

**RESPONSE TO THE
COLCHESTER
PREFERRED OPTIONS
LOCAL PLAN
IN SUPPORT OF
LAND EAST AND WEST
OF NORTH LANE,
MARKS TEY
(SITE 10514)**

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1.0 Introduction

- 1.1 These representations have been prepared on behalf of Mr Richard Hines in support of land east and west of North Lane, Marks Tey (hereafter referred to as the “Site”). The Site was submitted through Colchester City Council's Call for Sites process in 2024 and has been assessed under reference **10514**.
- 1.2 Accompanying these representations are:
- **Site Location Plan (Appendix 1)**
 - **Vision and Delivery Document (Appendix 2)**
 - **Framework Masterplan (Appendix 3)**
 - **Suite of evidence base including:**
 - **Access Arrangements (Appendix 4)**
 - **Ecology Preliminary Review (Appendix 5)**
 - **Flood Risk and Drainage Appraisal (Appendix 6)**
 - **Pre-planning Foul Water Assessment Report (Appendix 7)**
 - **Initial Geodiversity Assessment (Appendix 8)**
 - **Initial Archaeology Assessment (Appendix 9)**
- 1.3 The full extent of the land the subject of these representations is set out on the Site Location Plan. It includes parcels of land east and west of North Lane, Marks Tey. Representations are supported by Vision and Delivery Document and accompanying Masterplan which, together, demonstrate that a residential development in the region of 136-160 new homes could be delivered onsite in the short-term. Allocation of the Site would help bolster the Council's five-year housing land supply in a sustainable location within close walking distance of one of the City's mainline railway stations and excellent access to the strategic road network.
- 1.4 The masterplan proposals have been informed by a suite of technical evidence to demonstrate that there are no insurmountable barriers to development. Furthermore, development of the site, either by itself or as part of a wider planned masterplan area to the north of Marks Tey railway station, would offer substantive public benefits that would not accrue if the site were not allocated in the emerging Local Plan.
- 1.5 The proposed masterplan has also been the subject of pre-application discussion with planning officers at Colchester City Council. Pre-application advice, received in the summer of 2025 under reference 251229, provides us with the opportunity to further refine the proposals in parallel with the emerging Local Plan. Details of our representations are set out below.

2.0 Responses to the Policies

Policy ST3: Spatial Strategy

- 2.1 We **support** the Spatial Strategy insofar as it relates to the identification of Marks Tey as a Growth Area but suggest that the Council uses policy directions set out in the consultation draft National Planning Policy Framework ("NPPF") to secure further transit led growth across its identified Growth Areas including Marks Tey.
- 2.2 We note that the evidence base supports the identification of Marks Tey for growth, in particular the Spatial Strategy Topic Paper which at Section 5 explains that the existing transport corridors have formed a basis for this. Marks Tey benefits from its excellent strategic position adjacent to the A12 and mainline railway station; development in this location would help improve accessibility for people to move around Colchester, to London and the wider East of England, also enabling them to make more sustainable travel choices to commute to major employment areas. Accommodating growth in such a way would accord with national planning policy which states that significant development should be focused on locations that are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (NPPF para 110).
- 2.3 The Government's recently published analysis¹ shows how connecting where homes and jobs are to where there are already railway lines presents environmental gains e.g. through assisting the drive toward net-zero and reducing car-dependency, along with generating substantial socio-economic benefits e.g. reduced journey lengths, increased active travel, enhanced public transport performance, and economic gains from improved productivity and urban regeneration. This all arises by using infrastructure that *already exists*; this demonstrates the suitability of the Council's preferred strategic approach, but it could go further.
- 2.4 In December 2025 the Government published a consultation on the new NPPF. We recognise that it will have limited weight until it is formally adopted, but we consider that the Council should give weight to some aspects of its emerging policy in light of the approach being taken forward in the Spatial Strategy coupled with expressions of Ministerial intent. Policy S5 of the consultation NPPF proposes to allow for suitable development (including housing and mixed use) around railway stations offering high levels of connectivity, recognising these as sustainable locations. It makes clear that such development should be limited to land physically well-related to the station and within reasonable walking distance of it. In the context of Colchester City there are only a handful of locations that would benefit from this presumption – Marks Tey is one such location, and it happens to be proposed as a Growth Area. We consider that the Council should utilise this as justification for further growth of locations in Marks Tey that are physically well-related to the station and within reasonable walking distance of it. Such locations would by definition include site reference 10514 which would be within 800 metres of the mainline train station (and for the majority of the site would be significantly less).

¹ [Impacts of integrating land-use and transport planning: a rapid evidence assessment - November 2025](#)

- 2.5 The Council should actively accommodate the approach being established by the consultation draft NPPF so that it can form part of a plan-led system of development proposals across the City, coordinated with infrastructure and environmental enhancement.
- 2.6 In summary, we support the Spatial Strategy under Policy ST3 but suggest that the Council uses the policy directions set out in the consultation draft NPPF to secure further transit-led growth across its identified Growth Areas including Marks Tey.

Policy ST5: Colchester's Housing Need

- 2.7 We **object** to this policy insofar as it relates to Marks Tey and Site 10514 because:
- The housing requirement falls short of identified need by at least two years taking account of the anticipated adoption date of the Plan, meaning that it would only look ahead 13 years instead of the required 15 years.
 - Notwithstanding this, the extent of housing supply is insufficient because it needs to contain greater flexibility to take account of the fact that not all allocated sites deliver as expected.
 - The extent of growth proposed in Marks Tey does not match its position in the hierarchy as a Growth Area, by virtue of there only being two major allocations – there should be a greater spread and size of sites to enable development to commence in the short term to help bolster supply;
 - There appear to be inaccuracies in the evidence base which appears to have led to suitable sites, such as 10514, being discounted from selection. It needs to be updated to take account of evidence mitigation;
 - Site 10514, "Lane west and east of North Lane, Marks Tey", should be allocated for residential development.
- 2.8 Details on each of these points are as follows.

Housing requirement

- 2.9 Policy ST5 states that *"the Council will plan. Monitor and manage the delivery of at least 20,800 new homes in Colchester City between 2025 and 2041. The annual housing requirement for Colchester is 1,300, as identified by the Standard Methodology"*.
- 2.10 Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. Based on the Local Development Scheme the Council's latest expectation is that the Plan would be submitted for examination in October 2027 following the regulation 19 consultation in summer 2026. As a minimum the time from submission to adoption would take 12 months. Therefore it is likely that the Plan would be adopted no earlier than 2028, meaning that the Plan period would only look ahead 13 full years from adoption rather than the required 15 years. In order for the Plan to be consistent with the NPPF it must be extended by two years to 2042/3. This would increase the overall housing requirement to be met within this Local Plan by at least another circa 2,600 new homes, to 23,400.

- 2.11 From what can be seen in the consultation document and supporting evidence base, the Council is not proposing to utilise a stepped housing requirement. A key starting point for any spatial strategy should be to ensure that the Plan delivers homes consistently across the plan period and does not seek to unnecessarily delay the delivery of new homes on the basis of the sites that are selected to meet housing needs. Therefore, the Council must do all it can to avoid pushing back the delivery to new homes to later in the plan period on the basis of its Spatial Strategy. If the Council's choice of strategy reveals it cannot meet needs and does not have a five-year land supply on adoption it should seek to allocate additional sites, not to amend the trajectory. To help inform this the Council should provide a trajectory in accordance with NPPF paragraph 78. It should also allocate sufficient sites that can be delivered in the short term because it cannot currently demonstrate a five-year housing land supply.

Housing Supply

- 2.12 The Council has identified supply over the proposed Plan period of 21,106 homes, just over 300 homes more than the proposed requirement. This falls 2,294 homes short of the housing requirement necessary to be consistent with national policy as referred to above and needs to be rectified through the allocation of further sites. Notwithstanding this, headroom of only 300 homes does not provide sufficient flexibility to take account of the fact that not all sites deliver as expected. By applying a higher degree of headroom this would ensure that the Council and others can be sure that development needs would be met in full over the Plan period and that the Plan is therefore both positively prepared and effective. We consider that a buffer of at least 10% between the number of homes expected to be delivered over the Plan period and the housing requirement should be applied. This would mean that sites to provide additional 2,340 homes would need to be found.

Marks Tey Growth Location

- 2.13 Marks Tey's status as a Growth Area does not appear to be matched by the allocation of a sufficiently broad range of sites to deliver growth within the whole of the Plan period – including within the first five-year period. Only two site allocations are proposed in Marks Tey; Policies PP17 and PP18 in combination allocate 2,500 new homes in Marks Tey but the extent of growth deliverable within the first five years of the Plan period is not known. The evidence base accompanying the Plan acknowledges that the extent of infrastructure required to deliver the large-scale allocations would be substantial, so we consider that this should be balanced by the allocation of further sites in Marks Tey to help ensure choice and competition in the market for land within this Growth Area.
- 2.14 The extent and range of land allocated at Marks Tey also does not appear to match the ambitions of the Spatial Strategy under Policy ST3. The supporting text to ST3 recognises the opportunities for potential improvements to infrastructure and placemaking, its strategic location along with the benefits brought by the existing train station, to support the potential for expansion. However it allocates no suitable available land within very close proximity of the train station.

Inaccuracies in the evidence base

- 2.15 The Council should correct inaccuracies in the evidence base which appear to have led to the non-allocation of site 10514 from the Plan. In doing so it should update the Sustainability Appraisal to take account of mitigation proposed as part of the masterplan proposals on 10514 that accompany these representations.
- 2.16 We note that Appendix E of the *Sustainability Appraisal* (February 2025) and the *Summary of Evidence* paper (October 2025) provide rationale for discounting site 10514 which can be distilled into two principal reasons. An extract from the Sustainability Appraisal is shown below for ease of reference.

Appendix E Audit trail of decision making for site options considered for the Preferred Option Local Plan

Site ref	Site name	Site address	Settlement	Proposed use	Is site included in the Preferred Options Local Plan?	Justification
10514	Land west and east of North Lane	North Lane, Marks Tey	Marks Tey	Residential	No	Reason for discounting: A significant proportion of the site is located within Flood Zone 2 and 3. Development of the site is likely to significantly harm biodiversity as the site is adjacent to Marks Tey Brickpit SSSI (geological) and c.55m from Marks Tey Brickpit LoWS. Furthermore, it contains Priority habitat watercourse (Roman River).

Above: Extract from Appendix E of the Sustainability Appraisal (page 225)

- 2.17 Based on the above, impacts on biodiversity and flooding are identified as reasons why the site is discounted.
- 2.18 Taking biodiversity first – the Sustainability Appraisal states that “development of the site is likely to significantly harm biodiversity as the site is adjacent to Marks Tey Brickpit SSSI (geological) and c.55m from Marks Tey Brickpit LoWS. Furthermore, it contains Priority habitat watercourse (Roman River).” It should be noted that the Local Plan Topic Paper – Site Allocations: Process paper (October 2025) states at paragraph 3.17 that the “*Colchester Biodiversity Assessment considered all reasonable sites and identified likely harm to biodiversity. Sites identified as likely to significantly harm biodiversity have not been allocated in the Preferred Options Local Plan. A few sites identified as likely to harm biodiversity have been allocated where the evidence indicates that harm can be avoided or mitigated, for example by amending the site boundary or requiring buffers to adjacent Local Wildlife Sites.*” Based on the above, the “significant harm” threshold appears to set a benchmark by which sites could be discounted.
- 2.19 There does not appear to be an evidence-based approach as to why a “significant harm” assessment has been attributed to the Site. The Strategic Land Availability Assessment Methodology Paper (published in December 2023) provides a Red/Amber/Green Assessment scoring system by which sites should be appraised. An extract is shown below for ease of reference:

Natural and Historic Environmental Constraints		
Is the site partially located within any of the following designations? • Area of Outstanding Natural Beauty (AONB) • Site of Special Scientific Interest (SSSI) • Special Area of Conservation (SAC) • Special Protection Area (SPA) • Ancient Woodlands • RAMSAR <i>Source: Mapping</i>	The NPPF contains many commitments to protecting sites nationally or internationally designated for their landscape, biological, geological, archaeological or historical importance.	Red – more than 50% of the site is located within a designation. Amber – less than 50% of the site is located within a designation. Green – site is not located within any designations listed.

Assessment criterion	Justification	RAG Assessment
Is the site located within any of the following local designations? • Local Wildlife Site (LoWS) • Local Nature Reserve (LNR) • Coastal Protection Belt <i>Source: Mapping</i>	The NPPF encourages the protection and enhancement of sites of biodiversity and geological value and maintaining the character of the undeveloped coast.	Red – more than 50% of the site is located within a designation. Amber – less than 50% of the site is located within a designation. Green – site is not located within any designations listed.

Above: extract from the biodiversity criterion within the SLAA Methodology paper

2.20

Site 10514 is not located within a Local Wildlife Site, Local Nature Reserve or Coastal Protection Belt. Its western edge is located adjacent to but wholly outside of a SSSI, so would therefore score a “Green” in the RAG assessment. Additionally, the evidence on which the accompanying masterplan proposals have been formulated finds no natural or historic environment designation-related reason for discounting the Site.

- A **Preliminary Ecology Review** (prepared by Essential Ecology) confirms that the Site is suitable for development from an ecological perspective subject to the implementation of its recommendations and further species-specific surveys. The opportunity exists to bring forward biodiversity benefits which would not be brought forward in the absence of proposals. In respect of geological significance of the Marks Tey Brickpit SSSI, two

specific evidence base studies have been commissioned by Mr Hines covering this matter:

- **Initial Geodiversity Statement** (prepared by Harrison Geotechnical) identifies that the site abuts Marks Tey Brick Pit SSSI, the nature conservation interests of which relate to its geological assets. The study identifies that development would have no direct or indirect impact on active or disused pit or quarry lacustrine deposits lying within the SSSI boundary. However, there is likely to be direct or indirect impact on finite buried category lake deposits and Palaeolithic archaeology in the areas outside the SSSI boundary. The Initial Archaeology Assessment below takes this matter further.
- **Initial Archaeology Assessment** (prepared by Andrew Josephs Associates) identifies that there are no over-riding constraints to the promotion of the Site for development. It identifies that the wider landscape is quite rich in archaeology, in particular of Roman date. The overall potential for buried archaeology within the Site is moderate. Intensive ploughing across the proposed development area will however have truncated that which is present, so preservation is likely to be of low-moderate quality.

As identified in the Initial Geodiversity Statement referred to above, the locality is well-known for its Palaeoenvironmental and Palaeolithic archaeological potential, so further palaeolithic and geoarchaeological investigations were also carried out under the banner of the archaeology assessment. The evaluation work identifies an approximate location where the highest potential exists for palaeolithic archaeology that could be preserved in situ. Not only are there no over-riding constraints to development, but there are also significant opportunities to increase our knowledge of the Hoxnian period as well as that of palaeolithic peoples – a research priority in English archaeology – whilst preserving the most sensitive locations within the site, providing educational opportunities within the proposed development. Further field-based evaluation would be required.

- 2.21 The extensive evidence base undertaken in support of the Site confirms that proposals would not give rise to “significant harm” because they are capable of being appropriately addressed as part of a masterplan scheme, but this does not appear to have been considered. Furthermore, the development of the site has the potential to deliver educational and recreational public benefits, which are included as part of the masterplan. There is therefore no evidence-led reason why the site has been attributed a “significant harm” assessment in the Council’s evidence base.
- 2.22 The Sustainability Appraisal states that a “*significant portion of the site is located within Flood Zone 2 and 3.*” The proportion of land within the flood zone should not in itself be a reason to discount the site, particularly when the remainder of the site could appropriately accommodate major residential development proposals of circa 136-160 new homes. Additionally, paragraph 3.1 of the SLAA Methodology paper states that “*one RAG assessment does not necessarily rule out the site from further consideration*”, so the Sustainability Appraisal should not identify it as a reason for discounting the Site. The Framework Masterplan contained within the Vision Document is informed by a Flood Risk and Drainage Appraisal and it shows how major development proposals could be delivered in a manner that would not be affected by the parts of the site that are affected by Flood Zone designation. The total site area put forward in the Call for Sites is 13.95 hectares but a benefit of its size is that it has a gross developable area of 4.65 hectares (approximately 33%). The northern parcel is entirely within the Flood Zone but is included within the masterplan proposals due to the connected public open space along the Roman River corridor it would provide as part of the wider development.

- 2.23 Flood and natural/historic environment related constraints should not therefore be presented as reasons to discount development on the Site. On the contrary, Planning Practice Guidance provides clarity on the need for and role of a Sustainability Appraisal in relation to Plan development. It states that the Sustainability Appraisal is an iterative process², with proposals being revised as the Local Plan emerges to take account of the appraisal findings. It therefore stands to reason that appraisal findings presented at the regulation 18 draft stage should be amended at a later stage of the emerging Local Plan process to take account of evidence of suitable mitigation that addresses any significant effects. The suite of evidence included with these representations, as summarised above, identifies that the issues identified in the Sustainability Appraisal in respect of site 10514 can be addressed with suitable mitigation. The Sustainability Appraisal should therefore be updated.

Policy GN2: Strategic Green Spaces and Nature Recovery

- 2.24 We note that the policy provides support in general terms for the “*delivery of large scale strategic open spaces, habitat creation and restoration of wildlife rich habitats that delivers the strategic opportunities outlined in the Essex Local Nature Recovery Strategy (LNRS). The Council will work with landowners and other stakeholders to support the delivery of the Essex LNRS.*”
- 2.25 The policy also refers specifically to “*proposals for a Roman River corridor nature recovery area, as shown on the policies map*” which the policy states will be supported. “*Any proposals within this area that are not principally related to nature recovery must demonstrate that they will not prevent nature recovery coming forward in the Strategic Opportunity Areas identified in the Essex LNRS and how they will contribute to delivering habitat creation in accordance with the Essex LNRS.*”
- 2.26 We also note that paragraph 5.10 of the supporting text to the policy states:
- The Roman River corridor nature recovery area is specifically referred to in the policy and shown on the policies map. This area is identified in the draft Essex LNRS as a strategic opportunity area for woodland, grassland, freshwater standing water and freshwater river buffers. A proposal for a multi-parish nature green space / local nature recovery corridor was submitted to the Council by Aldham, Great Tey and Marks Tey Parish Councils as part of the Green Network and Waterways engagement. The corridor includes mature hedgerows and trees, pastureland, floodplain, a reservoir and some arable land. Much of the Roman River is followed by a public right of way. Just to the north of the river is the ‘Gainsborough Line’, also a linear habitat, with trees the length of it. Marks Tey Brick Pit SSSI, local wildlife sites and ancient woodland are located within the proposed corridor. Marks Tey’s Neighbourhood Plan includes a ‘green corridor’ which brings in the Roman River.*
- 2.27 The location and extent of the land area covered by this policy is not clearly identified on the policies map and there are no relevant items in the legend that help interpret it. This needs to be

² [Planning Practice Guidance, Paragraph: 001 Reference ID: 11-001-20190722](#)

rectified. This is important because the masterplan accompanying these representations for the land east and west of North Lane, Marks Tey, includes within the development proposals a primary focus on connectivity to nature within which the proposed residential areas would sit. This provides an opportunity for the development proposals on the Site to potentially create links with, and enhance, any separate proposals identified by Policy GN2.

- 2.28 Shown below is an extract from our accompanying Vision and Delivery Document which shows that the Site is uniquely positioned in Marks Tey because it is bounded to the north by Roman River. This provides an opportunity for the creation of a green spine running the extent of the Site's northern boundary, increasing public access to Roman River as a recreational and ecological asset. The retained public footpath running north towards Aldham would be supported by new informal footpaths running alongside the Roman River and through the Site, providing a connected network of routes. The Site's Roman River corridor would be fundamental to the wider green infrastructure approach, creating opportunities to provide connected, circular and biodiverse routes through the development.
- 2.29 Additional to the above, the potential of the Site is considerable in terms of its ability to tell stories of both the climate history of the Hoxnian period as well as that of Palaeolithic peoples. This can be illustrated by interpretation boards along guided footpaths, pamphlets/website, short audiovisual reconstructions of the past and inform, perhaps, the nature of the vegetation and/ or animals encouraged around the proposed ponds at the site. The identified key area of the Site could be preserved in situ within the Site and lends itself to a circular, educational geoarchaeological walk.



Above: extract from page 58 of the accompanying Vision and Delivery Document showing the scheme's open space and green infrastructure proposals.

2.30 Development would also include integrated Sustainable Drainage System (SuDS), making the landscape multifunctional by combining recreation, practicality, and character. The Site-wide use of native and climate-resilient plant species would not only create an attractive natural landscape but also promote local ecology, helping to achieve Biodiversity Net Gain (BNG). This would ensure that the Site has adequate drainage attenuation and swales, alongside habitat creation and recreation, functioning as part of the wider landscape, developed to support the local biodiversity as well as being attractive features which enhance the sense of place of the development.

2.31 In summary, the Site's:

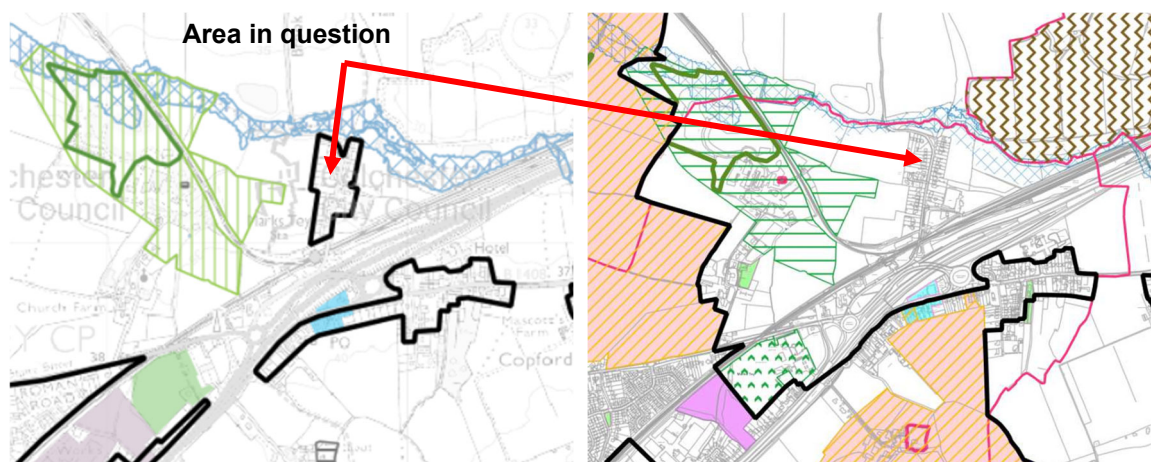
- Extensive frontage to Roman River;
- Ability to tell stories of both the climate history of the Hoxnian period as well as that of Palaeolithic peoples; and
- Opportunities to create integrated SuDS, making the landscape multifunctional by combining enhanced public access, recreation, practicality, and character

provide a unique opportunity for development proposals to deliver links with and enhance any separate proposals being put forward as part of Policy GN2, but these can only be delivered if the Site is allocated for development.

The Policies Map

2.32 Notwithstanding our view that site 10514 should be allocated for development and included within the development boundary for Marks Tey, there appears to be a discrepancy regarding the settlement boundary on the emerging policies map as currently proposed that needs to be corrected.

2.33 The adopted Local Plan shows the existing residential area to the north of the railway station within the settlement boundary. However the emerging draft policies map does not show a development boundary for this area. There does not appear to be an evidence-based reason for this discrepancy, so this should be amended. See extracts below.

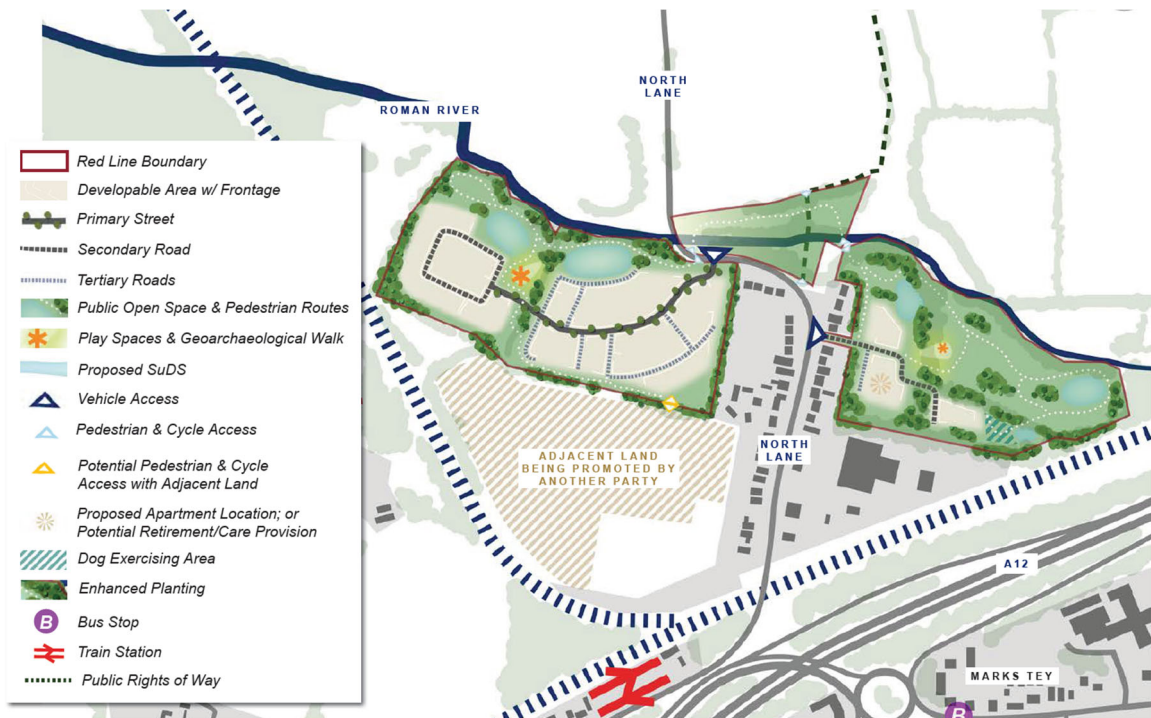


Left: adopted policies map Marks Tey inset. Right: emerging policies map Marks Tey inset

- 2.34 This is important because it may affect how the decision maker would view the suitability of development proposals within or on the edge of the built-up area of Marks Tey, having regard to its proximity or adjacency to the settlement boundary.

3.0 Land east and west of North Lane, Marks Tey

- 3.1 Accompanying these representations are a Masterplan Vision and Delivery Document and Framework Masterplan for the proposed development site, an extract from which is shown below.



Above: extract from the Vision and Delivery Document showing the masterplan proposals.

- 3.2 As shown above, the masterplan:

- Is based on a suite of technical evidence that demonstrates its deliverability in light of local site-specific constraints.
- Would deliver a residential development of between approximately 136 – 160 new homes on land that is physically well-related to and within reasonable walking distance of Marks Tey mainline railway station;
- Has the capacity to provide a mix of residential housing to match local demand;
- Opens up public access and recreational opportunities that do not currently exist, including provision of a green corridor along the Roman River as part of a wider network of multi-functional green spaces;
- Provides an ecologically and historically rich open space with dedicated and educational footpath routes, enabling the site to be a destination for recreation within Marks Tey;
- Provides the opportunity to enhance existing movement routes into Marks Tey, through offsite improvements and/or financial contributions; and
- Should it be desired, could be delivered as part of a wider masterplanned area to the north of Marks Tey railway station.

3.3 The accompanying evidence base comprises:

- **Ecology Preliminary Review (prepared by Essential Ecology).** This confirms that the site is suitable for development subject to the implementation of its recommendations and further species-specific surveys. The opportunity exists to bring forward biodiversity benefits which would not be brought forward in the absence of proposals.
- **Flood Risk and Drainage Appraisal (prepared by Motion),** together with an Anglian Water Pre-Planning Assessment Report. The Appraisal identifies areas within the site within Flood Zone 1 and that residential development is capable of being located here. A combination of attenuation ponds and swales are recommended SUDS features for the site. The Pre-Planning Assessment Report identifies the suitability of a connection to the foul sewerage system via manhole MH7301 immediately to the north of the site, which has capacity for development.
- **Proposed Access Arrangements (prepared by Motion).** These confirm that a suitable means of vehicular and pedestrian access could be secured to the western and eastern parcels within the site. We can also confirm that this can be achieved without the need for third party land.
- **Initial Geodiversity Statement (prepared by Harrison Geotechnical).** The site abuts Marks Tey Brick Pit SSSI, the nature conservation interests of which relate to its geological assets. The Statement has been prepared to identify the potential impacts of built development on key geodiversity assets. The study identifies that the development would have no direct or indirect impact on active or disused pit or quarry lacustrine deposits lying within the SSSI boundary. However, there is likely to be direct or indirect impact on finite buried category lake deposits and Palaeolithic archaeology in the areas outside the SSSI boundary. The Initial Archaeology Assessment below takes this matter further.
- **Initial Archaeology Assessment (prepared by Andrew Josephs Associates).** It identifies that there are no over-riding constraints to the promotion of the Site for development. It identifies that the wider landscape is quite rich in archaeology, in particular of Roman date. The overall potential for buried archaeology within the Site is moderate. Intensive ploughing across the proposed development area will however have truncated that which is present, so preservation is likely to be of low-moderate quality.

As identified in the Initial Geodiversity Statement referred to above, the locality is well-known for its Palaeoenvironmental and Palaeolithic archaeological potential, so further palaeolithic and geoarchaeological investigations were also carried out under the banner of the archaeology assessment. The evaluation work identifies an approximate location where the highest potential exists for palaeolithic archaeology that could be preserved in situ. Not only are there no over-riding constraints to development, but there are also significant opportunities to increase our knowledge of the Hoxnian period as well as that of palaeolithic peoples – a research priority in English archaeology – whilst preserving the most sensitive locations within the site, providing educational opportunities within the proposed development. Further field-based evaluation would be required.

3.4 These demonstrate the sustainability credentials of this location in Marks Tey and the deliverability of the Site as a prospective growth location in the emerging Local Plan.

- 3.5 The proposed masterplan has been the subject of pre-application discussion with planning officers at Colchester City Council. Pre-application advice, received in the summer of 2025 under reference 251229, provides an opportunity for the proposals to be refined further in due course.

APPENDIX 1

SITE LOCATION PLAN

Land at North Lane, Marks Tey

