

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

13 January 2026

Dear Sir/ Madam

COLCHESTER CITY COUNCIL PREFERRED OPTIONS LOCAL PLAN REGULATION 18 CONSULTATION 2025 - LAND WEST OF KEELARS LANE, WIVENHOE, ESSEX

On behalf of our client, Tarmac please find enclosed our representations to the Preferred Options Local Plan Consultation prepared by Colchester City Council ("the Council") in relation to Tarmac's landholdings at Land west of Keelars Lane, Wivenhoe, Essex ("the Site").

The Site has previously been submitted as part of the Council's Call for Sites process (Wivenhoe Quarry) Site ID 10594) and we can confirm that the Site remains available, achievable and developable for any potential allocation for a residential-led development in the Council's next Local Plan.

This submission is supported by a Vision Document outlining the opportunity and can be found at **Appendix 1**.

Background

The Site comprises a former sand and gravel quarry and extends to 55 hectares. At present, remediation and restoration works are being undertaken on Site.

There is a single public footpath that crosses the Site. There is no public access to the remainder of the Site.

The Site's planning history relates primarily to its former operational use as a sand and gravel quarry with associated approvals for extraction/restoration, although an application of note is outline approval (reference: 222881) for 2 hectares of commercial development on the north eastern boundary of the Site with access from Tye Lane. This planning permission was granted in June 2023 and the site is currently being marketed for sale.

Tarmac previously held a Pre-application meeting with your Council in September/October 2019 where it was agreed that the Site would be promoted through the development plan process.

Ongoing discussions are being held with Wivenhoe Town Council in relation to its aspirations to prepare a Local Nature Plan that would sit as an appendix to the adopted Neighbourhood Plan. Discussions have taken place since the Call for Sites submission about the possibility of greater public access to the Site and the potential for enhanced nature conservation across parts of the Site, in particular by linking the Site to a wider network of nature conservation assets within the River Colne and wider area.

Tarmac supports the preparation of the new Local Plan as the importance of creating an up-to-date Plan-led approach to planning for development cannot be understated. There have been many significant planning legislative changes since the adoption of the current Local Plan, including several significant changes to the NPPF within the most recent revisions published in December 2024.

It is important to note that the Government, elected in July 2024, has committed to take a more proactive and positive approach to planning to previous Governments, including setting the target of the delivery of 1.5 million homes in England over the period of this parliament (likely to 2029). The production of a new Local Plan for Colchester will play an important part in meeting these ambitions.

This representation provides a focused response to a number of draft policy matters contained within the document as well as highlighting the opportunity that the Tarmac Site presents to help the Council meet its housing needs and support the aspirations of the local community.

The revised NPPF (published in December 2024) clearly sets out the Government's pro-growth commitment to delivering in excess of 1.5 million homes. Colchester City Council must ensure that sufficient land is allocated to support these targets. Particularly in light of the former delivery strategy to allocate largescale strategic allocations which are taking longer than envisaged to deliver new homes.

This new Local Plan should therefore respond to the Government's ambitious housing target but also reflect on the Council's previous strategy for delivering homes, making sure that new sustainable locations are chosen that do not compete with the strategic sites but make a meaningful contribution to choices for local people in the larger settlements.

The Opportunity

The Site is located 5 kilometres to the south east of Colchester. The town of Wivenhoe is located to the west of the site and has many local services including shops, restaurants, medical centres, leisure and recreational uses. Alresford Village is located approximately 1.5 kilometres to the south east which contains shops, restaurants, surgeries, schools and recreational grounds.

The primary access to the Site is from Rectory Hill/Alresford Road to the south of the Site, with a secondary access from Keelers Lane to the east of the Site. It is from this access, Heavy Goods Vehicle (HGV) access the Site. Other vehicles can also access the site at the south west corner from Alresford Road. Cycle/pedestrian access is provided from the eastern boundary of the site off Keelars Lane, which connects to the Public Right of Way, that currently runs through the centre of the site.

Bus stops are located along Alresford Road / Rectory Hill which provide services to Colchester, Weeley, Brightlingsea and Walton-on-the-Naze. Wivenhoe Mainline Rail Station is located approximately 1km to the south west of the Site (a 15 minute walk) and runs direct services to Colchester, Clacton on Sea and London Liverpool Street.

The Site represents a unique opportunity for a residential-led development in a highly sustainable location in Wivenhoe, a 'Large Settlement' as described in the Preferred Options document. Thus, the Site is well placed to address local housing need and assist in addressing the wider unmet needs (which we discuss further below). The uniqueness of the Site extends to its ability to contribute more than housing by providing ample opportunity to deliver Biodiversity Net Gain and Green Infrastructure, enhance existing habitats and extend the green network from Wivenhoe to the east.

Extensive areas of open space can be achieved through utilising the southern part of the site. Indeed ongoing restoration and remediation works are already underway to support this and would be embedded as part of any future planning application for residential development to the north.

The Vision Document submitted in support of the Site provides further details of the Site and the development opportunity. The purpose of the Vision Document is to:

- Set out a high level vision for the Site and broad design principles;
- Illustrate the process that has led to the emerging masterplan proposals and explain the design principles and concepts that have been applied;
- Introduce the concept masterplan and explain the rationale behind its development, in particular the ability to form part of the draft Local Nature Plan;
- Justify and confirm that the Site is available, suitable and deliverable and should be considered for development; and
- Enable positive engagement with the local community and key stakeholders.

In summary, the Site is deliverable and is capable of delivering a significant number of social, economic and environmental benefits to the area.

Comments on the Preferred Options Local Plan Regulation 18 Consultation 2025

The draft Local Plan is set against a housing requirement of 1,300 dwellings per annum, totalling 20,800 new homes over the plan period (2025-2041). This is a mandatory target in accordance with the NPPF calculated in accordance with the Standard Methodology and therefore must be planned for. Unsurprisingly the Council has set out its preferred option of delivering homes reliant on strategic allocations of the Tendring Colchester Borders Garden Community (TCBGC) Growth Area and the Marks Tey Growth Area. These proposed allocations amount to over 4,500 homes of the total 11,089 set out at Table ST5.2.

Draft Policy ST3: Spatial Strategy, sets out the Council's preferred locations for growth, including highlighting the heavy reliance on the TCBGC and Strategic Growth locations. Wivenhoe sits below these locations in the settlement hierarchy and is classified as a 'Large Settlement' and is therefore anticipated to contribute commensurate to its position in the settlement hierarchy.

The Council sets out an alternative approach on page 33 whereby a more dispersed pattern of new development would be explored further. This is logical where active infrastructure is in existence and can be utilised to deliver homes in the immediate future – a position desperately needed by the Council as a result of the previous commitment to delivering homes via the Garden Communities which are still yet to deliver a single home. We encourage the Council to look at the capacity of the Large Settlements such as Wivenhoe which are extremely well connected and can deliver housing in the more immediate future.

Paragraph 11a of the NPPF makes clear that “all plans should promote a sustainable pattern of development.” Paragraph 83 of the NPPF also promotes sustainable development in rural areas, stating “housing should be located where it will enhance or maintain the vitality of rural communities.” As such, rather than concentrating growth solely in large strategic allocations, the draft Plan should pursue a more balanced distribution of development, including allocating the Wivenhoe Quarry Site for the residential led development that a 'Large Settlement', such as Wivenhoe is capable of accommodating.

The Site

The Site has previously been submitted as part of the Council's 'Call for Sites' process (Site ID 10594), but is not currently proposed to be allocated for development within the draft local plan.

The 'Summary of Sites Evidence' document published in October 2025 sets out a summary of the sites assessed as part of developing the new Local Plan for housing and employment and forms part of the evidence base for the new Local Plan.

The document confirms that the Site passed the Strategic Land Availability Assessment (SLAA) stage 1 sieving process and therefore, passed to the SLAA stage 2. The following positive summary of the Site suitability, availability and achievability is provided:

- No contribution to coalescence

- Some constraints identified in relation to site access via roads/highways but not significant enough to affect the site's deliverability
- No known issues with utility provision
- Some site specific issues – Trees and lakes on the site. Quarry restoration work required
- Greenfield
- On agricultural grades 2 (50% or more)
- There are no neighbouring use issues
- Less than 50% of the site is located within an area designated for nature
- Opportunities to enhance or create green infrastructure
- Development would not result in the loss of public open space, public right of way or a bridleway
- There is a possibility of harm arising to heritage and archaeological assets from new development
- Site is wholly located in Flood Zone 1
- Site is wholly located within a Critical Drainage Area
- Site is vacant or its current use can cease at short notice
- The site does not rely on another piece of land
- Site is wholly within a Minerals Safeguarding Area
- There is possibility of site contamination, but it can be remediated without affecting development viability

Whilst the above confirms the highly positive reasons why the Site is suitable, available, and achievable for development (as detailed within the Vision Document for the Site), potential harm to biodiversity and nature conservation on the Site are cited as the key reasons for discounting the allocation of the Site for development.

The biodiversity and nature conservation sensitivities of the site and surrounding area are fully acknowledged. The vision for the Site is for a highly sustainable new community set within an expansive green network of open spaces. Around 80% of the Site, previously utilised as arable farmland and for minerals extraction, will be repurposed to become parkland, recreation space, amenity space as well as new, biodiverse habitats that will support and encourage local wildlife. There will be a major new 32 hectare nature reserve sitting at the heart of the scheme, including areas of woodland, wildlife ponds and grassland habitat, all connected together by a network of recreation trails. Existing and new residents of Wivenhoe will have a major new natural resource to access on the doorstep of every home, enhancing the health and wellbeing of the community.

The development vision for the Site provides the opportunity to enhance the existing biodiversity and sustainably manage it for the future, therefore, for the positive reasons detailed above the Site is suitable, available and achievable and should be allocated for residential-led development within the new local plan.

The 'Summary of Sites Evidence' document also states that the Site is disconnected from the existing settlement, when compared to the alternatives. The opportunity exists to positively plan for growth on a site which is well related to the remainder of Wivenhoe, which is classified as a 'large settlement' within the draft Local Plan, where an appropriate level of growth is appropriate. It is clear that as Wivenhoe continues to grow, the Site can complement the proposals for its expansion with the development of sites such as Taylor Wimpey's scheme on land allocated for development in the Wivenhoe Neighbourhood Plan (Policy WIV29) and also land off Croquet Gardens (Policy WIV28) for which there is an undetermined application for housing, care home, car park for the cricket club and allotments. The permitted commercial development land on the north eastern boundary of the Site also establishes the principle of development in this location.

Both sites adjoin the Site on its western and south-western sides. On the east side of Taylor Wimpey's proposal is land proposed for a nature reserve. On land to the north of the Croquet Gardens proposals, Wivenhoe Town Council has ambitions for open space with continued use of permissive and public rights of way. Both the Site and the town will be connected by an extensive network of footpaths and cycle routes. These will encourage activity, leisure and social interaction across all ages, and ensure sustainable connections into Wivenhoe centre and its facilities.

On the 16th of December 2025, the Government published a revised NPPF for consultation until March 2026. Draft policy S5 (principle of development outside settlements), sets out that development for housing and mixed-used development which would be physically well-related to a railway station or a settlement within which the station is located, should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects. Whilst it is acknowledged that this policy has not yet been adopted, the Site is considered to meet the requirements of this policy, with its strong relationship to Wivenhoe and the railway station and therefore, it provides further support for the development of the Site. This is in line with the Government's ongoing planning reforms to help deliver much needed new housing in suitable locations.

In overall conclusion, the proposals for the Site embody sustainable and inclusive design principles, delivering:

- Approximately 350 new high-quality homes including a range of types, tenures and sizes to support a mixed and balanced community whilst contributing to local housing needs;
- Strong new green corridors which build upon the existing landscape and green network to encourage healthy active lifestyles;
- Creation of a new sustainable community which maximises existing movement routes to deliver a permeable, accessible and legible development; and
- Creation of a place with a clear identity, informed by the character of Wivenhoe and its recent developments.

For the reasons stated above, the Site should be allocated for residential led development to help the Council meet its housing needs and support the aspirations of the local community.

Yours faithfully

Christopher Collett
Associate Partner

E: christopher.collett@carterjonas.co.uk
M: 07867169423