



Colchester City Council  
New Local Plan Update

**Preferred Options Local Plan Regulation 18  
Consultation 2025-26**

January 2026



[gladman.co.uk](https://www.gladman.co.uk)



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# 1 INTRODUCTION

## 1.1 Context

1.1.1 Gladman Developments Ltd. (Gladman) welcome the opportunity to comment on the Colchester City Council Preferred Options as part of the Local Plan Full Update and request to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

1.1.3 This submission provides Gladman's formal representations to the Regulation 18 consultation.

1.1.4 Gladman Developments have several land interests in Colchester City's authoritative area which are being promoted through the emerging Local Plan Update. The following sites were submitted to the Call for Sites and are considered to be suitable and sustainable locations for development:

- Land off Baker's Lane, Braiswick (around 100 dwellings, policy reference PP7)
- North-East Colchester (west of Harwich Road, cumulating approximately 750 of the total 2,000 dwellings of the entire allocation PP9)
- Land off Colchester Road, West Mersea (up to 100 dwellings)
- Land off Rowhedge Road, Colchester (up to 75 dwellings)

1.1.5 The sites are available, suitable, and deliverable for housing as summarised in Section 6 of this representation, and two of these sites (at Baker's Lane and at Harwich Road) are draft allocations. Gladman looks forward to engaging further with the Council as the plan progresses.

- 1.1.6 This submission also has been produced largely utilising the 2024 NPPF (National Planning Policy Framework) regulations recognising that the Council are seeking to submit their Local Plan before the December 2026 deadline. We note that a revised NPPF consultation has very recently been announced (on 16<sup>th</sup> December 2025), and therefore the council will need to carefully consider any potential implications for the emerging Local Plan.
- 1.1.7 One minor house-keeping comment would be that draft local plans are often very long documents, and so it is useful for the reader to have access to the whole document as one, single, PDF file. Unfortunately, the draft plan is not available in this format and we found it difficult to navigate the document via the website portal, which requires scrolling through the web pages. A single file that can be downloaded is therefore requested for future consultations.

## 2 LEGAL COMPLIANCE

### 2.1 Duty to Cooperate

- 2.1.1 The Duty to Co-operate, as a legal test, has now been rescinded by the Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023. However, engaging with prescribed bodies on relevant strategic and cross boundary matters remains an important part of the plan making process.
- 2.1.2 The revised Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process<sup>1</sup>. The SoCG(s) should provide a written record of the progress

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<sup>1</sup> PPG Reference ID: 61-001-20180913

made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

## 2.2 Sustainability Appraisal

- 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2 The Council should ensure that the results of the SA process conducted through the preparation of the Local Plan clearly justify the policy choice made, including proposed site allocations (or decisions not to allocate sites) when considered against reasonable alternatives. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected.
- 2.2.3 The SA must demonstrate that a comprehensive testing of options has been undertaken and that it provides evidence and reasoning as to why any reasonable alternatives have not been pursued. A failure to adequately give reasons in the SA could lead to a challenge of the Council's position through the examination process. The SA should inform plan making. Whilst exercising planning judgement on the results of the SA in the Local Plan is expected, the SA should still clearly assess any reasonable alternatives and clearly articulate the results of any such assessment.

## 3 NATIONAL PLANNING GUIDANCE

### 3.1 National Planning Policy Framework

3.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The NPPF requires plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

3.1.2 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

3.1.3 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

3.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Colchester City Council Local Plan provides a

sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.

- 3.1.5 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.6 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. Annex 2 of the Framework (2024) defines the terms “deliverable” and “developable”.
- 3.1.7 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full.
- 3.1.8 As outlined in our Introduction section, a revised NPPF was announced on 16<sup>th</sup> December 2025. In light of this, the council will need to ensure that any future consultations for this draft Local Plan are compliant with this revised version. In the interim, this rep has been submitted largely in conjunction with the 2024 version of the NPPF.

## 3.2 Planning Practice Guidance

- 3.2.1 The need to plan for the sufficient delivery of homes is affirmed in the Written Ministerial Statement (WMS) given by the then Deputy Prime Minister, and Secretary

of State for Housing, Communities and Local Government, Angela Rayner on 30 July 2024, in addition to the on-going consultation on proposed revisions to the Framework and other changes to the planning system.

- 3.2.2 The WMS reaffirms that the country is in “the most acute housing crisis in living memory” and is clear in its conclusion that “there is no time to waste. It is time to get on with building 1.5 million homes”. These are now material considerations for plan making and decision making and clearly set the tone and direction of the newly elected Government.

## 4 REGULATION 18 CONSULTATION

### 4.1 Introduction

- 4.1.1 The sections that follow below include comments from Gladman on the overall strategic approach taken by the council, as well as reviewing some of the proposed policies and site allocations.
- 4.1.2 The minimum end date of the plan should be 15 years from adoption, as per paragraph 22 of the Framework. At present, it is difficult to follow which year is the starting point for the plan period – in the draft plan under para 2.14 it confirms the plan period is 2025-2041, however in Section 14, Appendix A, Table 14.1 (when confirming the new policies over the previous draft policies) it is stated that the plan period is 2026-2041. The plan seemingly seeks to cover the period 2025 or 2026 to 2041, resulting in either 15 or 16 years being planned for. Clarity is sought on this regarding the start date.
- 4.1.3 The most appropriate starting date of the two is 2026. The standard method is a forward-looking assessment of need taking into account both under and oversupply in its methodology and uses a base period that is required to start in from the year that the housing need is calculated. In order to be consistent with national policy, Gladman would recommend that the plan period to start in the most recent year in which the housing need is calculated.

4.1.4 Additionally, our experience of Local Plan examinations suggests that delays to the local plan-making process are inevitable, and so the plan period only going to 2041, i.e. 15 or 16 years from the Regulation-18 consultation, is too short. It is advisable, therefore, to look beyond 2041 to ensure that the required period is covered regardless of any likely delays. It is suggested that the plan period be amended to at least 2026-2043.

## 4.2 A Settlement Hierarchy for Colchester

### **Settlement Hierarchy**

4.2.1 The settlement hierarchy is presented under draft policy ST3: Spatial Strategy, giving 5 separate tiers, as well as open countryside.

4.2.2 Gladman consider that the draft settlement hierarchy is appropriate for the growth of the authoritative area for the plan period. The proportionate distribution of growth is important to ensure that settlements – both large and small – remain sustainable and that growth takes place in locations which can support it.

4.2.3 Gladman are promoting sites across the settlement hierarchy in Colchester (three sites) as well as one in West Mersea, which has Large Settlement status in the draft plan. These site promotions are suitable and sustainable locations due to the range of services and facilities they provide, the sustainable public transport choices available and quality of life they offer residents. New development in these locations can contribute to the vitality and viability of local services, stimulate the local economy through increased resident expenditure and support local education and healthcare facilities through S106 and/or CIL contributions.

## 4.3 Housing Figures and Requirement and Growth Strategy

4.3.1 Draft policy ST5: Colchester's Housing Need provides details of the housing numbers required over the plan period, with the plan period here stated as being 2025-2041 (16 years). It confirms that at least 20,800 new homes are needed to meet the future housing need, equating to 1,300 dwellings per year.

- 4.3.2 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 4.3.3 We note in draft policy ST5 that provision will be made for at least 20,800 new homes across a range of tenures. These are broken down by: existing commitments, Tendring Colchester Borders Garden Community, windfall and the local plan allocations. These four give a combined estimated total of 21,106 dwellings.
- 4.3.4 These figures allow for a 308-dwelling buffer from the housing need, equating to a 1.48% buffer on what is needed over the 16-year period. This figure is far too low to be sustainable and relies too heavily on all of the allocations coming forward with the estimated dwellings numbers, as well as appropriate windfall levels being available. It is advisable that this buffer is increased to provide more confidence that the housing need is met.
- 4.3.5 In light of this, it is suggested that more sites should be identified in order to ensure that the need of 20,800 is not met. The most appropriate way to approach this would be to include a greater number of short-medium sized sites, as these not only assist with the overall housing need but also greatly assist with delivery in the first few years of a local plan.
- 4.3.6 Gladman is promoting such sites in West Mersea, which can accommodate around 100 dwellings, and off Rowhedge Road, Colchester, which can accommodate around 75 dwellings. Further detail on this can be found in Section 6: Site Submissions below.
- 4.3.7 Further, the need for affordable homes is a pressing issue, and the Council may wish to pursue a higher housing requirement to maximise the delivery of affordable homes. This approach has been progressed by East Riding of Yorkshire.
- 4.3.8 Draft Policy ST3 sets out the strategy for growth across the authority area. The planned growth within the draft plan is concentrated in existing settlements in a proportional manner to ensure that there are sustainable levels of growth in appropriate locations (i.e. utilising the settlement hierarchy).

- 4.3.9 In principle, Gladman consider such an approach to be suitable, however, there are elements of this which require review.
- 4.3.10 Whilst we agree with this proportionate approach, the numbers which add up to meet the housing need across the plan period are so fine that it would appear that there are several sites that the plan is lacking to ensure that the housing need is met. To continue with the proportionate approach using the settlement hierarchy, we would recommend that more small-medium sized sites are allocated across the settlements.
- 4.3.11 As advised, such sites assist with both the overall housing need and also greatly assist with delivery in the first few years of a local plan. Having more planned development will also take the pressure off the dependence for windfall development to come forward. The windfall reliance accounts for around 10% of the housing need, which in our experience in Examinations is not wholly supported by the Planning Inspectorate. It is therefore advisable to allocate more sites to reduce the windfall dependency.
- 4.3.12 In the first instance, we submit that such sites should come forward in the larger settlements, such as Colchester and the Large Settlements, and that Gladman's land interests at Baker's Lane, West Mersea and off Rowhedge Road, Colchester would be ideally positioned to fulfil this role.
- 4.3.13 The Rowhedge Road site lies adjacent to the Colchester Urban Area, is sustainably located in relation to the city's services and amenities and further development in the location can be successfully assimilated into the existing settlement and its surroundings. In addition to its status as a Large Settlement, West Mersea is the only designated Large Settlement in the hierarchy for some distance geographically, such that growth here will help support the wider area as a growth hub, which helps support the Small Settlements of East Mersea, Peldon, Great Wigborough and Salcott. Further information on our sites in West Mersea and land off Rowhedge Road can be found in Section 6 below.
- 4.3.14 Finally, whilst not strictly concerned with housing numbers and growth, Policy ST2: Environment and Green Network Sites sits alongside the Local Plan's other suite of

proposed Strategic Policies, and seeks to identify “*Strategic Areas that present the best opportunities for habitat creation and enhancement aimed at improving biodiversity*”, which it states are shown on the policies maps as ‘strategic biodiversity areas’. The policy goes on describe how these areas will be protected, with support given to strengthening and enhancing connections between habitats to improve the contribution to the biodiversity network.

- 4.3.15 As outlined above, Gladman submit that there may be a requirement to identify additional sites to ensure Colchester’s housing needs are met. At this stage, we therefore suggest that there may be a corresponding need to review any policies that may be relevant to achieving this objective, which could include Policy ST2.
- 4.3.16 In this regard, we question whether the ‘protection’ of ‘strategic biodiversity areas’ is appropriate (if this is what the policy is proposing), and query whether the Local Plan should be taking a more balanced approach, which could recognise that development proposals can often provide the opportunity to secure the long-term management of green infrastructure. Gladman reserve the right to comment on this policy and any supporting evidence base documents in response to future consultations.

## 4.4 Development Management Policies

### **Draft Policy GN5 – Suitable Alternative Natural Greenspace**

- 4.4.1 We generally agree with the principle of this policy, however Blackwater Estuaries Special Protection Area is the main reason for our site in West Mersea not being allocated for residential development. Given that there are mitigation measures available under draft policy GN5, it is unclear why the site has been ruled out so hastily.

### **Draft Policy LC3 – Coastal Areas**

- 4.4.2 Policy LC3 seeks to take forward Colchester’s Coastal Protection Belt designation, as presently covered by adopted Section 2 Local Plan Policy EN2. The policy advises that in such areas of the borough an integrated approach to coastal management will be promoted and development will only be supported if it meets certain criteria.

- 4.4.3 As detailed in Section 6 of these submissions below, Gladman are currently promoting Land off Rowhedge Road, Colchester, which is situated within the Coastal Protection Belt as defined on the Council's draft Policies Map. The supporting text to Policy LC3 advises that its purpose *"is to protect Colchester's rural and undeveloped coastline from inappropriate development that would adversely affect its rural, undeveloped and open character..."*. However, we question whether circumstances of the Rowhedge Road site are consistent with these characteristics.
- 4.4.4 The Rowhedge Road site lies adjacent to the existing Colchester urban area, with existing areas of development adjoining the site the south east and west, and existing areas of woodland planting bordering the site to the north and east. Any development in this location would be experienced as part of the existing built-up area, would be well contained from its wider context, including the Colne Estuary, and would be accompanied by a comprehensive framework of green infrastructure and landscaping.
- 4.4.5 We therefore query how development in this location could adversely affect the rural, undeveloped and open character of Colchester's coastline, and how including the Rowhedge Road site within the Coastal Protection Belt designation is consistent with these aims. We would request that the inclusion of the Rowhedge Road site within the Coastal Protection Belt designation is reviewed.
- 4.4.6 As detailed in Section 6 of these submissions, we submit that Land off Rowhedge Road is well positioned to accommodate further residential development to meet Colchester's needs, and that it could do so successfully without adversely affecting to the site's setting and surroundings.

**Draft Policy NZ1 – Net Zero Carbon Development (in operation)**

- 4.4.7 We disagree with the need for this policy. Whilst we acknowledge the importance of new dwellings being environmentally sustainable for future generations, such requirements will be made under national policy, thus making a development management policy on this aspect unnecessary. We would therefore request that this policy be removed and left for the national building regulations to accommodate.

- 4.4.8 However, should this policy remain, we would request that instead of all dwellings, that a percentage of dwellings per site be built out to the standards requested. This would result in net-zero carbon dwellings still being built out, but without the detriment of unaffordability for those seeking to buy, as ultimately the additional costs incurred in making dwellings net-zero will be reflected in the house prices and therefore the fall upon purchaser.

#### **Draft Policy H6 – Self and Custom Build**

- 4.4.9 We support this policy. Requesting 2% of large developments to be self/custom build plots is appropriate, as this is a reasonable number and does not negatively impact smaller schemes with mandatory self/custom build requirements, as the requirement is only for schemes of 150+ dwellings. This is provided that the evidence supports these figures.
- 4.4.10 We also agree with the 12-month turnaround time on the Self-Build Register, with sales on the open market taking place after this period should the plot(s) not be purchased.

## **5 SITE ALLOCATIONS**

### **5.1 General Approach and Housing Trajectory**

- 5.1.1 As above, the 20,800 dwellings required over the plan period are expected to come forward in four possible ways: existing commitments, Tendring Colchester Borders Garden Community, windfall and the local plan allocations.
- 5.1.2 Gladman agrees with the proportionate approach and agrees with the residential allocations that have been included.
- 5.1.3 However, as outlined above, there is very little room for error in terms of housing numbers (308 across the entire plan period). Given this tight margin, it would be appropriate to seek further small to medium sized sites for allocation to assist with these margins, as well as assure a 5-year housing land supply (as such sites tend to come through in the early years of a local plan).

- 5.1.4 As advised, Gladman are promoting sites in West Mersea and Rowhedge Road which are wholly appropriate to assist in this regard. Further details are in Section 6: Site Submissions below.

## 6 SITE SUBMISSIONS

### 6.1 Land off Baker's Lane, Braiswick

- 6.1.1 Land off Baker's Lane is a highly sustainable location for growth in the draft local plan and lies within the proposed settlement boundary for Colchester. This allocation (reference PP7) is around 18.5 acres and can provide around 100 dwellings. Gladman strongly support the inclusion of this site in the plan, and it is available, deliverable and achievable to bring a positive level of residential development to the settlement.
- 6.1.2 The site lies in a natural direction of growth to the west of the settlement, with recent development taking place to the east of the site. The site also lies within reasonable walking distance of Colchester Train Station, as well as the nearby primary school and nursesey. Additionally, there are two public rights of way (PROWs) joining the site on its western boundary, again emphasising the site's strong pedestrian linkages to its surrounding areas.
- 6.1.3 Gladman are seeking expert advice for pedestrian connections to the existing footway on Baker's Lane. We are also open to the possibility of a safe and appropriate pedestrian crossing if required.
- 6.1.4 An appropriate buffer will be provided on any application for the Moat Farm Dyke scheduled monument to the east of the site. We are currently liaising with experts on this matter to ensure the best possible outcome for this aspect.
- 6.1.5 Highways access can easily be obtained along the western boundary of the site, with, given the limited space along Baker's Lane, pedestrian footpaths being available within the site's boundary as part of a future scheme.

6.1.6 A policy-compliant level of affordable housing will be provided, in a range of sizes and tenures. The site will accommodate a range of house types and sizes informed by local need.

6.1.7 The site acts as a crucial gatekeeper for future growth of Colchester in a westerly direction, with possibilities to the south and west of this site becoming available after development here at Baker's Lane. Development of this site is therefore crucial for any future growth of the settlement in a westerly direction.

## 6.2 North-East Colchester

6.2.1 As aforementioned, Gladman are promoting a 97-hectare site at North East Colchester (west of Harwich Road) for a residential led development comprising approximately 750 homes, a local centre, a two form entry primary school and strategic green space. This site forms part of a larger site allocated for around 2,000 homes under draft Policy PP9. In accordance with the requirements of draft Policy PP9, Gladman have worked alongside other land promoters and developers who own or control land within the remit of Policy PP9 and have prepared a Masterplan Framework jointly with Gleeson, but with input from other parties with smaller land holdings, including Taylor Wimpey and Mrs Julie Clinch. The Draft Masterplan Framework ('the Framework') can be found at Appendix 1, appended to this submission's email.

6.2.2 The purpose of the Framework is to articulate a vision for the future development of North East Colchester. It seeks to set out shared objectives, spatial principles and development aspirations that could guide the successful delivery of the site, aligning with the requirements of national and local planning policy, including the expectations of emerging Policy PP9. Following this Regulation 18 consultation, further engagement with Colchester City Council and other key stakeholders will be undertaken with regards to the content of the Framework.

6.2.3 The Framework is underpinned by a series of technical studies undertaken on Gladman and Gleeson's sites, forming a clear and strong evidence base to the

proposals. Together these assessments have informed a constraints and opportunities mapping exercise, which has assisted with preparing a deliverable Masterplan that could accommodate the requirements and expectations of the draft Policy PP9. This includes the expectation that the allocation would provide land for a new primary school and a local centre. As discussed below, it is considered that the Harwich Road site would be the optimum location to accommodate these facilities.

- 6.2.4 Gladman is supportive of the allocation of land west of Harwich Road as part of the North East Colchester allocation. The Framework has been prepared jointly with Gleeson to demonstrate that the site can viably deliver all of the requirements set out by the policy. Each of these requirements in so far as that they relate to the Gladman site are discussed in further detail below.

#### **Land Uses and Infrastructure Provision**

- 6.2.5 Draft Policy PP9 anticipates the delivery of approximately 2,000 new dwellings of a mix and type of housing to meet evidenced needs which is compatible with surrounding development. Applying a range of locally appropriate densities across the Gladman site, around 750 dwellings could be delivered which would include 1-5 bedroomed homes in a range of house types.
- 6.2.6 As demonstrated by the Framework, the Gladman site will deliver a number of additional services and facilities that will be available for new and existing residents. A 1-hectare Local Centre will be delivered on-site, providing small scale retail and community uses and offering economic and social benefits. A 2.1-hectare site for a new two form entry primary school is also proposed by the Framework on the site, increasing the offer of education facilities within the locality in accordance with the emerging policy and the proposed requirements of the Local Education Authority.
- 6.2.7 The decision has been made to accommodate all community uses (local centre, school and strategic open space) required by draft Policy PP9 on the Gladman controlled site to the west of Harwich Road, as the physical attributes of the site, as well as opportunities for safe and suitable access are most favourable compared with other land parcels within the allocation. The proposed location within the centre of

the Gladman site will ensure that the community uses and the proposed school can benefit from strong frontage and visibility along the primary route from Harwich Road. Gladman are therefore able to provide certainty around the delivery of this necessary public infrastructure, as these uses will be proposed as part of a future outline application submitted by Gladman, should the site be allocated within the Local Plan.

### **Highways and Access**

- 6.2.8 The Site is sustainably located in respect of access to facilities and services, including public transport, with methods of travelling other than private car a viable option for future occupiers. Furthermore, public transport connections could also be available from within the site with the primary access route running through the development, which will be of the necessary standard to accommodate a bus route connecting St John's Road to Harwich Road.
- 6.2.9 Draft Policy PP9 notes a requirement for safe and suitable site access to required highway design standards. With regards to the Gladman site, the Framework propose two primary access points off Harwich Road and one primary access point off St Johns Road. Initial feasibility studies confirm that safe and suitable access can be provided in these locations, supported by the introduction of traffic-calming measures to Harwich Road to improve walkability and a creation of a new safe crossing at the intersection with the active travel corridor.
- 6.2.10 In response to the requirement for the provision of active and sustainable travel and ensuring connectivity with existing Public Rights of Way the Framework will deliver an enhanced pedestrian and cycle network. As well as a primary active travel corridor linking the Gladman site to the wider PP9 allocation. the Framework also illustrates the provision of a secondary active-travel route within the Gladman site, connecting Bullace Close, Dunthorne Road and Harwich Road. These key networks will be supported by a wider network of formal and informal footpaths that link the local centre with dwellings within the site and surrounding communities.

6.2.11 Account has also been taken of land within the allocation to the north of the Gladman site, which would require access to be taken through the Gladman site. The Framework allows for vehicular and pedestrian access into this parcel to ensure comprehensive development across the two sites.

#### **Green and Blue Infrastructure Provision**

6.2.12 Enhanced open space in excess of 10% of the total allocation area is required by draft Policy PP9, including one area of 'strategic' open space, and multiple areas of incidental open space. It is proposed that approximately 40% (38.12 hectares) of the total PP9 allocation will be retained as green space, supplemented by additional POS within development parcels.

6.2.13 The green and blue infrastructure strategy set out by the Framework brings together existing woodland, hedgerows, trees, with new play spaces, amenity areas, community growing spaces, SuDS features, natural and semi-natural habitats, and a connected path network. Their design and placement have been informed by technical inputs and the ambition to create an integrated network that supports both residents and biodiversity.

6.2.14 As demonstrated by the Framework, the Gladman site will accommodate an area of strategic open space in the form of a new local park centred around an existing mature oak tree which will act as a focal point for the new and existing residents. It was agreed with all participating parties of the framework that the Gladman site was the most appropriate location within the allocation for this community space due to its flat topography, accessibility from existing surrounding communities (which will be further enhanced) and the opportunity to create a community hub combined with the local centre and school sites.

6.2.15 In response to the requirements of draft Policy PP9, an appropriate surface water management strategy can be delivered. The Framework Plan identifies the indicative location of Sustainable Drainage Systems (SuDS) to attenuate surface water, which in relation to the Gladman site are indicatively located along the northern site boundary following the advice of Gladman's flood risk and drainage consultant. To support this,

an initial Flood Risk Assessment (FRA) has been undertaken to evaluate potential flood risks associated with the proposed development and to recommend suitable mitigation measures, where necessary, to reduce flood risk to an acceptable level.

### **Protecting and enhancing Landscape Features**

- 6.2.16 Draft Policy PP9 refers to a number of site-specific features which should be protected and enhanced as part of future development proposals. Of particular relevance to the Gladman site is the Bullock Wood SSI, is a designated ancient woodland which should be appropriately buffered from development. The Framework demonstrates that development will offset from Bullock Wood, allowing for a 15m wide corridor with walking routes and incidental play, and a soft, informal green residential edge to the ancient woodland. At the outline application stage, Gladman will seek to secure the protection of the Ancient Woodland and retention of mature trees and hedgerows within the site.

### **Summary**

- 6.2.17 Gladman welcome the inclusion of the land at North East Colchester as a proposed strategic allocation and hope the additional information provided within this representation and enclosed Framework assists the Council in demonstrating that this site is deliverable and suitable for an allocation in the Regulation 19 plan. The Gladman site is wholly deliverable and can meet the site-specific requirements of draft Policy PP9.

## **6.3 Land off Colchester Road, West Mersea**

- 6.3.1 West Mersea is designated as a Large Settlement in the draft settlement hierarchy (Policy ST3). With an estimated population of over 7,000, it is a highly sustainable location for growth. Gladman are promoting land off Colchester Road for residential development.
- 6.3.2 Land off Colchester Road (ref: 10748) is capable of delivering around 100 homes and relevant community infrastructure. The entire site is approximately 12.5 acres, and it

lies on the main access road into the settlement from the north. Colchester lies around 5 miles from West Mersea, and given the site's location the impact on the roads in West Mersea will be minimal as most would head immediately north towards the city.

**6.3.3** The site comprises arable fields and 3 residential properties lying immediately to the north-east of the site, with a fourth slightly further north, all on Paeony Chase. The eastern and southern sides of the site run parallel with Colchester Road, with some dwellings immediately to the site's west and fields to the north-west. The site's location can be found in Figure 1 below. It is relatively flat in nature and has no flood risk.

**6.3.4** A policy-compliant level of affordable housing could be provided, in a range of sizes and tenures. The site will accommodate a range of house types and sizes informed by local need.



**Figure 1** Land off Colchester Road, West Mersea

**6.3.5** Suitable mitigation and precautionary measures will be implemented on site to ensure that there are no significant adverse effects on ecology and 10% biodiversity net gain can be achieved through new habitat creation and enhancement.

**6.3.6** The negative impacts the site has been labelled with in the Sustainability Appraisal are the impacts on Historic Environment and Landscape, with the latter presumably

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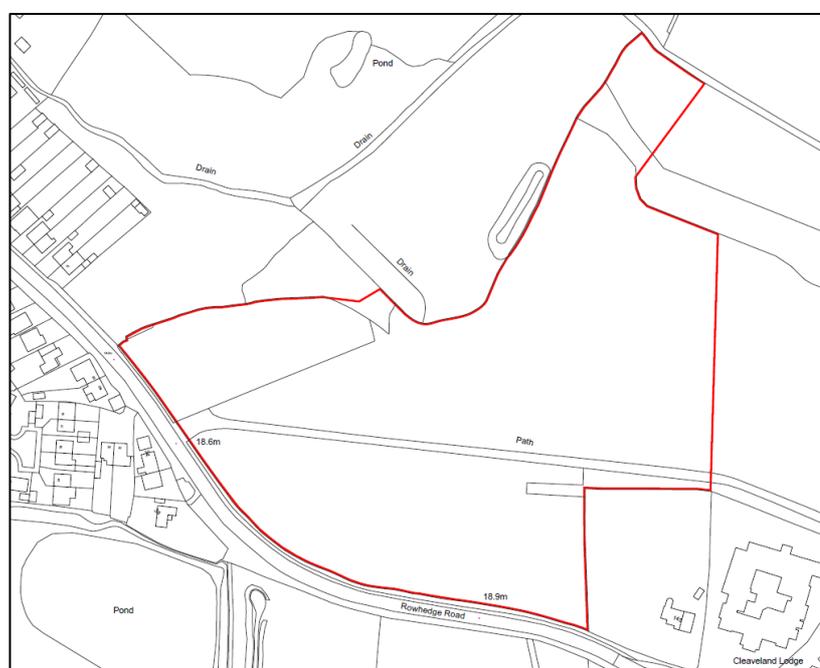
related to impacts on the estuary. However, whilst we acknowledge the importance of such an environmental feature, this should not be a reason preventing this site for allocation. In terms of proximity, the site lies several fields away from the estuary itself, and there is already existing built form between the site and the estuary. The aforementioned Paeony Chase consists of four dwellings, all of which lie closer to the estuary than the site. There is therefore no additional encroachment to the estuary, as the built form already exists – this site simply seeks to build up to the existing dwellings.

- 6.3.7 Additionally, mitigations can easily be implemented on this site – its orthodox shape allows for open space to be enjoyed to the north-west corner, thus maintaining a buffer between any houses on this site to the estuary, whilst simultaneously allowing for new and existing residents to enjoy the view of the estuary. Contrary to the site assessments, residential development of this site can have a positive impact on the estuary and given its location in the wider scheme of the settlement, its size and how the settlement itself functions, makes it an ideal location for a sustainable residential scheme.
- 6.3.8 There is one listed building near the site, which is the sole property on the northern side of Paeony Chase. There is already built form between this building and the site, meaning any visual impacts on the listed building from developing the site would be minimal. Further, mitigation measures can be undertaken to minimise the any potential impacts on the listed building.
- 6.3.9 Gladman have explored several assumptions concluded by the LPA pertaining to residential land interests in the authoritative area. Fundamentally, Gladman do not consider that the site at West Mersea should be discounted primarily due to potential impacts made upon the estuary, and can provide the Council with information regarding our design approaches to mitigate this harm. In the context of a significant national housing crisis and a significant rise in market and affordable housing needs in the District, Gladman do not consider it appropriate nor justified to discount the site on the edge of a highly sustainable settlement without due consideration of how

the site could be delivered through landscape-led design. We would welcome the opportunity to discuss this site further, and the significant benefits it can deliver with the Council.

## 6.4 Land off Rowhedge Road, Colchester

6.4.1 As discussed in our submissions above, Gladman are currently promoting Land off Rowhedge Road, Colchester for residential development. The site extends to a total area of 3.99ha, with the site's location and the extent of the land under promotion by Gladman shown in Figure 2 below.



**Figure 2** Land off Rowhedge Road, Colchester - Location Plan

6.4.2 Located immediately adjacent to the Urban Area of Colchester, which forms the top tier of the Council's settlement hierarchy and the main focus for development within the borough area, Gladman submit that Land off Rowhedge Road is ideally situated to deliver residential growth to meet Colchester's housing

6.4.3 Land off Rowhedge Road is not subject to any technical, landownership or viability constraints that would preclude its development and delivery. This is further

evidenced by the suite of technical assessments that have been prepared in support of Gladman's current planning application for the site (Colchester City Council ref: 251150) which is currently pending determination with the authority.

- 6.4.4 The remainder of this section describes the site's suitability for development, taking account of the technical studies that have been undertaken to inform its delivery to date, and describes how it would represent a logical location for further sustainable development.

#### **New Homes**

- 6.4.5 The site could accommodate up to 75 dwellings, delivering a range of market and affordable homes to meet the borough's housing needs. In accordance with the Council's emerging policy position, 30% of the homes would be delivered as affordable housing. The proposals can be delivered at a density that makes efficient use of the land whilst also being appropriate for the location and respecting its character and surroundings.

#### **Transport and Accessibility**

- 6.4.6 Vehicular access to the site can be achieved from Rowhedge Road and will ensure that both pedestrians and cyclists can access the site. Traffic surveys undertaken in support of Gladman's current application submission have shown that this access could suitably accommodate the number of vehicle movements associated with the proposals, whilst also demonstrating that the site's development would not have an unacceptable impact on the operation of the wider highway network or on highway safety more broadly.
- 6.4.7 A good range of services and facilities can be accessed from the application site by walking and cycling. The proposals lie in close proximity to the range of amenities present within Old Heath, whilst also benefitting from access to the greater range of facilities that are available in the wider Colchester urban area. The nearest bus stops to the site are situated on Rowhedge Road with further bus stops located on Fingringhoe Road. These stops are served by a regular service to Colchester city

centre and also provide access to the wider bus network, as well as Colchester railway station.

### **Ecology**

- 6.4.8 The development of the Rowhedge Road site would not cause harm to any ecological designations or protected species that cannot be addressed through appropriate mitigation and enhancement measures. A comprehensive suite of ecology surveys have assessed the site's potential to provide habitat for bats, badgers, dormice, reptiles, riparian mammals and great crested newts; through the implementation of precautionary working measures, habitat enhancement and accepted mitigation methods, it has been concluded that no unacceptable impacts will arise in this respect.
- 6.4.9 The proposed landscaping scheme for the proposals will help to improve the site's habitat structure and diversity. This could include new scrub planting, the retention and enhancement of existing on-site hedgerows and woodland planting, and the sowing of an appropriate grassland mix. Enhanced and created habitats will be positively and appropriately managed to maximise their biodiversity value and the contribution they can make to ecological networks. Biodiversity net gains would be secured in accordance with national policy requirements.

### **Landscape**

- 6.4.10 Gladman's current application submission has been supported by the preparation of a Landscape and Visual Impact Assessment (LVIA). This describes how the site could accommodate residential development without giving rise to any unacceptable landscape and visual effects, whilst also concluding that it does not constitute or form part of a 'valued landscape'.
- 6.4.11 Submissions on the Rowhedge Road site's identification as part of the Coastal Protection Belt are provided in response to Policy LC3 in Section 4 of these representations above. In this regard, it is questioned whether the inclusion whether the coverage of the Rowhedge Road site by this designation is appropriately justified.

6.4.12 It is understood that the purpose of the Coastal Protection Belt is protect the borough's coastline from development that would adversely affect its rural, undeveloped and open character. However, it is questioned whether the Rowhedge Road site exhibits these characteristics. Development on the site would be experienced as part of an existing, built-up developed area, would be accompanied by a comprehensive framework of green infrastructure and landscaping, and would be well contained from its wider context, including the Colne Estuary.

#### **Historic Environment**

6.4.13 Gladman's current application submission has been supported by a Heritage Desk Based Assessment (HDBA), describing how the development of the Rowhedge Road site would not affect the setting or significance of any listed buildings or locally listed buildings due to the absence of any historical functional associations and invisibility. The HDBA also concludes that any archaeological interest in the site could be addressed via archaeological recording, if this is deemed necessary.

#### **Flooding and Drainage**

6.4.14 A comprehensive Flood Risk Assessment (FRA) has also been prepared in support of Gladman's current planning application. This identifies how the site could be safely developed in relation to the risk of flooding. Any development would be situated within Flood Zone 1, with no built development or other vulnerable uses at risk of flooding from any other source.

6.4.15 A suitable drainage strategy delivered in accordance with Sustainable Urban Drainage System (SuDS) principles would be provided, and would ensure the development of the site would not give rise to an increased risk of flooding on-site or elsewhere. This drainage strategy would also include a three-stage treatment train to ensure there are no impacts on the receiving watercourse in relation to pollutants.

#### **Infrastructure Provision**

6.4.16 It is not anticipated that the proposals will give rise to any infrastructure deficiencies that cannot be appropriately and adequately addressed. In this context. Gladman

would be willing to enter into a Section 106 agreement with Colchester City and Essex County Council to secure proportionate upgrades to infrastructure where these are shown to be necessary to accommodate any development proposals.

### **Summary**

- 6.4.17 As can be seen from the above summary, it can be satisfactorily demonstrated that there are no infrastructure or technical constraints that would prevent the delivery of a sustainable and acceptable residential development at Land off Rowhedge Road, Colchester.
- 6.4.18 Gladman and the site's owners would welcome the opportunity to work with the authority's officers to bring a suitable proposal for the site forward, and submit that it would represent a suitable and sustainable location for further resident development as part of the Council's emerging Local Plan proposals.

## **7 CONCLUSIONS**

### **7.1 Summary**

- 7.1.1 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 7.1.2 Gladman are generally in support of the plan as drafted, with some key caveats highlighted above in both the Development Management Policies section, as well as sites not included for allocation.
- 7.1.3 The sites that have been selected as draft allocations are good options. Those which Gladman are involved in at Baker's Lane and North East Colchester are sustainable sites that will strongly assist in meeting Colchester's housing need. However, there is a need to extend the plan period further to reduce the risk of it being too short (i.e. under 15 years) and no longer being legally compliant.
- 7.1.4 Further, to extend by a few years requires more sites to be allocated to support the extra years, which would help to increase the resilience of the Local Plan and the

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buffer between the planned supply of housing vs. identified needs. Gladman proposes further small to medium sites to assist with this need, and these can be captured in the first few years of the plan period, which can also assist greatly with the 5-year housing land supply.

- 7.1.5 Gladman also request that a housing trajectory be published as soon as possible to ensure appropriate levels of growth take place throughout the plan period.
- 7.1.6 We hope you have found these representations informative and useful towards the preparation of the Colchester City Council Local Plan.
- 7.1.7 Gladman welcome any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at [policy@gladman.co.uk](mailto:policy@gladman.co.uk).

