

Colchester City Council Planning Department
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Date: 14 January 2026

To Whom It May Concern

Colchester City Council: Regulation 18 Local Plan Consultation Response obo Taylor Wimpey Strategic Land

On behalf of our client, Taylor Wimpey Strategic Land (“TWSL”) we make representations to the above consultation on the Colchester City Council’s (‘CCC’) Local Plan Review (Regulation 18). TWSL welcomes the opportunity to engage with CCC in the preparation of its Local Plan and potential future allocations for residential development.

Taylor Wimpey is a national homebuilder operating from 24 regional offices across England, Scotland and Wales. Taylor Wimpey’s regional offices have a strong local focus and have a good track record of delivering new homes across the Country and is currently working with CCC Officers on its site at North-East Colchester and Wyvern Place, Wivenhoe and Hartford Green, Great Bentley are under construction with completed dwellings being sold.

TWSL is committed to delivering new high-quality homes within Colchester and, in that regard has a continued interest in the land at east of Mersea Road, in the settlement of Abberton and Langenhoe. A site plan is included at Figure 1 of this letter. These representations follow a previous submission by Savills to the ‘Call for Sites’ consultation in late 2023. The site (LPA ID 10622) was assessed within the Council’s Strategic Housing Land Availability Assessment (“SHLAA”) evidence base document however has not been allocated for development within the draft Local Plan. Despite this, the Council proposes to allocate a site within Abberton and Langenhoe for 50 new dwellings (PP25 View Park), noting the settlement’s good road connections to Colchester and access to local bus services.

These representations have been prepared having reviewed the various background evidence base documents, consideration of national policy, namely the National Planning Policy Framework (December 2024) (“NPPF”)¹. They focus on the promotion the site at Abberton and Langenhoe for allocation for residential development. TW consider that, for a sound local plan, it is important that additional, smaller scale sites that can be brought forward in the earlier years of the Plan period (such

¹ Following the publication of the local plan consultation, the Ministry for Housing, Communities and Local Government published a draft NPPF for consultation. Changes to the NPPF will be considered at Regulation 19 stage.

as their land at Langenhoe), are allocated in the draft Plan to ensure a consistent supply of new housing and that they five year supply is met.

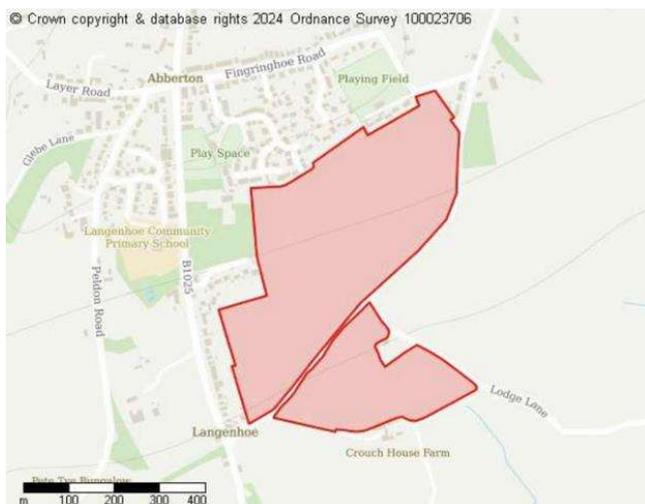
We trust that the information in this letter will be taken into account and afforded weight in the formulation of emerging local policy. Please ensure Lichfields and TWSL are kept informed of the next stages of the process. Annex 1 sets out TWSL's responses to consultation questions submitted online.

Context and Background

Land East of Mersea Road, Abberton and Langenhoe

The Site is located within the settlement of Langenhoe and Abberton, approximately 6km south-east of Colchester city centre. The Site is situated to the south of the village, outside of the settlement boundary; see Figure 1 below.

Figure 1: Land east of Mersea Road, Abberton and Langenhoe. (Red line boundary highlights TWSL's ownership)



Source: Summary of sites evidence, Colchester CC (October 2025)

The Site is separated into two parcels; A and B. The two parcels are severed by School Lane which runs from south-east to north-west. Parcel A to the north of School Lane is greenfield land and abuts the existing built envelope of Langenhoe. Parcel B, located to the immediate south of School Lane is also agricultural greenfield land. Crouch House Farm sits adjacent to the southern boundary of Parcel B. Together the two parcels comprise 17ha of land.

The Site is located within the Coastal Protection Belt ('CPB') and Flood Zone 1.

The Site, it is located within walking distance of all of the village's facilities. Langenhoe Community Primary School is located c.180m to the west of the site. TWSL is exploring the potential of introducing direct pedestrian route via a footway on the north side of Abberton Road/School Lane to provide a connection from the existing footway on the northern side of School Lane and on towards that on the eastern side of Mersea Road. This will provide a connection to the bus stops, primary school and village hall on Mersea Road. The Site is within a 10-minute walk from two local bus stops; Butterfly Loade to

the west and Hams Farm to the east. These bus stops provide local bus services to Colchester centre. The nearest train station is Colchester Town. It is considered to be a sustainable location a contextually appropriate level of growth. Colchester Settlement evidence Stage 2 (October 2025) identifies Abberton and Langenhoe as a 'Medium Settlement'. Draft Policy ST3 (Spatial Strategy) supports allocation of an 'appropriate level of growth' within medium settlements based on the opportunities and constraints of that settlement.

According to the Council's planning register, there is no relevant planning history on the site.

The Site is not currently allocated for development within the adopted or current draft of the Local Plan. Current evidence base documents assess the development potential of the site (SHLAA November 2025) but dismissed its suitability for allocation on the basis of the coastal protection belt designation.

However, the Coastal Protection Belt is not an overriding reason to oppose new development and any potential impacts of new development could be suitably mitigated through careful design. TWSL is aware of the policy requirement to avoid visually incongruous and intrusive development and has engaged a landscape consultant to undertake landscape analysis which will underpin the emerging development. The Site is located within Coastal Farmland character area (Landscape Character Assessment 2024) and mitigation would be provided to ensure that any proposed development would respect and maintain the characteristics of the Coastal Farmland Character Area. In all other respects, the Site is unconstrained, and technical assessments have been undertaken to demonstrate that there is a suitable vehicular access to the site and that there are no ecology or flooding constraints.

Although the site east of Mersea Road has not been allocated in the draft plan, the draft local plan does include a site allocation for 50 residential dwellings within the same settlement of Abberton and Langenhoe. Draft policy PP25 (View Park, Abberton and Langenhoe) sets out a requirement for approximately 50 new dwellings and associated infrastructure. The draft allocated site sits to the northeast of TWSL's site east of Mersea Road. Paragraph 12.26 of the draft plan indicates the settlement's suitability for some residential development highlighting the local facilities (primary school, community hall and public open space). It then goes on to state that the settlement "*benefits from good road connections to Colchester being situated along the B1025 which has bus stops situated along it which are served by the Mersea bus*".

TWSL is of the view that the Site should be allocated, so that new housing could be brought forward to assist the Council in meeting its unmet housing demand particularly in the shorter term. The following section of this letter identifies why the site is suitable for development and why the Site should be positively considered for allocation.

Colchester Housing Need

The starting point for these representations and consideration of the site for allocation is the Council's housing need. The emerging Local Plan states commits to the delivery of at least 20,800 new homes in Colchester City across the plan period (2025-2041) with an annual housing requirement of 1,300 homes per annum as identified by the new Standard Methodology².

² NPPF December 2024

Draft policy ST5 (Colchester's Housing Need) identifies that to achieve this there will be site allocations to deliver 11,089 dwellings. A windfall allowance has been applied in accordance with paragraph 73 of the NPPF 2024. In the coming years, there is always a risk that this level of windfall sites will not come forward, as it is a diminishing reserve.

The draft Local Plan proposes six large scale site allocations for over 600 new homes; proposed at northeast Colchester, Berechurch Hall Road, Tiptree, Marks Tey (x2) and Langham. These allocations will make a significant contribution to housing delivery across the Plan period however, the majority are largely dependent on strategic infrastructure improvements coming forward including new highways infrastructure, highways connections, schools and other community infrastructure provision. With such requirements, the larger site allocations identified within the draft Plan may be delayed or are likely to take longer to bring forward and be delivered. It is inevitable that some other sites may not come forward for planning or be delivered within the Plan period. The next stage of the local plan review will therefore need to test the robustness of the housing supply and consider whether CCC is vulnerable to future five-year housing land supply deficits as a result of an overreliance on strategic sites. It would be prudent to have a 20% buffer to allow for site that do not come forward, or which are delayed.

TWSL's site at Abberton and Langenhoe is a small site that is not reliant on the delivery of strategic infrastructure and agreement with third parties and statutory consultees. Residential development on the site could be delivered in the short to medium term, reducing CCC's reliance on large strategic sites and bring forward housing delivery within the proposed housing trajectory. Table 2-3 (Planned Housing Growth by location) of the Colchester Infrastructure Audit and Delivery Plan (Stage 3- October 2025) sets out the location of housing growth associated with the existing and potential site allocations. The table highlights that there are a significant number of homes expected to be delivered on larger sites at Marks Tey, East Colchester and South Colchester. During year 5-15 of the plan there are a relatively limited number of small-medium allocations planned for delivery. This trajectory cannot account for certain sites which are currently allocated but may potentially not come forward within the Plan period including smaller allocations in the first five years of the plan, or sites which are delayed owing to infrastructure delays.

In that regard, TWSL consider that it would be more prudent if housing in Colchester was brought forward in a more balanced manner, through a greater mix of small, medium and large-scale strategic allocations programmed evenly across the Plan period. Given the Council are only just meeting the Standard Method and the reliance on larger allocations, a larger buffer to the five-year housing land supply would de-risk housing land supply deficits across the plan period.

TWSL's site at Abberton is available and ready to be delivered in the short to medium term. Allocation of the site could assist with increasing the housing delivery within the first half (year 1-10) of the Plan period and help to avoid reliance on the majority of housing being delivered towards the end of the Plan period.

Housing Mix

Draft policy H1 requires housing mix to be informed by the Colchester Local Housing Needs Assessment, existing housing stock in the area and character of the local area to ultimately achieve a mixed and balanced community. While TWSL acknowledges and supports the need to deliver larger

family sized units across Colchester it also welcomes the flexibility afforded by the draft policy to propose an evidence-based alternative housing mix at the time of any application.

Parking

TWSL acknowledges the standards set out in the Essex Planning Officers Association Parking Guidance and the flexibility afforded by draft Policy PC3 to site-specific considerations when determining an appropriate parking quantum.

TWSL will monitor the review of parking standards carefully to understand what the impact could be for future TWSL scheme layouts.

Net Zero Homes

TWSL welcome the overarching ambition set out in Chapter 7 of the draft plan and policies NZ1, NZ2, NZ3 and NZ4. TWSL are committed to net zero development.

However, Policy NZ2 should revert to Future Home Standard (FHS) standard and homes that are zero carbon ready. This would provide a consistent approach to enable better delivery of much needed homes, including both market and affordable housing.

Draft Policy NZ1 requires residential development to deliver 80kWh/m² building footprint per year of renewable energy. The requirement for new dwellings to generate at least the same amount of renewable energy as the dwellings demand over the course of the year would be extremely challenging to calculate. This is because an assessment must include both regulated and unregulated energy, and it is difficult to estimate the exact quantum of energy needed given this is entirely dependent on the occupier's use of appliances.

TWSL considers the policy's requirements will also significantly increase the building costs for new homes, which ultimately would increase sales price which could worsen Colchester's relatively better affordability in comparison with other areas in the region.

TWSL is also concerned about providing large amounts of Photovoltaic (PV) arrays given challenges around grid capacity and issues with being able to export back the grid. There are also the challenges of house typologies where PV are impractical to be delivered.

Draft Policy NZ2 requires new major development to achieve an embodied carbon limit of <500kgCO₂e/m². While TWSL support the Council's ambition to reduce embodied carbon, there are concerns the requirements of Policy NZ2 could have an adverse impact on housing delivery. TWSL, one of the largest housebuilders in the country, is already committed to reducing embodied carbon (scope 3 emissions) within the supply chain and have set ambitious targets to do so over the long term. The requirement to submit a WLC assessment for each application would place unnecessary burden upon their new development activities as this work is already part of corporate commitments.

Should the requirement be retained, to ensure that the policy does not negatively affect housing delivery, it is requested that Policy NZ2 should be amended to introduce greater flexibility by referring to the FHS Standard and to remove the reference to the renewable energy limit to require developers to 'maximise' renewable energy generation on site to account for site specific constraints. It should also recognise developers who have already made large scale corporate commitments to reducing embodied

carbon throughout their activities and developments, by accepting evidence on non-site-specific matters when assessing compliance with policy NZ2. It should also allow flexibility to align with any future regulations introduced subsequently, which will aid consistency and delivery of much needed homes.

Wastewater and Water Supply

TWSL object to the proposed requirement within draft Policy NZ3 for all new dwellings to achieve a water efficiency standard of 80 litres per person per day (l/p/d). This is primarily because the proposed figure is significantly greater than proposals by the Department for Environment Food and Rural Affairs to revise the minimum Water Efficiency Standard in new houses from 125 l/p/d to 105 l/p/d, as well as the optional technical standard from 110 l/p/d to 100 l/p/d in areas of serious water stress.

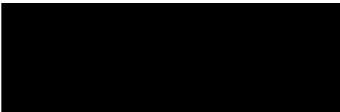
When considering water limits in a revised policy on water efficiency, regard should be had to the potential viability issues that may arise from overly strenuous requirements, particularly when combined with other policies in the plan.

Summary and Conclusions

Taylor Wimpey welcomes the opportunity to comment on the emerging CCC Local Plan and are keen to continue to engage with the LPA as the drafting of the new Local Plan progresses to Regulation 19 stage. The submission to the LBH Regulation 18 Local Plan focuses on the potential/emerging development in Abberton and Langenhoe. The Site should be positively considered for small-medium scale residential allocation to facilitate delivery of high-quality development at the site that would contribute to housing delivery in Colchester in the earlier years of the Local Plan.

Should you have any questions regarding these representations or wish to discuss them further, please contact either Simon Slatford or myself at this office.

Yours faithfully



Sophie Bisby
Senior Planner
BSc (Hons) MA MRTPI

**Annex 1: Response to CCC Regulation 18
Consultation- summary of responses to
consultation questions obo Taylor
Wimpey Strategic Land**

Briefing Note

Our ref 71001/01/SSL/MIB
Date 14 January 2026
To Colchester City Council
From Lichfields obo Taylor Wimpey Strategic Land

Subject Response to CCC Regulation 18 Consultation- summary of responses to consultation questions obo Taylor Wimpey Strategic Land

1.0 Strategic Policies

1.1 Policy ST5: Colchester's Housing Need

- 1.2 The Local Plan identifies a need for at least 20,800 homes between 2025 and 2041, with a significant proportion expected from site allocations and an uncertain windfall allowance. The draft Plan relies heavily on a small number of large strategic sites that depend on major infrastructure and are likely to be delivered over longer timescales.
- 1.3 TWSL's site at Abberton and Langenhoe represents a small, deliverable site that is not reliant on strategic infrastructure or third-party agreements and could be brought forward in the short to medium term. Evidence within the Infrastructure Audit and Delivery Plan demonstrates a concentration of housing delivery on large sites, with relatively limited small to medium-scale allocations during the mid-plan period.
- 1.4 A more balanced housing strategy, incorporating a greater mix of small, medium and large sites across the Plan period, would reduce the Council's reliance on larger strategic sites coming forward in the first 5 years of the plan period, as set out in the proposed housing delivery trajectory. Allocation of the Abberton site could support early delivery and build more certainty within the Council's housing trajectory.
- 1.5 Please refer to Lichfields written representations letter obo Taylor Wimpey Strategic Land, dated 14 January 2026.

2.0 Net zero homes and buildings, renewable energy and water

- 2.1 **Policy NZ1: Net Zero Carbon Development, NZ2: Net Zero Carbon Development – embodied carbon, Policy NZ3: Wastewater and Water Supply, Policy NZ4: Renewable Energy**
- 2.2 TWSL welcomes the ambition of Chapter 7 and Policies NZ1–NZ4 and supports the objective of net zero development. However, it considers Policy NZ2 should align with the Future Homes Standard (FHS) and require homes to be zero-carbon ready, to ensure consistency and support the delivery of market and affordable housing.

- 2.3 TWSL raises concerns that Policy NZ1's requirement for residential development to generate 80kWh/m² per year of renewable energy is impractical, difficult to accurately calculate due to reliance on occupant energy use, and likely to significantly increase build costs, with potential impacts on housing affordability. Additional concerns relate to grid capacity constraints and the feasibility of providing photovoltaic panels across all housing types.
- 2.4 While supporting the aim of Policy NZ2 to reduce embodied carbon, TWSL considers the proposed carbon limit and mandatory whole life carbon assessments could adversely affect housing delivery and duplicate existing corporate commitments. It therefore requests greater flexibility, including alignment with the FHS, a requirement to maximise on-site renewable energy generation subject to site-specific constraints, and recognition of developers' existing commitments to reducing embodied carbon.
- 2.5 Please refer to Lichfields written representations letter obo Taylor Wimpey Strategic Land, dated 14 January 2026.
- 2.6 **NZ3: Wastewater and supply**
- 2.7 TWSL object to the proposed requirement within draft Policy NZ3 for all new dwellings to achieve a water efficiency standard of 80 litres per person per day (l/p/d). This primarily because the proposed figure is significantly greater than proposals by the Department for Environmental Food and Rural Affairs to revise the minimum Water Efficiency Standard from 125 l/p/d to 105 l/p/d, as well as the optional technical standard from 110 l/p/d to 100 l/p/d in areas of serious water stress. Regard should be had for the potential viability issues from overly strenuous requirements.
- 2.8 Please refer to Lichfields written representations letter obo Taylor Wimpey Strategic Land, dated 14 January 2026.

3.0 Homes

3.1 Policy H1: Housing Mix

- 3.2 TWSL acknowledges and supports the need to deliver larger family sized units across Colchester, however the policy should provide flexibility to propose an evidence-based alternative housing mix at the time any application.
- 3.3 Please refer to Lichfields written representations letter obo Taylor Wimpey Strategic Land, dated 14 January 2026.

4.0 Place and connectivity

4.1 Policy PC3: Parking Standards

- 4.2 TWSL acknowledges the standards set out by the Parking Guidance and the flexibility afforded by draft Policy PC3, and will continue to monitor the view of parking standards to understand the potential impact on the layout of scheme.

- 4.3 Please refer to Lichfields written representations letter obo Taylor Wimpey Strategic Land, dated 14 January 2026.