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**DEFENCE INFRASTRUCTURE ORGANISATION (DIO)**

**REPRESENTATIONS TO COLCHESTER REGULATION 18 LOCAL PLAN  
CONSULTATION – JANUARY 2026**

Dear Sir/Madam,

We are writing on behalf of our client, the Defence Infrastructure Organisation (DIO), which is part of the Ministry of Defence and is responsible for managing the military estate, including the provision of homes for service personnel across the UK.

We submit representations to the Colchester Regulation 18 Local Plan Consultation covering multiple DIO-owned sites and strategic concerns regarding the emerging Local Plan. These representations have been prepared to assist Colchester City Council in developing an effective and deliverable plan that recognises both local priorities and national defence requirements.

In line with the National Planning Policy Framework (NPPF) it is important that planning authorities and development plans recognise that MOD Establishments are of strategic military importance to the UK. It is important that planning authorities consult with the MOD during the preparation of their plans and take into account the need to safeguard operational sites.

To support the ongoing military training and operations within the City it is considered that the inclusion of a specific policy in the Local Plan to recognise these requirements would be beneficial and accord with national planning policy.

Paragraph 102 of the National Planning Policy Framework (December 2024) states that '*planning policies and decisions should promote public safety and take into account wider security and defence requirements including by 'b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.'*

**Summary of Other Representations**

Land South of Birch Brook

Our client is concerned with the proposed designation of this defence land as a Strategic Biodiversity Area under Policy ST2. We object to this blanket designation which could prevent continued operational use and future land release requirements, thereby conflicting with national defence objectives as recognised in NPPF Paragraph 102b.

We also raise significant concerns regarding the spatial strategy's over-reliance on large, complex strategic allocations in village locations, which introduces substantial delivery risks. We estimate that approximately 2,970-3,695 dwellings from major strategic allocations are at medium to very high risk of non-delivery within the Local Plan period. The Plan requires greater flexibility, contingency planning, and a more diverse range of site sizes and locations to maintain housing supply resilience as supported by the NPPF.

#### Middlewick Ranges

Whilst we acknowledge the proposed de-allocation of this 120-hectare site as a housing allocation, our client objects to the dual designation as both Local Green Space under Policy GN3 and Strategic Biodiversity Area under Policy ST2. This approach creates unnecessary policy duplication and potential conflicts that could harm proper ecological management and enhancement.

The Local Green Space designation is also inappropriate for extensive tracts of land where the primary value lies in biodiversity function rather than recreational or community use, contrary to National Planning Policy Framework (NPPF) Paragraphs 106-108. We request removal of the Local Green Space designation to avoid policy confusion and constraints on effective habitat management as required by the NPPF.

#### DIO Berechurch

This 3.6 hectare site is being considered for operational defence use, potentially including Service Family Accommodation (SFA) development to address urgent identified needs. We object to its proposed inclusion within a Strategic Biodiversity Area designation, which lacks robust evidential justification and fails to recognise the site's operational importance in accordance with NPPF Paragraph 102b.

We also highlight that there is an established operational requirement for the site for military purposes, this includes the need deliver new Service Family Accommodation (SFA) to meet a significant shortfall in provision in Colchester, yet the Local Plan provides no recognition or policy support for this requirement contrary to national defence priorities set out in NPPF Paragraph 102b.

The site also contains existing electrical infrastructure and is surrounded by development on three sides, questioning its suitability as a biodiversity area. We emphasise the need for operational flexibility to adapt to changing defence requirements without undue policy constraints. We recommend inclusion of a specific Military Establishments policy to support development that enhances operational capability and recognise SFA provision as essential workers housing.

#### Open Space Designations Merville Barracks

Our client objects to the proposed designation of two parcels within our clients' estates (at Drury Meadows and Montgomery Estate) as Open Space under Policy GN6. These sites, totalling approximately 2.17 hectares, are suitable for SFA infill development and do not provide demonstrable public recreational or amenity value, nor is there funding identified within the Local Plan evidence base for the long term management and maintenance of this land as open space. The designations lack robust justification as the sites were not assessed within the Council's Open Space Report (2023), rendering the approach unsound.

We highlight that there is an urgent need in Colchester to deliver new SFA, yet the Local Plan provides no recognition or policy support for this requirement contrary to national defence priorities set out in NPPF Paragraph 102b. We also recommend inclusion of a specific Military Establishments policy to support development that enhances operational capability and recognise SFA provision as essential workers housing.

## **Key Requested Revisions**

We respectfully request the following amendments to strengthen the Plan's deliverability and soundness:

- 1. Remove Strategic Biodiversity designations from operational defence land (Land South of Birch Brook and DIO Berechurch).**
- 2. Remove Local Green Space designation from Middlewick Ranges to avoid policy duplication and given it is an extensive tract of land and therefore unsuitable.**
- 3. Remove Open Space designations from SFA estate land or provide policy flexibility for SFA development.**
- 4. Include specific policy recognition and support for general defence requirements and Service Family Accommodation provision.**
- 5. Incorporate greater flexibility and contingency planning within the spatial strategy.**
- 6. Diversify housing supply through a broader range of site sizes and locations.**
- 7. Establish clear triggers for releasing reserve sites to maintain housing supply resilience.**

## **Conclusion**

The DIO remains committed to working collaboratively with Colchester City Council to ensure the emerging Local Plan provides an appropriate and flexible framework that recognises both local housing needs and national defence priorities. Our representations seek to strengthen the Plan's effectiveness, deliverability, and resilience whilst ensuring that essential defence operations can continue without unnecessary policy constraints.

We believe that addressing these concerns will result in a more robust and sounder Local Plan that better serves the needs of Colchester's communities whilst fulfilling the Council's obligations to support national defence requirements.

We look forward to your consideration of these matters and to continued engagement throughout the Local Plan process.

Yours faithfully,

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**Mike Hopkins**

Director

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