies within the following designations:

- Colchester Settlement Boundary
- North Growth Area
- North Colchester Strategic Employment Zone / Employment Zone

These designations reflect the area's established and strategic role for employment and economic activity. An extract of the adopted policies map is included at Figure 2 below for reference.

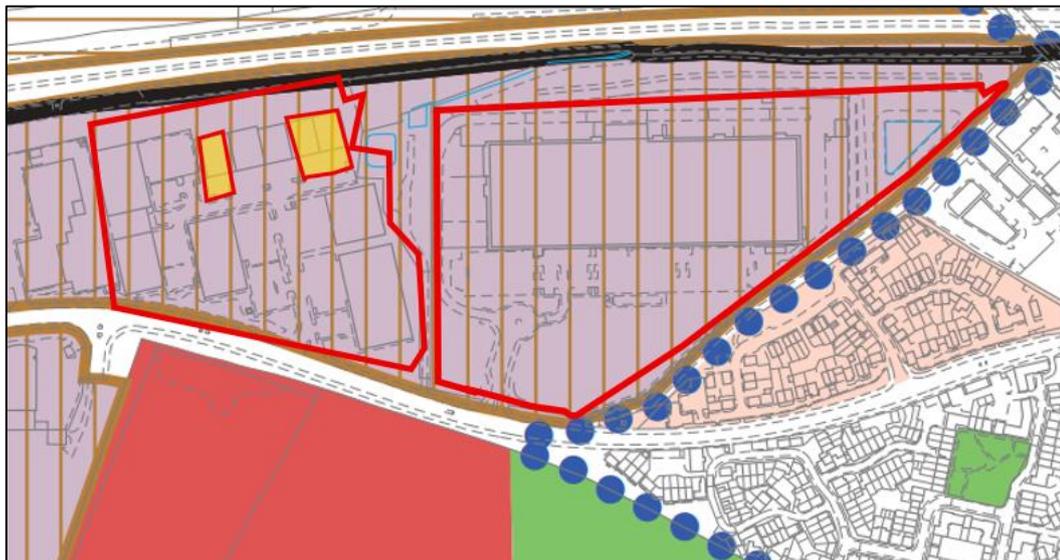


Figure 2: Extract of adopted policies map (with IPIF's holding outlined in red)

With reference to the draft Policies Map as part of the Regulation 18 consultation the 'North Colchester Strategic Employment Zone / Employment Zone' designation (or similar) seems to have been omitted. This is shown at Figure 3 below.

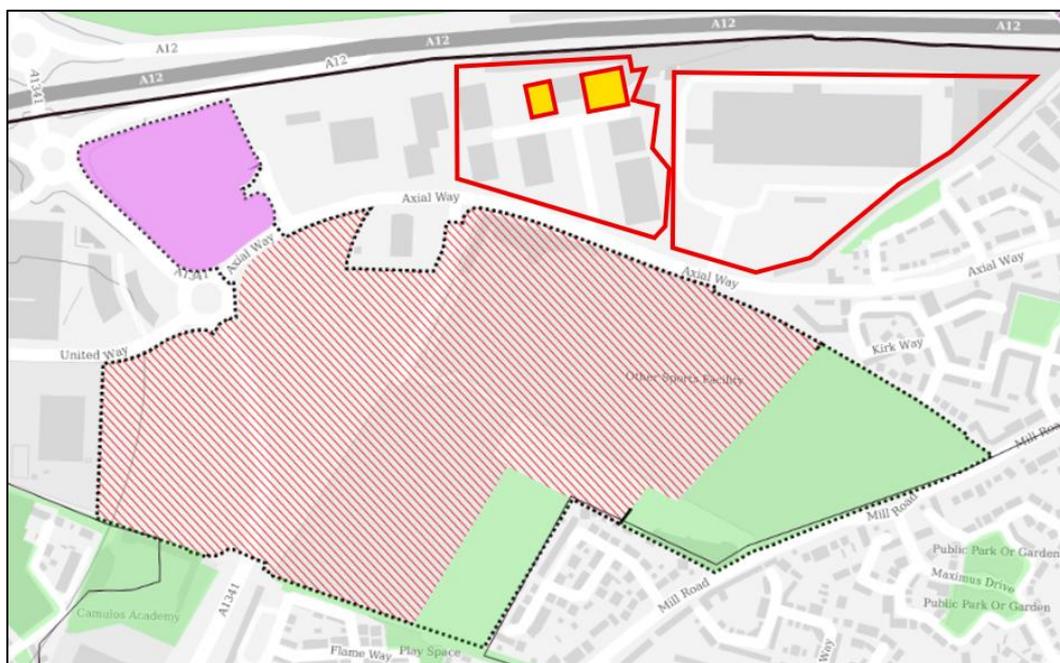


Figure 3: Extract of emerging policies map (with IPIF's holding outlined in red)

This omission seems odd given the wording of draft Policy E1 (Protection of Employment) which talks about defined areas on the polices map; unless the defined areas are only meant to cover new employment provision. This is currently unclear within the consultation document. We would respectfully request clarity on this matter.

These comments are made in the context of IPIF identifying an opportunity to develop two underutilised parcels of land within their holding to deliver additional employment floorspace. These parcels are shown in Figure 4 below.



*Figure 4: IPIF Development Parcels*

The two parcels currently comprise managed landscaping historically associated with the unit to the rear. These parcels are hugely underutilised given their location and can better help to contribute towards the Council's economic need. It is noted that the latest Employment Study (February, 2025), prepared as part of the evidence base for the new Local Plan, estimates that there is a net additional demand for 41.7ha of employment land across Colchester over the plan period.

If the Council's intention is not to include a wider employment designation within the new Local Plan which covers IPIF's holding, then it is respectfully requested that the two parcels above are allocated for employment development (Use Classes B2 / B8 / Eg). This would then establish the principle of employment development for the parcels.

*Policy E1 (Protection of Employment)*

We note that draft Policy E1 looks to safeguard land and premises for Class E(g), B2, and B8 uses. Whilst the list of uses is supported, Policy E1 should also allow for associated Sui Generis uses or small scale supporting uses which sit outside of Class E(g), B2, and B8. This is to help support the primary function of such land and premises. This is especially true on larger employment estates where uses such as a nursery, gym, or café can help support the wider work force.



**Summary**

I trust that the above is of assistance in the preparation of the new Local Plan. I would be grateful for confirmation of receipt of these representations and would welcome the opportunity to engage with further versions of the new Local Plan in the future. If you have any queries, please contact either myself or my colleague Michael O'Driscoll ([michael.odriscoll@savills.com](mailto:michael.odriscoll@savills.com)).

Yours faithfully

A handwritten signature in black ink that reads "Savills". The signature is written in a cursive, flowing style.

**Oliver Milne**  
Associate Director