

Representations to the Colchester Preferred Options Local Plan



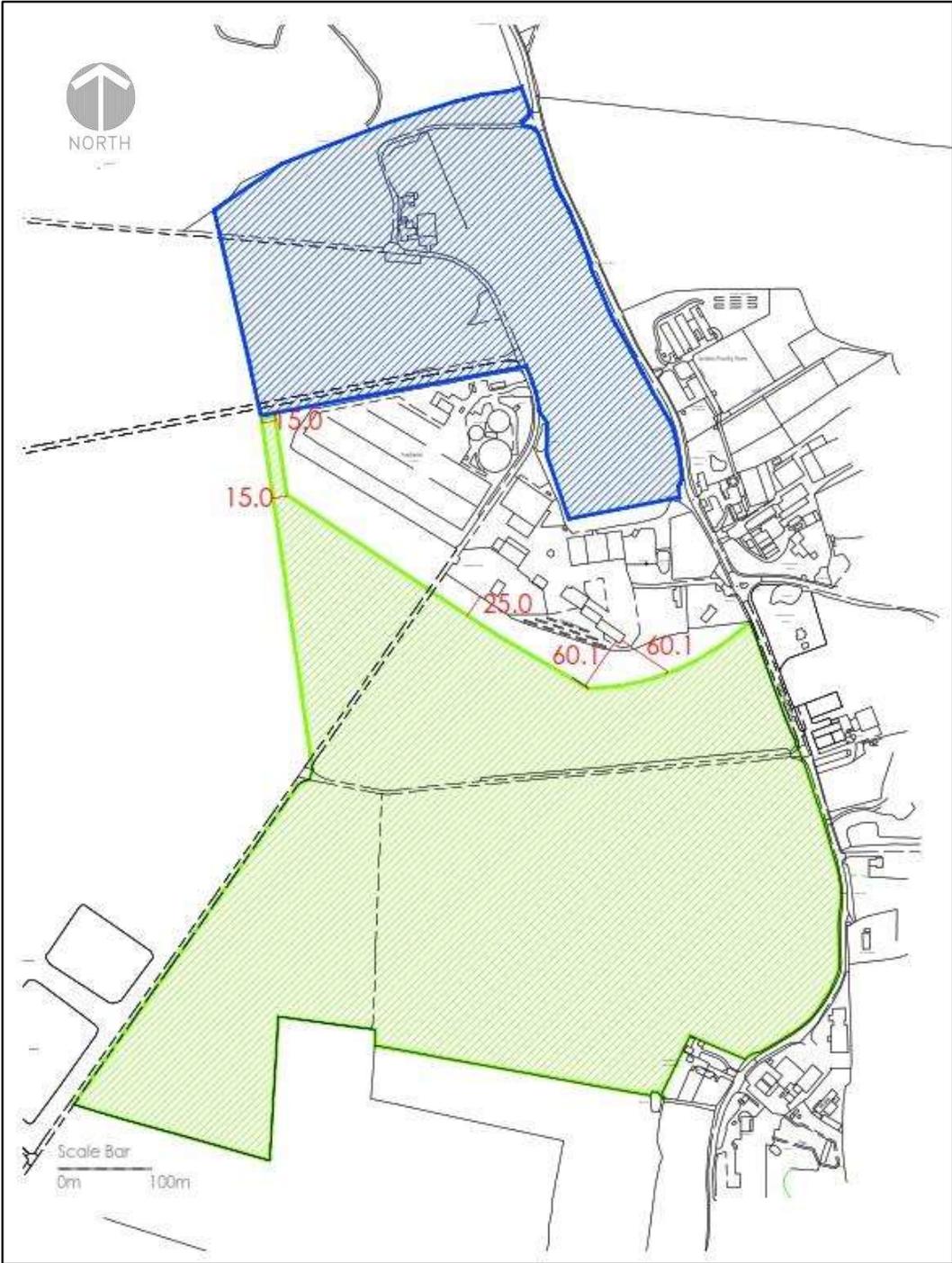
Land at Woringford Airfield, Colchester

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 Woringford Airfield (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 intention of promoting the Site is to secure the allocation of the Site in the next Colchester Local Plan for a sustainable, policy-compliant and deliverable strategic mixed-use development that can contribute meaningfully to the City's housing needs, support the rural economy and assist in achieving wider strategic objectives.
3. In broad terms, the promotion seeks a comprehensive, masterplanned scheme comprising a substantial quantum of new homes (including policy-compliant affordable housing) together with the retention and planned expansion of existing employment activity and supporting infrastructure. The development concept is landscape-led, incorporating extensive green and blue infrastructure, public open space and sustainable drainage, with scope for on-site community facilities commensurate with the scale of development.
4. We welcome the opportunity to comment on the emerging Local Plan. Our representations relate specifically to Land at Woringford Airfield, a location capable of making a significant contribution to meeting Colchester's housing requirements while also supporting employment activity and delivering infrastructure in a coordinated manner. For clarity, references to "the Site" in these representations refer to Land at Woringford Airfield.
5. A proportionate body of technical work either accompanies, or will accompany, the promotion of the Site. This work demonstrates that the Site is capable of accommodating

sustainable development, with no constraints identified to date that would necessarily preclude its allocation or delivery within the plan period, subject to appropriate mitigation and further assessment where necessary. The detailed outputs of that work will be provided separately and are not repeated in these representations.

- 6. A site plan is included below, showing the employment land at Fairfields Farm within the two parcels and the surrounding built form along Fordham Road



7. 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 overall housing requirement, delivery assumptions and the need for a resilient housing supply position across the plan period, including a realistic contingency margin;
 - the spatial strategy and distribution of growth, including the role of strategic sites in supporting effective delivery and infrastructure provision;
 - the approach to site selection and the transparent testing of reasonable alternatives, including the Site; and
 - selected policy areas with direct implications for masterplanning, deliverability and viability, including design, infrastructure delivery, green and blue infrastructure and the rural economy.

Plan Making Context

8. 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.
9. 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).
10. 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).

11. 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. Paragraph 77 also highlights that larger sites should demonstrate planned investment in infrastructure and scope for environmental gains; 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).
12. A fundamental principle of the Framework is therefore the delivery of sustainable development through a plan-led system, including 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

13. 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.
14. 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.

15. The Government has also brought forward the Planning and Infrastructure Bill, 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.
16. A further central component of the reforms is the move to a faster plan-making process. Government guidance published in late 2025 sets out the expectation that local planning authorities should prepare a single local plan and adopt it within a 30-month process under the reformed system. That change is intended to accelerate plan coverage and reduce 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.
17. 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 and separately announced that an expert taskforce had recommended locations for new towns, with an emphasis on large-scale delivery and a clear expectation that such proposals contribute materially to national housing supply. In that context, Tempsford has been identified as one of the priority locations linked to the strategic benefits of planned rail infrastructure. While that specific growth corridor 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.
18. 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.

19. 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.
20. 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 (including the Council's Settlement Evidence work), site availability and suitability (through the SLAA process), infrastructure capacity and delivery planning (through the Infrastructure Audit and Delivery Plan), 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.
21. 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.

22. 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 Wormingford Airfield can contribute to the Plan's delivery objectives through a strategic mixed-use proposition that supports both housing delivery and the rural economy, including through the retention and expansion of established employment activity, whilst being shaped through masterplanning and mitigation to respond appropriately to the countryside and sustainability considerations identified in the Council's evidence base.

Site Context

Land at Wormingford Airfield (Fairfields Farm, SLAA Site ID 10638)

23. The Site is located at Wormingford Airfield (Fordham Road, Colchester, CO6 3AQ) within the administrative area of Colchester City Council and is promoted through the Council's Call for Sites and SLAA process (recorded as "Fairfields Farm Wormingford Airfield", Site ID 10638).
24. The Site forms part of the wider Wormingford Airfield land and includes a residential-led parcel promoted by our client, land intended to be retained for employment purposes and the existing employment land associated with Fairfields and Fairfield Crisps. The combined landholding across these parcels extends to approximately 54 hectares.
25. In locational terms, the Site lies in open countryside outside any defined settlement boundary and is not immediately contiguous with an identified settlement. Wormingford village lies in the vicinity, and Colchester is the principal urban centre to which the Site relates in strategic terms. The B1508 lies to the east and provides a strategic north to south route between Colchester and Sudbury. The A12 lies to the south, with access to the strategic road network available via the Marks Tey junctions.
26. The Site has frontage to Fordham Road and also relates to Mount Bures Road. There are existing vehicle access points from Fordham Road associated with current uses, including accesses serving the Gliding Club and the existing operational land. The Essex and Suffolk Gliding Club operates from part of the wider airfield land.

27. A further characteristic of the Site is the presence of public rights of way and bridleways within and adjacent to the wider airfield land, which provides a strong basis for a connected green infrastructure and movement network.
28. The transport evidence prepared as part of earlier due diligence identifies Fordham Road as the appropriate focus for any future principal site access arrangements. It also identifies that the surrounding “Protected Lanes” network is narrow and is not suited to accommodating significant additional vehicular movements, although it offers opportunities for enhanced walking and cycling connectivity. Notwithstanding the rural context, the Site sits within reach of existing and potential sustainable movement corridors. National Cycle Network Route 13 runs in the vicinity and provides onward connections towards Colchester and to nearby settlements. Existing bus services operate in the wider area, including services connecting Wormingford, Colchester and Sudbury. The evidence base also recognises that the opportunities for non-car travel will need to be strengthened through development-led measures, including improved walking and cycling infrastructure and potential enhancements to public transport provision.
29. The Site is promoted as a strategic mixed-use development opportunity capable of contributing to both housing and economic objectives. A distinguishing feature is the presence of an established and expanding local employer, with clear aspirations for growth and continued investment, and a requirement to retain operational continuity. The Site therefore presents an opportunity, in principle, to align planned housing growth with the retention and expansion of employment activity through a coordinated, masterplanned approach, rather than relying on piecemeal development in the countryside.
30. In terms of form and content, and subject to masterplanning and technical assessment, the Site is capable of supporting a strategic mixed-use scheme at a scale which could, in principle, include a substantial residential component (potentially in the order of circa 600 dwellings), alongside retained and enhanced employment land and supporting infrastructure. The development concept could theoretically comprise policy compliant affordable housing, community facilities appropriate to the scale of development, education provision where justified, and a comprehensive green infrastructure and sustainable drainage network, with public access and connectivity enhanced through the existing rights of way and bridleway network.
31. The Site is therefore well placed to make a meaningful contribution to the next Colchester Local Plan as an allocation, particularly where the Council must ensure that

the spatial strategy is deliverable, sufficiently flexible and capable of maintaining an effective housing supply position, including a realistic contingency margin, while also supporting local economic objectives. The following sections of these representations build on this site description by addressing the relevant strategic and development management policies and by setting out the case for the Site to be included as a proposed allocation within the emerging Plan.

Spatial Strategy and Development in the Countryside

Preferred Options Draft Policies ST3 and ST4

32. 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.
33. 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.
34. 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.

Policy ST3: Spatial Strategy

35. 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.
36. 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 strategic allocations. This is important for two related reasons.
37. 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, in principle, 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 be capable of accommodating strategic allocations where they strengthen plan effectiveness and delivery resilience.
38. 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 community benefits. The spatial strategy should therefore be applied in a way that allows the Council to test and, where justified, select strategic sites that may sit outside existing settlement boundaries but can contribute materially to housing delivery, infrastructure provision and economic objectives.
39. In practical terms, that means the Council should ensure that Land at Wormingford Airfield 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 "Fairfields Farm Wormingford Airfield" (SLAA Site ID 10638). The Site is promoted as a strategic mixed-use opportunity linked to established employment activity and the rural economy, and it should be assessed on that basis rather than filtered out by reference to countryside location alone.

Policy ST4: Development in the Countryside

40. 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. ST4 also supports sustainable rural businesses where criteria are met.
41. 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.
42. The key issue is how ST4 is applied in plan-making terms. ST4 is expressly drafted to allow countryside development where required to meet identified needs. 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 strategic allocations in countryside locations even where the evidence supports them and where allocation is necessary to maintain deliverability and resilience.
43. This is directly relevant to Wormingford Airfield. The Council's Settlement Evidence Stage 1 identifies Wormingford as a small settlement with limited services and facilities and limited public transport accessibility. We recognise and accept that baseline. It means that any strategic allocation at Wormingford Airfield must be advanced on a mitigation-led, masterplanned basis and should not be justified by overstating the existing service role of the village.
44. However, that baseline does not remove the plan-making question that ST4 itself raises, which is whether there are strategic countryside locations that can meet identified needs through comprehensive planning and mitigation, including by providing supporting facilities, improving sustainable movement opportunities and delivering environmental enhancement. Earlier transport due diligence for the land identifies limitations in walkable destinations and constraints in the rural road environment, but it also identifies existing access opportunities from Fordham Road, the role of the rights of way network, and the existence of longer-distance cycling connectivity in the vicinity. Those factors point to the appropriate approach for any allocation here. If the Site is taken forward, the Plan should require a package of measures which could theoretically include enhanced pedestrian and cycle links, improvements to public transport provision, and on-site

facilities commensurate with the scale of development, alongside landscape-led design and phasing.

45. That approach is consistent with the effectiveness test in NPPF paragraph 36 and with the requirement in NPPF paragraph 72 to identify sites having regard to deliverability, suitability and likely viability. It also aligns with the Council's infrastructure planning approach as set out in its infrastructure audit and delivery work.
46. Taken together, the application of ST3 and ST4 should therefore lead the Council to test Wormingford Airfield transparently through the evidence base and Sustainability Appraisal, and where the assessment demonstrates that impacts can be mitigated and the site can deliver in a comprehensive way, to progress it as an allocation in the next Local Plan. That outcome would strengthen the Plan's resilience, provide additional flexibility in the supply portfolio and support economic objectives through the retention and expansion of existing employment activity, while still operating within the countryside protection framework provided by ST4.

Housing Needs and Delivery

Draft Policy ST5, Local Housing Need, five-year housing land supply and delivery assumptions

47. Draft Policy ST5 sits at the core of the Preferred Options Plan, as it translates the Council's housing evidence into a quantified requirement and, critically, into a deliverable strategy. This approach aligns with the National Planning Policy Framework (December 2024) which requires strategic policies to meet identified needs (paragraph 11) and to identify and maintain a sufficient supply and mix of sites (paragraphs 72 and 78).
48. The Council's evidence base identifies a local housing need figure of 1,300 dwellings per annum, described as a mandatory target for the purposes of the Plan. This is an important anchor for ST5, particularly in the context of the Government's stated objective of materially boosting delivery and the policy direction towards clearer requirements, more streamlined plan-making and a stronger focus on implementation and delivery.
49. It is also notable that the Habitats Regulations Assessment supporting the Preferred Options stage identifies, an overall requirement of 21,106 dwellings (2025 to 2041) and a claimed supply position of 23,202 dwellings, including commitments, a windfall allowance and proposed allocations. In principle, we support the Council's intention to plan positively for housing by identifying a portfolio that exceeds the minimum

requirement, as this is consistent with the need for plans to be effective and deliverable in practice, not simply theoretically compliant.

50. However, the key issue for ST5 is not whether the Plan can present a headline surplus at a single point in time, but whether the strategy is underpinned by delivery assumptions that are realistic and resilient to foreseeable delivery risks. The NPPF is explicit that authorities should make a realistic assessment of delivery rates for large scale development (paragraph 77) and should maintain supply through an annually updated stock of deliverable sites with the appropriate buffer (paragraph 78).
51. In delivery terms, the most recent published Housing Delivery Test measurement (2023) indicates that Colchester delivered 110% of its requirement over the relevant three-year period, with no associated consequence. This is a positive position in national monitoring terms and indicates that the Council is not currently subject to the more stringent policy consequences that apply where delivery falls below 95%, 85% or 75% (NPPF paragraph 79).
52. Nevertheless, the HDT result should not be interpreted as removing the need for a robust, risk-aware ST5 strategy. The Preferred Options Plan period extends to 2041, and delivery risk over that timeframe is inevitable due to market cycles, infrastructure dependencies, lead-in times, labour and materials constraints, and the practical realities of phased build-out. The Government's wider reform agenda is increasingly focused on transparency and implementation, reinforcing that plans must not only allocate land, but also demonstrate credible pathways to delivery at pace and scale.
53. In that context, we support the principle that ST5 should be applied alongside a realistic contingency margin and a balanced portfolio of sites. This is consistent with the function of the NPPF buffer, which is intended to ensure choice and competition and to improve the prospect of achieving planned supply (NPPF paragraph 78). The corollary is that any apparent "surplus" in the overall supply should be treated, in practical plan-making terms, as a necessary allowance for slippage rather than a justification to exclude otherwise suitable and deliverable sites.
54. The Council's five-year housing land supply evidence provides an important lens on delivery assumptions. The Council's published 2025 Housing Land Supply Position Statement (base date 1 April 2025) explains that, for five-year supply purposes, Colchester has historically calculated its requirement using the adopted Local Plan annual requirement of 920 dwellings per annum and applies a 5% buffer. The statement also records that the Council did not publish a 2024 position statement, relying on the

NPPF provisions that apply where an adopted plan is less than five years old and identified a five-year supply at examination.

55. While the five-year supply position is a distinct monitoring exercise, its assumptions are directly relevant to ST5 in two respects. First, ST5 is proposing a materially higher annual requirement anchored to the Council's evidence base (1,300 dwellings per annum), and therefore the Plan's delivery framework needs to be calibrated to that higher delivery challenge rather than to the historic adopted requirement. Secondly, the Council's approach to deliverability, lead-in times and build-out trajectories across its supply should be transparent and internally consistent between the Plan's overall trajectory and the methodology used in its monitoring statements, in order to demonstrate that ST5 is effective and not reliant on optimistic assumptions.
56. Similarly, where the Council relies on components such as windfall in its overall supply position, the NPPF requires "compelling evidence" that windfalls will provide a reliable source of supply, and that any allowance is realistic in the context of the housing land availability assessment and historic delivery. (NPPF paragraph 75). In our view, ST5 should be supported by a clear and proportionate explanation of how any windfall allowance has been derived and why it remains robust under the higher LHN-led requirement, particularly given the emphasis in national policy and reform discourse on delivery realism.
57. Against that background, there is a strong plan-making case for ensuring that ST5 is supported by additional allocations that are capable of contributing to housing delivery and that also align with the Plan's wider objectives. This includes allocations that can provide a meaningful quantum of housing, but also those that can contribute to employment, rural services and the wider sustainability outcomes sought by the Plan. This is consistent with the NPPF's recognition that large scale development can best achieve significant supply, provided it is well located and supported by infrastructure and a realistic rate of delivery (paragraph 77).
58. Land at Wormingford Airfield is relevant in these terms. The Site is promoted as a strategic mixed-use opportunity which, in principle, is capable of making a material contribution to housing delivery over the plan period, potentially including circa 600 dwellings, alongside the retention and expansion of employment activity and the delivery of on-site infrastructure and environmental gains. The promotion is not advanced as a commitment to a fixed quantum or a fixed delivery programme. Rather, it is advanced as a credible allocation option that can contribute to the resilience of the Plan's housing

supply and the effective delivery of ST5, including by providing additional choice within the portfolio and a practical contingency against slippage elsewhere.

59. Importantly, this is not an argument for dispersing growth irrespective of sustainability considerations. As noted elsewhere in these representations, Wormingford is a smaller settlement and therefore the planning balance must be approached carefully. The point for ST5 is that the Plan should not inadvertently increase delivery risk by relying disproportionately on a narrower set of sites, particularly where delivery is contingent on complex infrastructure interventions or long lead-in times. A balanced portfolio that includes deliverable, well-planned strategic opportunities is more likely to maintain delivery over the plan period and to avoid destabilising under-delivery scenarios that would frustrate both local objectives and the Government's broader housing ambitions.
60. For the purposes of improving the effectiveness of ST5 and its supporting trajectory, we therefore recommend that the Council:
- demonstrates, transparently, how delivery rates and lead-in assumptions have been derived for proposed allocations, consistent with NPPF paragraph 77;
 - evidences any windfall allowance against the NPPF test of compelling evidence (paragraph 75), particularly in the context of the higher LHN-led requirement;
 - ensures that the Plan's supply surplus is treated as a realistic contingency margin, rather than as a margin that can safely be eroded through the exclusion of otherwise suitable allocations; and
 - includes additional deliverable allocations, such as Land at Wormingford Airfield, to strengthen the robustness of the housing delivery strategy and reduce plan-risk over a long plan period.
61. On this basis, we support the direction of Draft Policy ST5 in anchoring the Plan's housing requirement to the Council's evidence. However, we consider that ST5 will only be demonstrably sound if it is underpinned by a delivery strategy that is explicit about its assumptions, realistic about delivery risk, and supported by a sufficiently diverse and resilient portfolio of allocations. Land at Wormingford Airfield can assist in that regard by providing an additional strategic allocation option capable of contributing to both housing delivery and wider plan objectives over the plan period.

Tendring Colchester Borders Garden Community

Draft Policy ST9 and the Garden Community DPD

62. Draft Policy ST9 addresses the Tendring Colchester Borders Garden Community (“TCBGC”) and confirms that proposals within the development boundary will be determined in line with the policies and requirements set out in the Garden Community Development Plan Document (“DPD”). ST9 also reflects the relationship with the saved strategic policies for the Garden Community (SP8 and SP9) which continue to apply where relevant.
63. The inclusion of the Garden Community as a strategic component of the housing strategy is clearly significant in quantitative and delivery terms. The Council’s own housing supply presentation, as set out in its viability evidence policies matrix, includes an assumed contribution of 1,700 dwellings from the TCBGC within the plan period. As a result, the effectiveness of ST5 and the overall supply position is sensitive to the timing and certainty of delivery from this strategic element.
64. While a DPD-led approach can provide an appropriate policy framework for a complex strategic site, the plan-making issue is whether ST9 and the wider evidence demonstrate sufficient confidence in timely delivery to justify the scale and phasing of the assumed contribution within the plan period. Strategic new settlement delivery is inherently complex and is often characterised by long lead-in times and dependence on infrastructure sequencing, delivery mechanisms and market absorption. These are matters of practical implementation, which national planning reform is increasingly seeking to address through greater emphasis on delivery realism and build-out performance.
65. The Council’s Infrastructure Audit and Delivery Plan (“IADP”) confirms the significance of the Garden Community and its infrastructure requirements. It also reinforces that delivery is dependent on a substantial package of infrastructure and on an effective programme for implementation and phasing. This is relevant because where a plan relies materially on such a strategic component, it must also demonstrate appropriate flexibility in the remainder of the allocations portfolio to manage inevitable delivery risk.
66. In this regard, appeal decision-making has previously highlighted the uncertainties that can arise where delivery assumptions depend on strategic components. The Inspector’s decision in the Tiptree appeal (ref: APP/A1530/W/22/3301862) noted disputes regarding the timing and certainty of the Garden Community contribution, including that delivery was dependent on a DPD framework and that slippage and uncertainty were material considerations at that time. Although the plan-making context has evolved since, the

appeal illustrates the broader point that reliance on strategic components can be subject to challenge where delivery assumptions are not demonstrably robust.

67. These considerations are important for the Preferred Options Plan because the Plan period is lengthy and delivery risk is unavoidable. The Council is seeking to plan positively to meet a higher local housing need figure, and the Plan's effectiveness will depend on whether housing is delivered consistently through the period rather than backloaded. Where a material component of supply is dependent on strategic infrastructure-led delivery, it is prudent for the Plan to include sufficient additional allocations elsewhere to provide a realistic contingency margin and avoid under-delivery if strategic outputs are delayed.
68. In this context, ST9 should be framed and applied in a way that does not inadvertently place too much weight on optimistic assumptions regarding early or mid-plan delivery from the Garden Community. Instead, ST9 should sit within a wider strategy that recognises the delivery characteristics of strategic new settlement growth and therefore provides a sufficiently broad and diverse portfolio of allocations to ensure that the housing requirement can be met over the plan period.
69. This is directly relevant to the case for additional allocations such as Land at Wormingford Airfield. The Site is not promoted as an alternative to the Garden Community, but as a complementary strategic option that can strengthen the robustness of the overall housing delivery strategy. It is a known site within the Council's assessed pool, and it is promoted as a strategic mixed-use opportunity capable in principle of contributing to housing delivery alongside economic objectives.
70. The key plan-making point is therefore that, if the Garden Community is relied upon materially within the plan period, the Preferred Options Plan should demonstrate clear evidence and transparency on the timing and phasing assumptions for that contribution, and it should include additional allocations capable of coming forward in parallel so that housing needs are met even in scenarios of delay or slower build-out. This approach is consistent with the Government's reform agenda, which is increasingly focused on ensuring that plan allocations are translated into delivery, and with national policy expectations that plans should be effective and deliverable in practice.
71. On that basis, ST9 should be treated as a strategic component that requires careful monitoring and realistic programming, and the Plan's allocations portfolio should be strengthened so that the housing strategy is resilient to slippage in delivery from the Garden Community. The allocation of additional deliverable sites, including Land at

Wormingford Airfield, would assist in maintaining a realistic contingency margin and ensuring housing needs can be met across the plan period.

Environment and Green Network and Waterways

Draft Strategic Policy ST2 and related Green Network and Environment policies (GN1, GN2, EN1–EN3)

72. 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, green network and waterways, and heritage. This is aligned with national policy, which requires plans and decisions to contribute to and enhance the natural and local environment and, where relevant, to give particular weight to conserving and enhancing landscapes designated for their scenic beauty, including their setting (NPPF December 2024, including paragraphs 187–190).
73. However, for the purposes of plan-making and site selection, it is important that ST2 is applied in a way that is both evidence-led and delivery-focused. Colchester’s own settlements evidence is explicit that enhancing the green network and waterways is a “key starting point” for the Plan and that new allocations can be prioritised where there is clear opportunity to deliver environmental enhancements alongside growth. In that context, the Site at Wormingford Airfield should be assessed not simply through the lens of constraint, but also through its capacity to deliver measurable environmental gains through comprehensive masterplanning, including landscape-led structure, habitat creation, and green and blue infrastructure that improves connectivity and addresses local deficits.
74. We support the principle of Policy GN1, including the requirement for major residential development to submit a Green Network and Waterways Plan and to incorporate multifunctional open space of at least 10% of gross site area, designed around SuDS and climate adaptation and supported by long-term management arrangements. These are appropriate expectations for strategic allocations. The key point for the Preferred Options Plan is that the policy framework and allocation approach should actively enable strategic sites to plan positively for these outcomes, rather than treating them as residual requirements to be “fitted in” later. In practical terms, where a strategic site is expected to deliver substantial green and blue infrastructure, the allocation policy should clearly signpost the intended green network role of the site, the broad location of strategic open

space, and the requirements for long-term stewardship, so that deliverability, land budgeting and viability are transparently addressed at plan stage.

75. Policy GN2's emphasis on delivering strategic green spaces, habitat creation and nature recovery aligned with the Essex Local Nature Recovery Strategy is also supported. For Wormingford Airfield, this is directly relevant: a masterplanned approach can use green and blue infrastructure as the organising framework for the scheme, securing habitat connectivity, SuDS-led water management and accessible open space in a way that contributes to wider ecological networks. This also aligns with the Council's infrastructure evidence, which sets out green infrastructure guiding principles focused on multifunctionality, connectivity, character, and long-term management.
76. We also support the intent of Policy EN1 in relation to designated nature conservation sites and the requirement for avoidance and mitigation where recreational impacts arise, including through the Essex Coast RAMS (Bird Aware Essex Coast) mechanisms. From a plan-making perspective, the important point is to ensure that the Preferred Options Plan does not inadvertently over-rely on a small number of strategic allocations while assuming that project-level mitigation will resolve cumulative effects. The more resilient approach is to allocate a balanced portfolio of deliverable sites, each capable of embedding green and blue infrastructure from the outset, with clear policy hooks for proportionate avoidance and mitigation (including any project-level on-site greenspace measures where relevant) alongside the strategic RAMS framework.
77. Policy EN2 and EN3 are similarly supported in principle. The requirement to deliver at least 10% biodiversity net gain and to maximise on-site delivery is now a central component of effective and credible plan-making, and the policy correctly links delivery to evidence and the mitigation hierarchy. For Wormingford Airfield, this is a further reason to pursue allocation: strategic sites can deliver BNG in a planned, coherent way, integrated with open space, SuDS and landscape buffers, rather than through fragmented or piecemeal approaches. In addition, the Council's whole-plan viability work explicitly recognises that policies such as GN1 and EN2 have viability implications which need to be reflected through appropriate assumptions at plan stage. This reinforces the value of bringing forward strategic allocations that can internalise these requirements through masterplanning and land budgeting, rather than relying on smaller sites where policy compliance can be harder to reconcile with delivery.
78. Overall, the environmental and green network policies are capable of supporting a sound strategy, but their effectiveness will depend on how they are translated into the allocations and trajectory. If the Council is seeking to embed a genuinely plan-led green

network and waterways approach, it should ensure that the Preferred Options Plan allocates additional deliverable strategic sites that can demonstrably deliver multifunctional open space, nature recovery and landscape-led design at scale. In our view, Woringford Airfield is well suited to that role and should be taken forward as an allocation, supported by an appropriately framed allocation policy that secures environmental outcomes through masterplanning without introducing undue prescription that could hinder timely delivery.

Rural Workers' Dwellings

Preferred Options Draft Policy H8

79. Policy H8 (Rural Workers' Dwellings) is an important policy in the context of Colchester's rural economy. It provides the criteria framework through which on-site accommodation can be supported where there is an essential functional need linked to a rural-based business, including tests around viability of the enterprise, alternative accommodation, design and landscape integration and flood risk.
80. The relevance of H8 to these representations is twofold. First, it provides an appropriate policy mechanism for supporting rural enterprises where on-site accommodation is genuinely necessary to sustain operations, which aligns with national policy's objective of supporting a prosperous rural economy and the vitality of rural communities. Secondly, it is important that H8 is applied in a way that is coherent with the Plan's wider strategy of supporting employment and mixed-use delivery, including in locations where established rural employment activity is to be retained and expanded.
81. In that context, Land at Woringford Airfield is promoted as a strategic mixed-use opportunity which includes the retention and planned expansion of existing employment activity. The Plan should avoid a position where the operational needs of a rural-based business within a strategic allocation are inadvertently frustrated by an overly narrow interpretation of H8, particularly where masterplanning can address siting, design and landscape integration in a coordinated manner. This is not an argument that any on-site accommodation is required or proposed at this stage. Rather, it is an allocation-stage point that the policy framework should be capable of supporting the practical operation and planned growth of rural employment uses where robust evidence demonstrates an essential functional need.
82. We therefore support H8 in principle, but recommend that the supporting text clarifies two matters for effective implementation:

- Relationship with strategic allocations and masterplanning: where a strategic site allocation includes the retention and expansion of rural employment activity, any proposal for a rural workers' dwelling should be capable of being considered in the context of an agreed masterplan and parameter framework, so that the policy tests on siting, landscape integration and amenity can be addressed comprehensively rather than in isolation. This would support coordinated delivery and avoid piecemeal decision-making.
 - Proportionate application of the "temporary dwelling" expectation: H8 includes a criterion referencing circumstances where a temporary rural workers' dwelling has previously been granted, or evidence is provided to justify why a temporary dwelling has not been required. It would assist clarity if the Plan confirms that this is not a rigid sequencing requirement, and that where a business is demonstrably established and evidence shows an essential functional need, the policy allows an appropriately evidenced route to a permanent dwelling without unnecessary delay.
83. These clarifications would strengthen policy effectiveness, align H8 more clearly with the Plan's economic strategy, and ensure that the Plan supports genuine rural enterprise needs without weakening the safeguards that the criteria provide.

Economy

Preferred Options Draft Policies E1, E2 and E3

84. The economy policy suite is a material part of the Site promotion case because Land at Wormingford Airfield is advanced as a strategic mixed-use opportunity, including the retention and planned expansion of existing employment activity alongside new homes. In plan-making terms, this is relevant to the soundness and effectiveness of the Preferred Options Plan because it can assist in achieving a more balanced relationship between homes and jobs, and it provides a practical mechanism for supporting the rural economy as part of an allocation-led approach.
85. Policy E1 (Protection of Employment) safeguards existing employment land and premises (including identified employment provision) primarily for Class E(g), B2 and B8 uses, and only supports redevelopment or change to non-employment uses where a series of tests are met, including no reasonable prospect of continued employment use supported by at least 12 months marketing evidence. In principle, we support the

objective of protecting fit-for-purpose employment provision and avoiding unnecessary loss of employment land.

86. However, it is important that E1 is applied with sufficient flexibility to support the Plan's wider objectives, particularly where strategic sites come forward as comprehensive, masterplanned proposals. The Council's Employment Study identifies an overall quantitative shortfall in employment land supply relative to forecast demand over the plan period and recommends that the Council will need to identify additional sites, while also adopting a balanced approach to protection to avoid both "over-protection" and "under-protection". The Study also highlights the need to support a range of business sizes and requirements and acknowledges that demand and suitability will vary geographically.
87. In that context, the key point for this Site promotion is that E1 should not be applied in a way that inadvertently discourages comprehensive mixed-use schemes that retain and support employment activity. E1 includes a criterion seeking to avoid conflict with existing or proposed B or E(g) uses, including in relation to traffic, noise and other effects.
88. For strategic mixed-use allocations, the correct plan-led response is not to treat potential interface issues as a reason to exclude sites at plan stage, but to ensure that allocation policy and masterplanning secure appropriate design, buffers, access and phasing so that employment activity can operate successfully alongside new homes. This is one of the principal advantages of allocation, as it enables coordinated mitigation rather than piecemeal decision-making.
89. Policy E2 (Economic Development in Rural Areas and the Countryside) is directly relevant to Wormingford Airfield. E2 confirms that the Council will protect employment areas in rural Colchester that provide an economic function, including both allocated sites and other rural locations performing a similar role, and identifies a range of employment-generating uses that are appropriate in principle, including E(g), B2 and B8 uses and other employment-generating activities aligned with rural enterprise. E2 also supports extensions and replacement buildings where they are beneficial to an established business, subject to appropriate design and landscape mitigation.
90. This policy direction strongly reinforces the planning logic of allocating Wormingford Airfield as a strategic mixed-use site. Rather than treating the existing employment function as a constraint on housing allocation, E2 provides a positive policy basis to retain and strengthen rural employment uses, including through appropriate enhancement and modernisation of premises, while controlling environmental effects. It

is also consistent with the Council's Employment Study recommendations that the Council should support flexibility in the rural economy, including opportunities to reuse and adapt land and buildings where appropriate.

91. For policy effectiveness, it would assist if the supporting text for E2 (and the application of E1 where relevant) is clear that the "rural employment" protection framework is intended to support investment and planned growth of established rural employment activities, including where those activities sit within a strategic mixed-use allocation. This matters for deliverability: where the Plan seeks to combine housing delivery with employment retention and growth, the policy framework should be unambiguous that coordinated masterplanning is the means by which amenity and landscape matters will be managed, rather than an approach that inadvertently sterilises the employment component or deters investment through uncertainty.
92. Policy E3 (Agricultural Development and Diversification) is also relevant in principle, as it supports and encourages appropriate diversification proposals that sustain rural enterprise, subject to compatibility with the rural environment and other policy protections. While Wormingford Airfield is not promoted as an agricultural diversification scheme, the policy reinforces the Plan's wider objective of sustaining rural economic activity and supporting enterprise in the countryside, which is aligned with the Site's mixed-use promotion and the retention and expansion of existing employment activity.
93. Overall, the economy policy suite supports, rather than undermines, the case for taking Wormingford Airfield forward as an allocation option. In particular, E2 provides a strong policy basis for safeguarding and enhancing rural employment functions, and the Council's Employment Study indicates that the Plan must ensure sufficient employment land and adopt a balanced approach that avoids blight and supports investment. We therefore request that, as the Plan progresses, the Council ensures that:
 - the application of E1 and E2 explicitly supports comprehensive, masterplanned mixed-use allocations that retain and strengthen established rural employment activity; and
 - the site selection and reasonable alternatives testing gives positive weight to strategic sites that can support both housing delivery and the rural economy, subject to criteria-led allocation requirements on access, design, landscape mitigation and amenity protection.

Growth and Opportunity Areas and Proposed Allocations

Strategic approach to allocations and the case for Land at Wormingford Airfield

94. 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 deliverable portfolio of sites. This is therefore the principal mechanism for ensuring the Plan is effective and capable of meeting Colchester's 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.
95. The Plan's housing requirement is framed at a materially higher level than the adopted Local Plan requirement. As set out earlier 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 historic adopted annual requirement of 920 dwellings per annum. This internal alignment point matters directly for allocations: the portfolio and trajectory must be capable of supporting a higher delivery challenge, and the Plan should not rely on narrow margins or optimistic assumptions that are only sufficient when measured against the lower historic figure.
96. The Council's latest five-year housing land supply position statement indicates a supply position marginally above five years. That position relies in material part on windfall delivery assumptions and other components which, while capable in principle of contributing to supply, introduce sensitivity to the assumptions applied and to delivery performance. In plan-making terms, the implication is not that the Council should abandon windfall assumptions, but that the allocations portfolio should be sufficiently resilient such that any slippage in windfalls, strategic components or lead-in times does not result in under-delivery against the Plan's higher requirement.
97. The Preferred Options Plan also includes reliance on strategic components, including the Tendring Colchester Borders Garden Community, with an assumed contribution within the plan period. As set out earlier, strategic new settlement delivery can be subject to programme risk and infrastructure dependencies. The Plan should therefore avoid over-reliance on any single strategic component and should include a realistic contingency margin in the overall supply, supported by a balanced portfolio of sites with varied lead-in profiles and delivery characteristics.

98. In that context, the Council should ensure that the Proposed Allocations list includes sufficient deliverable and developable opportunities beyond existing commitments, so that the Plan can achieve the requirement in practice over the plan period. This includes identifying strategic allocations that can contribute materially to supply and also deliver wider plan objectives, including economic growth, rural vitality and environmental enhancement through masterplanning.
99. Land at Wormingford Airfield should be assessed and progressed through this allocation lens. The Site is already within the Council's assessed site pool through the SLAA process (recorded as "Fairfields Farm Wormingford Airfield", Site ID 10638). It is promoted as a strategic mixed-use opportunity which can, in principle, provide a meaningful additional source of housing delivery within the plan period, while also supporting the rural economy through the retention and planned expansion of established employment activity.
100. The Site is not promoted on the basis that it is unconstrained or that delivery would be automatic. It is in the countryside and would need to be shaped through landscape-led masterplanning, sustainable movement measures and proportionate environmental mitigation in line with the Plan's policy framework. The point for allocations is that the Site has the characteristics of a strategic, comprehensively planned opportunity where those matters can be addressed through allocation criteria and masterplanning, rather than being left to piecemeal and reactive decision-making.
101. Allocating the Site would also support the Plan's economic strategy. The Council's Employment Study identifies a quantitative shortfall in employment land supply relative to forecast demand and highlights the importance of supporting investment and flexibility in the local economy. The Site's mixed-use proposition, including the retention and expansion of existing employment activity, aligns with that direction and provides an opportunity to integrate homes and jobs, which in turn can assist in reducing out-commuting pressures in principle and improving the overall sustainability balance.
102. From a plan effectiveness perspective, the Council should recognise the value of strategic mixed-use allocations in strengthening deliverability. Strategic sites can internalise and fund infrastructure and mitigation, provide flexibility in layout and phasing, and deliver green and blue infrastructure as an organising framework. This aligns with national policy which recognises that the supply of large numbers of new homes can often be best achieved through larger scale development, provided such schemes are well located and supported by infrastructure and deliver at a realistic rate.

103. 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. Those steps are intended to ensure the Plan is deliverable, resilient and capable of meeting the housing requirement in practice, while enabling strategic mixed-use opportunities to be assessed fairly and transparently:
- The Council should ensure that Wormingford Airfield is transparently tested as a reasonable alternative through the Sustainability Appraisal and site selection process, with clear reporting of the reasons for selection or rejection against the spatial strategy, housing delivery requirements and environmental policy framework.
 - The Council should ensure that the allocations portfolio is calibrated to the higher local housing need-led requirement and includes a realistic contingency margin, rather than relying on narrow headroom, sensitive windfall assumptions or optimistic build-out trajectories.
 - Subject to that testing, the Council should progress Land at Wormingford Airfield as a proposed allocation in the next iteration of the Plan, framed as a strategic mixed-use site with criteria-led requirements for masterplanning, access and sustainable movement measures, landscape-led design and environmental mitigation, and the retention and support of established employment activity.
104. In summary, the effectiveness of the Preferred Options Plan will depend on whether the Growth and Opportunity Areas and Proposed Allocations deliver a portfolio that is genuinely capable of meeting the Plan's housing requirement over the plan period, with sufficient flexibility and contingency to manage delivery risk. Land at Wormingford Airfield is a credible strategic option within the assessed site pool which can assist in strengthening that portfolio through a mixed-use allocation proposition aligned with both housing delivery and economic objectives.

Summary and Requested Modifications

105. For the reasons set out in these representations, we support the Council's intention to plan positively for housing delivery through the Preferred Options Local Plan, including the approach in Draft Policy ST5 of aligning the housing requirement with the local housing need position. However, the soundness of the Preferred Options Plan will ultimately depend on whether the spatial strategy and proposed allocations represent the most appropriate reasonable alternatives and whether they are capable of being

delivered in practice throughout the plan period, with realistic delivery assumptions and an adequate contingency margin.

106. The Plan's overall effectiveness is sensitive to delivery risk. This is particularly relevant where the housing strategy relies materially on strategic components and assumptions which may be subject to programme slippage over a long plan period. In that context, it is essential that the Plan maintains a balanced portfolio of sites and does not overly rely on narrow headroom in the supply position or on optimistic trajectories. A resilient strategy should provide choice and flexibility so that housing needs can still be met if some elements of supply deliver later than anticipated.
107. Land at Wormingford Airfield (Fairfields Farm, SLAA Site ID 10638) is a credible strategic site within the Council's assessed pool and should be tested and progressed as a proposed allocation in the next iteration of the Plan. The Site is promoted as a strategic mixed-use opportunity and is distinguished by the presence of established employment activity and the potential to align planned housing delivery with retention and expansion of the rural economy through a coordinated, masterplanned approach. The promotion is advanced on an "in principle" basis and is not intended to commit to a fixed quantum of housing or a fixed delivery programme at this consultation stage. Rather, it is intended to demonstrate that the Site is capable of contributing meaningfully to the Plan's objectives and to strengthening the robustness of the supply portfolio.
108. The policy framework within the Preferred Options Plan provides appropriate mechanisms to shape the Site, including through countryside and sustainability criteria, environmental and green network requirements, and the economy policies that support rural employment. Taken together, the Plan is capable of accommodating a strategic allocation here, subject to appropriate criteria and evidence at the relevant stages. The key plan-making issue is therefore whether the Council is willing to test and progress the Site transparently as a reasonable alternative, given the need for a deliverable and resilient allocations portfolio.
109. In order to ensure that the Plan is justified and effective, the Council should make the following modifications:
 - Progress Land at Wormingford Airfield (Fairfields Farm, SLAA Site ID 10638) as a proposed allocation in the next iteration of the Local Plan, framed as a strategic mixed-use site capable in principle of making a meaningful contribution to housing delivery over the plan period alongside the retention and support of established employment activity.

- Ensure that the Site is transparently assessed and reported through the site selection and Sustainability Appraisal process as a reasonable alternative, including clear reasons for selection or rejection against the spatial strategy, housing delivery requirements, countryside policy framework, and environmental and economic objectives.
- Calibrate the allocations portfolio and delivery trajectory to the higher local housing need-led requirement and ensure that the Plan's supply position includes a realistic contingency margin, rather than relying on narrow headroom or sensitive assumptions that could be vulnerable to slippage.
- Where strategic components are relied upon for supply within the plan period, ensure that their assumed delivery profile is realistic and supported by clear evidence and infrastructure programming, and ensure that the wider allocations portfolio provides resilience in the event of delay.

110. If the Council is not minded to progress the Site as a proposed allocation at this stage, a clear alternative would be to identify it expressly as a contingency allocation to be released if monitoring indicates under-delivery. However, the preferred position remains that the Site should be progressed now, through the Preferred Options Plan process, so that it can be assessed properly through reasonable alternatives testing and, subject to that evidence, provide an additional strategic allocation that strengthens the Plan's deliverability and resilience over the plan period.

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