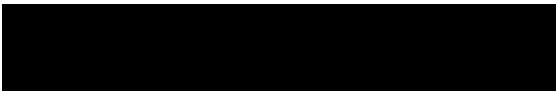


Place Strategy Manager
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13th January 2026

By email to: local.plan@colchester.gov.uk;
Sandra.scott@colchester.gov.uk;

Dear Sirs

**Colchester City Council Local Plan Review – Regulation 18 Consultation
‘Soundness’ Representations concerning Draft Policy PP37: Land north of Park
Lane, Langham**

Further to the above Local Plan Regulation 18 consultation, we write to provide our representations for your consideration concerning objections to draft Policy PP37 which proposes 900 new homes at Langham.

We are Langham residents and have lived in the village for around 24 years. We are also chartered town planners and run Lawson Planning Partnership, an award-winning consultancy based at Severalls Business Park in Colchester, which has a focus on promoting and delivering sustainable development. Our representations set out below are made in our capacity as local residents.

Summary

1. In summary, we consider that draft Local Plan Policy PP37, which is a strategic allocation for 900 homes, does not represent sustainable development. It is a disproportionately large housing development abutting Langham, a relatively small village with few facilities and very limited sustainable transport opportunities to link with Colchester and other sustainable settlements.
2. The draft Policy is also at odds with NPPF guidance on planning for sustainable development and is contrary to the draft Plan's Themes and Objectives at Paragraph 2.21 and Spatial Strategy set out in Policy ST3. This also requires the Plan's related sustainability appraisal to be reassessed in this regard as the Langham allocation has been incorrectly graded.
3. Notwithstanding the tensions with national and local planning policy, the housing allocation appears speculative in nature, evidenced by the absence of any related land budget, surveys/studies and delivery mechanisms normally provided by promoters at this stage in the planning policy process for a strategic development of this nature and scale. Coupled with identified significant development constraints including an infrastructure shortfall (existing and pipeline) and conflict with a private airfield, this also indicates a lack of certainty over the deliverability of the site during the Plan period.

4. The absence of necessary infrastructure and mitigation including sustainable transport links and wastewater drainage provision as identified in the related evidence based documents, also exposes the vulnerable nature of this draft allocation from a sustainability and deliverability perspective.
5. The site is in productive agricultural use forming best and most versatile (BMV) agricultural land, with no indication from the owners that the continued cultivation of this valuable arable land asset is likely to cease.
6. These shortcomings indicate a lack of suitability, availability and deliverability associated with the draft allocation, which would be inconsistent with the objective of contributing to the achievement of sustainable development as required by para 16a) of the NPPF.
7. Additionally, there are consequential tensions with all four soundness tests set out in paragraph 36 of the NPPF. It is therefore, requested that Policy PP37 is deleted from the draft Plan and replaced with an appropriate alternative housing strategy focused on directing this significant strategic level of growth to other more appropriate locations including the northern fringes of Colchester. Provision for a suitable level of development for approximately 90 homes at Langham could also be made.

Representations

8. Our objections set out in these representations concern the inappropriate scale of housing development proposed for Langham contained in draft Policy PP37 and lack of deliverability prospects during the Plan period. We consider that 900 new homes attached to a village which has only 420 households, very limited transport accessibility and community and employment facilities is simply too large and excessive for this location. The Policy appears inconsistent with each of the draft Plan's Themes and Objectives at paragraph 2.21 and is contrary to the Plan's own settlement hierarchy and Spatial Strategy included in Policy ST3. This additionally requires the draft Plan's sustainability appraisal to be reassessed in respect of draft Policy PP37 as it indicates an unjustified bias in favour of sustainability attributes, which are absent.
9. In this regard, the draft Plan at paragraph 3.23 states, 'The settlement hierarchy identifies medium and small settlements where growth is allocated appropriate to the size of the settlement and its constraints (underlining our emphasis).' Langham is defined as a Medium Settlement (fourth in the settlement hierarchy) and yet has been allocated a significantly higher number of dwellings compared with each of the 'Large Settlements' of Tiptree, West Mersea and Wivenhoe. There seems to be no planning rationale which could justify this level of housing in this location.
10. Also, as identified within the Local Plan Evidence Base documents, the required infrastructure needed to support this growth in Langham including sustainable transport provision and wastewater capacity is not available and is unlikely to be delivered either. A strategic development of this size should also be backed up by a range of related surveys and studies usually undertaken by the promoter to demonstrate deliverability and made consistent with the LPA's related sustainability assessment to warrant support and justification as a Local Plan allocation.
11. However, other than a broad layout plan provided by a land agent, which has not taken account of key development constraints, the draft allocation appears as a line on a plan isolated from a sustainable settlement. It represents the type of residential development that was prevalent in the 1960's and

1970's, which experienced significant housing growth in rural areas, resulting in car reliant satellite dormitories.

12. Yet, the current policy emphasis on settlement planning requires significant growth to be focussed at locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (NPPF paragraph 110). Despite the long list of requirements set out in draft Policy PP37, there is no evidence to show how the required infrastructure would be provided and sustainable development achieved. The development of 900 homes at Langham could result in 1,000 to 1,500+ AM and PM peak car borne trips, with little mitigation identified, offered or achievable to bring about a suitable modal shift in favour of sustainable transport modes. Utilising the strategic road network via the A12 Trunk Road for localised car based trips is inappropriate. Also, the local route to Colchester via Langham Lane, a well used 'rat-run' to and from the A12 and Colchester, is inadequate for the type of utilisation involved and could not reasonably accommodate cycle lanes.
13. Irrespective of the sustainability deficiencies of the proposed 900 homes, the Local Planning Authority (LPA) is also expected to demonstrate that there is a reasonable prospect that proposed development can be developed within the timescale envisaged, which appears to be absent.
14. A further key constraint in this regard, is the absence of existing and future wastewater capacity identified in the WRC study evidence document, probably necessitating the need for an on-site sewage treatment plant and associated cordon sanitaire, which could extend beyond 200 metres for a facility capable of dealing the level of effluent generated by 900 homes.
15. Also, the need for a no-development airfield safeguarding zone at the western part of the site, north of the existing airfield runway has not been included. The flight path of the airfield and low flying aircraft are material considerations which do not seem to have been assessed. It is noted that reflector disks were added to the overhead cables at the end of the runway on Park Lane as a hazard warning to pilots. Consequently, an obstacle clearance zone on the western side of the site, kept clear of housing and other built structures needs to be factored in as evidenced by our own experience of aircraft approaching the airfield over existing housing located on School Road.
16. All of these constraints, which do not appear to have been assessed would significantly reduce the housing capacity of the site, leading to a knock-on overall shortfall.
17. The site is currently in active agricultural use forming BMV land, providing arable crops on an annual basis. The landowners have not to our knowledge expressed intentions to cease cultivating this significant arable land resource, which should be retained for this purpose. There are plenty of alternative green field sites, which are not actively cultivated, and the LPA's housing land and site assessment needs to be revisited with this important consideration in mind, as part of a sequential site selection exercise.
18. Significant housing development of this scale needs to be accommodated within or adjacent to a larger and sustainable settlement. There is no Green Belt around Colchester City and there are a range of sites located on the northern fringes of the built-up area, which could be considered for further strategic housing growth as an alternative. Although such development would breach the boundary provided by the A12, it would allow new homes to be well linked to and integrated with the existing urban fabric where there are good links to shops, services and employment opportunities via viable and convenient bus (including park & ride & rapid transit), cycle and pedestrian routes and other infrastructure.

19. Therefore, there is no need to ‘leapfrog’ the urban fringe and push significant housing growth out to Langham, which if it actually came forward, would do little more than create a large car reliant dormitory settlement adjacent to the village.
20. Langham has relatively few community facilities and employment opportunities, although they provide for the current village population, with some capacity to accommodate the identified level of housing need set out in the Parish Council’s Housing Needs Study (2025). However, to have any chance of achieving some form of self-sufficiency and a suitable homes – jobs alignment ratio, it is considered that 900 additional households would need to be supported by a much greater level of community, employment and transport facilities, currently not planned for, creating a new settlement abutting the village with little identified benefit to the existing community. If the achievement of sustainable development is the key driver here, which it should be, there needs to be a radical rethink over locating strategic levels of housing at Langham.

Conclusion

21. The proposed 900 home strategic allocation in draft Policy PP37 amounts to an unsustainable form and pattern of development contrary to the planning policy principles for achieving sustainable development set out in paragraph 11 of the NPPF and the emerging Local Plan strategy itself. The draft allocation also raises identified deliverability issues and conflict with the soundness tests set out in paragraph 36 of the NPPF as summarised below:
- **Not positively prepared** – the isolated strategic housing allocation at Langham would not contribute to meeting the area’s objectively assessed needs consistent with achieving sustainable development.
 - **Unjustified** – attempting to locate 900 homes against Langham village is not an appropriate strategy, especially when there are more suitable housing site options at sustainable locations.
 - **Ineffective** – the identified constraints associated with the draft allocation and lack of any serious development intentions and infrastructure investment, renders Policy PP37 an undeliverable option for the plan period.
 - **Inconsistent with national policy** – the 900 home allocation at Langham would not enable the delivery of sustainable development in accordance with the policies of the NPPF and other relevant national policies aimed at achieving sustainable development and combating climate change.
22. Therefore, it is requested that draft Policy PP37 is deleted from the draft Plan and replaced with an appropriate alternative housing strategy focused on directing this high level of growth to sustainable locations including the northern fringes of Colchester. Allowance for a modest level of housing growth amounting to approximately 90 dwellings in line with the size of Langham and the identified level of local need could be accommodated on other sites within the village.
23. Finally, although the Regulation 18 draft Local Plan represents the LPA’s ‘preferred options’ we understand that officers are amenable to considering and pursuing suitable changes, where justified. Similarly, it is also understood that the Local Plan Committee when resolving to approve the draft Plan for consultation purposes at its November 2025 meeting, made clear that it was not approving or

supporting its content and therefore, it is assumed that the Committee will also be amenable to considering and incorporating suitable changes too as included in our representations.

We hope you will find our representations to be helpful as part of the Local Plan preparation process and that they will be taken into account by the Council's Planning Policy Team and Local Plan Committee in due course.

Yours sincerely



Mr & Mrs J.C. Lawson MRTPI

cc Langham Parish Council