

CONSULTATION

RESPONSE

Colchester Local Plan Preferred Options

Land off Colchester Road,
West Bergholt

On behalf of
Pigeon Investment Management

January 2026

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0. EXECUTIVE SUMMARY

- 0.1 This his representation endorses the DLP's allocation of Land off Colchester Road, West Bergholt (c.4.1ha, Site 10749) for 100 homes, as proposed by DLP Policy PP44.
- 0.2 It affirms the proposed allocation's its soundness, deliverability within five years, and alignment with NPPF housing objectives.
- 0.3 The borough has a significant housing requirement that national policy for which national policy requires it to plan. This requirement is not simply an arbitrary number: Colchester faces acute housing needs—1,563 homelessness cases (2024/25), 449 households in temporary accommodation (March 2025), and 2,403 on the housing register. Positive planning is required to mitigate social, economic, and health harms from shortages.
- 0.4 The Site offers a sustainable extension to West Bergholt, a well-serviced medium settlement with strong connectivity to Colchester. The Site's allocation is supported by the DLP evidence base, despite this overstating some of the potential negative impacts of its development.
- 0.5 Relatively minor tweaks to the requirements for development of the Site proposed by Policy PP44 are considered necessary to ensure the policy is justified, effective and consistent with national policy.
- 0.6 The Site is sustainable and deliverable for residential development, and we look forward to working with the Council and other stakeholders to realise the potential benefits of its development to provide homes.

1. INTRODUCTION

- 1.1 This representation on the Colchester Local Plan Regulation 18 ('the Draft Local Plan' or 'DLP') is submitted by Ceres Property on behalf of Pigeon Investment Management ('Pigeon'), and in respect of Land off Colchester Road, West Bergholt ('the Site').
- 1.2 The Site is being actively promoted for residential development by Pigeon, and is proposed to be allocated for such use in the DLP.
- 1.3 The DLP's proposed allocation of the Site is considered to be sound in principle, and as set out within this representation will deliver significant benefits and contribute to the sustainable management of the growth in the borough.
- 1.4 Relatively modest alterations to detailed policy wording in the DLP concerning the Site's development is considered necessary, but otherwise we are supportive of the DLP's proposed approach to the development of the Site.
- 1.5 The Site is reference 10749 in the plan-making process, and policy PP44 of the DLP concerns its proposed allocation.
- 1.6 The Site is situated on the eastern side of West Bergholt, and its characteristics are discussed in more detail within Section 4 of this representation.
- 1.7 A Site Location Plan is provided overleaf as Figure 1.



Figure 1 – Site Location

1.8 The representation is divided into the following sections:

Section 2 considers the extent of housing need in Colchester; the risks associated with failing to address this and the benefits of planning positively to help address such needs.

Section 3 considers the proposed spatial strategy as per DLP Policy, and in particular its approach to West Bergholt.

Section 4 discusses the Site: its deliverability for residential development to help address local housing needs; its potential to engender significant social, environmental, and economic benefits; and its ability to form part of a wider strategy for sustainable development.

Section 5 provides comments on proposed allocation PP44, including accompanying policy requirements proposed by the DLP.

Section 6 sets out a brief summary of this representation, and suggests next steps in respect of the Site.

2. HOUSING NEEDS

- 2.1 Colchester is experiencing significant housing pressures that reflect, but are distinct from, wider national trends. These pressures have far-reaching social, economic and health consequences for residents of the borough.
- 2.2 The housing crisis manifests through homelessness, overcrowding, unsuitable and poor-quality housing, unaffordability and associated impacts on public expenditure and economic performance
- 2.3 Homelessness is a major concern within Colchester. Whilst national statistics indicate some recent reductions in statutory homelessness, local data shows sustained and growing demand for assistance within the borough.
- 2.4 The drivers of homelessness in Colchester reflect local housing market conditions, including high private rents, limited availability of social housing, and affordability constraints; as well as the more widely felt issues regarding welfare pressures and cost-of-living challenges.
- 2.5 These factors contribute not only to increased risk of homelessness but also to longer stays in temporary accommodation, with associated financial and human costs for the Council and affected households.
- 2.6 Recent homelessness and temporary accommodation data for the borough includes the following:
- In 2024/25, 1,563 new homelessness cases were assessed in Colchester.
 - During the same period, 693 people required emergency accommodation.
 - As at March 2025, 449 households were living in temporary accommodation, up from 326 the previous year.
- 2.7 These figures indicate that Colchester continues to experience substantial and growing issues with homelessness.
- 2.8 Colchester City Council's Housing and Homelessness Summary (2024–2025) and key housing needs data highlight high house price-to-income ratios, rising housing need and increasing pressure across the housing system.
- 2.9 Pressure on Colchester's social housing stock is reflected in the size and composition of the Housing Register. Key indicators include the following.
- As of March 2025, there were 2,403 applicants on Colchester's Housing Register.

- Within this total, 672 households required three-bedroom or larger family homes, demonstrating particular pressure on larger social rented units.
 - Reported waiting times can exceed five years for families and up to two years for single applicants, which constrains move-on options from temporary accommodation and prolongs stays in emergency or interim housing.
- 2.10 Housing shortages and unaffordability also place direct strain on local public finances, particularly through rising expenditure on temporary accommodation and increased demand for health, social care and support services.
- 2.11 Local market indicators demonstrate that Colchester is experiencing a pronounced housing shortage, with strong demand across tenures and limited supply.
- 2.12 A shortage of suitable and affordable housing constrains labour mobility, affects business growth and limits the ability of local employers to attract and retain staff. Affordability challenges are associated with delayed household formation, with younger adults increasingly unable to access home ownership or secure long-term private rented accommodation locally. Public sector employers including health, education and emergency services, experience recruitment and retention challenges linked to high housing costs and limited availability of appropriate accommodation. Such issues all likely affect Colchester, given the above,
- 2.13 Housing quality is a further concern within the existing housing stock in the borough. DHCLG's English Housing Survey: Local Authority Housing Stock Condition Modelling 2023 (published 2025) estimated that over 11,000 homes in the borough failed the decent homes standard. These included over 14% of the private rented housing stock. Over 4,000 homes were estimated to have problems with damp. Poor housing conditions, including damp, disrepair and inadequate thermal efficiency, evidently affect a proportion of Colchester residents. Such issues disproportionately impact children, older people and those with existing health conditions.
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- 2.14 The Council's Homelessness and Rough Sleeping Strategy and its 2024 progress report emphasise the human impacts of insecure and unsuitable housing locally, including mental and physical health problems and pressures on local health and support services.
- 2.15 Colchester's Housing and Homelessness Summary for 2024/25 reports that new affordable housing delivery remains insufficient to meet identified needs, with only 128 new affordable homes delivered between 1 April 2024 and 31 March 2025.

- 2.16 The Council's Local Housing Needs Assessment (2024) suggests it has an affordable housing need of 877 dwellings per annum (dpa), underlining the severity of the need. A further indication of the need to substantially increase the number of homes delivered in the borough is that the current minimum local housing as calculated in accordance with the Planning Practice Guidance is 1,300 dpa – a substantial increase on the 920 dpa for which the current Development Plan plans.
- 2.17 In terms of access to the private housing market, median house prices in Colchester significantly exceed local incomes, and private rents have risen faster than wages in recent years, placing both home ownership and private renting beyond the reach of many lower and middle-income households.
- 2.18 Challenges to obtain housing for newly forming households in the borough will inevitably place pressure on such people to seek accommodation elsewhere in more affordable areas, with resultant harm to the vitality of communities.
- 2.19 In summary, there is clear evidence that the housing crisis at the national level also impacts Colchester. Indeed, there is evidence to suggest the impact is more acute in the borough than at the national level. This gives rise to a number of substantial concerns and potential harms to the local community, for the reasons set out above.
- 2.20 In considering the impact of housing delivery (or the impact of failing to deliver housing) the plan-making process (including Sustainability Appraisal) should account for the social and economic harms that can result from a lack of housing, and the benefit that addresses shortages has the potential to deliver for the local community.
- 2.21 The NPPF places great emphasis on seeking to address housing shortages. It requires that plans seek to meet objectively assessed needs for housing *as a minimum* and to significantly boost the supply of homes. Providing a spatial strategy that, as a minimum, seeks to meet Colchester's identified housing needs is therefore essential to a sound Local Plan. But furthermore, boosting the housing land supply in Colchester, and doing so through a cogent strategy for growth, has the potential to deliver significant social and economic benefits to the local community. Benefits associated with providing homes include reduced homelessness and housing instability; greater choice and flexibility for renters and buyers; shorter commutes and stronger local communities; better health, stability, and educational outcomes; increased economic productivity and labor mobility; more inclusive, balanced growth across the area.
- 2.22 Given all of the above, we consider it essential the strategy for delivering homes includes allocation of a variety of sites and is imbued with sufficient flexibility to account for changing circumstance or unexpected events (such as a site not delivering as many homes and / or as quickly as anticipated).

2.23 In addition, and mindful of the scale of affordable housing needs in particular, it may be appropriate for the new Local Plan to positively seek to exceed the bare minimum housing requirements.

3. POLICY ST3: SPATIAL STRATEGY

- 3.1 This section of this representation concerns Policy ST3 insofar as it concerns the proposed approach to West Bergholt.

West Bergholt's characteristics and potential to sustainably accommodate growth

- 3.2 West Bergholt is a large rural parish located c.3 miles northwest of Colchester's city centre, comprising approximately 929 hectares of largely agricultural land interspersed with compact residential settlement. The population of the village itself stands at 3,310 residents (2021 Census) living in approximately 1,363 households, making it a significant settlement within the City of Colchester's administrative area.
- 3.3 It is located a relatively short distance (c.1km) from the western edge of the city of Colchester, with the A12, and arable fields and wooded areas, maintaining the distinct identity of the village from the neighbouring city.
- 3.4 West Bergholt exhibits a notably aging demographic profile relative to Colchester averages. The 2021 Census recorded 3,310 residents distributed as follows: approximately 20% aged 0-17 years (670 persons), 54% of working age 18-64 (1,790 persons), and 25% aged 65 years and above (831 persons).
- 3.5 This age structure reveals two distinct characteristics: first, a substantially higher proportion of retirement-age residents (20% versus 15% borough-wide), and second, a correspondingly larger population of dependent children aged 5-17 years (approximately 17% versus 14% borough-wide).
- 3.6 This pattern indicates the parish functions as an attractive location both for established families with school-age children and for older couples and retirees seeking to downsize while remaining in an accessible but still relatively rural area.
- 3.7 West Bergholt is unusually well-served for a village of its size, providing both convenience services and significant recreational/community facilities that enhance its sustainability credentials for planning purposes.

- 3.8 The village contains a two-form entry primary school (Heathlands Church of England Primary School), which serves in the order of 350–400 pupils and is located within walking distance of most of the settlement.
- 3.9 Health provision includes a GP surgery and a pharmacy, whilst higher-order health services are provided at Colchester Hospital approximately 3 miles away.
- 3.10 Local convenience needs are met by a Co-op store incorporating a Post Office, supplemented by additional small shops and services such as a hairdresser and other convenience retail.
- 3.11 Social and leisure functions are concentrated around the Orpen Memorial Hall and John Lampon Hall complex, which provide flexible space for community meetings, activities and events.
- 3.12 Recreational provision includes the Lorkin Daniell playing field (with football pitches, play equipment and a multi-use games area), Poor's Land for junior sport and informal recreation, a cricket ground, several children's play areas and around 140 allotment plots, together representing a strong portfolio of open space and sport facilities for a settlement of this scale.
- 3.13 Community activity in West Bergholt is both extensive and well-established. Parish records and the Parish Plan evidence the existence of more than 40 clubs, societies and regular groups, covering a broad spectrum from sports clubs (football, cricket, bowls, badminton) to uniformed youth organisations (Scouts, Guides, Beavers) and social, cultural or support groups such as knitting and craft groups, coffee mornings, over-60s activities and parent-and-toddler sessions.
- 3.14 The village also hosts regular church-based activities at St Mary's, alongside an active programme of events based at the Orpen Hall complex. Annual events such as the village fete and the Heathlands Fireworks display are well-attended and form part of a broader calendar of community-led activities. Previous community surveys undertaken for the Parish Plan indicated very high levels of participation in local organisations and events, with over half of households taking part in at least one club or group and a significant minority involved in several. This level of engagement points to a cohesive community with a strong local identity.
- 3.15 The village is evidently home to a vital and vibrant community.
- 3.16 In terms of accessibility and transport, West Bergholt is well connected to Colchester and the wider sub-region. Regular bus services operate to and from Colchester, including the no.66 service with a typical daytime frequency of around 30 minutes, and services that link to Sudbury and other settlements.

- 3.17 Colchester Railway Station, c. 2.5 miles away, provides frequent services to London, Ipswich and Norwich, reinforcing the parish's role as a commuter location.
- 3.18 Environmental and landscape considerations form an important part of the settlement's character and its planning context. The parish contains attractive countryside associated with the River Colne valley to the south / south-west of the village, and a wider pattern of farmland, woodland and hedgerows. Notable assets include Hillhouse Wood (Bluebell Wood), an area of ancient and semi-natural woodland managed by the Woodland Trust, as well as a network of public rights of way and a series of local wildlife sites.
- 3.19 The West Bergholt Neighbourhood Plan designates 14 Local Green Spaces, including key areas such as the Lorkin Daniell field, Poor's Land, The Heath and local allotments, reflecting their high community value and contribution to visual amenity and biodiversity.
- 3.20 Policy provisions in the Neighbourhood Plan, particularly those relating to coalescence, landscape and green spaces, operate to maintain a clear separation between West Bergholt and the urban edge of Colchester.
- 3.21 West Bergholt is identified within the current Development Plan, in Local Plan Section 2, as a 'Sustainable Settlement', positioned below the main urban area of Colchester but above smaller villages and hamlets, reflecting its range of services, accessibility and role in accommodating a proportion of the borough's housing growth.
- 3.22 Whilst the city of Colchester's position at the top of the administrative area's settlement hierarchy is axiomatic, it is essential the new Local Plan supports the vibrancy and vitality of the borough's other settlements, including by directing a sustainable, proportionate level of growth to such community. Such growth can be critical in sustaining village services and facilities, to the benefit of existing and future residents; as well as to ensuring the village remains a sustainable settlement.

Policy ST3 and West Bergholt

- 3.23 Policy ST3 of the DLP proposes the spatial strategy for accommodating growth includes the following:

"Growth is directed across Colchester starting with the most sustainable and accessible locations in the urban area or close to, transport corridors and existing centres, where there tends to be a range of employment opportunities, facilities, services and travel choices for future communities.

"Additionally, an appropriate level of growth is allocated within the large, medium and some small settlements, based on the opportunities and constraints of each settlement and informed by the

wider evidence base. This can help support the long-term viability of services and facilities, which may otherwise be lost”.

3.24 We broadly agree with the proposed approach as set out above. In particular, the recognition of the need to direct growth to support long-term viability of settlements is welcomed.

3.25 In addition, we suggest the policy text acknowledges that not all settlements within the same tier of the hierarchy will be equally sustainable to accommodate growth, and that their sustainability is not solely down to the characteristic of the settlement itself but also the accessibility of larger centres from them. Consequently, settlements such as West Bergholt, with its strong and sustainable transport connectivity to Colchester, will generally be more sustainable than other settlements that are of similar size and otherwise similar characteristics.

3.26 The DLP states that medium settlements:

“include settlements with a range of community and social infrastructure but to a lesser extent than the infrastructure within the larger settlements. These medium settlements are capable of accommodating growth appropriate to the size, scale and infrastructure of the settlement”.

3.27 We consider the above is applicable to West Bergholt, and in particular its ability to accommodate proportionate growth.

3.28 The village’s strong service base, high levels of community activity, good public transport links and proximity to Colchester clearly support its role as part of a sustainable spatial strategy, especially when compared with smaller villages lacking such facilities.

4. THE SITE AND ITS PROPOSED DEVELOPMENT

The Site and its Environs

- 4.1 The Site comprises two grassland fields, separated by a central belt of trees and vegetation which runs north-south and bisects the Site.
- 4.2 It measures a total of c.4.1 ha, and adjoins the existing settlement boundary of West Bergholt, on the south-eastern side of the village.
- 4.3 In terms of topography, the Site's highest point is in the north-west corner, with the land falling gently southwards and eastwards.
- 4.4 The western parcel is an irregularly shaped field that projects into the existing settlement envelope – it is contained by existing residential, suburban, development to the west, north and north-east. Landscaping acts to contain the Site to the east and south.
- 4.5 The eastern parcel's western and southern boundaries comprise mature landscaping. The eastern boundary adjoins the rear gardens of Hill House Cottage, and the Site is contained by Colchester Road to the north.
- 4.6 The eastern parcel has a frontage onto Colchester Road, which is marked by a hedgerow. Beyond this lies the former Truman's Brewery, which has been converted into mixed-use three and four-storey development, comprising residential flats and shared offices for small businesses.
- 4.7 East of the Site, the B1508 provides the main highway link connecting the village with Colchester / Braiswick. The road contains some residential development, located intermittently along it, but largely categorised by mature landscaping either side of the road.
- 4.8 Further eastwards lie wooded areas, St Botolph's Brook, and the A12 (over which the B1508 runs) which help ensure clear separation between West Bergholt and Colchester / Braiswick. The West Bergholt Neighbourhood Plan, citing landscape assessment work, highlights the important role played by vegetation in restricting visibility between West Bergholt and Colchester, as well as the topographical variation and senses of distance and openness provided by the St. Botolph's Brook valley.
- 4.9 The Site is largely featureless, with the exception of the hedgerow which bisects it and landscaping along its boundaries.

- 4.10 It does not contain any heritage assets, and there are no Conservation Areas in proximity to the Site. It is however in proximity to several heritage assets, associated with the former Truman's Brewery site to the north, as well as Grade II listed converted barn associated with Hill House Farm to the east.
- 4.11 The Site is not subject to any ecological designation suggesting it is of any particular ecological value. None of the trees within or along the Site's boundaries are subject to Tree Preservation Orders.
- 4.12 It is not subject to any landscape designations, and is not a valued landscape in the context of paragraph 187b) of the NPPF. The Site is greenfield land beyond the settlement boundary and as such has a rural character, but its landscape characteristics are nevertheless evidently impacted by adjoining residential, suburban development.
- 4.13 The Site is entirely within Flood Zone 1 – land least at risk of flooding from tidal or fluvial sources. A narrow band of land subject to a 0.1 – 1% chance of flood risk ('low chance') is located along the western boundary of the Site, but the Site is otherwise absent of any surface water flood risk concerns.

Planning History

- 4.14 The Site was subject of an outline planning application in 2017 for up to 97 dwellings with accompanying, supporting, development (reference 173127).
- 4.15 This application was subject to a non-determination appeal (reference APP/A1530/W/18/3207626) that was dismissed on 19 August 2019.
- 4.16 Through this appeal, the Inspector identified the following three main issues as being the proposed development's effect on:
- a) The character and appearance of the area.
 - b) Heritage assets.
 - c) The supply of housing.
- 4.17 In respect of impact on the character and appearance of the area, and considering the specific development that was proposed and was subject of the appeal, the Inspector found that it would result in conflict with Development Plan policies that were in place at that time (Core Strategy policies ENV1 and SD1), by virtue of the proposal having a substantial and adverse impact on the character and appearance of the area.

- 4.18 In respect of heritage, the Inspector concluded that the harm would be less than substantial to the significance of heritage assets.
- 4.19 The consideration of a planning application / appeal is of course a very different exercise to the consideration of a site for allocation. In the case of the former, it is necessary to consider a specific proposal in the context of the Development Plan that is in place at that time as well as other material considerations. In the case of the latter, it is part of the preparation of a new / revised Development Plan through which new allocations and policies will be formulated, and does not consider a specific scheme per se but rather the site's sustainability and deliverability for development, as part of a wider strategy for consideration of the Local Planning Authority area as a whole and in comparison to reasonable alternatives.
- 4.20 Importantly, the appeal decision did not suggest that the Site was subject to any significant constraints as to render it fundamentally unsuitable for residential development, or that it was inherently unsustainable to provide housing. On the contrary, and as per the Inspector's conclusions at paragraph 62, it was a case that the particular appeal proposal was in conflict with the Development Plan in place at the time, and in relation to the specific circumstances at that time, there were no material considerations that would outweigh this conflict.

Sustainability and Deliverability for residential development

- 4.21 For the reasons discussed in Section 3 of this representation, not only is West Bergholt a sustainable settlement to which to direct some of the borough's housing needs; it will be *necessary* for the new Local Plan to ensure some growth to the village over the plan period, in order to support the vitality of the community. Failure to do so would result in a plan that did not support sustainable development and was consequently unsound.
- 4.22 It is therefore a case of identifying suitable, deliverable sites for residential allocation for homes for West Bergholt.
- 4.23 Sustainability appraisal is an important tool in plan-making. The NPPF confirms that this should demonstrate how Local Plans have addressed relevant economic, social and environmental objectives (including opportunities for net gains). There is also a requirement under the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations') for alternatives to be assessed, and the reason for the selection of the preferred approach set out.
- 4.24 The DLP is accompanied by a sustainability appraisal ('the SA'). The SA appraised the Site (reference 10749).

4.25 In explaining the reasons for the Site's identification as a preferred option for residential allocation in the DLP, the SA explains in Appendix E that:

"This site is a logical extension to West Bergholt and better related to the core function of the village when compared to alternatives. Whilst it is within a coalescence break in the neighbourhood plan, the degree of harm is likely to be less than alternatives and the policy will require appropriate mitigation."

4.26 The SA's appraisal of the Site found that it would have significant positive effects in respect of housing, and positive effects in relation to transport and community and health and wellbeing objectives.

4.27 It raised particular potential concerns in respect of SA objectives on efficient use of land, historic environment and landscape. The SA did however note that, with the exception of efficient use of land, these were mitigated to a degree by the proposed policy requirements of PP44 for development of the Site.

4.28 In relation to the historic environment impact concerns, we consider the negative impacts have been overstated in the SA. As noted above, the Site does not contain any designated heritage assets. Whilst there are heritage assets within proximity to the Site, the impact on these can be mitigated through the layout of future development and does not represent an insuperable constraint.

4.29 In respect of landscape, again we suggest that the concerns have been overstated. As set out above, the Site is not within a valued landscape. It adjoins the existing settlement boundary, and a substantial length of the Site's boundaries adjoin existing residential development.

4.30 The Site is within an area in which, explains the West Bergholt Neighbourhood Plan, it will be necessary to avoid coalescence with Colchester. But this is not a site-specific designation, but rather a blanket designation applied to all land and within an area that extends from the north-east of the village stretching round clockwise to the south-west.

4.31 At a site-specific level, development of the Site would represent a modest extension to the residential envelope, extending the settlement boundary a nominal distance towards Colchester. Furthermore, it would bring the built form of the village no closer to Colchester than existing dwellings located closer to the city than the Site along Colchester Road, including those immediately east of the Site – dwellings that whilst beyond the settlement boundary are clearly read as being part of West Bergholt.

4.32 The distance between the edge of the Site and the western edge of Colchester is considerable, with development of the Site having limited impact in absolute or relative terms in this regard. Significant physical barriers (including the A12 and St. Botolph's Brook) would still provide visual and functional separation between the two settlements.

- 4.33 Development of the Site also gives rise to the opportunity to create a new settlement edge that is of a significant degree of permanence. This could, for example, include provision of a green buffer.
- 4.34 Separately, the SA's appraisal suggests the Site would have a minor negative impact on services and facilities. This is considered an unduly negative assessment of its potential impact in relation to this matter. As noted, including elsewhere within the SA, the Site is well-related to services and facilities in the village, particularly when compared with alternatives. New development can help sustain existing facilities and services, ensuring they remain viable and continue to serve the existing community. When these factors are considered, we suggest the Site will have a positive impact on this SA objective.
- 4.35 Similarly, we suggest the proposed allocation of the Site should be seen as having a positive impact on SA objective 3 (economic development) given the support for village services and facilities its development could engender, in addition to the inherent economic benefits associated with new residential development (including supporting employment during construction, but also on an ongoing basis by supporting jobs in local businesses that future residents are likely to frequent) the Site's relationship with the village's services and facilities gives rise to the potential for it to have specific positive economic impacts for West Bergholt.
- 4.36 The SA is considered similarly unduly negative in respect of the Site and biodiversity. Development of the Site will necessarily be accompanied by a biodiversity net gain of at least 10%. This cannot be seen as anything other than a positive impact on biodiversity.
- 4.37 In summary, we consider that the Site is more sustainable than the SA suggests. It is noteworthy that, even with what we suggest is an unduly negative appraisal of the sustainability of the Site for residential development, the SA nevertheless supports its allocation for such. Clearly, if the SA were to be updated in future iterations to reflect the above, the justification for the Site's allocation would simply be greater.
- 4.38 The DLP's evidence base also includes the Strategic Land Availability Assessment (SLAA). The SLAA Site Assessment Report Stage 2 (2025) includes an assessment of the Site's suitability, deliverability and availability for residential development.
- 4.39 The SLAA's RAG rating of the Site is generally positive. The only 'red' ratings relate to the Site being greenfield land, its agricultural land classification, and in respect of coalescence.
- 4.40 Turning first to the Site being greenfield land, it will of course be necessary to develop some greenfield land to meet the borough's development needs, so the Site being greenfield cannot be determinative.

- 4.41 In respect of the agricultural land classification of the Site, the SLAA suggests that more than 50% of the Site is Grade 1, 2 and / or 3a. However, it is unclear how this has been determined. Furthermore, given the size of the Site is only c.4.1 ha, the loss of agricultural land its development would entail would be relatively nominal and vastly smaller than the 20-ha threshold generally used to consider whether loss of agricultural land should be seen as a significant concern.
- 4.42 As with the SA, it is notable that despite the SLAA's consideration being, in our view, unduly negative, the Site was considered sufficiently suitable to justify a proposed residential allocation. We suggest the Site is even more suitable to provide homes, and thus its allocation in the new Local Plan even more justified than the DLP evidence base suggests.
- 4.43 In terms of other factors relevant to the consideration of the Site's suitability for residential allocation, it is also relevant to note that despite the West Bergholt identifying a number of key views that are important to retain around the village, development of the Site does not have the potential to impact on any of these, as figure 2 below confirms.



Figure 2 – West Bergholt Neighbourhood Plan Map CA7 (Key Views)

4.44 In a similar vein, the Site would not result in a loss of any of the local green spaces allocated by the Neighbourhood Plan (shown in Figure 3 below). The Site is private land and is not currently publicly accessible.

West Bergholt Neighbourhood Plan

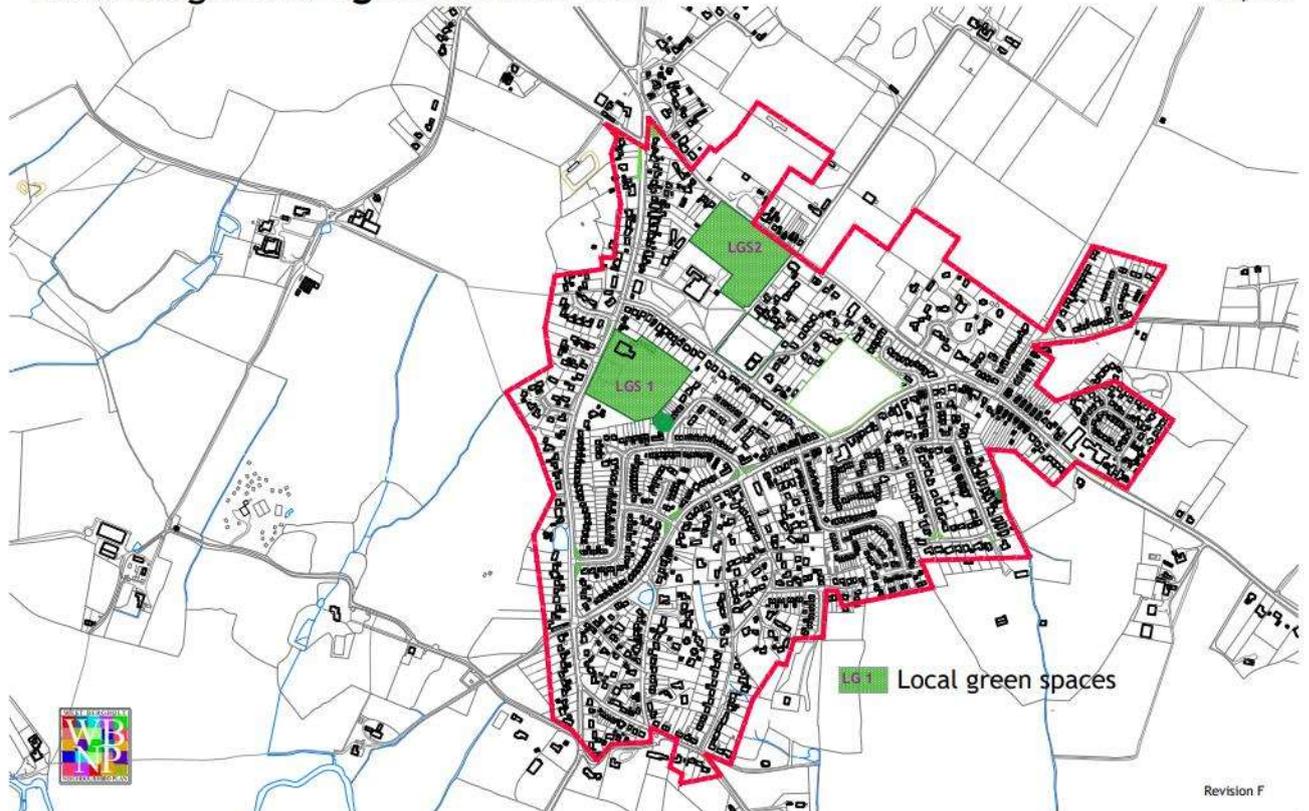


Figure 3 - West Bergholt Neighbourhood Plan Map PP4 (Local Green Spaces)

4.45 Separately, in considering the Site's sustainability and suitability for housing, we suggest it is pertinent to note that, in providing 100 dwellings, it is of a scale capable of making a meaningful contribution to housing – and a variety of tenures and sizes of housing – but at the same time not so large a site as to give rise to concerns that it would result in undue harm to the character of the village.

4.46 Finally on this issue, we consider it relevant to note the location of the Site in relation to the major neighbouring centre and a key destination for existing and future residents of West Bergholt. Colchester is located to the south-east of the village. By locating development on the south-east side of West Bergholt, this therefore minimises any impact associated with residential development and the Site on the local highway network within the village, with traffic associated with the neighbouring centre not having to travel through the village itself.

- 4.47 Turning to the availability and achievability of the Site, it is in single ownership and not subject to any ownership or legal constraints that could constrain its ability to deliver homes. It is not subject to any significant constraints the cost of addressing which could undermine viability. There are no significant infrastructure upgrades or other pre-commencement works necessary that could significantly delay commencement of development. The Site is being actively promoted for residential development by an experienced promoter, and is located in an area in which the market remains strong.
- 4.48 The Site is available and achievable for residential development in the first five years of the plan period.

Overview

- 4.49 The Site is not subject to any significant constraints that would render it unsuitable for residential development.
- 4.50 The Site would represent a logical, proportionate addition to West Bergholt – a village that is sustainable for proportionate growth.
- 4.51 Residential development of the Site would deliver a number of significant benefits, and its allocation is supported by the DLP's evidence base.
- 4.52 The DLP evidence base confirms the Site as being sustainable for residential development, particularly relative to reasonable alternatives. We consider that the Site is more sustainable and suitable to provide homes than key elements of the DLP evidence base, and thus is even more justified for allocation than this evidence base suggests.
- 4.53 The Site is available and achievable for residential development in the early years of the plan period.
- 4.54 In short, the Site is deliverable and sustainable to make a meaningful contribution to meeting housing needs, and its allocation in the new Local Plan would be justified, consistent with the NPPF, and effective.

5. POLICY PP44

5.1 For the reasons set out in Section 4 of this representation, the proposed allocation of the Site through the new Local Plan for c.100 dwellings is evidently sound. This section of this representation focuses on the specific policy requirements for development of the Site proposed by Policy PP44 of the DLP.

5.2 Policy PP44 of the DLP reads as follows (please note that there is an error in the DLP's referencing, but in order to make clear which aspects the comments related to, this has been retained):

In addition to the infrastructure and mitigation requirements identified in Policy ST 7 and subject to compliance with all other relevant policies, development will be supported on land within the area identified on the policies map which provides:

a) Approximately 100 new dwellings of a mix and type of housing to meet evidenced needs and be compatible with surrounding development;

b) Safe and suitable site access to required highway design standards. The point of vehicular access is to be agreed with the Highway Authority and it will need to be demonstrated that the proposal would not be detrimental to highway capacity and safety;

c) Provide a safe pedestrian access to ensure connectivity within and throughout the site to existing footways and any public rights of way. Ensure provision of green infrastructure connections and recreational access to the countryside, also securing active travel links and connections to the settlement;

d) Development must ensure it does not harm the coalescence break which is defined in the West Bergholt Neighbourhood Plan and ensure appropriate mitigation and enhancement is provided as evidence through appropriate landscape character evidence to be agreed with the Council;

e) Onsite BNG measures should focus on enhancing hedgerows and enhancing the condition and distinctiveness of grassland;

f) Screening comprising locally appropriate hedgerows and/or woodland will be required along the site boundaries to ensure that development is sensitively integrated into the landscape to reflect and reinforce rural character;

g) Development must not discharge surface water to the foul sewer network;

- h) Applicants must demonstrate they have confirmed with Anglian Water Services that treatment capacity at the Water Recycling Centre is available to serve the development at the point of anticipated connection and where appropriate agree to phasing triggers to support development;*
- i) Demonstrate adequate capacity for managing wastewater including proposed phasing requirements or alternative solutions to the satisfaction of the Council and Anglian Water;*
- j) A range of measures in addition to prioritising SuDs (Policy EN8) and water efficiency measures to reduce the risk on impact on the WRC capacity as a result of planned growth including:*
- i) Removal of unrequired network flows;*
 - ii) Targeted education to include new residents of the development;*
 - iii) Reduction in the demand for potable water;*
- k) Development must conserve, and where appropriate, enhance the significance of heritage*
- l) assets (including any contribution made by their settings). Designated heritage assets close to the allocated site includes six Grade II, one Grade II Listed Buildings and Scheduled Monument to the east as informed by the Stage 1 HIA; j) Any site specific infrastructure requirements from the IDP (likely to include education provision, highway mitigation, water and wastewater and specific community / open space provision). All development Proposals within West Bergholt parish, will also be determined against the policies in the West Bergholt Neighbourhood Plan (adopted October 2019) where they are up to date and relevant*
- 5.3 We are generally supportive of the thrust of the above policy requirements, and subject to some relatively minor modifications they are considered deliverable. However, we do have several comments.
- 5.4 In respect of point d), we agree that the development of the Site should be implemented in a manner that minimises risk of future coalescence between West Bergholt and Colchester, and reduces perception of any coalescence that may arise from development of the Site. However, we suggest that the current wording of this criterion does not provide clarity to a future decision-maker as to how to consider the issue in determining a planning application.
- 5.5 In addition, whilst this presumably refers to the *current* Neighbourhood Plan, and how this seeks to avoid coalescence, it does not account for a future, updated / alternative Neighbourhood Plan. This could set out an alternative approach which may not be appropriate to refer to in this policy.

- 5.6 We suggest that, as an alternative which would still achieve the objectives of the policy, this criterion makes reference to proposals for development of the Site being required to demonstrate how they have provide a new, robust, settlement edge that is imbued with a degree of permanence, minimising the risk of future encroachment into the countryside between West Bergholt in the Colchester to the extent that it could result in the coalescence of the two settlements.
- 5.7 In respect of criterion h), we consider this is unjustified and inappropriate.
- 5.8 Water companies are required to ensure that sewerage infrastructure is planned and funded to provide the necessary capacity to support growth proposed through new Local Plans. Water companies must create Drainage and Wastewater Management Plans (DWMPs) which are required to align with Local Plans to consider current and future development needs. Additionally, water companies plan in 5-year cycles (i.e. Asset Management Periods), and are not looking over the 15-year plus plan period the new Local Plan will address.
- 5.9 In short, the water company is expected to collaborate with local authorities to ensure that sewerage infrastructure is planned and funded in line with projected growth in a Local Plan, i.e. once allocations are proposed, the water company should ensure it plans to provide the respective capacity. It is not the case that any existing water recycling capacity issues should be determining where or when growth can be delivered. On the contrary, the Local Plan should perform this role, and water companies react to ensure this can be achieved.
- 5.10 Similarly, we suggest that there are aspects of criterion k) that are seemingly seeking to make the developer of the allocation responsible for matters which are the responsibility of water companies.
- 5.11 Finally, the reference in the final paragraph to the need for development to the Site to conform to the 2019 Neighbourhood Plan policies where up to date and relevant is considered, at best, superfluous. The made Neighbourhood Plan is already part of the Development Plan and thus relevant and up to date policies would need to be considered in respect of any application for development of the Site, regardless of the new Local Plan. Additionally, by specifically referencing the 2019 Neighbourhood Plan, this could give rise to potentially problems in the event that an updated / revised Neighbourhood Plan was to be prepared.
- 5.12 We wish to stress that we wish to work collaboratively with the City and Parish Councils regarding the development of the Site, and would welcome discussions with the Councils and other stakeholders as the plan progresses.

6. OVERVIEW AND NEXT STEPS

- 6.1 Colchester City Council is subject to significant housing needs, particularly in terms of affordable housing, and it is important a new Local Plan is put in place to sustainably address these.
- 6.2 Whilst the city of Colchester is clearly the principal settlement in the borough, it is critical that the new Local Plan ensures proportionate growth is also directed to the borough's smaller settlements in order to support the vitality, ensure their services and facilities remain viable, etc.
- 6.3 West Bergholt is a sustainable settlement to accommodate proportionate growth and one to which sustainable growth should be directed in order to sustain and enhance the vibrancy of this community.
- 6.4 As the DLP proposes, and its evidence base supports, allocation of the Site for c.100 dwellings is sustainable and deliverable.
- 6.5 The proposed policy requirements for the development of the Site as per PP44 are broadly supported, subject to some relatively minor modifications.
- 6.6 Pigeon will progress with technical work to further demonstrate the sustainability and deliverability of the Site for residential development, and we would welcome discussions with the Council and other stakeholders ahead of the next iteration of the new Local Plan.