

**Planning Policy**

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12<sup>th</sup> January 2026

Dear Sir/ Madam,

## Colchester City Council: Regulation 18 Local Plan Review – Representations on behalf of Colchester United Football Club in Relation to Florence Park: Colchester United Football Training Centre, Grange Road, Tiptree

1. On behalf of our client, Colchester United Football Club (CUFC), we hereby submit representations in response to the Regulation 18 consultation on the draft Local Plan Review, objecting to the proposed exclusion of the Florence Park site from the Tiptree Settlement Boundary.
2. To inform this submission we have reviewed related document comprising the draft Colchester Local Plan Review: Regulation 18 consultation document and policies maps, published on 26<sup>th</sup> November 2025, the Settlement Evidence Stage 1 Report (November 2024) and the Settlement Evidence Stage 2 Report (October 2025).
3. These representations have had regard to the 'soundness' tests contained within the National Planning Policy Framework (NPPF, February 2025), which require Local Plans to be positively prepared, justified, effective and consistent with national policy (paragraph 36).

### Summary of Representations

4. In summary, these representations seek:
  - ❖ The reinstatement of Florence Park within the Tiptree settlement boundary; and,
  - ❖ The associated removal of Florence Park from the 'countryside'.

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5. These amendments are required to ensure that the draft Plan represents an effective strategy for meeting its policy objectives, is positively prepared, justified and compliance with national planning policy and can, therefore, be found 'sound'.
6. The proposed removal of Florence Park including its related buildings and infrastructure from the settlement boundary, in an attempt to re-badge this facility as 'countryside' as set out in the draft Plan, fails these soundness tests, which requires corrective action.
7. A similar situation occurred in the preparation of the Tiptree Neighbourhood Plan, when the Examiner directed that Florence Park should be reinstated within the settlement boundary in line with CUFC's request and as shown in the adopted Colchester Local Plan. This formed part of a comprehensive purposely planned urban extension comprising housing, sports facilities and other open space, which was promoted by CUFC and accepted by the Local Plan Inspector.

### Background and Sports Strategy

8. CUFC operates Florence Park comprising 9.18 hectares (22.69 acres) of land south of Grange Road in the west of Tiptree, as well as further parcels of land to the north and east, which have been developed for housing (see plan at [Appendix 1](#)). Florence Park Training Centre contains five football pitches, including a community pitch, a sports accommodation building and ancillary parking area.
9. Established in 1937, CUFC has played an important role in the provision and development of sport in the City and wider area. CUFC is an asset valued by many members of the community who enjoy participating in and watching football as a key team sport. These activities, in turn, contribute to inspiring members of the community of all age groups and levels to take up sport themselves.
10. CUFC is also a valued local employer, and its reputational benefits have positive effects on associated elements of the local economy.
11. CUFC has invested significantly in its sports facilities in recent years, including the Community Stadium and the Florence Park Training Centre. In addition, CUFC has invested in the Warriors Rest Ground, located east of Tiptree and owned by Colchester City Council.
12. Planning permission for the Florence Park Training Centre was granted in 2010 (ref: 091627). The development was partly dependent on cross-funding from the provision of 103 dwellings on adjacent land to the north and south of Grange Road, consented under permission refs: 122134 and 151886 and currently part-completed.
13. Tiptree also has local community football teams facilitated by CUFC, including Tiptree Jobserve Youth Football Club, which is open to all youth players in the locality. These clubs are extremely popular and host several teams for varying age groups that use the ground at Warriors Rest and the designated community pitch and associated facilities at Florence Park.

14. In order to maintain its positive influence in the provision and development of sport in the City, CUFC must continually advance its offer and grow as a professional sports club and business. Fundamental to CUFC's long-term development strategy is the need to achieve Category 1 status as a football training academy, as designated by the Football League's Elite Players Performance Plan (EPPP) youth development scheme.
15. If CUFC is able to achieve Category 1 status, it will be able to set up a football training academy to attract the very best talent, which will in turn raise its profile, increasing its influence and encouraging more members of the community into sport, and enhancing its ability to reinvest funds directly into community endeavours such as local community football teams.
16. Working towards achieving Category 1 status has been a cornerstone of CUFC's sports strategy for several years but, unfortunately, the Training Centre at Florence Park is not of sufficient size to allow this accreditation to be achieved. The current site also suffers from restrictions imposed on its use by planning conditions that control the hours of operation and times of the year when it may be used. In addition, expansion into adjacent land has been ruled out on availability and suitability grounds.
17. CUFC has, therefore, been looking to relocate its existing facilities to a new, larger site that is capable of attaining Category 1 status, and this search remains ongoing. However, it is also important to note that the requirements to continue to meet the current Category 2 status are consistently evolving, with one such example being a likely future obligation to provide a '3G' pitch with associated floodlighting. At present, there are no floodlighting facilities at Florence Park, and residential amenity considerations could be a constraint to such provision. In addition, the limited hours of operation imposed on Florence Park, as a result of residential amenity considerations, further restrict use of the site for sports purposes.
18. Therefore, while Florence Park is currently able to retain Category 2 status, there is a real possibility that this will not continue to be the case, which would represent a significant backwards step for CUFC's academy status and sport development in general. This would further reduce the likelihood of attracting the best young players in the area, thereby negatively impacting on the Club's profile and ability to invest in local community sport provision.
19. As part of the above strategy, and in order to cross-fund a relocation, CUFC will seek to redevelop some of the existing Florence Park Training Centre to provide housing for approximately 120 new homes. However, the Club would also retain the current first team pitch to enable it to be utilised by local community teams, along with the high-quality sports building with car parking, again for local community use at least in part. An illustrative concept masterplan is attached at [Appendix 2](#). This was discussed as part of the preparation of Tiptree's Neighbourhood Plan, at a Steering Group meeting on 8<sup>th</sup> October 2018 and included within CUFC's representations to the draft Neighbourhood Plan.
20. In summary, CUFC provides a range of wider community benefits that create positive economic and environmental benefits. The Club's long-standing development strategy is,

therefore, consistent with the objectives of national planning and sports policies, which seek to encourage rather than hinder these benefits from being realised. Although the adopted Local Plan currently provides a policy framework to enable this development strategy and vision to be realised, the Preferred Options draft of the Local Plan Review, which places Florence Park outside the Tiptree Settlement Boundary, would effectively prejudice the delivery of CUFC's legitimate and positive planning and sports development objectives.

### Planning Policy Context

21. The National Planning Policy Framework (NPPF, 2005) requires the planning system to be genuinely plan led. Succinct and up-to-date Plans should provide a positive vision for the future of each area (paragraph 15). Amongst other requirements, Plans should:
  - "(a) be prepared with the objective of contributing to the achievement of sustainable development;*
  - (b) be prepared positively, in a way that is aspirational but deliverable; and,*
  - (d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals"* (paragraph 16).
22. Paragraph 32 requires Local Plans to be underpinned by relevant and up-to-date evidence to justify the proposals concerned.
23. The NPPF requires Local Plans to be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are 'sound' – i.e. whether they are:
  - (a) Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs;
  - (b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - (c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - (d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.
24. It is within this policy context the following representations should be considered.

## Detailed Representations

### Adopted Colchester Local Plan (2022)

25. Florence Park is shown as 'Public Open Space' wholly within the Tiptree settlement boundary on the adopted Policies Map. The site is also identified in the list of facilities that serve the area (paragraph 6.216). Policy SS14: Tiptree states that the Tiptree Neighbourhood Plan will define the extent of a new settlement boundary for Tiptree.
26. As 'Public Open Space' to which Policies DM4: Sports Provision and DM17: Retention of Open Space and Recreation Facilities apply. Policy DM4 supports the protection, enhancement and delivery of new sports and leisure facilities to encourage active lifestyles and to increase participation on formal and informal recreation. Policy DM17 sets out criteria to be met by proposals for the development of existing or proposed public or private open space.

### Adopted Tiptree Neighbourhood Plan (2023)

27. Prior to its adoption, the draft Tiptree Neighbourhood Plan sought to exclude Florence Park from the settlement boundary. Following the submission of representations at the various consultation stages objecting to this proposed exclusion, the Neighbourhood Plan Examiner agreed that *"it is unclear how this redefined settlement boundary has been informed by specific new evidence, for example an analysis of the settlement edge and the existing uses/ built form in relation to their context. As a consequence, the proposed boundary contains changes from the extant development plan that appear evidentially unjustified"* (paragraph 4.39 of the Examiner's Report, dated 15<sup>th</sup> December 2022).
28. The consequent recommendation (ref: PM1) was for *"the settlement boundary to be amended to reflect the extent of the extant development boundary defined by the CLP plus the TNP site allocations"*. Accordingly, the adopted Neighbourhood Plan shows the Florence Park site reinstated within the settlement boundary as requested by CUFC.
29. The Examiner also advised that a future review of the settlement boundary could be undertaken through a partial review of the Neighbourhood Plan or through updates to the Colchester Local Plan, provided this was supported by proportionate evidence (paragraph 4.42 of the Examiner's Report).
30. With the above context in mind, these representations seek to protect CUFC's planning position, allow for a potential future development strategy and establish a suitable planning policy basis for the emerging Local Plan Review, as set out below.

### Preferred Options Draft Colchester Local Plan (November 2025)

#### Settlement Boundary Amendments

31. The draft Policy Map for Tiptree shows the settlement boundary brought in to where Grange Road meets the track that runs north-south opposite the entrance to Florence Park. It then

follows Florence Park's eastern boundary before cutting off the south-eastern end of the site. The proposed boundary then replicates the adopted settlement boundary at the western end of Harrington Close. As such, a small sliver of the site is shown as retained within the settlement boundary.

32. With the exception of the retained portion, this would appear to represent a deliberate 'carving out' of the site, despite its status as a key sports and community facility that serves and is an integral part of Tiptree.
33. It is noted that paragraph 5.11 of the Local Plan Committee Report, dated 17<sup>th</sup> February 2025, states that *"changes to the settlement boundary reflect the proposed site allocations and ensure a defensible boundary, whilst recognising the need to facilitate some small-scale development in villages which will contribute towards the windfall allowance"*. The exclusion of Florence Park from the Tiptree settlement boundary does not meet any of these stated reasons for amending such boundaries.
34. Paragraph 12.5 of the draft Local Plan states that *"proposed changes to the settlement boundaries are explained in the Stage two Settlements Evidence"*, and this is discussed further below.
35. The Stage One Settlement Evidence document (November 2024) states that the starting point for assessing the current settlement boundaries was the Settlement Boundary Review that supported the adopted Local Plan, which has been updated using new evidence and discussions with Town and Parish Councils (page 2: paragraph 1).
36. The Settlement Boundary Review (2017) advises that the Council does not generally seek to substantially alter settlement boundaries in order to ensure they continue to *"reflect both national and local policy aimed at promoting brownfield development, allocating the most sustainable sites and protecting the countryside"* (page 8). The proposed exclusion of Florence Park from the Tiptree settlement boundary would appear to contradict these aims.
37. It was considered in the Stage One Settlement Evidence document that *"the views of Town and Parish Council and their knowledge of their settlement are an important part of the Settlements Evidence"*. The evidence document also advises that *"consultation with Town and Parish Councils has taken place aiming to ensure the information is accurate"* (page 3: paragraph 1).
38. It is concerning that the views of infrastructure and facility providers and owners, such as CUFC, have not been included and that they have not been consulted in the same way. Details concerning community and sports facilities such as Florence Park should be confirmed with the relevant owners and operators where such facilities are not owned or operated by the Town, Parish or City Council.
39. The Stage One report states that it identifies *"high level constraints and opportunities"* that have been used to inform any amendments to settlement boundaries. New growth around Grange Road is acknowledged on page 92 and none of the constraints identified in the report relate to Florence Park.

40. The Stage Two Settlement Evidence document (October 2025) reiterates the Settlement Boundary Review (2017) principles that were applied in relation to the adopted Local Plan and Tiptree Neighbourhood Plan, both of which included Florence Park within the settlement boundary. Accordingly, application of the same principles should result in the same conclusion and does not justify excluding Florence Park from the Tiptree settlement boundary in the draft Local Plan, especially when there are sound planning reasons for maintaining the boundary as is in respect of Florence Park.
41. The specific proposals for amending Tiptree's settlement boundary are listed on page 34 of the Stage Two Settlement Evidence document. These include extensions to the settlement boundary to incorporate proposed residential allocations and planning permissions that have recently been granted and the removal of "open space to west" as a "general amendment". It is understood that this amendment relates to the removal of Florence Park from the settlement boundary, albeit this is not specified in the document. No other rationale or justification is provided for removing this land from the settlement boundary.
42. In light of the above, it is unclear what justification has been applied to the proposed removal of Florence Park from the Tiptree settlement boundary, when the application of the Review principles in 2017 allowed for its inclusion as promoted by CUFC as part of a comprehensive urban extension strategy comprising new housing and sports uses.
43. Although the Tiptree Neighbourhood Plan Examiner advised that a review of the settlement boundary could be undertaken through a partial review of the Neighbourhood Plan or through updates to the Colchester Local Plan, it was stipulated that this would need to be supported by proportionate evidence. No such evidence appears to have been provided to justify the proposed exclusion of Florence Park from the Tiptree settlement boundary.
44. A settlement boundary review should not be used to frustrate proposals for sites such as Florence Park, which are in compliance with national and local policy and where there is a clear and legitimate planning strategy in place for their development. The draft Local Plan's attempt to re-designate Florence Park as 'countryside' and prejudice sustainable development opportunities (deliberately or otherwise) represents a perverse and unjustified measure, which would render the draft Local Plan 'unsound'.

### Sports Provision and Community Facilities

45. Draft Policy CS4: Sports Provision states that "the Council will work with sports providers across the city to protect, enhance and deliver new and improved sports and leisure facilities to encourage active lifestyles and to increase participation in formal and informal recreation". The proposed exclusion of the Florence Park site from the Tiptree settlement boundary could preclude the achievement of this policy intention, as it could jeopardise CUFC's plans for future enhanced provision for formal sports facilities, as well as community access to these facilities at Florence Park and elsewhere. As such, it would not represent an effective strategy for achieving this policy objective.
46. In addition, the jeopardising of CUFC's plans through the exclusion of Florence Park from the Tiptree settlement boundary would be contrary to the NPPF, which allows for the

development of sports facilities where alternative and improved provision will be created in a location well related to the functional requirements of the relocated use and its existing and future users (paragraph 104).

47. In light of the above, the removal of Florence Park from the Settlement Boundary could prevent the objectives of the draft Policy from being realised and would be rendered ineffective, contrary to the NPPF and, therefore, 'unsound'.

### Development in the Countryside

48. The draft Local Plan describes areas considered to be in the countryside as "*small villages and hamlets and isolated clusters of dwellings which lack any community facilities or access to services or public transport and rely on nearby large settlements to meet their daily needs*" (paragraph 3.31). Florence Park does not fit this definition, being a formal outdoor sports facility that has been a part of Tiptree (identified as a 'Large Settlement' within the draft Local Plan) for over 10 years. It contains a large sports building, other built structures, car parking and formal sports pitches. It certainly is not vacant, undeveloped open space, divorced from the facilities and services within Tiptree. The site is served by purpose-planned footways/ cycleways linking to the centre of Tiptree, as well as local public transport facilities, and contributes towards meeting Tiptree's community facility and recreation needs. This all formed part of a comprehensive planned urban extension, previously promoted by CUFC through the Local Plan and Development Management processes and should therefore, be retained as shown in the adopted Local Plan.
49. The proposed removal of Florence Park from the Tiptree settlement boundary on the basis that it represents 'countryside' would be factually incorrect, inappropriate and, therefore, 'unsound'.
50. As discussed above, Florence Park is included in the Tiptree settlement boundary within the adopted Neighbourhood Plan, following the Examiner's conclusion that there was no justification for its removal.
51. Paragraph 12.22 of the draft Local Plan states that "*this plan seeks to build on the work undertaken to inform the Neighbourhood Plan and ensure the vision can be realised*". However, removing a key sports and community facility (and potential future housing site) from the settlement boundary would contradict this intention and could put achieving the Neighbourhood Plan's vision at risk. As such, it is considered to be ineffective and, therefore, 'unsound'.

### Future Housing Delivery

52. Table ST5.2: Local Plan Housing Allocations identifies that sites in Tiptree are proposed to provide 645 dwellings over the Plan period. The proposed relocation of the training facilities at Florence Park would release the site for a residential development comprising approximately 120 dwellings, as discussed above. This would allow Tiptree to meet 18% of its housing allocation on one site, rather than the proposed allocations, which are all estimated to deliver smaller developments.

53. However, by removing Florence Park from the Tiptree settlement boundary and identifying it as 'countryside' would mean that development of the site would be subject to the restrictions set out in draft Policy ST4, which would be inappropriate given the site's established position as a key recreation and community facility that serves the Tiptree population. Although an allocation for residential development on the Florence Park site is not currently being sought, the removal of the site from the settlement boundary could render the housing delivery policy ineffective and 'unsound' by jeopardising delivery of a potential future housing site.

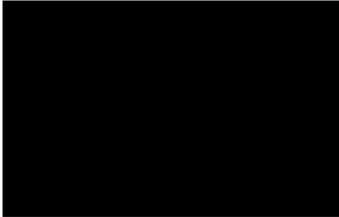
## Conclusion

54. In summary, CUFC objects to the proposed exclusion of Florence Park from the Tiptree settlement boundary, on the grounds that the proposal is not positively prepared, justified or in compliance with national planning policy and it would render the draft Plan ineffective and, therefore 'unsound'.
55. The proposed removal of Florence Park from Tiptree's settlement boundary would have the direct effect of removing the principle in favour of this site being redeveloped for a mixed housing and community sports scheme as part of a purpose-planned development and investment strategy on the basis that an alternative relocation site is identified. In addition, the proposed exclusion does not acknowledge the site's spatial and functional relationship with the settlement and conflicts with national and local strategic policies that support the expansion and improvement of sports facilities for the benefit of all.
56. CUFC has reiterated its planning intentions at each Local Plan and Neighbourhood Plan consultation stage. Therefore, against this background, it is surprising and disappointing to see that Florence Park is proposed to be excluded from the settlement boundary in the draft Local Plan, which could prejudice the Club's investment plans for developing sporting excellence and community participation, as supported by draft Policy CS4.
57. No rationale has been provided for the proposed exclusion of the site from the settlement boundary. It is, therefore, considered to be unjustified and not based on any technical assessment, related evidence or good planning reason.
58. In light of the matters discussed above, the draft Local Plan cannot be considered an appropriate strategy for achieving its stated objectives and meeting identified needs. Until the identified shortcomings have been addressed, the draft Local Plan cannot be demonstrated to meet the soundness tests set out in the NPPF.
59. Accordingly, CUFC considers it to be essential that Florence Park is retained within the Tiptree settlement boundary, as shown on the adopted Local Plan Proposals Map and the adopted Tiptree Neighbourhood Plan Policies Map, to ensure the emerging Local Plan can be found procedurally correct and is able to meet the overall aims and objectives of planning for sustainable development. This would also provide a suitable planning policy basis and related certainty for the delivery of CUFC's development strategy, rather than simply frustrate and delay the achievement of commendable and legitimate planning objectives.

We would be grateful if you could confirm safe receipt of these representations, which we trust you will find useful and will take into account as part of the draft Local Plan consultation.

Should you wish to clarify any of the matters raised, please do contact us.

Yours faithfully



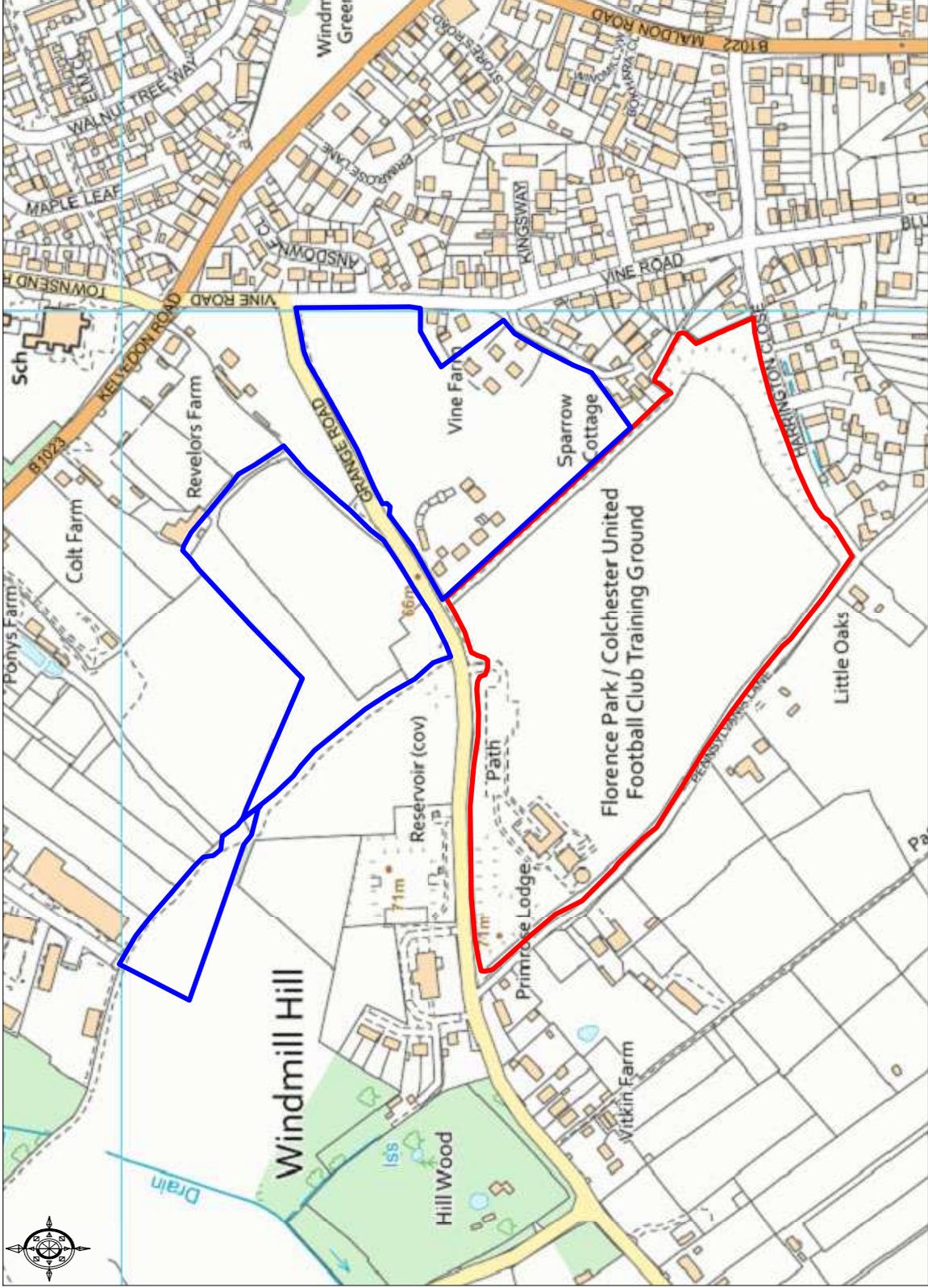
Aarti O'Leary  
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Enc.

## Appendix 1

### Florence Park Site Plan

Grange Road, Tiptree, Colchester  
Site Plan and other Land in Client Ownership



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## Appendix 2

### Illustrative Concept Plan

# Tiptree Neighbourhood Plan

Call for Sites Consultation  
(May 2017)

Colchester United FC  
Submission

Florence Park Tiptree  
Redevelopment

## CONCEPT PLAN



Previously Approved Housing  
(under construction)



Proposed New Housing



Retained Sports & Community  
Facilities



Potential Business units



Lawson Planning Partnership Ltd.

Scale 1: 2500 approx. @ A3 size

July 2017

Job 196