

# CONSULTATION

## RESPONSE

### **Colchester Local Plan** Preferred Options

Land south of Old House Road,  
Great Horkesley

**On behalf of**  
The Maurice Trust and Denbury Homes Ltd.

January 2026

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## 1. INTRODUCTION

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- 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 The Maurice Trust (landowner) and Denbury Homes Ltd. (developer), and in respect of land south of Old House Road, Great Horkesley ('the Site')
- 1.2 The Site is under option to Denbury Homes Ltd. for development. Representation have been made throughout the Local Plan process to date, but at present the site remains unallocated and outside of the proposed settlement boundary of Great Horkesley.
- 1.3 Alongside the Local Plan process, Denbury Homes are also engaging with the Council through the pre-application process, with an intention to submit a full planning application later this year.
- 1.4 This representation considers the wider context of housing need in Colchester, and the approach of the current DLP to addressing this. It then considers the Spatial Strategy and the role of Great Horkesley within this, before going on to discuss the Site and the opportunity it presents to support wider Local Plan objectives.
- 1.5 A Site Location Plan is provided at Appendix A.

## 2. HOUSING NEEDS

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- 2.1 The country is in the midst of a housing crisis. The consequences of this are manifold and negative, with wide-ranging social, economic and health impacts across England.
- 2.2 At the national level, the housing crisis manifests through homelessness, overcrowding, unsuitable and poor-quality housing, unaffordability and associated impacts on public expenditure and economic performance.
- 2.3 Most recent national statistics regarding statutory homelessness cover the quarter April to June 2025 and identified that whilst there had been some small improvements in overall figures, there remains an estimated 42,470 households assessed as homeless.
- 2.4 Further national analysis undertaken by charities includes people in temporary accommodation and various forms of hidden homelessness then this figure increases to at least several hundred thousand people homeless in England on any given night. This figure is understood to have increased over the last year, despite the recognised quarterly decrease in statutory homelessness acceptances.
- 2.5 Regardless of the specifics of these figures, they is clearly a significant issue that which reflects trends in high private rents, constrained social housing supply, welfare reforms, and cost-of-living pressures that limit the ability of at-risk households to sustain accommodation. These housing pressures contribute directly to homelessness risk and to the duration and cost of temporary accommodation placements.
- 2.6 On top of this, there continues to be national issues in respect of overcrowding and the quality of existing housing.
- 2.7 A lack of housing in areas of high demand constrains labour mobility, affects the formation and growth of businesses and hampers the ability of employers to recruit and retain staff.
- 2.8 Public services such as the NHS, police and schools have experienced recruitment and retention difficulties linked to high housing costs and limited availability of suitable accommodation.
- 2.9 Evidence indicates that Colchester City Council's administrative area is far from immune to these national pressures, with local market signals indicative of a housing shortage. Colchester City Council's Housing and Homelessness Summary – year end 2024 to 2025 and the Council's Key housing needs statistics suggest these include high house-price-to-income ratios and rising housing need.

- 2.10 Colchester City Council and its housing management partner (Colchester Borough Homes) report significant levels of homelessness and temporary accommodation use. Recent data includes the following.
- In 2024/25, there were 1,563 new homelessness cases assessed in Colchester.
  - During the same year, 693 people required emergency accommodation at some point, illustrating the scale of immediate housing crises locally.
  - As at March 2025, 449 households were living in temporary accommodation in Colchester, up from 326 the previous year, indicating a marked increase in reliance on short-term housing solutions.
- 2.11 These figures suggest that, despite some national reductions in statutory homelessness, Colchester is experiencing substantial and growing demand on its homelessness services.
- 2.12 Colchester's Housing and Homelessness Summary for 2024/25 also 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.
- 2.13 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.
- 2.14 In summary, there is clear evidence that the housing crisis at the national level also impacts Colchester. Indeed, 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.
- 2.15 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.
- 2.16 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 labour mobility; more inclusive, balanced growth across the area.

## Summary

- 2.17 Given all of the above, we consider it essential the strategy for delivering homes includes allocation of a variety of sites, as well as an overall provision that seeks to exceed the absolute minimum requirement and afford flexibility and contingency where it may be required across the Plan period (such as sites not delivering as many homes and/or as quickly as anticipated).
- 2.18 For further context, a Local Plan that proposes the delivery of 21,106 against a total minimum need of 20,800 homes equates to a buffer of just 1.1%, or 306 homes. This therefore provides very little contingency for delayed or non-delivery. This is particularly concerning when significant reliance is placed on strategic growth allocations, and the Tendring Colchester Border Garden Community which are dependent on the delivery of strategic infrastructure which could easily suffer as a result of changes to funding allocations for example.
- 2.19 We also note that the Sustainable Appraisal has not tests higher total housing requirements to formally understand the implications this could have in better meeting affordable housing needs or other infrastructure requirements.

### 3. POLICY ST3: SPATIAL STRATEGY

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- 3.1 This section of this representation concerns Policy ST3 (Spatial Strategy), and its recognition of Great Horkesley as a medium settlement specifically.
- 3.2 The draft Spatial Strategy confirms the Council's intentions to direct growth in Colchester to the most sustainable and locations in the urban area or close to, and then beyond this allocated an appropriate level of growth to large, medium and some small settlements based on the opportunities and constraints of each settlement. The Council recognise the ability of such an approach to ensure the long-term viability of services and facilities in these locations which may otherwise be lost.
- 3.3 Within the associated settlement hierarchy, Great Horkesley is defined as a medium settlement. This is in recognition of the proximity of the village to the Colchester urban edge, proximity to the A12 and the range of services and facilities in the village.
- 3.4 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".*
- 3.5 Whilst we support this approach in principle, and the allocation of additional housing to Great Horkesley accordingly, we consider that the village has the capacity to accommodate increased housing growth, particularly where there are sites available which could deliver such growth in accessible locations with little to no wider harm that could not be mitigated through the proposed development, such as the site the subject of this representation.
- 3.6 In terms of the policy specifically, we propose further recognition within it 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, a settlement such as Great Horkesley, which is in very close proximity and easily accessible from accordingly, the main Colchester urban area should be considered more sustainable than other settlements of a similar size but significantly further away from the urban area.

## 4. THE SITE AND PROPOSED DEVELOPMENT

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- 4.1 The site is circa 6.45ha and located to the north of Great Horkesley and to the west of the A134 and south of Old House Road. It is also located to the west of residential development at The Crescent.
- 4.2 There are footpaths on both sides of the A134 which provides pedestrian and cycle connections to facilities and services to the south including village hall, public house, retail units, pre-school and primary school.
- 4.3 There are bus stops in close proximity to the site providing services into Colchester City Centre and to Sudbury.
- 4.4 Colchester railway station is approximately a 10 minute drive from the site which provides frequent services into London Liverpool Street, Ipswich, Norwich and Clacton-on-Sea. The site is thus extremely well connected and provides opportunities for active travel.
- 4.5 To the south of the site is Aldercar Wood which is subject of a Tree Preservation Order (TPO), there are however no TPO trees on the site. The site is not within a conservation area but there is a Grade II listed building, Rookery House, located to the north east.
- 4.6 The site is located between the north and south settlement boundaries of Great Horkesley. The site is also located in EA Flood Zone 1.
- 4.7 Whilst the site does not meet the existing settlement boundary of Great Horkesley, as shown on the draft Local Plan excerpt below, we do consider that the current boundary (Figure 1) is not reflective of the true settlement shape and extent of development. There is little justification for splitting the settlement when there is continuous development between the two.
- 4.8 It can be seen that the formal boundary is split in two, when in fact there is consistent development between the two and thus the joining of these two boundaries would include around 85 existign residential properties. It would also in turn then present a number of opportunities for modest extensions to the settlement without encroachment towards other settlements or on land which would otherwise have a much greater impact on the wider landscape and surrounding rural character.

4.9 We therefore propose that the settlement boundary for Great Horkesley is amended to include the full extent of the existing built area, as well as the site the subject of this representation, as indicated in Figure 2.

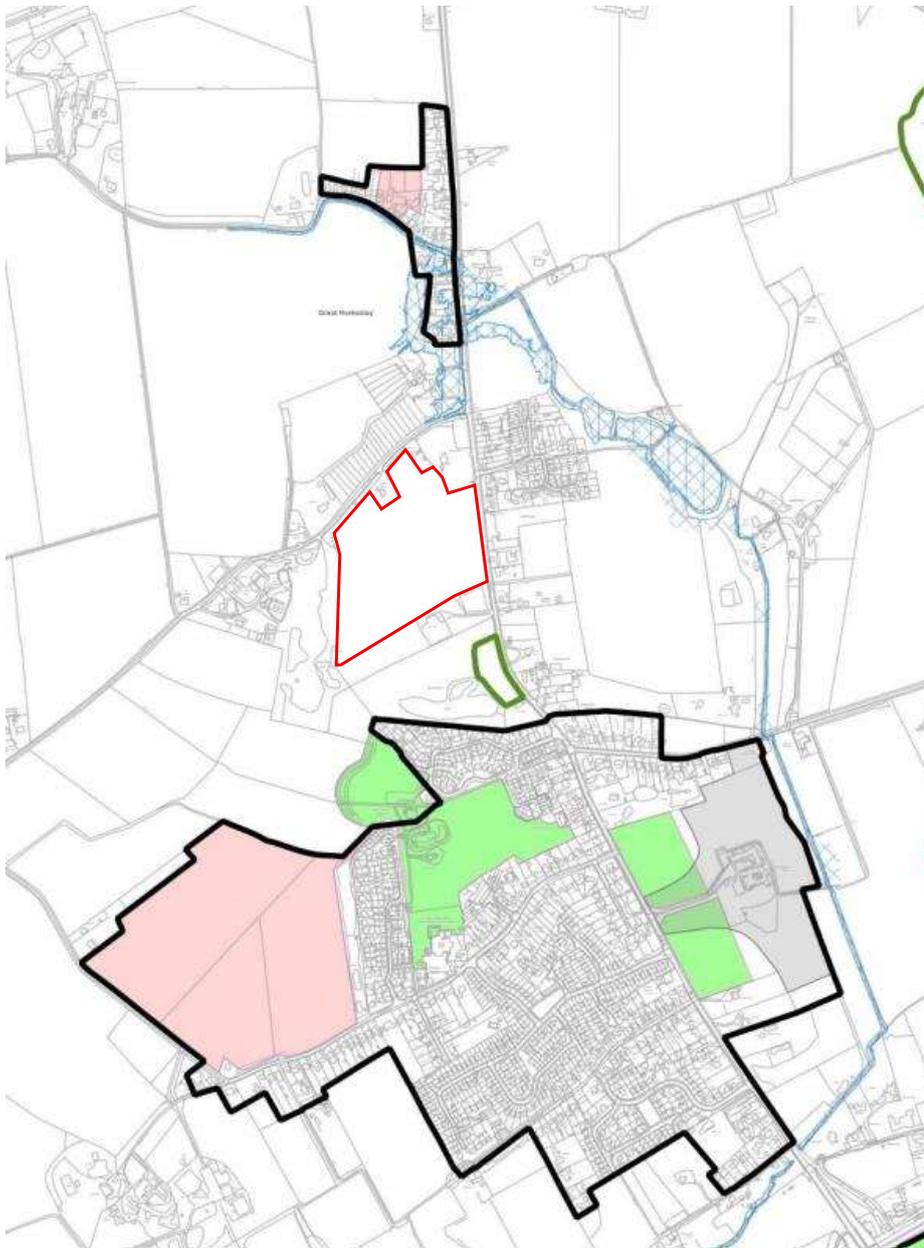
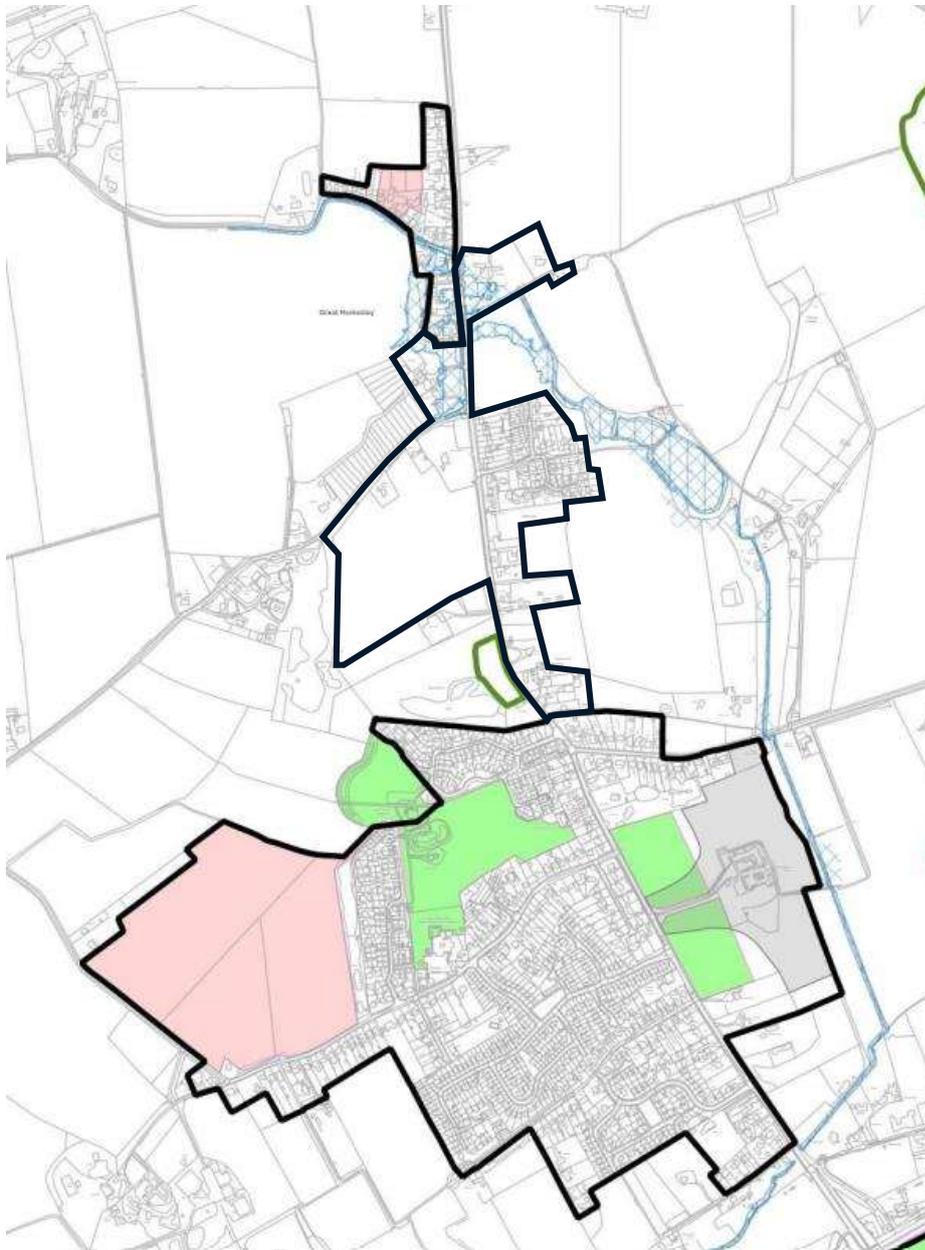


Figure 1: Great Horkesley Settlement Boundary as per Reg 18 Local Plan



*Figure 2: Proposed Great Horkesley Settlement Boundary*

## Proposals

4.10 Early assessment of site constraints and opportunities has identified the ability for the site to be able to deliver:

- 110 new homes
  - 74 market homes
  - 33 affordable homes (30%)
  - 3 self-build plots
- New substantial areas of open space and green network throughout site
- Defined buffer to existing Grade II Listed Rookery House
- Minimum 10% biodiversity net gain
- New links from the site to the existing green infrastructure network via The Crescent and Footpath 34
- Green buffer round entire site

4.11 An indicative masterplan and associated layout for the site are provided at Appendix B and C respectively. This demonstrates the ability of the site to provide the above benefits.

4.12 The Council's own DLP evidence base (Strategic Land Availability Assessment (SLAA)) confirmed that there are no significant constraints to the development of the site, and advised that the site was excluded from allocation purely based on its proximity to the village's facilities when compared with other sites.

4.13 Taking into account previous commentary within this representation regarding the need for the Council to plan for more than just the minimum number of new homes, then it is proposed that this is considered further based on its standalone credentials and opportunities as opposed to simply considering against other sites in the context of a set housing need.

## Overview

4.14 The Site is not subject to any significant constraints that would render it unsuitable for residential development.

4.15 The Site would represent a logical, proportionate addition to Great Horkesley in a contained location which follows the existing pattern of development.

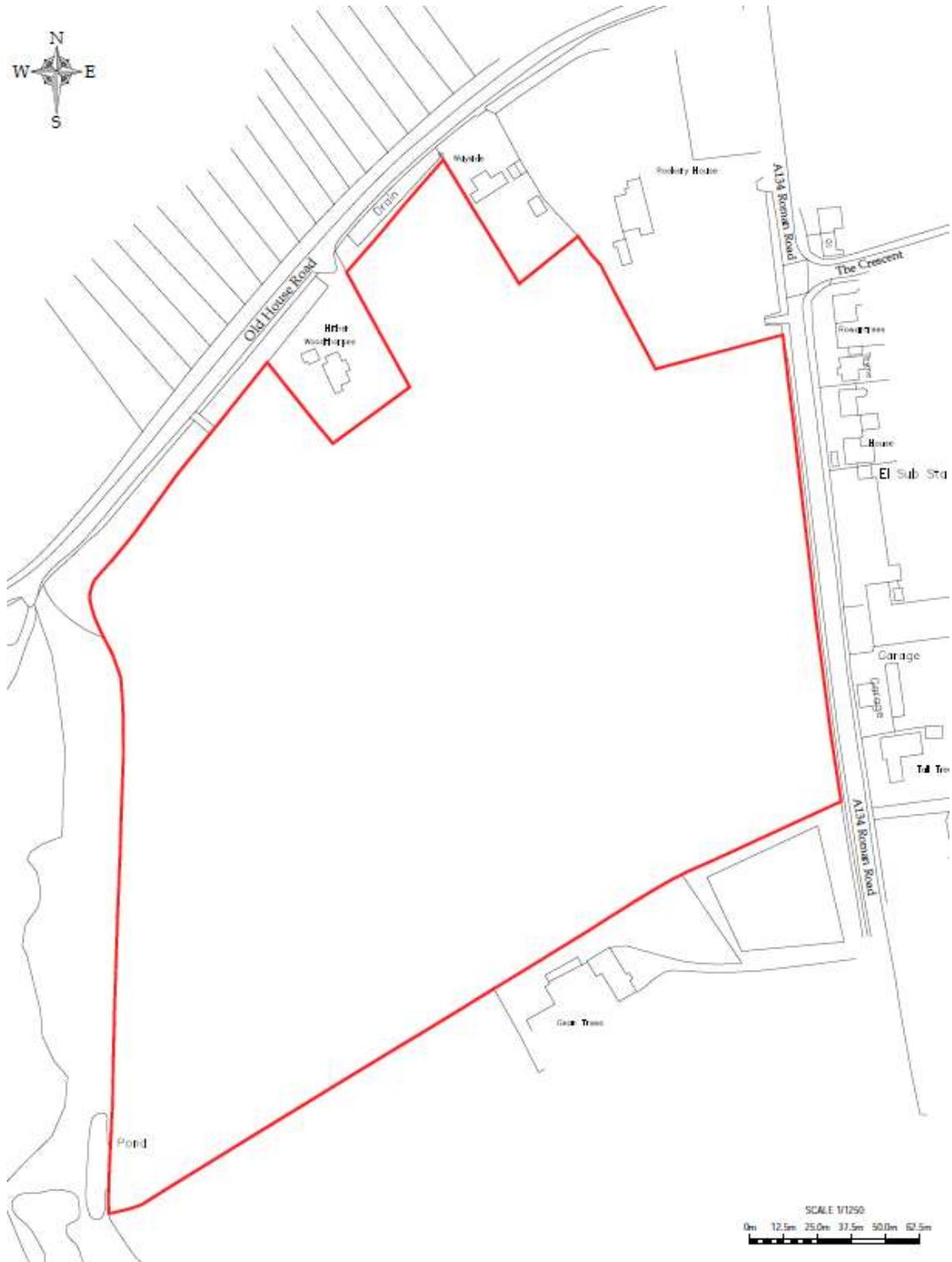
4.16 When considering additional sites, the site the subject of this representation should be considered in high regard and proposed for allocation accordingly.

## 5. OTHER DEVELOPMENT MANAGEMENT POLICIES

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- 5.1 We do not support the requirement set out in Policy LC1 which requires for all applications for major development sites to be accompanied by a Landscape Visual Impact Appraisal (LVIA). A full LVIA is extensive and it is not uncommon for a Landscape Visual Appraisal or other appropriate assessment of landscape impact to be more proportionate whilst still allowing for a suitable assessment of landscape impact.
- 5.2 We therefore propose that the wording of this policy is relaxed to include flexibility on the specific type of assessment that is required.
- 5.3 Proposed Policy GN5 requires that the Natural England standard of 8 hectares per 1000 head of population be applied where it is necessary to provide alternative greenspace as the result of a Habitat Regulations Assessment. It is proposed that the policy wording is reviewed to allow flexibility in the application of this ratio, as opposed to an arbitrary calculation. It is our view that the provision of SANGs should consider the quality of the provision, overall site location and other variables in determining an appropriate provision for any site.
- 5.4 Furthermore, sites in Colchester do of course make RAMs contributions to seek to manage recreational disturbance pressures, so again, this is a factor that should be taken into account alongside the Natural England ratio which may not consider local factors such as this.
- 5.5 In respect of proposed Policy NZ1, we consider the Council's dismissed alternative suggestion to be more appropriate. Building Regulations set out a number of requirements in relation to the sustainability of new buildings and by nature of them comprising national requirements, they are evidently deemed appropriate. It is therefore unreasonable for the Council to propose requirements beyond these without appropriate justification or flexibility.
- 5.6 The first point (a) of Policy PC7 is also unnecessarily prescriptive in requiring that the primary public open space for any new major residential development on greenfield sites should be located centrally within the site. We are mindful that new public open spaces can be important areas for existing residents as well as new, and can serve important roles in encouraging integration. In some instances, a new area of public open space will be a key public benefit for a development so it is important that there is flexibility to ensure that this can be located in the most appropriate location for each specific site.

## Appendix A



## Appendix B



