

Representations to the Colchester Preferred Options Local Plan

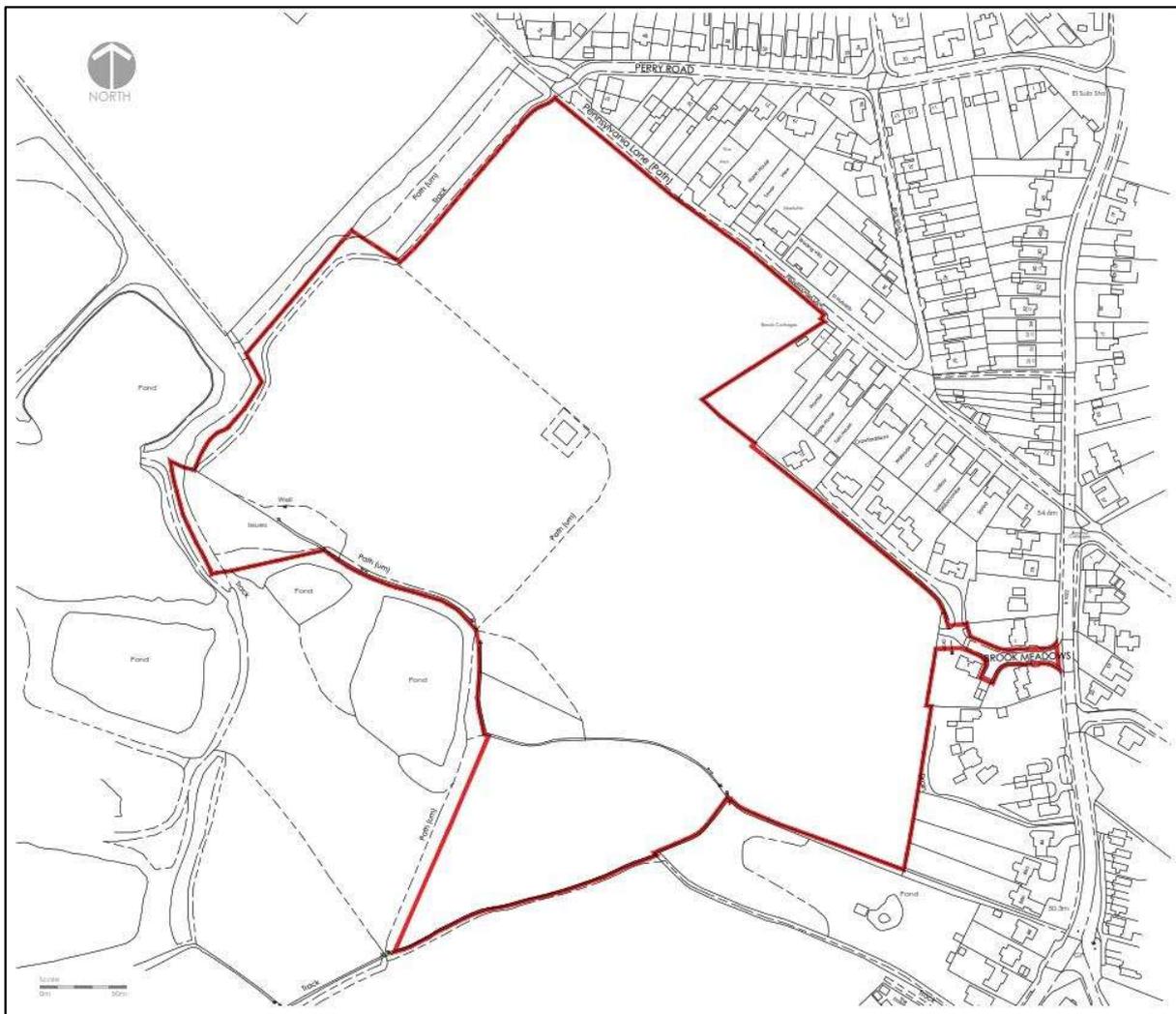


Land at Brook Meadows, Tiptree, Colchester

Introduction

1. This submission has been prepared by Cerda Planning Limited on behalf of our client in response to Colchester City Council's consultation on the Colchester Preferred Options Local Plan (Regulation 18) (November 2025) ("the Preferred Options Plan").
2. The land known as Land at Brook Meadows, Tiptree (the "Site") has been promoted through the Council's site assessment process, including the Strategic Land Availability Assessment, and through previous engagement on the emerging Local Plan. The Site is identified within the Council's assessed site pool as SLAA ID 10132.
3. The Council is currently progressing the Site as a Biodiversity Net Gain ("BNG") allocation, and we support the principle of Brook Meadows performing a strategic biodiversity and green infrastructure role. The Council's supporting evidence explicitly identifies Brook Meadows, Tiptree as a preferred off-site BNG location within the Plan's approach to BNG delivery.
4. However, the Site should not be treated as a single-purpose allocation by default. For plan-making purposes, the Preferred Options Plan should also test, transparently, whether the Site should be allocated for landscape-led residential development, either in whole or in part, including a hybrid approach where a residential component is brought forward alongside a strategically significant BNG and green infrastructure function. This is advanced on an "in principle" basis and is not intended to commit to a fixed quantum, detailed design or delivery programme at this stage.
5. We welcome the opportunity to comment on the emerging Local Plan. Our representations relate specifically to Land at Brook Meadows, Tiptree, and are provided to assist the Council in refining the Preferred Options approach for this location. For clarity, references to "the Site" in these representations refer to Land at Brook Meadows, Tiptree.

6. A proportionate suite of technical work has been undertaken historically and has been supplemented more recently to inform the Site's promotion and to provide context on baseline conditions and potential mitigation pathways. While time has passed and any future scheme would be supported by updated evidence as appropriate, the available material indicates that relevant matters such as access and movement, landscape and green infrastructure structuring, ecology and biodiversity enhancement, drainage and flood risk, amenity and heritage considerations can be addressed through a comprehensive, landscape-led approach and appropriate mitigation.
7. A site location plan is included below for ease of reference.



8. This submission responds to those elements of the Preferred Options Plan most relevant to the Site and its potential role within the emerging spatial strategy. It is submitted constructively, with the aim of assisting Colchester City Council in refining and shaping the strategy and policies of the Plan so that it is positively prepared, justified, effective and consistent with national policy. In particular, these representations address:

- the approach to site selection and the transparent testing of reasonable alternatives for the Site, including BNG-only, residential and hybrid options;
- the overall housing requirement, delivery assumptions and the need for a resilient supply position across the plan period, including a realistic contingency margin;
- the spatial strategy and the application of countryside policies to edge-of-settlement opportunities at Tiptree; and
- the environmental and green network policy framework and how it should be translated into criteria-based allocation requirements that secure delivery and long-term management.

Plan Making Context

9. The Development Plan sits at the heart of the planning system. There is a statutory requirement that planning decisions must be taken in accordance with the Development Plan unless material considerations indicate otherwise. Local Plans therefore provide the framework for future growth and development, including the scale and distribution of housing and employment, the delivery of infrastructure and community facilities, and the protection and enhancement of the natural and historic environment.
10. The National Planning Policy Framework (“the Framework”) confirms this plan-led approach. Paragraph 15 states that plans should be succinct and up to date, providing a positive vision for the future and a clear framework for addressing housing needs alongside other economic, social and environmental priorities. Local plans are examined to assess legal compliance and soundness, and are considered sound when they are positively prepared, justified, effective and consistent with national policy (NPPF paragraph 36).
11. In housing terms, the Framework places significant importance on delivering a sufficient supply of homes and ensuring that a sufficient amount and variety of land can come forward where it is needed. Paragraph 61 emphasises that, to support the objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The Framework also explains that strategic policy-making authorities should have a clear understanding of land availability through a strategic housing land availability assessment, and from this identify a sufficient supply and mix of sites taking account of availability, suitability and likely economic viability (NPPF paragraph 72).

12. The Framework recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development. Paragraph 77 states that such schemes should be well located, well designed and supported by the necessary infrastructure and facilities, including a genuine choice of transport modes. It also highlights that larger sites should demonstrate planned investment in infrastructure and scope for environmental gains, including biodiversity net gain; support access to services and employment opportunities; secure high quality placemaking; and deliver at a realistic rate having regard to lead-in times (NPPF paragraph 77).
13. A fundamental principle of the Framework is therefore the delivery of sustainable development through a plan-led system, achieved by identifying and allocating sufficient suitable sites to meet identified needs and by maintaining an up-to-date Local Plan that is deliverable in practice (NPPF paragraphs 15, 36, 61, 72 and 77).

National Planning Reform and Local Evidence Base

14. Recent and emerging national planning reforms reinforce the importance of an up-to-date, plan-led system capable of delivering a significant increase in housing delivery. The Government has reiterated its ambition to deliver 1.5 million new homes in England over the course of this Parliament and has positioned planning reform as a central mechanism for achieving that objective. In that context, the direction of travel is clearly toward clearer housing requirements, a faster and more standardised plan-making process, and a stronger emphasis on implementation and delivery so that plan allocations translate into completed homes at pace.
15. Alongside reforms to national policy, the Government has introduced a package of measures intended to unlock and accelerate delivery. This includes the New Homes Accelerator, first announced in July 2024, which is specifically framed as a mechanism to speed up delivery of large-scale housing developments and support the wider 1.5 million homes ambition. It also includes a programme of consultations and technical proposals aimed at improving the efficiency, transparency and governance of the planning system. By way of example, the Government consulted in 2025 on reform of planning committees, including proposals relating to delegation, committee size and composition, and mandatory member training, all directed at streamlining decision-making and improving consistency.
16. The Government has also brought forward the Planning and Infrastructure Act 2025, supported by a wider policy narrative that seeks to speed up and streamline the delivery

of new homes and critical infrastructure, including by addressing barriers that slow housing delivery and infrastructure consenting. The importance of this agenda for plan-making is that it reinforces the expectation that Local Plans should be deliverable and infrastructure-aware. It also underlines the need for allocations to be supported by credible infrastructure planning and realistic delivery assumptions, rather than relying on aspirational trajectories that cannot be implemented in practice.

17. A further central component of the reforms is the move to a faster plan-making process. Government proposals for the reformed system set out the expectation that local planning authorities should prepare a single local plan and adopt it within an accelerated timetable, with the objective of reducing the time lag between evidence, strategy selection and adopted policy. In parallel, reforms flowing from the Levelling-up and Regeneration Act 2023 include the intention to move away from the existing Duty to Cooperate model within the reformed plan-making system. The clear direction is toward a more outcome-focused approach to strategic alignment that seeks to reduce delay while still requiring effective engagement on cross-boundary matters in practice.
18. National planning reform has also been accompanied by a renewed emphasis on strategic new settlement delivery. In September 2025, the Government published the New Towns Taskforce report alongside an initial Government response, signalling a continued focus on delivery at scale through a range of new town typologies. While that specific growth agenda is not determinative for Colchester, it is indicative of the Government's approach: planning and economic growth are central, strategic locations are being advanced, and plan-making is expected to facilitate delivery at scale.
19. These reforms underline that up-to-date Local Plans are intended to be the primary mechanism for delivering housing, employment and infrastructure objectives. They also reinforce the continuing relevance of the National Planning Policy Framework ("the Framework") plan-led and delivery-led principles. In particular, NPPF paragraph 15 expects plans to provide a clear framework for addressing housing needs alongside other priorities, and paragraph 36 confirms that plans will be examined for soundness, including whether they are positively prepared and effective. The national emphasis on ensuring that a sufficient amount and variety of land can come forward where it is needed, supported by a clear understanding of land availability, also remains central (NPPF paragraphs 61 and 72). In plan-making terms, those principles point toward the need for a deliverable strategy supported by a balanced portfolio of sites and a realistic contingency margin, so that the housing requirement can be met even where some components deliver later than anticipated.

20. The reforms also sit alongside a clear national expectation that development should secure environmental gains in practice, including the delivery of measurable biodiversity outcomes. In plan-making terms, this heightens the importance of ensuring that the Plan's approach to biodiversity net gain is not treated as separate from housing delivery but is integrated into the allocation strategy through realistic delivery mechanisms, clear long-term management expectations, and site choices that can secure multiple objectives in a coordinated way.
21. Against that national context, it is particularly important that Colchester City Council's Preferred Options Local Plan is robust and deliverable, with a clear route to maintaining an adequate housing land supply throughout the plan period. Delivery risk inevitably arises over long plan periods due to market cycles, infrastructure dependencies, lead-in times and scheme-specific constraints. National reforms that focus on implementation and build-out transparency heighten the importance of being realistic at plan stage. A plan that depends on a narrow range of supply sources or optimistic assumptions is more exposed to slippage. Conversely, a plan supported by a balanced and diverse portfolio of sites, including strategic opportunities capable of comprehensive delivery and infrastructure provision, is more resilient and better aligned with the Government's delivery objectives.
22. Colchester City Council has prepared and published a substantial evidence base to support the Preferred Options Plan. This includes evidence relating to settlement roles and the settlement hierarchy, site availability and suitability, infrastructure capacity and delivery planning, landscape character and sensitivity, open space and green infrastructure needs, economic and employment needs, and whole-plan viability. The breadth of this evidence provides an appropriate basis at Regulation 18 stage for decisions on the scale and distribution of growth and for the transparent testing of reasonable alternatives.
23. While strands of the evidence base will inevitably be refined as the Plan progresses toward submission, particularly in relation to infrastructure delivery programming, viability inputs and the delivery trajectory, that does not diminish the need at this stage for a strategy that is demonstrably deliverable and resilient. The purpose of Regulation 18 is to test the emerging strategy and options, including whether there is sufficient flexibility and contingency in the supply portfolio. In that context, it is essential that the Preferred Options Plan makes effective use of the evidence base when determining both the quantum and the location of development, including through clear and transparent reporting of site assessment outcomes and reasonable alternatives testing.

24. Against this policy and evidence backdrop, the representations that follow are submitted constructively to assist Colchester City Council in aligning the emerging spatial strategy and site selection with national policy and the local evidence base. In particular, they are intended to demonstrate how Land at Brook Meadows, Tiptree can contribute to the Plan's delivery objectives through a plan-led approach that secures meaningful biodiversity outcomes and, crucially, ensures the Site is not treated as a single-purpose allocation by default. The Preferred Options Plan should therefore transparently test reasonable alternatives for the Site, including a BNG-only approach, a landscape-led residential approach, and a hybrid approach in which a residential component is brought forward alongside a strategically significant biodiversity and green infrastructure function, shaped through masterplanning and appropriate mitigation to respond to countryside and sustainability considerations.

Site Context

Land at Brook Meadows, Tiptree (SLAA ID 10132)

25. The Site is located at Land at Brook Meadows, Tiptree within the administrative area of Colchester City Council and is promoted through the Council's Call for Sites and Strategic Land Availability Assessment process (SLAA Site ID 10132). The SLAA Stage 2 assessment records the Site area as approximately 11.65 hectares and identifies the proposed uses as Housing and Green Infrastructure.
26. In locational terms, the Site lies on the western edge of Tiptree, adjoining the built-up area and extending along the settlement edge. It is influenced by residential development along Maldon Road (B1022) and the adjoining streets, including Brook Meadows and Pennsylvania Lane.
27. The Site relates directly to the B1022, which provides the primary north to south route through Tiptree and forms a key connection to the wider network. In addition, the Site sits adjacent to a landscape that has been shaped by historic sand and gravel extraction to the west, now comprising restored land including waterbodies and woodland, which forms an established green and blue infrastructure context.
28. The Site is recorded as being wholly within Flood Zone 1 and not within a Critical Drainage Area. The SLAA also identifies no reasonable highway constraints in principle, noting that access is considered safe and suitable, and records that the Site is adjacent to or within close proximity of the existing settlement boundary and would not lead to coalescence.

29. A defining characteristic of the Site is its relationship with locally designated ecological assets. The appeal decision records that the Site, together with the adjacent restored gravel pits to the west, forms part of the Inworth Grange and Brook Meadows Local Wildlife Site. The SLAA likewise records that more than 50% of the Site lies within a local designation of this type.
30. The Site's movement context includes public rights of way in the immediate vicinity. The appeal decision records that public footpaths run outside parts of the southern and north-western boundaries, and that a short length of Footpath 19 lies within the Site close to its western boundary, with further routes in the surrounding network. This provides a clear basis for considering how any future allocation could secure enhanced access and connectivity, and how green infrastructure and biodiversity objectives could be delivered alongside, and not in isolation from, wider plan objectives.
31. The Site has also been the subject of previous development promotion and decision-making, including an outline planning application for residential development which was refused and subsequently dismissed on appeal (Appeal Ref APP/A1530/W/22/3301862, decision dated 05 December 2022). This historic context is not rehearsed in detail in these representations. Its relevance for the current plan-making exercise is that the Preferred Options Plan now provides the appropriate mechanism to determine, transparently, the most suitable planning role for the Site through the testing of reasonable alternatives and, where appropriate, the setting of clear, criteria-based allocation requirements.
32. In terms of form and content, and without committing to a fixed quantum or a detailed scheme at this stage, the Site is capable, in principle, of supporting a landscape-led approach that secures meaningful ecological outcomes through the long-term management and enhancement of the Local Wildlife Site resource and its connections to the adjoining restored land. If the Plan considers that a residential or hybrid role is appropriate, that could theoretically be structured so that built development, open space, access and biodiversity delivery are planned comprehensively, with retained landscape structure and buffered ecological assets forming the organising framework for any future proposals.
33. The Site is therefore well placed to be considered through the Preferred Options process as part of a resilient plan strategy, particularly where the Council is seeking to ensure that allocations are deliverable, flexible and capable of maintaining an effective supply position over the plan period, while also securing measurable biodiversity outcomes. The following sections build on this site description by addressing the relevant strategic

and development management policies and by setting out the case for the Plan to transparently test reasonable alternatives for the Site, including BNG-only, residential and hybrid options.

Spatial Strategy and Development in the Countryside

Preferred Options Draft Policies ST3 and ST4

34. Policies ST3 (Spatial Strategy) and ST4 (Development in the Countryside) establish the Plan's approach to distributing growth to 2041, including how the settlement hierarchy is used, how countryside impacts are managed, and how development is balanced against biodiversity, landscape and heritage considerations.
35. We support the Council's overarching direction of focusing growth in the most sustainable locations. This reflects the plan-led approach in NPPF paragraph 15, which expects plans to provide a clear framework for meeting housing needs alongside other priorities, and the soundness framework in NPPF paragraph 36, which requires the Plan to be positively prepared and effective. It also aligns with the Council's settlement evidence, which explains that growth is directed first to the urban area and locations close to transport corridors and centres, with growth elsewhere informed by opportunities and constraints.
36. However, to be effective in delivery terms, the spatial strategy must also provide sufficient flexibility to manage delivery risk and maintain an effective housing supply position over the plan period. This is consistent with NPPF paragraph 61, which emphasises the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed, and NPPF paragraph 72, which expects plans to identify a sufficient supply and mix of sites having regard to availability, suitability and likely viability. In that context, the Council's application of ST3 and ST4 should not operate in a way that inadvertently narrows the allocations portfolio to the point that delivery resilience is weakened, or that reasonable alternatives are not transparently tested.

Policy ST3: Spatial Strategy

37. ST3 confirms that growth is primarily focused on the settlement hierarchy, having regard to sustainability merits, size, function and services, balanced against biodiversity,

landscape and heritage. ST3 also supports previously developed land and higher densities where they enable efficient use of land.

38. We support these principles, but the way ST3 is drafted and applied should make clear that the settlement hierarchy is a guiding framework rather than an absolute constraint on site selection. This is important for two related reasons.
39. First, NPPF paragraph 77 recognises that the supply of large numbers of new homes can often be best achieved through larger scale development, provided schemes are well located, well designed and supported by necessary infrastructure and facilities, including a genuine choice of transport modes. That national policy approach anticipates that plans will identify strategic opportunities where infrastructure and environmental gains can be planned and secured comprehensively, and where delivery can be sustained over time. It therefore reinforces the need for ST3 to remain capable of accommodating strategic allocations where they strengthen plan effectiveness and delivery resilience.
40. Second, the Council's own evidence recognises that growth patterns can legitimately be shaped by factors beyond a simple proportional distribution through the hierarchy, including transport corridors, infrastructure considerations and the ability to deliver wider community and environmental benefits. The spatial strategy should therefore be applied in a way that allows the Council to test and, where justified, select sites that are capable of delivering multiple objectives, rather than defaulting to single-purpose categorisation at Preferred Options stage.
41. In practical terms, that means the Council should ensure that Land at Brook Meadows, Tiptree is assessed transparently as a reasonable alternative through the site selection process and Sustainability Appraisal, noting that it is already included within the assessed site pool as SLAA Site ID 10132, with promoted uses recorded as housing and green infrastructure.
42. That approach is particularly important here because the Site is currently being progressed as a BNG location, and there is a material plan-making question as to whether a BNG-only approach is the most justified and effective option when compared against residential and hybrid alternatives. The Council's evidence identifies Brook Meadows as a preferred off-site BNG location, which supports the principle of an environmental role. However, ST3 requires the Council to balance objectives, and the Plan must therefore test whether a hybrid approach could secure strategic biodiversity outcomes while also contributing to housing delivery in a landscape-led manner, thereby improving overall plan effectiveness and resilience.

Policy ST4: Development in the Countryside

43. ST4 confirms that development in the countryside will be considered where required to meet identified needs in accordance with the spatial strategy, while supporting the vitality of rural communities. It also seeks to avoid adverse impacts on settlement roles and identities, valued landscapes and the intrinsic character and beauty of the countryside, and it recognises the importance of access to sustainable modes of travel.
44. We support the intent of ST4 and agree that countryside restraint and landscape protection must remain central. The Council's settlement evidence is clear that areas outside settlement boundaries are countryside and that boundaries perform an important management role in directing growth and protecting rural character.
45. The key issue is how ST4 is applied in plan-making terms at the edge of a Large Settlement. Even where land lies outside the defined settlement boundary and is therefore treated as countryside, ST4 is expressly drafted to allow countryside development where required to meet identified needs in accordance with the spatial strategy. It should therefore function as a criteria-based framework for shaping development, securing mitigation and protecting assets, rather than operating as a policy barrier that precludes the testing of edge-of-settlement opportunities where the evidence indicates they may contribute to a deliverable plan strategy.
46. This is directly relevant to Brook Meadows. The Site is on the edge of Tiptree, adjoining the built-up area, and sits within a sensitive environmental context, including its relationship with a Local Wildlife Site designation and the adjoining restored land to the west. We recognise and accept that baseline. It means that any consideration of residential or hybrid options must be advanced on a landscape-led and mitigation-led basis and should not be justified by downplaying ecological sensitivities.
47. However, that baseline does not remove the plan-making question that ST4 itself raises, which is whether there are countryside edge locations that can meet identified needs through comprehensive planning and mitigation, including by securing long-term habitat management, enhanced public access where appropriate, and green and blue infrastructure delivery as the structuring framework for the site. The appeal history provides relevant context that the Site has previously been tested in decision-making terms, but the Preferred Options Plan is now the correct mechanism to determine the Site's role through transparent reasonable alternatives testing and, if progressed, through clear criteria-based requirements that secure avoidance, mitigation and long-term stewardship.

48. Taken together, the application of ST3 and ST4 should therefore lead the Council to test Brook Meadows transparently through the evidence base and Sustainability Appraisal as:
- a. a BNG-only option, including the deliverability and long-term management implications of that approach;
 - b. a landscape-led residential option, structured to avoid and mitigate effects on sensitive assets; and
 - c. a hybrid option, where biodiversity delivery and green network functions are secured as the organising framework and any residential component is planned and controlled through clear criteria and long-term management arrangements.
49. Where that assessment demonstrates that impacts can be appropriately managed and that delivery can be secured in a comprehensive way, the Plan should not preclude a residential or hybrid allocation outcome solely because the land falls outside the current settlement boundary. A criteria-led approach under ST4 would strengthen the Plan's resilience, provide flexibility in the supply portfolio, and ensure that biodiversity objectives are secured through clear mechanisms, consistent with the effectiveness test in NPPF paragraph 36 and the requirement in NPPF paragraph 72 to identify sites having regard to deliverability, suitability and likely viability.

Housing Needs and Delivery

Draft Policy ST5, Local Housing Need, five-year housing land supply and the role of the Garden Community (Draft Policy ST9) within delivery risk management

50. Draft Policy ST5 sits at the core of the Preferred Options Plan because it translates the Council's housing evidence into a quantified requirement and, critically, into a delivery strategy capable of implementation. This approach aligns with the National Planning Policy Framework (December 2024), which requires strategic policies to meet identified needs (NPPF paragraph 11) and to identify and maintain a sufficient supply and mix of sites (NPPF paragraphs 72 and 78).
51. The Council's evidence identifies a local housing need figure of 1,300 dwellings per annum, which the Preferred Options Plan treats as the mandatory target for plan-making purposes. This is an important anchor for ST5, particularly in the context of the Government's stated objective of materially boosting housing delivery and the wider reform direction towards clearer requirements, streamlined plan-making and a stronger focus on implementation and build-out.

52. The supporting Habitats Regulations Assessment at Preferred Options stage also confirms the scale of the Plan's approach, identifying a requirement of 20,800 dwellings between 2025 and 2041 (1,300 dwellings per annum) and setting out the principal components of supply, including commitments, a windfall allowance, proposed Local Plan allocations and an assumed contribution from the Tendring Colchester Borders Garden Community.
53. In principle, we support the Council's intention to plan positively by identifying a portfolio which, on paper, is capable of meeting the requirement. However, the key issue for ST5 is not whether the Plan can show a headline supply position, but whether the supply is supported by delivery assumptions that are realistic, transparent and resilient to foreseeable delivery risks. This reflects the NPPF's emphasis that delivery rates must be realistic for large-scale development (NPPF paragraph 77) and that authorities should maintain supply through an annually updated stock of deliverable sites, with the appropriate buffer (NPPF paragraph 78).
54. For delivery context, the most recent published Housing Delivery Test measurement (2023) indicates that Colchester delivered 110% of its requirement over the relevant measurement period and is not subject to the policy consequences that apply where delivery falls below the specified thresholds (NPPF paragraph 79). This is a helpful monitoring position. It does not, however, remove the plan-making requirement to ensure ST5 is underpinned by a delivery strategy that is robust over a long plan period to 2041.
55. Delivery risk over a plan period of this length is unavoidable due to market cycles, infrastructure dependencies, lead-in times, labour and materials constraints, and the practical realities of phased build-out. The Government's reform agenda, including its emphasis on delivery and build-out transparency, heightens the importance of realism at plan stage. A plan that depends on a narrow range of supply sources or optimistic delivery trajectories is more exposed to slippage than a plan supported by a balanced and diverse portfolio of sites.
56. In that context, ST5 should be applied alongside a realistic contingency margin and a balanced portfolio of allocations. This aligns with the function of the NPPF buffer, which is intended to ensure choice and competition and improve the prospect of achieving planned supply (NPPF paragraph 78). The practical corollary is that any apparent plan-wide "surplus" should be treated as a necessary allowance for slippage, rather than a reason to exclude otherwise suitable and deliverable allocation options.

57. The Council's five-year housing land supply evidence is relevant as a lens on deliverability assumptions and transparency. The Council's most recent Housing Land Supply Position Statement (base date 1 April 2025) confirms that, for five-year supply purposes, Colchester has historically monitored delivery against the adopted Local Plan annual requirement of 920 dwellings per annum, applying a 5% buffer, and reports a marginal five-year position on that basis.
58. While five-year supply monitoring is a distinct exercise, it is directly relevant to ST5 in two ways. First, the Preferred Options Plan is proposing a materially higher annual requirement (1,300 dwellings per annum). The Plan's delivery framework and trajectory therefore need to be calibrated to the higher delivery challenge, rather than relying on assumptions that are rooted in the historic adopted requirement. Second, the Plan's trajectory should be internally consistent with the Council's approach to lead-in times, build rates and deliverability evidence used for monitoring, so that ST5 is demonstrably effective and not reliant on optimistic or untested assumptions.
59. Similarly, where the Council relies on windfall within the overall supply position, the NPPF requires compelling evidence that windfalls will provide a reliable source of supply, and that the allowance is realistic having regard to historic delivery and expected future trends (NPPF paragraph 75). In our view, ST5 should be supported by a proportionate explanation of how any windfall allowance has been derived and why it remains robust when assessed against the higher LHN-led requirement and the plan period to 2041.
60. These issues are heightened by the role that strategic components play within the overall delivery strategy, including the assumed contribution from the Tendring Colchester Borders Garden Community. The supporting material at Preferred Options stage includes an assumed delivery contribution from the Garden Community within the plan period. While a DPD-led approach can provide an appropriate framework for a complex strategic location, the plan-making issue is whether there is sufficient certainty and timeliness in the assumed contribution to justify the level and phasing relied upon in the Plan's trajectory.
61. Strategic new settlement delivery is inherently complex and typically characterised by long lead-in times, infrastructure sequencing constraints, land assembly and delivery mechanism requirements, and market absorption limits. These are not criticisms of the Garden Community approach, but practical delivery characteristics that need to be reflected transparently in the Plan's trajectory and in the level of flexibility provided elsewhere in the allocations portfolio. Where a material component of supply depends on strategic delivery of this kind, it is prudent for the Plan to include sufficient additional

allocations capable of coming forward in parallel, so that housing needs can be met even where strategic outputs are delayed or build out more slowly than anticipated.

62. The key plan-making implication for ST5 is therefore that the Council should ensure the Plan does not become overly sensitive to the timing of delivery from a small number of strategic sources. Instead, ST5 should be supported by a balanced portfolio of sites, including additional deliverable options capable of contributing to housing delivery while also aligning with other Plan objectives, including environmental delivery.
63. Land at Brook Meadows is relevant in these terms. The Council is currently progressing the Site as a BNG allocation, and we support the principle of Brook Meadows performing a strategic biodiversity and green infrastructure role. However, the Plan's effectiveness also depends on whether reasonable alternatives have been tested transparently. In particular, the Council should assess whether a BNG-only approach represents the most justified and effective outcome when compared with a landscape-led residential option or a hybrid option in which a residential component is brought forward alongside a strategically significant BNG and green infrastructure function.
64. A hybrid approach has potential advantages in plan-making terms because it can secure long-term biodiversity delivery and management while also contributing to housing delivery and the overall resilience of the allocations portfolio. Importantly, this is not advanced as a commitment to any fixed quantum or delivery programme. It is advanced as a plan-making proposition that should be tested objectively through the Council's evidence base and Sustainability Appraisal, and, if selected, secured through criteria-based requirements that protect sensitive assets, require appropriate buffers and management, and ensure that biodiversity outcomes are delivered and maintained in perpetuity.
65. For the purposes of improving the effectiveness of ST5 and its supporting trajectory, we recommend that the Council:
 - demonstrates transparently how lead-in times, annual delivery rates and phasing assumptions have been derived for proposed allocations, consistent with the NPPF expectation of realistic delivery trajectories for larger scale development (NPPF paragraph 77);
 - evidences any windfall allowance against the NPPF test of compelling evidence (NPPF paragraph 75), particularly in the context of a higher LHN-led requirement;

- treats any plan-wide supply surplus as a realistic contingency margin to address slippage risk, rather than as an optional margin that can be eroded without consequence; and
- ensures that the Site selection process and Sustainability Appraisal transparently test reasonable alternatives for Brook Meadows (BNG-only, residential and hybrid), so that the Plan secures both delivery resilience and measurable biodiversity outcomes through a coherent allocations' strategy.

66. On this basis, we support the direction of Draft Policy ST5 in anchoring the Plan's housing requirement to the Council's evidence. However, ST5 will only be demonstrably sound if it is underpinned by delivery assumptions that are explicit, consistent and realistic, and if it is supported by a sufficiently diverse and resilient portfolio of allocations. Testing Brook Meadows transparently against reasonable alternatives and securing the most justified and effective role for the Site through criteria-based allocation requirements, would assist in strengthening the Plan's effectiveness over the period to 2041.

Environment and Green Network

Draft Strategic Policy ST2 and related Green Network and Environment policies (GN1, GN2, GN5 and GN6, EN1-EN3, and EN5)

67. We support the intention of Draft Policy ST2 to ensure that growth conserves and enhances Colchester's natural and historic environment and safeguards landscape character through an integrated approach to biodiversity and the green network. For plan-making purposes, ST2 is also important because it frames how the Council should balance environmental protection and enhancement against the need to maintain a deliverable and resilient plan strategy over the period to 2041.
68. In this context, Land at Brook Meadows, Tiptree is directly relevant. The Council's emerging approach identifies Brook Meadows as a preferred off-site biodiversity net gain location of high strategic significance within Draft Policy EN2. We are content, in principle, with Brook Meadows being identified for a biodiversity-led role in the emerging Plan, provided that the allocation approach is framed in a way that secures deliverability and long-term management.
69. A key plan-making issue is that a BNG allocation must be more than a map designation. If Brook Meadows is to perform a strategic BNG function, the Plan needs to be clear on what success looks like and how it will be secured in perpetuity. This includes clarity on:

the intended habitat creation and enhancement outcomes; how those outcomes align with the Council's wider nature recovery priorities; how the land will be managed long-term; and how delivery will be funded, monitored and enforced. Without those hooks, the allocation risks being aspirational rather than effective.

70. The evidence prepared for the Site indicates that Brook Meadows has the potential to deliver meaningful habitat enhancement and creation through a coherent land management strategy. This includes the retention and enhancement of existing habitat features and the creation of new habitat types where appropriate. The Plan should therefore ensure that the policy framework positively enables the Site to deliver these outcomes in a planned way, including through a clear requirement for long-term stewardship arrangements.
71. The Green Network policies GN1 and GN2 should be applied to reinforce this delivery focus. Where Brook Meadows is identified as a strategic biodiversity and green network asset, the Plan should require that proposals (or delivery mechanisms) for the Site are underpinned by a clear management plan and that the Site's function as part of the wider green network is protected and enhanced. This is consistent with the Council's stated intention, through EN2, to prioritise locations capable of delivering the best gains for biodiversity.
72. Policies GN5 and GN6 are also relevant because they provide the policy pathway for protecting and strengthening ecological networks and securing effective management of green infrastructure assets. In plan-making terms, those policies should be translated into allocation criteria for Brook Meadows that secure, at minimum:
 - the protection of sensitive ecological areas and appropriate buffering;
 - habitat creation and enhancement as the primary structuring principle;
 - appropriate access arrangements where compatible with biodiversity objectives; and
 - binding long-term management and monitoring arrangements so that gains are maintained, not eroded over time.
73. Draft Policies EN1 to EN3 and EN5 should operate in a similarly practical way. EN3's emphasis on securing measurable biodiversity net gain and applying the mitigation hierarchy is supported in principle. The key plan-making point is that where the Council identifies a preferred off-site BNG allocation, the Plan should also specify the mechanisms through which delivery is secured, including how baseline, targeting, monitoring and long-term management will operate. Policy EN5 is relevant because it

reinforces the need for environmental objectives to be embedded into delivery, rather than being left as aspirational requirements that can be diluted at implementation stage.

74. Finally, while Brook Meadows is identified as a preferred off-site BNG site, that should not automatically preclude the Plan from transparently testing reasonable alternatives for the Site. The Site is already recorded in the assessed site pool with promoted uses including housing and green infrastructure, and the Plan should therefore test whether a BNG-only approach represents the most justified and effective outcome when compared to a hybrid option where biodiversity delivery remains the primary structuring principle but a landscape-led residential component is brought forward in parallel, subject to clear safeguards and long-term stewardship.
75. On this basis, the Environment and Green Network policy suite is capable of supporting a sound approach to Brook Meadows, but its effectiveness will depend on whether the allocation is framed with sufficient clarity and delivery mechanism to secure the intended biodiversity outcomes in perpetuity, and whether the Plan transparently tests whether a hybrid approach could deliver both strategic biodiversity benefits and a contribution to housing delivery without unacceptable harm.

Growth and Opportunity Areas and Proposed Allocations

Strategic approach to allocations and the case for Land at Brook Meadows, Tiptree

76. The Growth and Opportunity Areas and Proposed Allocations component of the Preferred Options Plan is the point at which the Council translates the spatial strategy, housing requirement and evidence base into a coherent and deliverable portfolio of sites. It is therefore the principal mechanism for ensuring the Plan is effective and capable of meeting housing needs over the plan period, consistent with national policy expectations that plans identify a sufficient supply and mix of sites supported by realistic delivery assumptions. It is also the stage at which the Council must transparently test reasonable alternatives through the Sustainability Appraisal and site selection process, so that allocations are justified and robust.
77. This allocation task is particularly important because the Preferred Options Plan is anchored to a materially higher housing requirement than the historic adopted Local Plan requirement used for monitoring purposes. As set out elsewhere in these representations, the Preferred Options housing requirement is based on a local housing need figure of around 1,300 dwellings per annum, while the Council's most recent published five-year housing land supply position statement is calculated using the

adopted annual requirement of 920 dwellings per annum. The allocations portfolio must therefore be calibrated to the higher delivery challenge and should not rely on narrow headroom or optimistic assumptions that would only remain robust if measured against the lower historic requirement.

78. The Council's latest five-year housing land supply position indicates a marginal position above five years. That position relies in material part on windfall delivery assumptions and other supply components which, while capable in principle of contributing to delivery, introduce sensitivity to the assumptions applied and to performance over time. The plan-making implication is not that windfalls should be excluded, but that the allocations portfolio should be sufficiently resilient such that slippage in windfalls, lead-in times or build-out does not translate into under-delivery against the Plan's higher requirement.
79. The Preferred Options Plan also relies on strategic components, including the Tendring Colchester Borders Garden Community, with an assumed contribution within the plan period. Strategic, infrastructure-led delivery can be subject to programme risk, governance and market absorption constraints. The Plan should therefore avoid over-reliance on any single strategic component and should include a realistic contingency margin supported by a broad portfolio of sites with varied lead-in profiles and delivery characteristics.
80. In that context, the Council's approach to proposed allocations should seek to optimise multiple plan objectives rather than allocating sites for a single outcome by default where reasonable alternatives exist. This is directly relevant to Land at Brook Meadows, Tiptree (SLAA Site ID 10132), which is already within the assessed site pool and is recorded as a site promoted for both housing and green infrastructure.
81. The Council is currently progressing Brook Meadows as a preferred off-site BNG location within Draft Policy EN2, identifying its strategic significance as high. We support the principle of the Site performing a strategic biodiversity and green network role, and we agree that a plan-led approach to off-site BNG delivery can be beneficial where it secures the "best gains" and long-term stewardship rather than leaving BNG delivery to piecemeal outcomes.
82. However, the allocation decision for Brook Meadows should not be treated as binary by default. The plan-making question is whether a BNG-only allocation is the most justified and effective use of the Site when tested against reasonable alternatives, including:
 - a biodiversity-led allocation (as currently envisaged);
 - a landscape-led residential allocation; and

- a hybrid allocation in which biodiversity delivery is secured as the primary structuring principle, but a residential component is brought forward in parallel where it can be achieved without unacceptable harm and with clear safeguards and long-term management.
83. This matters in practical allocations terms for two reasons. First, the Plan is required to meet a higher housing requirement over a long plan period and must therefore maintain delivery resilience and contingency. Secondly, Brook Meadows has the potential, in principle, to deliver strategic biodiversity outcomes through habitat enhancement and creation, but that potential does not necessarily depend on the Site being sterilised from any other use. A hybrid approach could, subject to robust safeguards, secure long-term biodiversity enhancement and management while also contributing to housing delivery, thereby supporting the Plan's effectiveness and resilience.
84. The key is that any allocation pathway selected for Brook Meadows must be deliverable and enforceable in practice. If the Council proceeds with a BNG allocation, the allocation framework should include clear requirements for the delivery and long-term management of habitat outcomes, monitoring and maintenance arrangements, and the mechanism by which biodiversity units will be generated, secured and managed in perpetuity. A map-based designation alone will not be sufficient to ensure the Site delivers its intended strategic role.
85. If the Council considers, through transparent assessment, that a residential or hybrid role is appropriate, the allocation should be framed with clear criteria to ensure that biodiversity objectives remain primary, sensitive areas are protected and buffered, and any built development is landscape-led and mitigation-led. This approach would allow the Council to integrate housing delivery and biodiversity delivery rather than treating them as competing objectives, while still ensuring that the environmental role identified for the Site is secured through binding requirements.
86. We therefore request that, as the Preferred Options Plan progresses, the Council takes the following steps in relation to Growth and Opportunity Areas and Proposed Allocations for Brook Meadows:
- Ensure that Brook Meadows (SLAA Site ID 10132) is transparently tested through the Sustainability Appraisal and site selection process against reasonable alternatives, including BNG-only, residential and hybrid options, with clear reporting of the reasons for selection or rejection.

- Calibrate the allocations portfolio to the higher LHN-led requirement and maintain a realistic contingency margin, rather than relying on narrow headroom, sensitive windfall assumptions or optimistic build-out trajectories.
- If Brook Meadows is retained as a BNG allocation, frame the allocation with explicit delivery and stewardship requirements so that biodiversity outcomes are secured in perpetuity and are demonstrably deliverable.
- If the assessment demonstrates that a hybrid approach is justified and effective, progress Brook Meadows as a mixed allocation with criteria-led requirements securing a landscape-led structure, avoidance and mitigation of ecological effects, and long-term management, while enabling an appropriate residential contribution as part of a comprehensive plan-led solution.

87. In summary, the soundness of the Preferred Options Plan will depend on whether the Proposed Allocations deliver a portfolio that is genuinely capable of meeting the housing requirement over the plan period, with sufficient flexibility and contingency to manage delivery risk, while also securing strategic environmental outcomes. Brook Meadows is already identified by the Council as a preferred location for strategic BNG delivery. The Plan should now ensure that the Site's role is determined through transparent reasonable alternatives testing and, whichever role is selected, that the allocation framework is drafted to secure deliverability and long-term stewardship in practice.