



CONSULTATION

RESPONSE

Colchester Local Plan Preferred Options

Land South of the A12, Kelvedon

On behalf of
Pigeon Investment Management

January 2026

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1. INTRODUCTION

- 1.1 This representation on the Colchester City Council Preferred Options Local Plan Regulation 18 Consultation (November 2025) ('the DLP' or 'the Draft Local Plan') is made on behalf of Pigeon Investment Management ('Pigeon') and in respect of Land South of the A12, Kelvedon ('the Site').
- 1.2 The Site straddles the administrative boundaries of Colchester City and Braintree District, and forms part of a wider parcel of land that is being promoted for a cross-boundary development of residential and employment.
- 1.3 Land to the north of the A12, is a high quality landscape and design-led sustainable scheme for 400 homes predominantly within Braintree District but including circa 11.8 ha within Colchester City, that is proposed for significant public open space and strategic landscaping, with a new riverside country park, that would create a sustainable extension to Kelvedon, delivering significant benefits for existing and future residents of the community.
- 1.4 Land to the south of the A12 is proposed for a new high-quality landscape and design-led sustainable industrial and logistics park that has the potential to deliver 1,500 jobs across land within both Braintree District and Colchester City. As illustrated by the enclosed Framework Masterplan (see Appendix 1).
- 1.5 The Site is strategically located on land north and south of the A12 and includes land that is proposed for the new Junction 24 at Kelvedon. The proposals for land south of the A12 have been designed to safeguard land required for the new Junction 24 and if allocated would deliver part of the approved A12 widening scheme, as part of a first phase that is deliverable in the short-term, in the form of the new roundabout on Inworth Road to the south of the A12, effectively pump priming the delivery of the A12 widening scheme.
- 1.6 Despite Government's decision to withdraw funding for the A12 widening scheme it remains a consented infrastructure scheme that is critical for the future prosperity of North Essex. By allocating the Site, the Council would effectively be safeguarding the land required to deliver the new Junction 24, helping to increase its prospects for delivery.
- 1.7 These representations follow submissions made to the Council at earlier stages in the plan-making process, through which the Council was furnished with a vision document setting out proposals for the Site and the wider parcel of land in which it sits.

- 1.8 The Site represents an excellent opportunity to deliver logistics or general employment development within the A12 corridor while also providing infrastructure that would essentially pump prime the A12 widening scheme, yet is not currently proposed to be allocated for logistics or general employment development in the DLP.
- 1.9 The Site's omission from the DLP represents a missed opportunity and it is important that assessment of the Site's deliverability and sustainability is not unduly influenced by the administrative boundaries that it happens to straddle, and that it is considered in a holistic manner. We are concerned that, to date, the Site has not been assessed in this manner.
- 1.10 Furthermore, we consider the current DLP does not adequately address the need or demand for logistics development in either quantitative or spatial terms.
- 1.11 The Site has the potential to not only help towards providing a use critically important to the economy (logistics), but in a manner that will facilitate delivery of one element of the new arrangements for Junction 24 of the A12 that was approved as part of the wider A12 Chelmsford to A120 Widening Scheme (but which no longer benefits from Government funding), as well as act as a potential catalyst for delivery of the wider approved improvements to the junction.
- 1.12 This representation seeks to set out changes to the DLP at this formative stage in the plan-making process, to ensure the next iteration of the new Local Plan is capable of being found sound.
- 1.13 The Site represents opportunity to not only help address soundness issues with the DLP, but to also provide significant social, economic and environmental improvements for the borough.

1.14 A plan showing the extent of the Site and in relation to the administrative boundaries is shown overleaf as Figure 1.

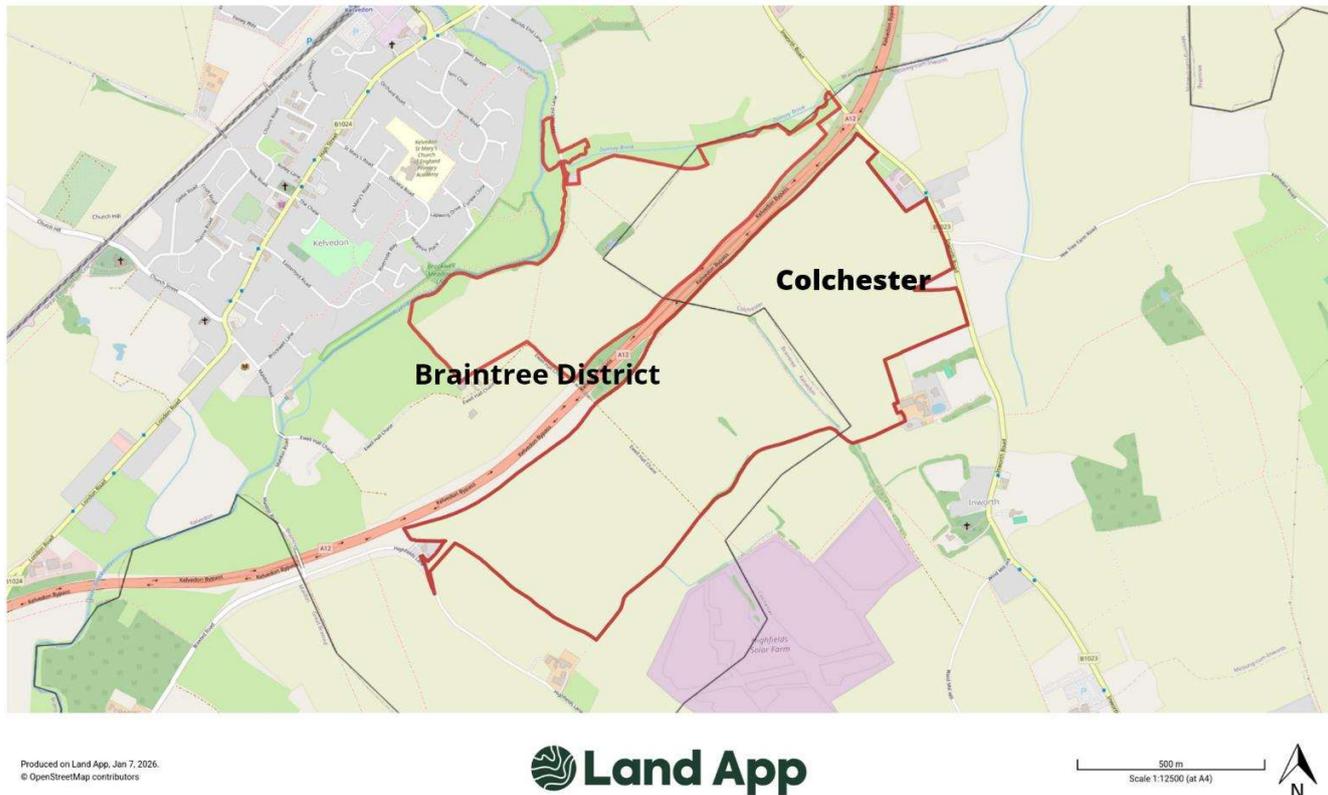


Figure 1 – Site Location

1.15 The representation is divided into the following sections:

Section 2 discusses requirements relating to cross-boundary matters that the new Local Plan will need to meet, and their relevance to the Site.

Section 3 considers evidence of local and regional demand for logistics, the spatial requirements for logistics development, and the DLP's approach to these.

Section 4 discusses the Site: its deliverability for logistics development; its potential to engender significant social, environmental, and economic benefits; and its ability to form part of a wider strategy for sustainable development with Colchester and the wider north Essex region.

2. ENSURING EFFECTIVE CROSS-BOUNDARY COLLABORATION

- 2.1 It is appreciated that the Government has made clear that Councils progressing new Local Plans under the current plan-making system will not be required to meet the statutory Duty to Cooperate. Whilst the statute provision concerning the Duty to Cooperate has not yet been formally removed, it is likely that the new Colchester Local Plan will not be required to demonstrate it has met the Duty to Cooperate at the time of its examination.
- 2.2 However, the Government's position on the Duty to Cooperate should not be interpreted as meaning it is no longer required to work collaboratively and constructively with its neighbours. Whilst the Duty to Cooperate and its somewhat essentialist and inflexible legal test is being abolished, the Government has made clear that there will still be a requirement for Local Planning Authorities to engage proactively and regularly with infrastructure providers, neighbouring and other relevant plan-making authorities, and other relevant bodies to identify and address cross boundary matters¹, albeit in the context of the soundness of the Local Plan. In short, effective cooperation with neighbouring authorities remains a prerequisite of a sound Local Plan.
- 2.3 The NPPF's section on 'Maintaining effective cooperation' states that effective strategic cross-boundary planning will "*play a vital and increasing role in how sustainable growth is delivered*" [24]; and at paragraph 25 emphasises the need for Local Planning Authorities to identify work together to identify the relevant strategic matters to be addressed through their plans. There is also a very clear case for considering opportunities to deliver sustainable development and economic growth based upon functional employment and housing market areas that extend beyond administrative boundaries.
- 2.4 The need for cross-boundary cooperation is particularly acute in relation to the issue of logistics development. Distribution networks rarely stop at administrative boundaries, and the functional employment and catchment areas served by logistics extend beyond the borough's administrative areas.
- 2.5 As discussed in further detail within Section 3 of this representation, there is robust evidence for the need to consider logistics development requirements and potential along the A12 corridor at a strategic, sub-regional scale. In particular, there is a strong relationship in this regard between Colchester and Braintree District.

¹ As confirmed through the NPPF (December 2025) consultation draft

- 2.6 Separately, the element of the Site within Colchester City Council's administrative area also has the potential to form part of a sustainable extension to Kelvedon. Kelvedon is located in Braintree District, but administrative boundaries should not be considered a barrier to its sustainable growth and failure to consider cross-boundary opportunities to meet growth requirements means that growth may not be directed to the most sustainable locations.
- 2.7 In respect of the particular cross-boundary opportunity presented by the development of the Site, it is important that this is explored by Colchester City and Braintree District Councils, working collaboratively with one another, together with Pigeon and other stakeholders.

3. LOGISTICS NEED AND DEMAND, AND THE DLP'S APPROACH

National Policy

- 3.1 The NPPF (paragraph 85) states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. It confirms significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also stresses the need for planning to counter any economic weaknesses in an area, as well as build upon potential opportunities.
- 3.2 At paragraph 86, the NPPF explains Local Plans should identify suitable locations for uses to meet the needs of a modern economy. These, it states, include (but are not necessarily limited to) laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.
- 3.3 The Planning Practice Guidance (PPG)² recognises that the logistics sector plays a critical role in supporting an efficient, sustainable and effective supply of goods for both consumers and businesses, while also making a significant contribution to local employment.
- 3.4 The PPG is clear that logistics uses have distinct operational and locational requirements which need to be considered separately from general industrial land when formulating planning policies. In particular, logistics development is not interchangeable with other employment uses and requires a bespoke strategic approach to its allocation that reflects its specific spatial requirements.
- 3.5 The PPG explains that strategic logistics facilities, serving national and regional markets, typically require substantial areas of land, excellent access to strategic transport networks, sufficient power capacity, and access to an appropriately skilled local workforce. Where a need for such facilities exists, strategic policy-making authorities are advised to work collaboratively with neighbouring authorities, infrastructure providers, developers, occupiers and other relevant stakeholders to identify the scale and nature of logistics requirements across the relevant market areas. In assessing this need, the PPG³ advises that authorities should be informed by a range of evidence, including engagement with logistics developers and occupiers to understand changing requirements in terms of the type, size and location of facilities, including the implications of new and emerging technologies.

² Paragraph: 031 Reference ID: 2a-031-20190722

³ Ibid

- 3.6 Having identified the scale and nature of need, authorities are then required to consider the most appropriate locations to meet these requirements, either through the expansion of existing sites or the allocation of new sites.
- 3.7 In doing so, the PPG⁴ also emphasises the importance of assessing land and policy support for other forms of logistics provision, including facilities serving small and medium-sized enterprises and 'last-mile' distribution facilities that support local markets. This assessment should take account of up-to-date evidence, including market signals, changes in population and housing growth, the local business base and the availability of supporting infrastructure.
- 3.8 The PPG further notes that certain sectors, including logistics, can benefit from clustering, which can play an important role in supporting collaboration, innovation, productivity and sustainability, and in strengthening the economic performance of the areas in which they locate. Understanding these more qualitative sector-specific needs requires active engagement with businesses and occupiers and should be reflected in strategic planning and land allocation decisions.
- 3.9 The Government's The UK's Modern Industrial Strategy (CP 1337) (June 2025) is also relevant to the plan-making approach.
- 3.10 This outlines the Government's ten-year plan to boosting business investment and support eight high-growth sectors to drive economic growth and living standards. At page 89 of the UK's Modern Industrial Strategy, it states:
- "Freight and logistics sector makes a vital contribution to the UK economy and the competitiveness of the [eight high-growth sectors identified], ensuring that the right goods are in the right place at the right time".*
- 3.11 National policy and guidance stresses the critical role of storage and distribution. The NPPF explicitly requires that significant weight be given to supporting economic growth and productivity, and that plans identify locations for modern economic uses including "*freight and logistics*"; and, at paragraph 87 b), "*storage and distribution operations at ... suitably accessible locations*". Government guidance likewise warns that logistics facilities serving national markets require large land areas and excellent transport connections.
- 3.12 In short, planning policies must proactively accommodate logistics demand.

⁴ Paragraph: 032 Reference ID: 2a-032-20190722

Local Need and Demand

Industrial & Logistics Needs Assessment

- 3.13 An Industrial & Logistics Needs Assessment (‘the ILNA’) has been prepared by Savills for Pigeon, which provides an evidence-based overview of the market potential for new industrial & logistics (I&L) development at the Site.
- 3.14 For the industrial and logistics sector, the ILNA identifies the A12 is a “*strategically important movement corridor*” and notes the potential economic benefits for both Braintree and Colchester this gives rise to.
- 3.15 The ILNA identifies Braintree and Colchester as an appropriate Property Market Area (PMA) in which to consider opportunities, need, and demand for industrial and logistics space along the A12 corridor.
- 3.16 The ILNA explains that the PMA does not include Chelmsford, located to the south, as Chelmsford’s market is generally more expensive than Braintree’s and somewhat orientated towards serving London.
- 3.17 To the north-east, along the A12 corridor, Ipswich / Suffolk is considered by the ILNA to be another separate market area from Braintree / Colchester, given this is more orientated toward serving Suffolk and those needing a location close to the ports of Felixstowe, Harwich and Ipswich.
- 3.18 The ILNA identifies a strong demand for industrial and logistics land in Braintree / Colchester driven by structural changes in supply chains, growth in e-commerce, and the need for modern logistics facilities.
- 3.19 It concludes the existing supply is insufficient and increasingly constrained. Current employment land allocations are sufficient in neither quantity nor quality to meet forecast demand. It finds much of the existing stock to be older, poorly located, or unsuitable for modern logistics requirements (for example, in relation to ceiling heights, yard depths, or access to strategic road networks)
- 3.20 The ILNA identifies a particular shortfall in large-scale, strategic logistics sites, especially those capable of accommodating units above traditional local market sizes. Locations with direct access to the strategic road network are highlighted as especially critical.
- 3.21 Another of the ILNA’s findings of particular importance to the new Local Plan is that, given the fast-changing nature of the logistics sector, the report stresses the importance of flexible employment

land policies. This includes allowing a range of unit sizes and avoiding overly restrictive site-specific constraints that could limit market responsiveness.

3.22 The ILNA warns of a risk that investment and jobs will be displaced to competing areas, undermining economic growth objectives and local plan strategies for the local area, if sufficient provision is not made for development locally.

3.23 The ILNA identifies the growing logistics sector as having the potential to result in significant economic benefits for Braintree and Colchester. It states:

“The PMA [Braintree and Colchester] has not significantly tapped into the growth opportunity posed by the expansion of e-commerce, but it could play a bigger role in the future if the local I&L market is supplied with the right sites in the right locations”.

The Council's Employment Study

3.24 As part of the Local Plan evidence base, the Council has had an Employment Study prepared by AECOM, which was published in February 2025 ('the ES')

3.25 The ES identifies logistics as one of the key sectors likely to influence demand for employment space in Colchester.

3.26 The ES suggests Colchester is positioned as a growing but capacity-constrained logistics location, with demand for storage and distribution closely linked to its strategic position on the A12 / A120 and within a wider North Essex / Essex logistics network that spans several neighbouring authorities.

3.27 It considers logistics to be a key strength and major employer in Essex that requires continued support, with Colchester forming part of this wider functional logistics economy.

3.28 The ES identifies a core Functional Economic Market Area (FEMA) which comprises Braintree, Colchester and Tendring. Its functional economic market area analysis concludes that Colchester is particularly connected with Tendring and Braintree, on the basis of road and rail connectivity, commuting flows, housing and property markets, and shared governance structures.

3.29 It notes absorption of B8 floorspace over the last decade has been consistently positive locally and across the FEMA, in contrast to near-neutral absorption for light and general industrial uses, evidencing sustained demand for warehousing linked to e-commerce, population growth and freight flows.

3.30 The ES suggests that more affordable industrial space is found elsewhere in the FEMA (especially Tendring), implying a degree of functional complementarity whereby Colchester accommodates

higher-value, higher-rent logistics/industrial activity and some occupiers or footloose logistics operations may gravitate to neighbouring districts.

- 3.31 The ES emphasises the importance of access to the strategic road network, particularly the A12 and A120, as a key locational driver for transport and logistics operators seeking proximity to markets, 24-hour access and efficient distribution.
- 3.32 The study sets out generic logistics locational requirements: strategic road access (particularly to the A12/A120 and M25), proximity to population and markets, labour and amenities, large and well-configured plots, potential for 24-hour operation, strong utilities and broadband, and where possible inter-modal facilities.
- 3.33 It also notes that occupiers increasingly expect Grade A logistics space with expansion capacity, public realm, amenities and infrastructure for EV charging and green fuels, reflecting ESG and decarbonisation drivers.
- 3.34 Given positive demand, low B8 vacancy, and rising rents, the preferred 'Labour Supply' scenario for considering employment need implies a substantial additional industrial land requirement (including logistics) to 2041, with existing allocations and pipeline land (including A12-linked sites) insufficient to fully meet forecast needs, prompting recommendations to safeguard well-located sites, intensify under-utilised A12-accessible employment areas, and identify additional land with good strategic road access.

The DLP's Proposed Approach

- 3.35 Both the Council's own evidence base and that prepared on behalf of Pigeon identify significant demand and need for land for logistics development in Braintree and Colchester, and in particular along the A12 corridor. They also identify potential significant economic benefits of planning to meet this need, as well as potential harms of failing to plan to accommodate a use that is critically important to the economy.
- 3.36 The NPPF, along with other Government policy, is unambiguous on the importance of the logistics sector and the need to plan to meet this.
- 3.37 Additionally, the logistics sector has specific locational requirements which often differ to other employment sectors, as the ES recognises.
- 3.38 Having regard to this, it is manifestly the case that the emerging new Local Plan must seek to plan to meet logistics needs, working collaboratively with Braintree District Council.

3.39 The DLP does note the importance of logistics development in the borough. At paragraph 3.44 it states:

*“The Employment Study identifies key sectors likely to influence demand for employment space over the plan period including the digital, creative and tech and financial and business service sectors, and key sectors likely to influence demand for industrial space include advanced manufacturing, construction, transport and **logistics** and green energy.”* (Emphasis added).

3.40 Whilst the DLP goes on to state at paragraph 3.44 that *“Proposals which support these sectors will particularly be encouraged in line with the requirements of the Policy and are set out in the relevant Place Policy.”* there does not appear to be any recognition of the specific locational requirement of logistics development or the need to plan to support this sector in particular, and there is no other reference to the logistics sector anywhere else within the DLP.

3.41 In terms of the approach to identifying employment land for allocation, the Strategic Land Availability Assessment (SLAA) does not appear to have had regard to the specific need for, or locational requirements of, logistics development in considering the deliverability of potential sites.

3.42 At paragraph 3.4 of the SLAA Methodology (2023) logistics is listed as one of the uses that will be assessed by the SLAA. However, the SLAA Methodology (2023) does not then go on to acknowledge any specific locational requirements for logistics. On the contrary, it suggests that the same suitability criteria will be applied in the consideration of sites for any employment uses. It should not be assumed that it would be appropriate to use the same criteria to consider the suitability of land for Use Class B2 / E development as that proposed for B8 logistics. We note, for example, that sites have been negatively assessed by the SLAA where they are separated from existing settlements. However, such sites should not be seen as inherently unsuitable for logistics development or unable to be accessed by sustainable forms of transport.

3.43 Despite the strategic importance of the A12 corridor, and the opportunity logistics development presents for economic growth, the DLP does not expressly address this opportunity. Whilst there are sites in proximity to the A12 that are proposed for employment / mixed-use development, these do not benefit from the same opportunity to connect with the strategic road network that the Site benefits from. As such, they do not appear to be suitable or available for logistics development.

3.44 National policy and guidance is clear on the importance of the logistics sector not only in terms of the direct economic benefits it generates in its own right, but also in terms of its importance to supporting other sectors of the modern economy. The DLP appears to have overlooked the importance of this, its own evidence base on employment needs, and the need to consider specific locational requirements of this sector. We appreciate the preparation of the new Local Plan is an

iterative process, and ahead of the next stage we urge the Council to examine the need for, as well as the potential opportunities associated with, logistics development.

- 3.45 The evidence suggests that allocation of suitable sites for logistics development has the potential for significant economic benefits. Conversely, failure to plan for this use could result in significant economic harm to the area, with the lack of appropriate logistics development to support other sectors being a particular risk.
- 3.46 In re-examining this issue, it will be important for the Council to work collaboratively with its neighbours, and in particular Braintree District Council, in order to identify the most suitable and appropriate locations for growth.

4. THE SITE AND ITS PROPOSED DEVELOPMENT

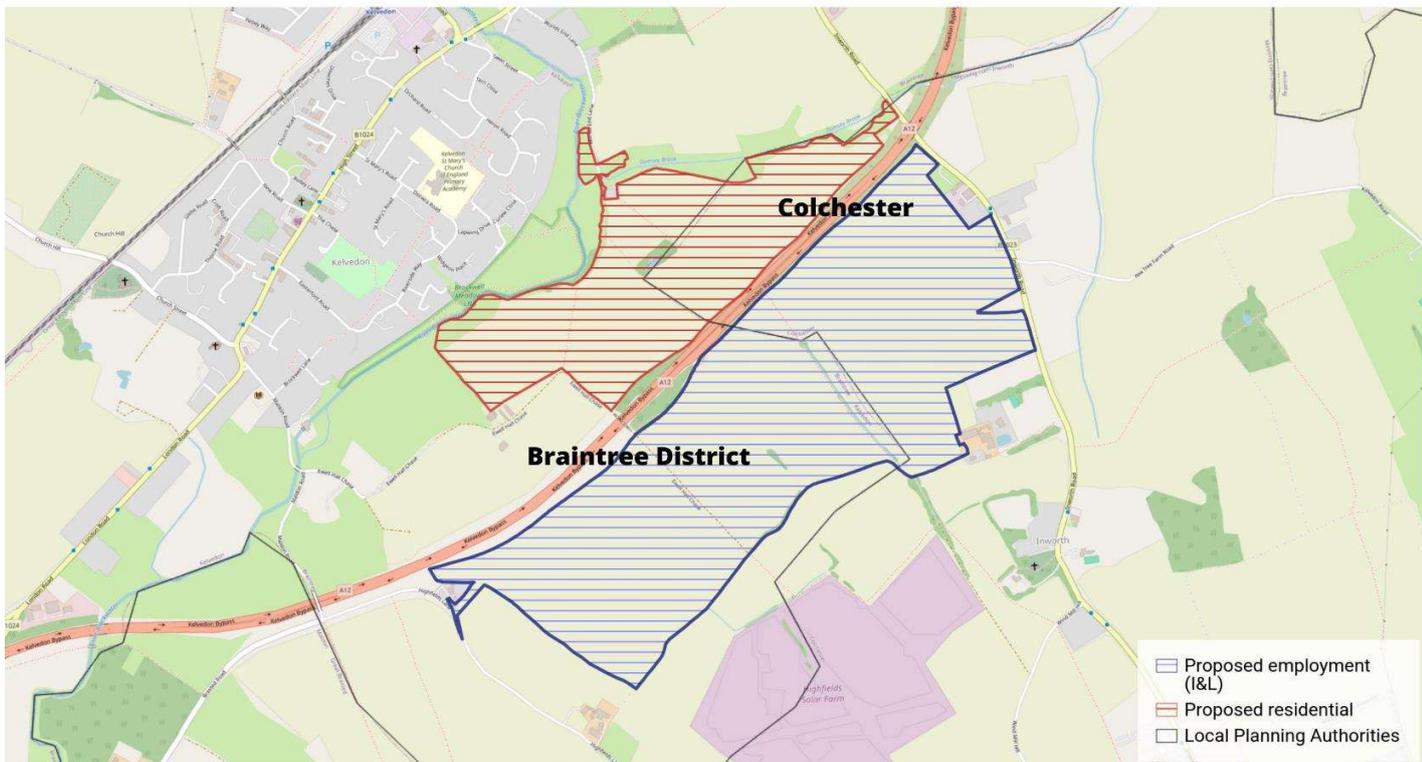
The Site and its Environs

- 4.1 The Site measures a total of c.105 ha and straddles the administrative boundary between Colchester and Braintree District, adjoining Kelvedon as well as land allocated in the current Development Plan for Braintree to deliver growth at Feering (it should be noted that whilst Kelvedon and neighbouring Feering are separate villages, the current Development Plan for Braintree District recognises that, functionally, they act as a whole. The Braintree Local Plan Section 2 notes that services and facilities within one able to also serve the population of the other and identifies Kelvedon with Feering as a key service village).
- 4.2 The Site is located immediately to the south of Kelvedon and is bisected by the A12. To the south of the Site is Highfields Solar Farm.
- 4.3 The element of the Site to the south of the A12 (proposed for industrial and logistics employment uses) measures c.72 ha); and the northern portion (proposed for residential development) adjoins Kelvedon and is c.33 ha in area.
- 4.4 The Site is primarily in agricultural use.
- 4.5 The northern boundary adjoins the River Blackwater and Domsey Brook, towards which the Site slopes gradually down. Beyond this brook, to the north-west of the Site, lies relatively modern residential development that forms the existing edge of the settlement of Kelvedon.
- 4.6 The Site is contained to the east and west by Inworth Road and Highfield Lane, respectively.
- 4.7 The Site is largely featureless with the exception of hedgerows demarcating the various field parcels that comprise it, farm tracks, and Public Rights of Way (ProW).
- 4.8 The Site benefits from an existing bridge (PRoW Footpath 25) over the A12, providing pedestrian and cycle access onto Worlds End Lane (via Footpath 15). Worlds End Lane is an existing Public Footpath providing a traffic-free route to the centre of Kelvedon. The Site is also well-served with PRoWs providing a traffic free route to Tiptree.
- 4.9 The Site is not subject to any ecological designations. Whilst the field margins have potential to support birds, badgers and foraging bats, given the majority of the Site is used for arable farming it is considered to be generally of low ecological value.

- 4.10 In respect of landscape, the Site is not considered a valued landscape as per paragraph 187 a) of the NPPF. The Site is located part within the Messing Wooded Farmland Landscape Character Area, part within the Blackwater River Valley Landscape Character Area (LCA). The former is characterised by a mixture of arable and pasture farmland that is well-wooded with woodland blocks with views of the Blackwater Valley through gaps in hedgerows courses. The latter Blackwater LCA includes distinctive linear poplar and willow plantations along the river banks. These are the characteristics of the Landscape Character Areas, but at a more localised level, the landscape value of the Site is also evidently impacted by the presence of the A12 running through it, as well as existing suburban development to the north.
- 4.11 The Site contains no listed buildings or scheduled monuments, and is not within a Conservation Area. There are a number of Grade II listed buildings located within proximity of the Site but these would not be affected by development of the Site.
- 4.12 The Site is entirely within Flood Zone 1 – land least at risk of flooding from tidal or fluvial sources. Whilst there are some small, localised areas of surface water flooding (generally following existing ditches) development of the Site can comfortably avoid impinging upon such areas.
- 4.13 There is nothing to suggest the Site would be subject to any contamination that could pose a significant constraint to its development, or any other environmental issues that might impact its suitability.

The Proposed Development

- 4.14 The plan shown overleaf (Figure xx) shows the extent of land proposed for industrial and logistics ('the Employment Development'), and the extent proposed for residential.



Produced on Land App, Jan 6, 2026.
© OpenStreetMap contributors



500 m
Scale 1:12500 (at A4)



Figure xx- Extent of land proposed for Residential Development and Employment Development, and location of administrative boundary

- 4.15 The element to the north of the A12 is proposed for residential development ('the Residential Development'). The majority of this portion of the Site lies within Braintree District, and is promoted for a residential-led extension to Kelvedon (to the existing settlement, and to a residential allocation in Braintree District's adopted Local Plan (FEER 233B)).
- 4.16 As set out earlier, the larger portion of the Site, located south of the A12, is proposed for industrial and logistics ('the Employment Development')
- 4.17 A phased approach to the Employment Development is proposed.
- 4.18 The development will retain and enhance existing hedgerows and trees within a comprehensive landscaping strategy for the Site. The landscaping strategy will incorporate substantial tree, shrub

- and hedgerow planting to all boundaries of the Site, which will act as a visual buffer to neighbouring land uses.
- 4.19 The Site benefits from existing pedestrian links to Kelvedon centre, and proposed development incorporates significant non-vehicular transport improvements.
- 4.20 Phase 1 is entirely within Colchester's administrative area, and is proposed to comprise an industrial and logistics development, as well as the realignment of Inworth Road and implementation of the new roundabout proposed as part of the A12 Chelmsford to A120 Widening. It also incorporates significant landscaping, blue infrastructure and active travel links connecting into the existing PRow network. A plan showing the Phase 1 proposals and how these relate to the wider opportunity for industrial and logistics is provided as Appendix 1 to these representations.
- 4.21 The Phase 1 development presents an initial development that will make a meaningful contribution to meeting the need and demand for logistics development along the A12 corridor, and supporting the local economy. In addition, it has the potential to be a catalyst for a larger scale industrial and logistics development and land within the Site is proposed to be safeguarded for this use.
- 4.22 The Residential Development is principally located within Braintree District and comprises new homes, a new country park focussed along the brook, green and blue infrastructure and active travel links. A Framework Masterplan has been provided and has been submitted to Braintree District Council as part of its plan-making process, an updated copy of which accompanies these representations as Appendix 2.
- 4.23 As with the Employment Development proposed, we suggest it will be important for the Council to work collaboratively with its counterparts at Braintree District Council to explore this opportunity and potential to maximise its benefits.

Sustainability, deliverability, and other benefits of the Proposed Development

- 4.24 The characteristics of the Site, described above, are such that it is not subject to any significant constraints that would render either the Residential Development or Employment Development unsuitable.
- 4.25 As already noted, the Site benefits from an existing PRow network providing non-vehicular connections to both Kelvedon and Tiptree. Kelvedon in particular is a short distance from the Employment Development and adjoins the part of the Site proposed for Residential Development. As part of the proposed development of the Site, improvements to the existing PRow are envisaged. Existing bus services run along Inworth Road immediately to the east of the Site.

- 4.26 Kelvedon also benefits from a railway station providing direct train services to major centres including London (Liverpool Street), Chelmsford, Colchester, and Ipswich.
- 4.27 The Site has the potential to connect directly to the A12, helping to ensure the potential economic benefits of this strategic route are realised. By their very nature, logistics uses will necessarily generate additional vehicular movements. However, the Site's location is such so that a) it ensures any impact on the local highway network is minimised, with direct access to the strategic network; and b) its proximity and connectivity to Kelvedon and Feering provides opportunities for future employees of the Employment Development to utilise sustainable modes of transport.
- 4.28 It should be recognised that it is often challenging to identify sites for logistics development that are both sufficiently well-located to the strategic highway network and at the same time provide opportunities for employees to access their workplace via alternatives to the private car. The Site however represent such a site.
- 4.29 The deliverability of the element of the Employment Development within Colchester was assessed through the Council's SLAA Stage 2 Site Assessment Report (2025) under reference ID 10677.
- 4.30 This element measures c.28 ha and is proposed to accommodate the Phase 1 Employment Development.
- 4.31 The SLAA's RAG rating of this parcel identified four reds, against the following considerations, with the following commentary provided:
- a) *Is the site within or adjacent to the existing settlement boundary? Red – removed from settlement boundary with significant area separating site from boundary.*
 - b) *Is the site brownfield or greenfield? Red – greenfield (approx. 75% plus).*
 - c) *Could development of the site enhance or create green infrastructure e.g Open Space, Park, Sport and/or recreation grounds, Country Park, Allotments? Red – no, there are no opportunities to enhance or create green infrastructure.*
 - d) *Is the site within a Minerals Safeguarding Area and/or Minerals and Waste Consultation Area? Red – Site is wholly within a Minerals Safeguarding Area. Mineral could be sterilised as a result of the non-mineral proposal*
- 4.32 In terms of a), this appears to ignore the proximity of Kelvedon and Feering to this element of the site, and to the wider Site that is being promoted here. The Site adjoins Kelvedon and areas proposed for growth in Feering. Furthermore, as set out within these representations, the Site is accessible (and can be made even more accessible) by sustainable transport modes. Whilst Feering

- and Kelvedon are located outside of the administrative area, the Site's proximity to them is still very much relevant.
- 4.33 Whilst the Site is predominantly greenfield, this does not render it inherently unsuitable for development. It should be recognised that the majority of the borough's development needs will need to be met through development of land currently greenfield and this does not therefore represent a reason to reject the Site.
- 4.34 In respect of c), it is not correct to say that there are no opportunities for green infrastructure. As set out in these representations, green infrastructure is proposed to accompany the Employment Development for this parcel. Additionally, wider proposals for the Site would result in significant additional green infrastructure, resulting in substantial environmental and recreational benefits.
- 4.35 Turning to the issue of minerals, and d), the Essex Minerals Local Plan does not appear to suggest the Site is in a minerals safeguarding area (although the scale and definition of the Minerals Local Plan Policies Map make this challenging to confirm). Even if it was within a safeguarding area, this does not render the Site's development unsuitable as, any mineral resource that is present could be extracted prior to development or incidentally as part of the Site's development..
- 4.36 In summary, none of the red RAG ratings identified in the SLAA in respect of the Site represent insuperable constraints or render the Site inherently unsuitable for development.
- 4.37 The proposed Residential Development and Employment Development would deliver a number of significant benefits.
- 4.38 The proposed Phase 1 Employment Development would generate an estimated 150-200 FTE jobs. This represents a substantial social and economic benefit. Furthermore, the provision of logistics development would help support other economic development within the wider area, representing a further social and economic benefit. Additionally, the wider Employment Development is estimated to have the potential to generate c.1,500 FTE jobs in total.
- 4.39 The provision of logistics development within this location, along the A12 corridor, would help reduce the number of journeys and distances that goods may otherwise have to travel in order to service the local catchment area. In this regard, the utilisation of the Site for logistics represents an environmental benefit.
- 4.40 Furthermore, such development would help realise a significant economic growth opportunity the A12 corridor and logistics development within this area represents.

- 4.41 The provision of employment use on land which is accessible to employees by alternatives to the private car is an environmental and social benefit.
- 4.42 The landscape enhancements have the potential to represent an environmental benefit, particularly given the limited ecological value of the Site.
- 4.43 The Phase 1 Employment Development can be delivered independently of the approved Junction 24 improvements. As the Phase 1 development includes delivery of part of the Junction 24 improvements, this represents a significant benefit of the proposals, which would effectively pump prime the delivery of the A12 widening scheme at Kelvedon. The potential for this initial delivery to act as a catalyst for delivery of subsequent element of the approved junction improvements therefore constitutes an additional significant benefit of the Phase 1 proposals.
- 4.44 The Employment Development and Residential Development are not mutually dependent on one another, and either could come forward and deliver sustainable development independently of the other.
- 4.45 There are however synergistic benefits if both the Employment and Residential Developments elements were to both come forward, particularly given they are both in proximity to a strategic growth location allocated for Feering in the existing (Braintree District) Development Plan. The provision of employment opportunities on one enhances the sustainability of the others for homes; and the existing allocation for homes, community facilities, public open space, retail, sustainable transport enhancements, etc. enhances the sustainability of the Site's Employment Development and Residential Development promoted for the Site.
- 4.46 It is recognised that the suitability of the element of the Site proposed for Residential Development within Colchester City's administrative area is dependent on development of the adjoining land within Braintree District that would connect it to the existing settlement of Kelvedon. The housing numbers to be directed to Kelvedon is of course principally a matter for Braintree District Council and its Local Plan Review. In the event that the element within Braintree District were to come forward / be allocated, the portion of the Site within Colchester would be a suitable, achievable and available to provide further sustainable growth to a settlement already identified in the Development Plan as being suitable for proportionate growth. This underlines the importance, and need for, effective joint working between Braintree District and Colchester City Councils on this Site and its proposed development.
- 4.47 In terms of availability and achievability, the Site is not subject to any legal or ownership barriers to residential or employment development. It is in single ownership, and is being actively promoted by an established promoter on behalf of the landowner.

- 4.48 There are no achievability or availability concerns regarding the Phase 1 Employment Development, and this element could be delivered within the early years of the plan period.
- 4.49 The Phase 1 Employment Development has been designed to work both with the existing Junction 24 arrangements, and those proposed through the A12 Chelmsford to A120 Widening Scheme. Subsequent phases of the Employment Development would likely come forward later in the plan period, alongside delivery of the wider Junction 24 improvements, which form part of the approved A12 Chelmsford to A120 Widening Scheme. The A12 Chelmsford to A120 Widening Scheme still benefits from consent, and the NPPF states at paragraph 111 c) that planning policies should:
- “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development”*
- 4.50 The safeguarding of land for the wider Employment Development proposed would be aspirational but realistic, and could be used to help strengthen arguments for the funding of the new Junction 24, given this would demonstrate how a substantial number of jobs could be directly generated if these infrastructure improvements were to be funded.
- 4.51 In summary, Phase 1 of the Employment Development would deliver significant social, environmental and economic benefits. The Site is suitable, available and achievable for this.
- 4.52 The Residential Development would deliver significant social, environmental and economic benefits. Its deliverability is dependent on the approach to be taken by Braintree District Council in respect of the element of the Site that lies beyond Colchester City Council's administrative boundaries and this requires cross boundary co-ordination between Braintree and Colchester.
- 4.53 The subsequent, later phase, Employment Development has the potential to engender very substantial social, environmental and economic benefits. This includes, but by no means limited to, the potential to act as a catalyst for wider Junction 24 improvements. To maximise these benefits, and to ensure the Employment Development is deliverable, a collaborative approach needs to be taken between the two Local Planning Authorities.
- 4.54 We would welcome discussions with the Colchester City Council and Braintree District Council regarding the Site and its proposed development ahead of the next iteration of the Local Plan.

5. OVERVIEW AND NEXT STEPS

- 5.1 The Site forms part of a wider, coherent cross-boundary opportunity comprising residential development north of the A12 and employment (industrial and logistics) development to the south. Together or separately, these proposals have the potential to deliver substantial economic, social and environmental benefits while supporting long-term infrastructure ambitions along the A12 corridor.
- 5.2 The Site straddles the administrative boundaries of Colchester City and Braintree District, and effective collaboration between the two authorities will be necessary to ensure this option and opportunity is properly considered as part of the plan-making process.
- 5.3 Whilst the statutory Duty to Cooperate is being phased out, national policy continues to place strong emphasis on constructive engagement between neighbouring authorities, particularly where growth opportunities, infrastructure provision and functional economic areas extend beyond local boundaries.
- 5.4 The proposals at the Site represent precisely such an opportunity.
- 5.5 The Site is well located within a shared functional employment and housing market area encompassing Colchester and Braintree, and its development should be assessed holistically rather than constrained by administrative boundaries. Pigeon strongly supports a collaborative approach between both Councils to explore how the Site can contribute to meeting shared growth objectives in the most sustainable manner, and wish to emphasize our willingness to work positively with the Council to seek to maximize the potential benefit of the Site to the administrative areas' communities.
- 5.6 The Site forms part of a wider, coherent cross-boundary opportunity comprising residential development north of the A12 and employment (industrial and logistics) development to the south. Together, these proposals have the potential to deliver substantial economic, social and environmental benefits while supporting long-term infrastructure ambitions along the A12 corridor.
- 5.7 There is compelling national, regional and local evidence demonstrating strong and growing demand for modern industrial and logistics development, particularly in strategically accessible locations such as the A12 corridor. National planning policy is clear that significant weight should be given to supporting economic growth, productivity and logistics provision, recognising the sector's vital role in underpinning wider economic activity.

- 5.8 Local evidence, including the Council's own Employment Study and independent market analysis, identifies Colchester and Braintree as part of a shared logistics market area characterised by low vacancy rates, constrained supply and a shortage of suitable, large-scale, well-connected sites. The evidence highlights a particular shortfall in strategic logistics locations with direct access to the strategic road network, capable of meeting the needs of modern occupiers.
- 5.9 Despite this, the emerging Local Plan does not currently allocate or safeguard sufficient land to meet identified logistics needs, nor does it adequately reflect the specific locational requirements of the sector. The omission of the Site therefore constitutes a missed opportunity to address a recognised economic need in a sustainable and deliverable way.
- 5.10 The preparation of a new Local Plan is however an iterative process, and the Site's omission and the lack of planning to address logistics needs and the cross-boundary opportunity presented by the Site is a matter that can be addressed prior to the preparation of the next iteration.
- 5.11 The proposed Employment Development would help safeguard the required land and 'pump-prime' delivery of important local highways infrastructure, strengthening the long-term case for full implementation of the improvements to Junction 24 of the A12.
- 5.12 The Site is not subject to any overriding environmental, heritage, flood risk or technical constraints that would prevent development. It benefits from excellent strategic connectivity to the A12, good access to Kelvedon and Feering, an existing public rights of way network, nearby bus services and a mainline railway station with direct links to London and key regional centres.
- 5.13 The employment development would generate significant job creation—initially 150–200 jobs in Phase 1, with potential for up to 1,500 jobs across the wider site—supporting local communities and the wider North Essex economy. Its location allows goods movements to be efficiently routed onto the strategic network, reducing pressure on local roads and helping to shorten supply chains.
- 5.14 Landscape-led design, substantial boundary planting, green infrastructure and active travel connections form an integral part of the proposals, ensuring the development responds positively to its setting and delivers environmental enhancements alongside economic growth.
- 5.15 Through positive planning and collaboration between Pigeon, the Councils and other stakeholders, the Site can play a meaningful role in meeting identified employment needs, supporting infrastructure delivery and contributing to sustainable growth across administrative boundaries.
- 5.16 We would welcome dialogue with the Council to refine the proposals, address any outstanding concerns and ensure that future iterations of the Local Plan fully consider the strategic opportunity

presented by this Site. A positive, coordinated approach will help maximise the social, economic and environmental benefits for Colchester, Braintree and the wider region.