

**Sandra Scott, Place Strategy Manager**

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12<sup>th</sup> January 2026

Dear Sandra,

**Colchester City Council: Regulation 18 Preferred Options Local Plan Consultation 2025 – Submission on behalf of Colchester Golf Club in relation to land at Chesterwell, Colchester (Draft Policy PP5)**

1. On behalf of our client, Colchester Golf Club (the Club), we write in response to the current Regulation 18 consultation on the draft Local Plan Review and the inclusion of land at Chesterwell (Policy PP5), owned by the Club, for housing development within the new Local Plan.
2. To inform this submission, we have reviewed the draft Local Plan and related evidence base documents as well as the planning applications for the adjacent Chesterwell development, which is in the process of being developed for housing by Mersea Homes.
3. In summary, subject to the inclusion of our proposed amendments, the Club strongly supports the allocation of the site for residential development. These representations set out a small number of suggested amendments to draft Policy PP5, to ensure that it is not overly prescriptive and provides necessary flexibility to enable the site to come forward in a phased way within the Local Plan period and to meet the relevant soundness tests set out in the National Planning Policy Framework (NPPF).
4. It is considered that, subject to the policy amendments being made, this would provide a suitable policy basis for the development of the site and related level of certainty, whilst retaining suitable flexibility for phasing and detailed design matters to be assessed and considered at the planning stage.

**Background**

5. Colchester Golf Club was founded in 1907 and is a non-profit making members club, owned and run by the members for the benefit of the members and the local community. The Club is situated approximately one mile north of the town centre and comprises a parkland, 18 hole golf course.

**Managing Director:**  
John Lawson, BA(Hons), MPhil, MRTPI

**Technical Director:**  
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**Directors:**  
Sharon Lawson, BA(Hons), DipTP, MRTPI  
Georgina Brotherton, BSc(Hons), MSc, MRTPI



6. The land the subject of these representations is referred to as ‘the site’ and covers the area outlined in red on the site plan included at **Appendix 1**.
7. The site forms part of Colchester Golf Club’s land and although it has previously been consented for golf club practise grounds, it has not been used in connection with the Club’s operations for some time. The land comprises former agricultural land, with trees and hedgerows around its perimeter, with a small number of trees within the site. The Colchester Orbital route runs along the western boundary.
8. To the west of the site is the golf course, to the south is open land followed by Braiswick Road. To the east is further open land followed by Mile End Road. To the north is further open land followed by Mile End Sport Centre and associated sports pitches.
9. Vehicular access to the site is currently indirectly via the Golf Club, with potential for more direct access to be gained from the east in association with neighbouring housing development.
10. The site is located within an accessible area in terms of the availability of public transport, being close to a railway station and on an existing bus route. Access to shops and other services within Colchester are also conveniently located.

## **Planning Policy Context and Site History**

### **National Planning Policy Framework (NPPF) (2025)**

11. The NPPF requires the planning system to be genuinely planned 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:
  - (b) be prepared positively, in a way that is aspirational but deliverable;
  - (d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; and
  - (f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (Paragraph 16).
12. Paragraph 32 requires Local Plans to be underpinned by relevant and up to date evidence to justify the proposals concerned.
13. When examining Local Plans, Paragraph 36 requires that they are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:
  - (a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

(b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

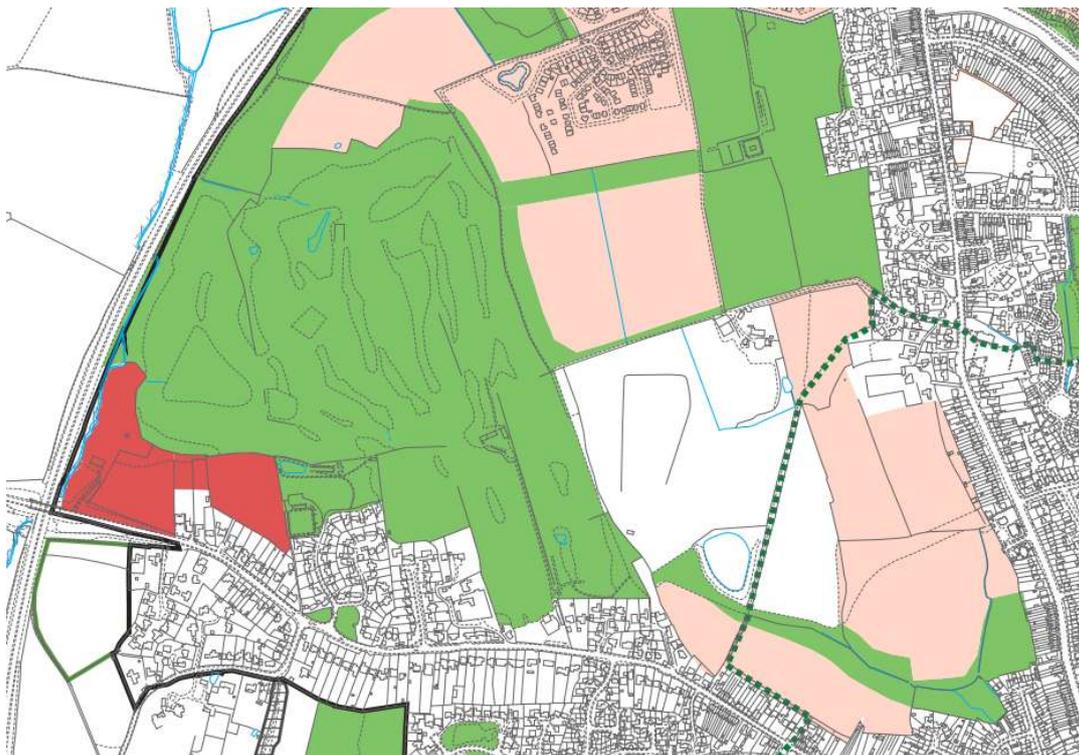
(c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

(d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

14. It is within this policy context the draft allocation should be assessed.

**Colchester City Council Adopted Local Plan (2021)**

15. The site is not adopted in the current Local Plan, although land to the east, south and north is identified as ‘Existing Commitments’ (identified by the salmon colour overlay in the plan included below).



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**Planning History**

16. Planning permission was granted on 2<sup>nd</sup> July 2014 (Application Reference: 145347) on land to the south, east and north of the Site for:

*“Mixed use development comprising residential dwellings, a neighbourhood centre including commercial, residential and community uses, education uses, strategic landscaping, green infrastructure and areas for outdoor sport facilities, access (in detail where specified) related infrastructure and other works and enabling works”.*

17. When the permission was granted, it restricted the development to the erection of no more than 1600 dwellings. Whilst many parts of the approved scheme have been constructed, the homes to the east and south of the Site have not yet been developed. The approved scheme includes a residential density plan that proposes a medium density of 33 dwellings per hectare on land immediately to the east of the Site. The approved scheme also shows a proposed road that will run along the eastern boundary of the site to serve the approved Chesterwell development, that could also serve the Site.

### Draft Allocation Policy PP5, Land at Chesterwell

18. The current Regulation 18 Consultation on the draft Local Plan includes the allocation of land owned by Colchester Golf Club for 50 homes (Draft Policy PP5). The land to the south, east and north has been excluded from the allocation at these areas are subject to an existing commitment and construction has commenced. The draft policy and associated map are included below.

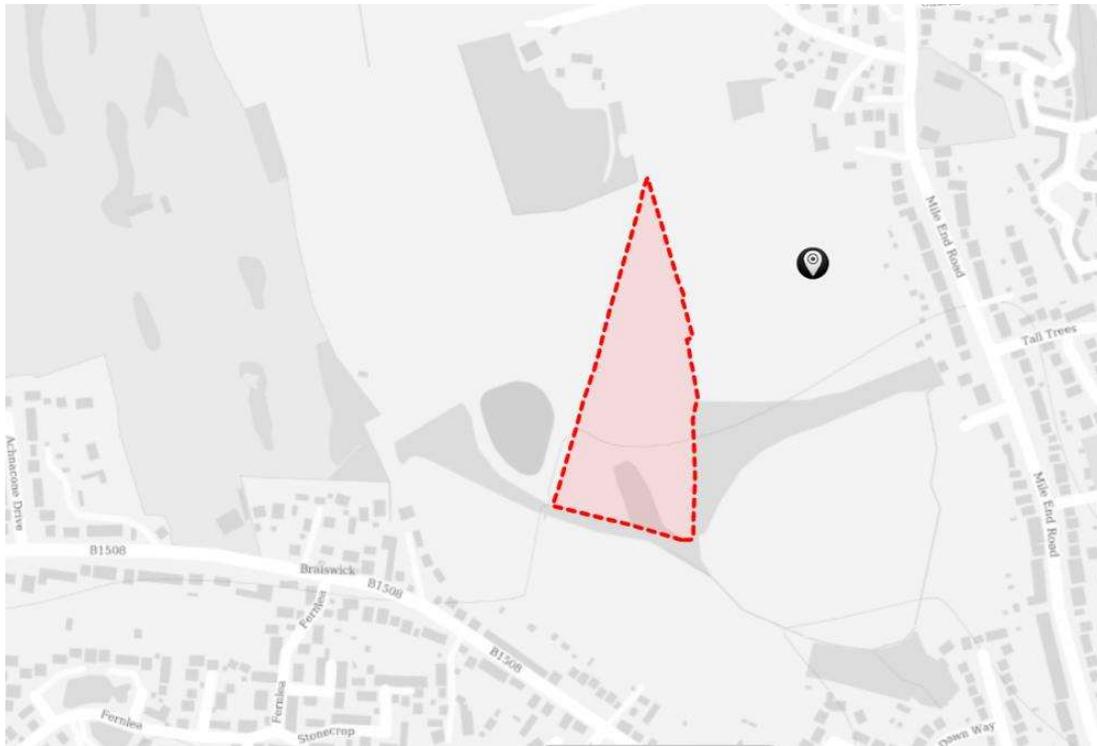
#### Policy PP5: Land at Chesterwell, Colchester

Comment 

In addition to the infrastructure and mitigation requirements identified in Policy ST 7 and subject to compliance with all other relevant policies, development will be supported on land within the area identified on the policies map which provides:

- a. Approximately 50 new dwellings of a mix and type of housing to meet evidenced needs and which is compatible with surrounding development;
- b. Safe and suitable site access to required highway design standards and point of vehicle access to be agreed with the Highway Authority and demonstration that proposal would not be detrimental to highway capacity;
- c. Onsite BNG measures should be based around watercourse gain requirements. The previous line of the watercourse onsite could be restored. Consideration should be given to creating higher distinctiveness grassland in the north of the site.
- d. For the retention of mature trees and hedgerows within the site;
- e. Improved walking and cycle routes to surrounding development and the railway station, utilising and connecting to the Public Right of Way network where possible;
- f. Development must conserve, and where appropriate, enhance the significance of heritage assets (including any contribution made by their settings). Designated heritage assets close to the allocated site includes two Grade II listed buildings as informed by the stage 1 HIA.
- g. Development must discharge attenuated surface water to a receiving waterbody and not to the combined sewer network, unless it can be demonstrated that there is no other option.
- h. Demonstrate adequate capacity for managing wastewater including proposed phasing requirements or alternative solutions to the satisfaction of the Council and Anglian Water;
- i. A range of measures in addition to prioritising SuDs (Policy EN8) and water efficiency measures to reduce the risk on impact on the WRC capacity as a result of planned growth including:
  - i. Removal of unrequired network flows;
  - ii. Targeted education to include new residents of the development;
  - iii. Reduction in the demand for potable water.

All development Proposals within Myland and Braiswick Neighbourhood Plan Area will also be determined against the policies in the Myland and Braiswick Neighbourhood Plan Review where relevant (adopted October 2023) where they are up to date and relevant.



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19. The Club have carefully considered draft Policy PP5, and the proceeding paragraphs set out their views on the draft allocation.

### Comments/Suggested Amendments on Draft Allocation Policy PP5, Land at Chesterwell

20. The Club strongly supports the allocation of the site for residential development within the new Local Plan. The Site is considered to be suitable for residential development being located immediately adjacent to land committed for housing and is also situated within a sustainable location.
21. However, there are a small number of suggested amendments to Policy PP5, to ensure that it provides necessary flexibility to enable the site to come forward in a potentially phased way within the Local Plan period and to meet the relevant soundness tests set out in the National Planning Policy Framework (NPPF).
22. These representations make comments on parts c, d and f of draft Policy PP5, and we have included suggested revised wording, where it is considered to be necessary.

**c. Onsite BNG measures should be based around watercourse gain requirements. The previous line of the watercourse onsite could be restored. Consideration should be given to creating higher distinctiveness grassland in the north of the site.**

23. Whilst the Club support Biodiversity Net Gain (BNG) being provided on the site, no BNG baseline assessment or preliminary ecological assessment has been undertaken by the Golf Club of their land. It is also not known what technical assessment CCC have undertaken of the site. It is therefore, not known whether the BNG measures should be based around watercourse gain requirements or other requirements.
24. Paragraph 32 of the NPPF requires Local Plans to be underpinned by relevant and up to date evidence to justify the proposals concerned. It is not clear that part c. of Policy PP5 meets the requirements of Paragraph 22 of the NPPF as no ecological or biodiversity evidence has been referenced to justify it.
25. Therefore, to avoid the policy being unsound, overly prescriptive, and potentially duplicating NPPF guidance relating to BNG, it is requested that part c. of Policy PP5 is amended so that the detailed BNG requirements for the site are determined at the planning application stage, in line with national planning policy guidance. The following revised wording is suggested:

c. Onsite BNG measures should be ~~based around watercourse gain requirements. The previous line of the watercourse onsite could be restored. Consideration should be given to creating higher distinctiveness grassland in the north of the site.~~ *provided on site.*

**d. For the retention of mature trees and hedgerows within the site**

26. Paragraph 136 of the NPPF advises that existing trees should be retained *wherever possible* [LPP emphasis]. No site masterplanning has been undertaken to date by Colchester Golf Club and we are not aware that the Council have undertaken a Tree Survey of the existing trees/hedgerows within the Site. Therefore, to avoid the draft policy becoming too prescriptive at this stage, we suggest the strategy for the retention or removal of existing trees/hedgerows is determined at the planning application stage, informed by a Tree Survey that would have assessed the quality and longevity of the trees within the site, along with the sites other constraints and opportunities. We therefore suggest that part d. of Policy PP5 is amended to align with the NPPF to:

d. For the retention of mature trees and hedgerows within the site, *wherever possible*

**f. Development must conserve, and where appropriate, enhance the significance of heritage assets (including any contribution made by their settings). Designated heritage assets close to the allocated site includes two Grade II listed buildings as informed by the stage 1 HIA.**

27. Part f. of Policy PP5 is not considered to be necessary as it provides unnecessary duplication of guidance in the NPPF relating to protecting and enhancing designated and non-designated heritage assets. This part of the policy is therefore, in conflict with paragraph 16(f) of the NPPF, that requires Local Plan policies to serve a clear purpose, avoiding unnecessary duplication of policies. We therefore suggest that part f. is omitted all together from Policy PP5.

## Summary and Conclusions

28. In summary, Colchester Golf Club support the allocation of their land for residential development within the new Local Plan. These representations set out a small number of suggested amendments to Policy PP5, to ensure that it is not overly prescriptive and provides necessary flexibility to enable the site to come forward in a phased way within the Local Plan period and to meet the relevant soundness tests set out in the National Planning Policy Framework (NPPF).
29. It is considered that, subject to the policy amendments being made, this would provide a suitable policy basis for the development of the site and related certainty whilst retaining suitable flexibility for detailed design matters to be assessed and considered at the planning application stage.
30. We hope you will be able to accommodate these changes to draft Policy PP5 to ensure its soundness, and should you require further clarification on the information submitted, please do contact me using the details provided.

Yours sincerely

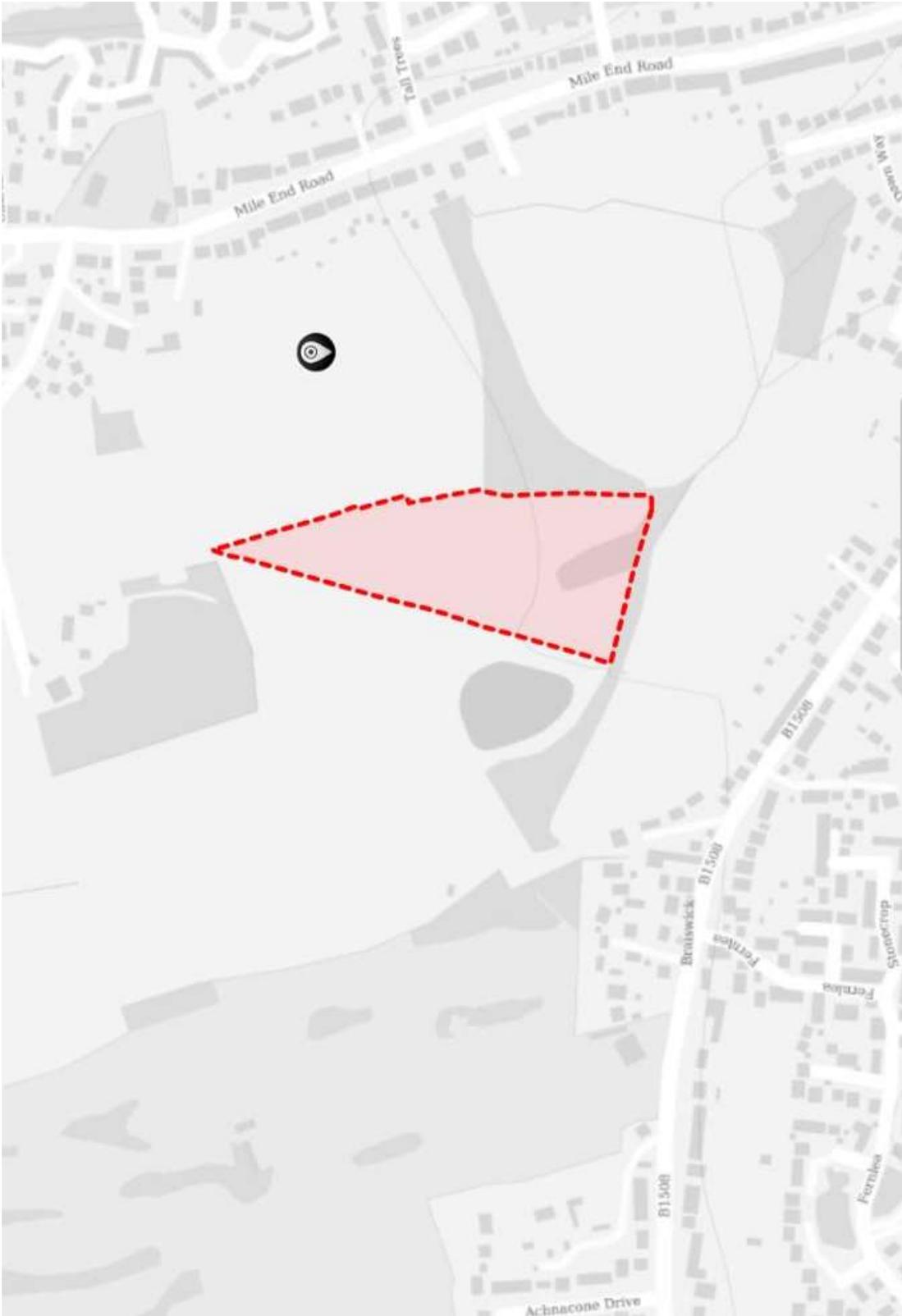


**Georgina Brotherton**  
**Lawson Planning Partnership Ltd**

Enc.



# Appendix 1



Colchester Local Plan Regulation 18 Consultation