



# CONSULTATION

## RESPONSE

### **Colchester Local Plan**

## Regulation 18

Land North of Bromley Lane, North  
East Colchester

**On behalf of** Gleeson Land

January 2026

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## 1. INTRODUCTION

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- 1.1 This letter comprises a representation to the Colchester Local Plan Review Regulation 18 consultation. It has been prepared by Ceres Property on behalf of Gleeson Land – the promoters of land north of Bromley Lane, North East Colchester.
- 1.2 The land the subject of this representation is outlined in red on the accompanying plan (Ref: 410\_067310) (Appendix A). It comprises 46.62 ha (of which 41.74 ha falls within Colchester City Council) situated within a wider area of land proposed for allocation in the Regulation 18 Preferred Options Local Plan under Policy PP9. This representation relates to the land under Gleeson Land's control only, but has been informed by work being undertaken regarding the wider land allocation alongside.
- 1.3 Gleeson are working alongside Gladman, who are the other party with a major land interest in the allocation, to prepare a cohesive masterplan for the site as a whole. This would support the progress of individual planning applications without risk to the overall objectives of the allocation as a whole. The latest version of the respective Masterplan Framework (Appendix B) is appended to this representation.
- 1.4 You will note they support and have directly informed the proposals for the land the subject of this representation.
- 1.5 Despite the above, the 46.62 ha being promoted by Gleeson Land remains deliverable in its own right, as detailed later in this representation.
- 1.6 In preparing these representations, regard has been had for Chapter 3 of the National Planning Policy Framework (NPPF) which relates to 'plan-making'.
- 1.7 Paragraph 15 of the NPPF promotes a plan-led system, and that succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental policies; and a platform for local people to shape their surroundings.
- 1.8 Paragraph 16 states that Plans should:
  - a) be prepared with the objective of contributing to the achievement of sustainable development;

- b) be prepared positively, in a way that is aspirational but deliverable;
  - c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
  - d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
  - e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
  - f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).
- 1.9 As set out at paragraph 36, local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are 'sound'. The test for soundness as set out within the NPPF requires that Plans are:
- a) Positively prepared
  - b) Justified
  - c) Effective
  - d) Consistent with national policy
- 1.10 By way of background to the Council's preparation of the emerging Local Plan, it is acknowledged that the Council's current five year land supply is increasingly marginal.
- 1.11 In February 2026 the existing Adopted Section 1 Local Plan becomes 5 years old, and the housing requirement within it will accordingly be out of date for the purposes of calculation of five year housing land supply as set by NPPF paragraph 232.
- 1.12 The housing land supply annual requirement will therefore become approximately 1,300 homes per annum in line with the standard method, as opposed to 920 homes per annum within the existing adopted Local Plan. Over a five year period this will add 1,900 homes to the required supply plus the required buffer.
- 1.13 The Council acknowledge this requirement at paragraph 3.36 of the Regulation 18 Consultation document, confirming that the requirement for 20,800 new homes over the plan period is a mandatory target which must be planned for. Taking into account the homes to be delivered

through the Tendring Colchester Borders Garden Community and windfall sites, the Council assert at paragraph 3.40 the need to plan for a minimum of 11,089 in order to meet the housing needs of Colchester (emphasis added).

## 2. THE SITE

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- 2.1 The Site currently comprises cultivated agricultural land, split into four distinct parcels divided by hedgerows/field boundaries. There are existing minor power lines crossing the site approximately north to south, and east to west. These are shown on the accompanying Opportunities and Constraints Plan. There is also a gas main running north to the south through the site.
- 2.2 The eastern boundary of the site is defined by Salary Brook, with some small areas at risk of flooding in association with this. Salary Brook also demarcates the authoritative boundary between Colchester City and Tendring District. To the north, the site meets further agricultural land. To the west/northwest the site meets existing residential development accessed from Welshwood Park Road and Woodlands, and additional land proposed for allocation towards the A137. An area of ancient woodland (Welsh Wood) insets the site in the eastern corner and then the southern extent of the site meets Bromley Road and Salary Close.
- 2.3 There are no listed buildings within direct proximity of the Site. The closest are Grade II Listed Hill Farmhouse and surrounding buildings which are south of Bromley Road and separated from the site by existing Salary Brook, existing vegetation and existing development along Bromley Road.
- 2.4 Due to its consistent use as an agricultural field, the ecological baseline of the Site is low. Despite this, the ecological value of the vegetated field and site boundaries should not be understated, and will therefore be duly considered for protection and enhancement as part of any future development proposals.
- 2.5 The Site is predominantly located within EA Flood Zone 1 (land at least risk of tidal and fluvial flooding), though some land area along the southeastern border are within Flood Zone 3, as well as being at risk of surface water flooding too.
- 2.6 More generally, the suitability of the site as a location for growth, and specifically for that of a significant scale, has already been recognised by the Council through its proposed allocation under Policy PP9.
- 2.7 The land adjoins the urban area of Colchester City and bus stops along Bromley Road provide regular bus services to the Hythe where there is a railway station, supermarkets and other retail and employment opportunities, Colchester town centre (including stops close to North Station), and through to Stanway too where there are a number of additional retail and leisure facilities. More

local facilities are just a short walk (approx. 400m) from the site along Bromley Road, including a local conveniences store, a nursery, Hazlemere Infant and Junior schools and Colchester Academy.

- 2.8 The site's constraints and opportunities have been mapped on the accompanying plan prepared by FPCR. Existing utilities routes are easily managed through rerouting and grounding, and the overall extent of the site affords ample land for the protection of a buffer for the adjacent ancient woodland to the west, as well as the avoidance of development in areas at risk of flooding which in turn provides an opportunity for the extension and enhancement of the Strategic Biodiversity Area alongside the adjacent watercourse along the southern boundary. Existing public rights of way through and around the site are also considered as opportunities for enhanced site access and connectivity. There are therefore no significant physical constraints to the sites development.
- 2.9 Some specific site constraints and opportunities have been considered in more detail below.

#### **Access and Public Rights of Way**

- 2.10 Engagement with Essex Highways has confirmed a scope and design for an access which would be suitable for the proposed development. The site would require a single access only, and is proposed to be taken from Bromley Road. Onward connectivity into surrounding areas and the rest of the proposed allocation will be in the form of pedestrian and cycle connections only.
- 2.11 Public Footpath 113 dissects the Site but is well-positioned to be retained and incorporated into future proposals to retain and enhance onward connectivity from the site to surrounding development and countryside to the northwest and southeast. The proposals will also provide opportunities for connection into Footpath 114 which runs along the northeastern boundary.

#### **Arboriculture**

- 2.12 There are no Tree Protection Orders on the site itself, but Welsh Wood Ancient Woodland meets the site in the southwestern corner. There is a requirement for an overall buffer for this woodland, as well as for the closest individual veteran trees within it. These have been set at fixed constraints from the outset. A Preliminary Arboricultural Appraisal identified a number of other high quality trees along the existing field boundaries, and along Bromley Road. These have been highlighted on the accompanying Constraints and Opportunities Plan and tree retention in these areas will be a priority.

#### **Ecology**

- 2.13 A preliminary ecological appraisal has also been undertaken for the site. The appraisal highlights that the Site is of the nature that would allow for a number of animal species to be supported.

Though further survey work would therefore be required as part of any future application, the early proposals have been designed to consider the existing value of the site, as well as the opportunities for maximising Biodiversity Net Gain and habitat opportunities alongside future development. The siting of the site along Salary Brook presents a unique opportunity in this respect.

### **Flood Risk**

- 2.14 Areas of flood risk are limited to the boundary of the site along Salary Brook. An area of surface water flooding also runs along the internal field boundary and associated ditch. These areas have been excluded from proposed development areas and will instead be used for open space, drainage mitigation and ecological enhancement areas.
- 2.15 The Council has of course undertaken a Sequential Test for all proposed allocations and this forms part of the Local Plan Evidence Base. This assessment confirms that only very small proportions of the allocation are in areas of risk, and acknowledges that the requirement for an initial masterplan will ensure that development is kept outside of these areas of risk. It is on this basis that the site “passes” the Council’s test.

### 3. **POLICY ST3: Spatial Strategy**

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- 3.1 Gleeson Land support the Council's spatial strategy, which seeks to direct growth to the most sustainable and accessible locations in the urban area. Prioritising these locations, whilst of course supplemented by smaller allocations across lower order settlements, is inevitably a sustainable strategy in that it ensures development will be delivered in the most accessible locations, and where there is already an established principle of development in the immediately surrounding area.
- 3.2 Land at Bromley Road, as allocated through Policy PP9, supports this strategy given its location on the edge of the existing Colchester Urban Area, and in a highly accessible location.

## 4. POLICY PP9: North-East Colchester

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- 4.1 Policy PP9 sets out a number of objectives for the wider site allocation, and thus it is important that any development of the smaller parcel the subject of this representation supports these objectives.
- 4.2 The policy recognises the importance of an overarching masterplan in ensuring that any phased development contributes to the overall objectives, and ensures that all are fully achieved across the allocation as a whole. Gleeson Land are working closely with other developers to prepare a masterplan, with the latest draft supporting this representation, with the expectation of formally submitting this to the Council for approval prior to the submission of any future planning applications. In the meantime however, in support of the promotion of this smaller parcel, each of the allocation objectives are considered in turn below.

*'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) *A predominantly residential development including community infrastructure, strategic open space and approximately 2,000 new dwellings of a mix and type of housing to meet evidenced needs which is compatible with surrounding development;'*

The latest Development Framework considers that this part of the site could deliver around 750 homes across two main phases, based on a density of 35 dwellings per hectare and taking into account land reserved for landscaping, drainage and open space. When considered as part of the wider allocation, this is proportionate and supports the overall delivery intentions of the policy.

- 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;'*

This representation is accompanied by an Access Appraisal and Transport Assessment Scoping Note which has been reviewed with Essex Highways through early pre-application discussions. We also provide a Pre-Application Response Note which follows up on the initial advice received. Most importantly, the engagement process has confirmed that a suitable single access can be achieved from Bromley Road for around 750 new homes. The proposed access has been the subject of a Road Safety Audit too to provide further reassurance. Access opportunities for other parts of the allocation will be considered at

the relevant time, but would be most appropriately accessed from Harwich Road and St John's Road, and thus independently of this part.

c) *'Provision of active and sustainable travel and passenger transport;'*

Proposals for active and sustainable travel will be developed through more detailed proposals and a full Transport Assessment, but pre-application discussions have identified an opportunity for a new Toucan crossing on Bromley Road to enhance pedestrian safety around this particular access point. Furthermore, the existing public rights of way are being considered as key opportunities within the Masterplan Framework of both this site and the wider allocation site, to ensure connectivity within the allocation as well as with surrounding land. The site is well-placed to access existing bus services.

d) *'Provision of a new local centre to serve the new and existing local community, this may include provision of retail, commercial and community facilities at an appropriate scale, relevant to the role and function of a local centre and the communities it is intended to serve.'*

At present, wider masterplan work has identified that the most suitable location for a local centre would be in the northwestern part of the allocation and the proposals for this more southerly part of the site would not hinder the delivery of this. Enhancements to existing public rights of way that cross the A12 would also ensure pedestrian and cycle connectivity to this centre from all parts of the allocation area.

e) *'Enhanced Open Space' as shown on the Policies Map substantively in excess of 10% of the allocation area must be provided as open space. This should include at least one area of strategic open space and multiple areas of less formal and more incidental open space.'*

At present, wider masterplan work has identified for a strategic open space would be most suitable in the northern part of the allocation. Nevertheless, the site the subject of this representation demonstrates appropriate space to provide open space to immediately serve homes in this part of the allocation, and contribute to the wider green network planned throughout area as a whole.

f) *'As a strategic site, there is potential for a range of habitat creation measures which should be maximised with regard to the Salary Brook strategic biodiversity area as defined on the policies map. Onsite BNG measures should focus on woodland creation to expand and buffer the SSSI, enhanced connectivity through creation of a green corridor between designated sites, buffers to Welsh Wood and Wall's Wood LoWS, gain in watercourse units, and delivery of a range of habitat creation measures including acid grassland;'*

Detailed landscape proposals would be developed in due course, but the early Masterplan Framework ensures that a buffer is provided to Welsh Wood, and also to Salary Brook where it is proposed that this buffer could then in turn provide an opportunity for enhanced biodiversity and open space. Other early landscaping proposals include the retention and enhancement of existing landscape features along the field boundaries.

- g) *'Biodiversity mitigation measures must include a buffer to Bullock Wood SSSI, the size of the buffer must be informed by a survey. The watercourse within the site must be protected and buffered. Opportunities should be taken to secure improved management to the SSSI to include protection from recreational disturbance, and connections between the SSSI and Welsh Wood and Wall's Wood LoWS;'*

The site the subject of this representation does not meet Bullocks Wood. It does however neighbour Welsh Wood and an appropriate buffer will therefore be designed into proposals to ensure its protection.

- h) *'Protection of water quality within Salary Brook water course and the conservation and enhancement of its biodiversity value;'*

An extensive buffer to the Salary Brook is proposed, and will provide generous space for its conservation and enhancement. The site drainage strategy will be carefully designed to manage the amount and quality of any surface water which may enter the existing watercourses.

- i) *'Adequate protection of the Ancient Woodland and retention of mature trees and hedgerows within the site;'*

Preliminary arboricultural assessments undertaken by Gleeson highlighted the key constraints in relation to the land under their control. This includes Welsh Wood Ancient Woodland and other trees and hedgerows of value within and around the site. These, with their associated buffers, have been set as fixed constraints to inform early site layout and land use proposals.

- j) *'Tree screening, muted colours and non-reflective at the edge of the site to help provide mitigation and integration within the landscape;'*

Extensive areas of open space are proposed on key site boundaries and will provide flexible spaces for planting and sensitive integration into the landscape.

- k) *'An active travel plan to be agreed with the Council which ensures site wide active travel connectivity including links beyond the site;'*

Gleeson will be happy to work with other landowners and the Council to agree this. To date, key connectivity opportunities have been factored into early site design work.

- l) *‘Connectivity with existing Public Rights of Way including connection and enhancement to the Colchester Orbital and connections between the areas of woodland within and adjacent to the site;’*

Existing public rights of way within and around the site will be retained, and there may be opportunities for enhancement also. Furthermore, the site will be designed to encourage connectivity into these existing routes, and allow for permeability across the site and wider allocation as a whole.

- m) *‘Development must conserve, and where appropriate, enhance the significance of heritage assets (including any contribution made by their settings). Designated heritage assets close to the allocated site includes four Grade II Listed Buildings as per the stage 1 HIA;’*

Given the location of the designated heritage assets closest to this part of the site, it is expected that the proposals will be able to be designed in a manner which ensures that any harm to their wider settings is minimised and/or negated.

- n) *‘Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters. A Minerals Resource Assessment as part of any planning application. Should the viability of extraction be proven, the mineral shall be worked in accordance with the scheme/masterplan as part of the phased delivery of non-mineral development;’*

Gleeson will undertake this engagement as part of any future planning application.

- o) *‘Development must discharge attenuated surface water to a receiving waterbody and not to the combined sewer network, unless it can be demonstrated that there is no other option;’*

Any future drainage strategy will consider this further.

- p) *‘Demonstrate adequate capacity for managing wastewater including proposed phasing requirements or alternative solutions to the satisfaction of the Council and Anglian Water;’*

This will be dealt with as part of any future planning application.

- q) *‘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:*

- *Removal of unrequired network flows;*
- *Targeted education to include new residents of the development;*

- *Reduction in the demand for potable water.'*

This will be considered through the development of a detailed drainage strategy for the site, and through design measures to minimise water consumption.

- r) *'Any site specific infrastructure requirements from the IDP (to include education provision (2.1ha site for Primary school and Early Years), highway mitigation, water and wastewater and specific community / open space provision);'*

Gleeson are working with other parties with an interest across the allocation to ensure that land and space is reserved for such uses in the most suitable locations.

- s) *'Before granting planning consent, wintering bird surveys will be undertaken at the appropriate time of year to identify any offsite functional habitat. In the unlikely event that significant numbers are identified, development must firstly avoid impacts. Where this is not possible, development must be phased to deliver habitat creation and management either on or off-site to mitigate any significant impacts. Any such habitat must be provided and fully functional before any development takes place which would affect significant numbers of SPA birds.'*

These surveys will be factored in the programme of species surveys that will be required prior to the determination of an application, as directed by Preliminary Ecological Appraisal work.

- t) *'Proposals for the allocated site will only be supported where they accord with a comprehensive masterplan in relation to the entire allocation, that has been agreed with the Council prior to submission of any planning application. The masterplan must be of sufficient detail to ensure optimal placemaking and housing delivery outcomes for the allocation and should be informed by an appropriate evidence base. The masterplan should be developed in collaboration with the Council, and relevant infrastructure providers, it should incorporate engagement with the local community and be informed by use of design review. Where appropriate and necessary, the masterplan shall be supported by parameter plans, design codes and/or guidance.'*

Gleeson are working with other parties in the preparation of a masterplan for the entire allocation area to meet this objective. The latest version of this document supports this representation and demonstrates the ability of the Site to complement the wider intentions of the allocation.

- 4.3 More generally, and whilst not a formal point of objection at this stage, we do consider it to be worth noting that there are a number of requirements within this policy which would ordinarily be addressed through standard development management policies set out elsewhere in the plan, and other national legislation. There may therefore be an opportunity to simplify the policy in areas.

## 5. **POLICY GN5: Suitable Alternative Natural Greenspace**

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- 5.1 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.
- 5.2 For site specific allocations, such as PP9, a provision of this nature, when taken with other land requirements set out through the policy, could have significant implications on viability.
- 5.3 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.

## 6. SUSTAINABILITY APPRAISAL

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- 6.1 As part of this Regulation 18 Consultation, a Sustainability Appraisal Report has also been provided for review and comment. This latest report considers the site-specific policy text following earlier “policy-off” appraisals. This ensures that mitigation sought through the proposed policy wording is therefore now reflected in the assessment.
- 6.2 The majority of assessments remain the same, apart from Economic Growth which improves to a minor positive, from a minor negative. Biodiversity and geodiversity also improves to a minor negative from a significant negative. We support this further consideration of these site constraints.
- 6.3 Whilst the assessment remains unchanged, we continue to have concerns over the recording of a significant negative effect for the site in relation to SA objective 2 – Efficient use of land. This is based on the loss of greenfield land and Grade 2 and Grade 3 agricultural soils. The majority of agricultural land around Colchester is in fact Grade 2 or 3 and thus not considered a scarce resource. Additionally, some areas are Grade 1 and therefore it would be expected that development in these locations would be seen to have the most significant negative impact but there is no greater
- 6.4 Given that this would apply to the majority of allocations for the City, it is considered disproportionate to consider this as a significant negative effect and a categorisation as a minor negative effect would better reflect this constraint.

## 7. SUMMARY

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- 7.1 Overall, Gleeson Land strongly support the proposed allocation of land north of Bromley Road. Whilst they do not control all land within the allocation, they are working closely with other landowners to ensure all of the objectives set out in Policy PP9 can be achieved.
- 7.2 More specifically, this representation has set out the extent to which their land can meet the objectives independently, and not hinder the delivery of the remainder of the allocation, emphasising the opportunity for new homes to be delivered over short timescales.

## Appendix A – Site Location Plan

## Appendix B – Masterplan Framework