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Dear Sir/Madam,

Colchester Local Plan – Regulation 18 Preferred Options Consultation – Land east of Layer Road

On behalf of our client, Landvest and Harding Homes, we hereby submit representations with respect of the Colchester City Council Preferred Options Local Plan Regulation 18 Consultation in relation to land to the east of Layer Road, Colchester.

The Site

The Site comprises a long, narrow parcel of land measuring approximately 2.5 hectares, situated immediately to the east of Layer Road. Site Location Plan enclosed.

Layer Road runs along the entirety of the site's western boundary, with existing residential properties flanking both the northern and southern edges. The adjacent road is a significant local route that connects central Colchester with its southern suburbs and would serve as the point of access to the site.

To the west side of Layer Road, lies Gosbecks Archaeological Park which is designated in the adopted Local Plan as an area of archaeological significance (Policy DM16) and is also protected for public open space and leisure use (Policy DM17). The Park is also a Scheduled Monument.

The housing to the north—primarily along Layer Road and Berechurch Hall Road—falls within the defined settlement boundary of Colchester Town.

To the east of the site, the land is identified as a draft allocation in the emerging Colchester Local Plan as Policy PP10 — *Land South of Berechurch Hall Road, Colchester*. This draft allocation, immediately adjacent to the Site, is proposed for allocation for approximately 875 new homes. The Site's proximity to this draft allocation reinforces its potential to form a natural and integrated extension to planned development in this part of Colchester along with the sustainability of its location.

The Site does not include any buildings or structures that are statutorily or locally listed, nor are there any such heritage assets in the immediate surroundings. The nearest listed building is Gosbecks Farmhouse (Grade II), located at a considerable distance to the northwest.

The land falls within Flood Zone 1, which indicates a low probability of flooding. The site is visually enclosed on all sides by established vegetation, offering a good degree of natural containment.

Background

The Council's current five year land supply is increasingly marginal. In February 2026 the existing Adopted Section 1 Local Plan becomes 5 years old, and the housing requirement within it will accordingly be out of date for the purposes of calculation of five year housing land supply as set by NPPF paragraph 232.

The housing land supply annual requirement will therefore become approximately 1,300 homes per annum in line with the standard method, as opposed to 920 homes per annum within the existing adopted Local Plan. Over a five year period this will add 1,900 homes to the required supply plus the required buffer.

The Council acknowledge this requirement at paragraph 3.36 of the Regulation 18 Consultation document, confirming that the requirement for 20,800 new homes over the plan period is a mandatory target which must be planned for. Taking into account the homes to be delivered through the Tendring Colchester Borders Garden Community and windfall sites, the Council assert at paragraph 3.40 the need to plan for a minimum of 11,089 in order to meet the housing needs of Colchester (emphasis added).

The NPPF sets housing targets as minimum requirements, confirming that the Government regards housing as a priority. In light of this priority, it is essential that Councils identify and allocate a sufficient supply of suitable sites for housing to ensure that these targets can be met. It is thus imperative that suitable and available sites, such as land at Layer Road are fully considered given the significant opportunity that they provide to delivering housing quickly. This is particularly the case given the site is being taken forward by Landvest and Harding Homes, local developers with experience and expertise in delivery.

Site Assessment

The Site is within a sustainable location as is evidenced by the consented schemes in the immediate vicinity. Land to the northeast has been allocated for substantial residential growth under Policy SC1 of the adopted Local Plan (South Colchester Allocations: South of Berechurch Hall Road), permitting up to 150 new homes along with supporting infrastructure. This neighbouring development is currently under construction and nearing completion.

Furthermore, as noted above, draft Policy PP10 – *Land South of Berechurch Hall Road* – proposes to allocate land immediately east of the Site for approximately 875 new homes within the new plan. This neighbouring allocation highlights the strategic growth focus in this area and indicates the opportunity for allocating the Site as a logical and complementary extension.

The Site offers the potential to provide for improved connectivity as is required under Policy PP10 and which is unlikely to be delivered without the inclusion of land at Layer Road. The proposed quantum of housing at site PP10 of 875 homes also appears particularly high and as such including a further allocation at Layer Road could therefore also contribute towards these overall numbers.

Although therefore the Site lies outside the defined development boundary, it nonetheless is adjoining it and bearing in mind the surrounding development thus forms a logical extension to the settlement development boundary.

In terms of transport corridors, including the B1026, the Site offers the potential to improve connectivity and contribute to a more coherent and legible masterplan for the area. Its availability, alongside the absence of environmental constraints, makes it a strong candidate to support the Council in meeting its housing targets.

The Site can be developed as a residential-led mixed-use development comprising circa 53 dwellings. The Site is in a sustainable location with good access to walking, cycling and public transport. Local shops, services and employment areas are within 2km, and bus stops are located adjacent to the site, offering frequent services to Colchester and nearby villages. Two train stations are also within 5km, providing connections to London and the wider region. It is anticipated that vehicular access to the Site will be taken from the northern boundary.

The Site is physically and visually separated from Gosbecks Archaeological Park which is located on the other side of Layer Road. Notwithstanding this the opportunities to improve pedestrian connectivity to this important community open space in appropriate locations are a key benefit that can be achieved. Whilst the Site forms part of the monument's wider agricultural setting, development here would result in no harm to its significance, given existing surrounding development and the filtered nature of any views.

This representation is submitted following pre-application discussions with the Council. The pre-application was submitted in June 2025 (ref. 251370) and supported by a number of technical reports, these are also enclosed with this submission:

- Indicative Layout (subject to change)
- Transport Scoping Note and Access drawing,
- Landscape Note,
- Heritage Technical Note
- Initial Ecology Input
- and Tree Report,

These demonstrate the suitability of the site for residential development. Furthermore, the pre-application response (28th November 2025) confirmed the potential for a scheme of new dwellings on the site and advised to bring forward the Site as part of the current Regulation 18 consultation.

In terms of landscape considerations the Site benefits from strong existing landscape features, particularly along Layer Road, where mature trees form a valuable green screen that contributes to the area's character and wider green infrastructure. This existing vegetation can be retained and enhanced where possible and the Site can thus be developed sensitively without causing any significant landscape harm.

The tree report evidenced how the development and access can be achieved whilst retaining all important trees. The only trees impacted at the access point would be a dead tree and a small number of lower quality trees. Full information is provided by the tree survey.

As part of the pre-app it was confirmed by the tree officer that the arboricultural baseline supports the principle of development on this site.

The Site is thus suitable for residential development and forms a logical extension to the currently proposed adjacent allocation, PP10.

The site can complement this allocation, including the provision of active travel route linking into the adjoining site whilst remaining deliverable independently. The lack of requirements for wider masterplan is of course also beneficial in terms of delivery and the ability to bring the site forward.

The Site has been considered as part of the Strategic Land Availability Assessment (SLAA) Stage 2 (February 2025) under reference 10515. The Site primarily scores 'Green' ratings in terms of the assessment criteria, demonstrating its suitability, however there are a number of 'Amber' scores in terms of the following:

- Adjacent to the settlement boundary
- Part brownfield / part greenfield
- Possible opportunities to enhance or create green infrastructure
- Possibility of harm to heritage assets arising from the new development
- Unsure whether the land owner is open to working in partnership and bringing the site forward in combination with others to enable a comprehensive approach to development
- There is a possibility of contamination but it can be remediated without affecting development viability

Notwithstanding the 'Amber' rating a number of the above matters have however been considered by the Council as not being a barrier to delivering development on the Site or, as set out above, in terms of heritage considerations, would not constrain development of the Site. Furthermore, our client is willing to work alongside others in collaboration in terms of bringing forward the wider adjacent allocation PP10 but equally it is considered that the Site can be independently delivered without prejudicing the delivery of allocation PP10. It is therefore important that the amber ratings within the SLAA are updated to green to properly reflect this.

The Site also is presently shown as scoring 'Red' within the SLAA in terms of the agricultural land classification, however no site specific assessment has been undertaken whilst the vast majority of land surrounding Colchester is either Grade 1, 2 or 3. The site will therefore not impact on important agricultural land. The removal of circa 2.5 hectares of land would also not overall result in a significant loss of the best and most versatile agricultural land. There is no justification at present to score the site red and this should also be updated in the assessment.

The assessment presently also scores the site as 'Red' in terms of its location within a Minerals Safeguarding Area on the basis that minerals could therefore be sterilised. The Site is however below the threshold (5ha) for which the Mineral Planning Authority needs to be consulted on in terms of its location within a Minerals Safeguarding Area. The Minerals Plan therefore does not restrict the site given the safeguarding policy would not be triggered. There is also again no justification for a red score.

It is not therefore considered that either agricultural land classification or Minerals Safeguarding Area are constraints to development. These scoring criteria should be updated, and this again further supports the allocation of the site.

In terms of the Sustainability Appraisal Report (February 2025) there are also some areas in which the site is scored more negatively than is justified.

As noted above, a pre-application enquiry has now been undertaken on the site including technical reports which shows the site is fully deliverable and sustainable.

In light of the above considerations including the sustainable location of the Site and the ability to develop residential schemes to take into account air quality and water resources sensitively, it is considered that the Site was marked significantly more negatively in the sustainability appraisal than it should bearing in mind the substantial benefits it offers in terms of a sustainable residential site and the contribution it can provide to the local community in terms of supporting facilities and services.

The Site has been assessed more negatively than justified, particularly given its sustainable location, strong relationship to the existing settlement, and absence of any fundamental environmental or technical constraints. The factors identified as constraints are in reality capable of being appropriately addressed through design, mitigation, and collaboration where necessary. The Site therefore represents a suitable, available, and deliverable opportunity for residential development that can make a meaningful contribution to local housing needs.

Our client intends to consider to work with the Council to develop the design detail of the proposals and supporting plan work to support site promotion. On this basis it is considered that the site should be allocated in the emerging Local Plan.

Summary

Land east of Layer Road represents a highly sustainable and deliverable opportunity to contribute towards Colchester's housing needs as set out at Policy ST5. Its proximity to existing and proposed allocations, combined with the absence of significant environmental or heritage constraints, makes it an ideal site for allocation.

The Site offers logical connectivity to surrounding development and can support a well-integrated scheme that complements the strategic growth objectives for South Colchester. With capacity for approximately 53 dwellings, the site can deliver homes quickly, helping to address the Council's pressing requirement for a robust five-year housing land supply.

The SLAA and SA assessment should be revised to take into account the latest work and evidence as presented in this submission and in the previous pre-app which show the site is sustainable and deliverable. The allocation of the site will also support the wider allocation of land to the east at Berechurch Road, including improving active travel connections, whilst avoiding remaining independently deliverable without the need for wider masterplanning.



We respectfully request that the Council includes the site for residential allocation in the plan. Doing so will ensure that Colchester meets its housing targets while promoting sustainable development in a location that is both accessible and well-related to existing infrastructure.

Yours sincerely

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