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Date: 14 January 2026

Ref: 333100589

Colchester City Council  
Rowan House  
33 Sheepen Road  
Colchester  
Essex  
CO3 3WG

Dear Sir/Madam

**Re: Draft Colchester City Council Preferred Options Local Plan Regulation 18 Consultation – Land North of A120, Marks Tey Growth Area**

This response has been prepared by Stantec on behalf of the L&Q Group and the G120 Consortium (collectively ‘the Promoters’), in response to the Draft Colchester City Council Preferred Options Local Plan Regulation 18 Consultation regarding the residential-led scheme on Land North of the A120, Marks Tey. We submit this letter and the Tey St Andrew’s Vision Document dated March 2021 which sets out the potential vision and design principles for the sustainable scheme which comprise this representation.

**Proposed Development**

The proposed development seeks to deliver approx. 1,000 dwellings through a mix of types and tenures including affordable housing with a new local centre (mix of uses - retail, community and small scale employment). A 2FE primary school is proposed with sustainable transport (including pedestrian and cyclist movement), transport hub and vehicular access from the A120 (Coggeshall Road). The scheme will incorporate open space with a minimum of 10% biodiversity net gain including green infrastructure, community woodland, sports pitches, allotments and food-growing spaces comprising a new neighbourhood connected to Marks Tey.

**Site Context and Planning Constraints**

The site comprises of approx. 90 hectares of arable fields with mature hedgerows and is well located adjacent to the village of Marks Tey approximately 10km west of Colchester. A public bridleway runs along the western edge of the site and a small pond and Church Lane are located on the eastern border, with Roman River to the north running in an east west direction. To the south of the site is the A120 (Coggeshall Road) with a foot path and bus stop with frequent services to Colchester, Braintree and Chelmsford. There are houses on the southern side of the A120 and on the western side of the site. The site is located within a sustainable location and is in close proximity to Marks Tey Station approx. 1km to the east. There are excellent rail connections – north to the cities of Norwich and Colchester, south to the cities of Chelmsford and London (London Liverpool Street can be reached in under an hour) and east to the port at Harwich or the coast, and west to Sudbury. The Opportunities and Constraints are set out within the Tey St Andrews Vision Document dated March 2021 which has been used to inform a Concept Plan and Illustrative Masterplan within the document. We are aware the upgrade to the A12 and proposed route of the A120 shown within the Tey St Andrews Document dated March 2021 are not going ahead at the present time.

The site is proposed as a draft allocation in the Draft Colchester City Council Preferred Options Local Plan Regulation 18 Consultation under Policy PP18: Land North of A120, Marks Tey Growth Area which is primarily within the Promoters control. The site also includes the adjoining land to the west, which we are aware of and is being promoted by the residential developer, Dandara whom the Promoters are in contact

with. The promoters (L&Q and G120) acknowledge that to deliver the comprehensive redevelopment of the Site, a masterplan for the entire site allocation needs to be agreed. The promoters also control additional land which is in a very sustainable location to the south-west of Marks Tey between the A120 (Coggeshall Road) and the A12 (London Road), which could accommodate further growth now and in the future, contributing towards meeting the need for new homes and services (please see the all the land within the promoters control within Appendix A).

## **Response to the Draft Colchester City Council Preferred Options Local Plan Regulation 18 Consultation Policies**

### **Response to Policy ST3: Spatial Strategy**

We support Policy ST3: Spatial Strategy, which makes appropriate provision for growth and supporting infrastructure across the Colchester area to 2041. The proposed spatial strategy and settlement hierarchy seeks to enable growth with Colchester Urban Area including City Centre at the top of the hierarchy and Growth and Opportunity Areas, including the Marks Tey Growth Area, as a secondary location for growth. Directing growth to locations along the key transport corridor of the A120 and in close proximity to Marks Tey train station through the Marks Tey Growth Area represents a sustainable pattern of development and will help to maximise access to public transport and existing infrastructure.

This approach aligns with paragraph 8 of the National Planning Policy Framework (NPPF) 2024 in promoting sustainable development, and is considered to be positively prepared, justified, effective and consistent with national policy, in accordance with the soundness tests set out in paragraph 36 of the NPPF 2024.

Additionally, this approach also aligns with proposed reforms to the NPPF and other changes to the planning system (December 2025 consultation) which identifies the permanent presumption in favour of suitably located development, steering proposals to sustainable locations and building homes around railway stations.

Policy ST3 provides a clear and justified spatial strategy to ensure land is brought forward to meet the identified needs over the plan period.

### **Response to Policy ST5: Colchester's Housing Need**

The NPPF 2024 reintroduced mandatory housing targets for each Local Planning Authority, as well as an updated standard method for calculating housing need. In light of this, the Council proposes an annual housing requirement of 1,300 dwellings per annum, this equates to at least 20,800 new homes over the plan period between 2025 to 2041 which is considered appropriate.

The Preferred Options Local Plan (Regulation 18) consultation proposes to meet this increased housing requirement through a range of options and includes Local Plan Allocations. It is considered Local Plan Allocations will support the delivery of housing in accordance with paragraphs 61 & 62 of the NPPF 2024 by ensuring that sufficient land is identified to meet objectively assessed housing need. This approach also aligns with proposed reforms to the NPPF and other changes to the planning system (December 2025 consultation) which requires local plans to identify a sufficient supply and mix of sites to meet the housing requirement figures.

Table ST5.2 sets out the Local Plan Housing Allocations, with Land North of the A120, Marks Tey proposed for approximately 1,000 new homes through Policy PP18. The Land North of the A120, Marks Tey will support access to public transport, with the site being in close proximity to Marks Tey railway station and an existing bus service operating from the bus stop on Coggeshall Road. Directing growth to this location represents a sustainable pattern of development in accordance with paragraph 8 of the NPPF 2024. This approach also aligns with proposed reforms to the NPPF and other changes to the planning system (December 2025 consultation) which identifies the permanent presumption in favour of suitably located development, steering proposals to sustainable locations and building homes around railway stations.

The proposed allocation makes an important contribution towards meeting housing need in a suitable and sustainable location and will support delivery of the required level of housing growth over the plan period in accordance with paragraphs 61 & 62 of the NPPF 2024. Therefore, it is considered policy ST5 is positively prepared, justified, effective and consistent with national policy, in accordance with the

soundness tests set out in paragraph 36 of the NPPF 2024. As well as the being in keeping with the thrust of the proposed reforms to the NPPF which continues to support the delivery of much needed housing in the most suitable locations.

### **Response to Policy PP18: Land North of the A120, Marks Tey Growth Area**

We support the Draft Site Allocation Policy PP18: Land North of A120, Marks Tey Growth Area, which proposes a mixed use development comprising approx. 1,000 new dwellings. The allocation will make an important contribution to meeting Colchester's housing needs both within the plan period and beyond.

Within the policy it sets out the following:

"It will be important when planning for the first phase of development that the whole site area is masterplanned to ensure residential development is supported by infrastructure including schools, community facilities and open space."

The development will be comprehensively masterplanned to ensure residential development is supported by appropriate infrastructure. The policy sets out "including schools, community facilities and open space." For the scale of development it is not considered the reference to "schools" is sufficiently precise. A development of this scale would typically generate demand for a single primary school with secondary education needs more appropriately address through strategic provision or off-site capacity enhancements. The use of the plural term "schools" introduces ambiguity and implies more than one school which is not supported by evidence and could adversely affect deliverability. To ensure clarity and effectiveness as required by paragraph 36 of the NPPF 2024 it is recommended that the wording be amended to refer to "a primary school".

The policy also states that:

"...development will be supported on land to the south of the larger site identified on the policies map which provides within the plan period."

It is not considered that restricting development support only to the southern part of the site is justified and effective, particularly given the allocation's role as a Growth Area. This wording risks unnecessarily constraining comprehensive and coordinated delivery across the site and could undermine effective phasing. It is therefore recommended that the policy be amended to state:

"Development will be supported towards the south and centre of the site"

Paragraph a, of the policy states:

"Approximately 1,000 new dwellings of a mix and type of housing to meet evidenced needs which is compatible with surrounding development."

We support the delivery of approximately 1,000 dwellings to meet evidenced housing needs, however, the wording "compatible with surrounding development" is undefined and this wording could introduce ambiguity and constrain appropriate design and density.

It is therefore recommended that paragraph a. be reworded as follows:

"Approximately 1,000 new dwellings of a mix and type of housing to meet evidenced needs, and to deliver a high-quality and well-designed development in accordance with this policy and other policies in the development plan."

In relation to paragraph c. this sets out:

"Substantively in excess of 10% of the allocation area must be provided as open space."

We support the need for open space on the site although it is considered this wording "Substantively in excess..." lacks clarity and is not effective. It is recommended this is replaced with a clear requirement, for example:

“A minimum of 10% of the allocation area shall be provided as public open space.”

The scheme will be masterplanned to ensure the residential development is supported by appropriate infrastructure and provide high quality, sustainable development.

### **Response to Policy H2: Affordable Housing**

We note the policy sets out in relation to affordable housing:

“Proposals should be designed tenure blind, demonstrating no distinctly different design characteristics between affordable and market homes. To promote social cohesion, affordable housing provision should not dominate an area, road or building across the development.”

We support that houses should be designed tenure blind although it is considered the wording “...affordable housing provision should not dominate an area, road or building across the development.” is undefined and subjective.

In the NPPF 2024 developments are sought to promote the creation of mixed and balanced communities with affordable housing integrated. Therefore, it is recommended the wording is changed to set out:

“Proposals should be designed tenure blind, demonstrating no distinctly different design characteristics and affordable homes. To promote mixed and balanced communities affordable housing should be well integrated through developments, with layouts and design that promote this, unless justified by site specific circumstances.”

### **Response to Policy PC4: Development Density**

We support this policy seeking to enable densities that make efficient use of land and the recognition that development densities that support sustainable transport and help sustain local amenities will be supported. The policy sets out:

“Developments with higher densities, that contrast with surroundings densities, will be supported where the wider development provides for public benefits in excess of standard policy requirements (e.g. >30% affordable housing, >10% POS, exemplar standard of design and placemaking). Benefits will need to outweigh any detrimental impacts arising from the increase in density and any resulting harm.”

It is considered requiring public benefits in excess of standard policy requirement where higher densities are proposed does not align with the NPPF 2024. Using explicit figures of more than 30% affordable housing and more than 10% Public open space in practice will be treated as an expected requirement. Paragraph 129 of the NPPF 2024 seeks to make efficient use of land which takes into account promoting change. The wording “contrast” with surrounding density is unclear and at present the wording is not justified, effective or positively prepared as set out in paragraph 36 of the NPPF 2024 and is recommended is reworded as follows:

“Higher density development that exceeds surrounding densities will be supported where it is appropriately located, demonstrates a high standard of design and placemaking, and where any adverse impacts are adequately mitigated.”

### **Summary**

To be considered deliverable, sites should be available now, offer a suitable location for development and be achievable with a realistic prospect that the development will be delivered on site within five years as set out in the NPPF 2024.

We support the Draft Site Allocation Policy PP18: Land North of A120, Marks Tey Growth Area, which proposes a mixed use development comprising approx. 1,000 new dwellings. The site will be brought forward through a comprehensive masterplanning process and delivered in phases, with early phases available, suitable and achievable within five years of allocation. On this basis, the site is deliverable and capable of contributing to housing supply in the plan period in accordance with the NPPF 2024, and the thrust of the proposed reforms to the NPPF and the other changes to the planning system outlined within the December 2025 consultation.

The Promoters are seeking to work with the Council and other landowners to enable comprehensive and sustainable development which will assist the Council in meeting its housing and employment needs with supporting infrastructure. The comments relating to each policy along with this letter and the Tey St Andrew's Vision Document dated March 2021 have been submitted online via the Council's consultation portal. We look forward to receiving confirmation this representation has been registered.

Yours sincerely

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