

Planning Policy
Colchester City Council
Rowan House
33 Sheepen Road
Colchester, CO3 3WG

By Email

14th January 2026

Dear [REDACTED]

***COLCHESTER CITY COUNCIL LOCAL PLAN
REGULATION 18 CONSULTATION
RESPONSE ON BEHALF OF ST. PHILIPS***

We write on behalf of our client, St.Philips, in response to the Council's latest Regulation 18 consultation (November 2025). The current consultation starts to identify the Council's preferred options for growth, including identifying site allocations to meet housing needs.

St. Philips has land interests in Langham, adjoining Park Lane to the south, with School Road to the north and Wick Road to the east (see **Appendix A**). The Site, measuring circa. 8 hectares, forms part of an identified allocation through Policy PP37 (Land North of Park Lane) as a preferred option for residential development.

Notwithstanding St.Philips' specific land interests, this response has been prepared in objective terms, in response to the current consultation and the supporting evidence base.

Response to Regulation 18 Consultation

Vision for Colchester

The overarching vision for the emerging Plan seeks to improve the quality of life for communities, create a better environment and contribute to healthy lifestyles. Emphasis is placed on the maximising opportunities through well connected green networks, as well as preserving and enhancing Colchester's identity. The main themes of the Local Plan vision include healthy and diverse places, welcoming inclusive communities, being well-connected and being sustainable. These themes are supported by a range of objectives, together forming a framework for how the vision of the Plan will be achieved.

Throughout the vision, its objectives and aims there is a common theme of supporting development which addresses needs and creates great places to live, work and play, whilst aiding the transition to net zero.

We support the vision identified by the Council, which can best be achieved through the adoption of an up-to-date Local Plan which seeks to meet housing and other growth needs in full in sustainable locations across the District.

Housing Needs and Requirements

Paragraph 62 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method. This further identifies that in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

The Council correctly identify the starting point for calculating minimum housing needs is the Standard Method (2024). This requires across the Plan period 2025 - 2041, the delivery of 20,800 homes, as a minimum. We support the acknowledgment that the Standard Method is a starting point for considering the housing requirement, this is justified and consistent with the NPPF.

Through the Sustainable Appraisal Report (SA, February 2025), the Council has determined there are no exceptional circumstances which justify a lower housing need. We consider this position is justified.

The Council has also established through the SA and Housing Topic Paper (November 2025) that there is no justification of increasing housing needs as a result unmet needs of neighbouring authorities or based on economic growth aspirations or infrastructure ambitions.

However, the Local Housing Needs Assessment (LNA, September 2024) highlights, based on the previous Standard Method, there is a considerable affordable housing needs of 877 affordable homes per annum. This affordable need is now likely greater reflecting the increase in minimum housing needs. The LNA concludes that affordable housing delivery should be maximised where opportunities arise. This is not considered in the SA with it instead concluding “that in the absence of the wider evidence justifying a lower, or higher level of growth, variation of the Standard Method requirement is not justified”.

We consider further work should be completed by the Council to establish whether an increase in the housing requirement is achievable.

Plan Period

Para 22 of the NPPF is clear that strategic policies should look ahead over a minimum 15-year period from adoption. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

The new Local Plan proposes a Plan period from April 2025 to March 2041, i.e. 16-years with the final monitoring year being 2040/41. This would require the Plan to be adopted before end of March 2027. This is considered unlikely on the basis of the Council's current Local Development Scheme.

We recommend the Plan period be extended by 2 years to ensure the required 15-year period post adoption is achieved, in order to avoid any soundness issues.

Spatial Strategy

The Plan identifies a proposed spatial strategy indicating this provides the framework for how the housing and employment needs will be met through allocations.

The Council's chosen hierarchy directs growth first to the urban area of Colchester, as the most sustainable location in the Plan area. Following this, it prioritises the growth and opportunity areas and then the most sustainable and accessible locations close to transport corridors and existing centres. This includes an "appropriate level" of growth allocated within the large, medium and some small settlements.

The settlement hierarchy remains an important part of the Plan, ensuring development can come forward in a sustainable manner whilst maximising the potential of the most sustainable settlements. This is consistent with the NPPF which states policies and decisions should guide development towards sustainable solutions, and states significant development should be focused on locations which are or can be made sustainable.

We are supportive of the approach to direct growth to the sustainable locations, notably those on or close to the main A road routes which cross through the District. The Council however needs to ensure sufficient justification is provided to support its distribution of development between settlements, including how the presence (or absence) of services and facilities have influenced this and proximity to transport corridors. For the reasons

as set out below, we consider the preferred options for Langham have been robustly justified.

The Plan should include a housing trajectory which identifies when sites are expected to deliver homes, ensuring housing needs are achieved across the Plan period including in the short (next 5-years) and medium (5 – 10 years) periods.

Langham

Langham includes two areas of settlement, Langham Moor and St. Margaret's Cross, linked by School Road. Langham contains a primary school, public house, a community café, a community shop, community centre, recreation ground, a playground, football pitches and tennis courts. It lies close to the A12 trunk road and is highly accessible via the road network to Colchester and other hubs nearby. The village is located outside of the Dedham Vale National Landscape which is to the north and east. The village is therefore well placed as an existing sustainable settlement with capacity to grow.

The SA acknowledges this, confirming that Langham is a sustainable settlement. The SA, Plan and wider evidence base classifies Langham as a medium settlement. We support this view.

Not only does Langham already have a good range of facilities and services, but this and other infrastructure requirements (i.e. junction improvements) can be supplemented through development.

The Colchester Settlement Evidence Stage 2 (Oct 2025) illustrates the existing and preferred options for settlement boundaries, and for Langham it is proposed to extend this to include land to the north of Park Lane joining the two settlements. We are supportive of this change as it is a logical extension providing new sustainable links between the separate parts of the village.

The Site and Land North of Park Lane

The Site (**Appendix A**) abuts the existing settlement edge of Langham along its northern boundary, and is within close proximity along its eastern boundary. Residential properties are located to the east along Wick Road, as well as to the north along School Road/St. Margarets Cross, where the pre-school, primary school, post office, football club, tennis courts and community centre are also located (all of which are within walking distance of the Site).

Land directly to the north of the Site has recently been developed for 46 dwellings and associated public open space through application ref. 191830. Land to the west of the Site comprises agricultural land but is part of the same proposed allocation.

The Site, as a discreet parcel on its own (circa. 8 hectares), has capacity to support circa. 150 – 200 homes within vehicular access to be taken from Park Lane. Pedestrian and cycle access could be provided to the north, through the new development which includes a link to the public right of way which runs along (inside) the northern boundary of the Site. This will help ensure sustainable movement is prioritised, with future residents being able to easily and directly walk to the existing facilities of the village.

The Council's evidence base, through the SLAA and Summary of Sites Evidence (October 2025) assesses the Site as part of the much larger Land north of Park Lane, Langham proposed allocation (ref. 10664 / PP37). The Site has not been assessed on its own.

The assessment concludes the proposed allocation area is a suitable location for residential development. Whilst some potential constraints are identified, these can be readily addressed through design or mitigation, these do not affect deliverability. Further, there are no known overriding constraints with respect to utility / service provision, neighbouring uses, or landscape or nature conservation. The Site and wider allocation are wholly located within Flood Zone 1 and not located within a Critical Drainage Area.

Whilst the Infrastructure Delivery Plan (and associated Evidence Base) identifies existing foul drainage capacity constraints locally for Langham, this highlights there are likely to be solutions in place for this in the medium term. Alongside this, work is being undertaken to consider any other potential on-site or off-site solutions. We expect there will be deliverable and viable options to enable delivery on the Site in the short-term.

We therefore consider the Council's assessment of the Land north of Park Lane to be sound. We therefore support the identification of this land as a proposed allocation through Policy PP37. Nevertheless, it should be noted we consider the conclusions would equally apply to the Site on its own.

Policy PP37 (Land North of Park Lane) identifies the Site and wider land to the west to deliver approximately 900 new dwellings to include safe and suitable access in a location to be agreed with impacts, including on the strategic highway network and other infrastructure, to be satisfactorily mitigated. We consider this is readily achievable, and the allocation can deliver high-quality new development which aligns with the Council's aspirations. We consider a scheme could be designed sensitively which respects the

character of the area and would not be significantly harmful to the wider landscape, including the nearby National Landscape.

The Policy identifies that proposals for the site will only be supported where they accord with a comprehensive masterplan in relation to the entire allocation, which has been agreed with the Council prior to submission of any planning application. Whilst we will seek to work collaboratively with the promoter of the land that forms the remainder of the allocation, we consider the Site could come forward separate to the wider allocation. It forms a discreet parcel adjoining the existing settlement boundary, with clear and obvious links to the south (via road) and north (via pedestrian routes). The ability for delivery to be achieved on the Site in the first 5-years of the Plan may be undermined if there are delays associated with the larger remainder of the allocation to the west. The policy wording should be tweaked to allow for the Site to come forward separately so long as it does not undermine the ability of the wider allocation to deliver a high-quality development.

Summary and Next Steps

As set out in these Representations, whilst further work should be undertaken to fully justify the approach proposed we support the Council's aspirations to proactively plan for growth, through the adoption of an up-to-date Plan. We look forward to discussing this further with the Council in due course, and are happy to provide any further information which may assist in the Council's ongoing consideration of the Site as part of this Plan-making process.

Yours Sincerely



Planning Director



Appendix A
Site Location Plan

This is an aerial map of a suburban area in Colchester, UK. A large, irregularly shaped green field is highlighted with a red border. The field is located between Birchwood Rd to the north and Wick Rd to the south. To the west of the field, there is a residential area with streets like School Rd and Moor Rd. To the east, there is a golf course area with streets like Park Ln and Langham Ln. Various landmarks and businesses are labeled, including 'The Little Dining Club', 'Colchester Golf Club', 'Beechwood Luxury Cattery', and 'Fortis Health & Wellbeing'. The map also shows other roads like Ipswich Rd, Birchwood Rd, Wick Rd, School Rd, Moor Rd, Park Ln, and Langham Ln. There are also labels for 'BOND Plumbing & Heating Services', 'ALFA', 'Mole Country Stores', 'Holiday Inn Express Colchester by IHG', 'icanvalet.com', 'Shell', 'Cimarron', 'Dave's Private Hire', 'RAF Boxted Memorial', 'The Shepherd & Dog', 'Roman Rovers Football Club', 'Langham Testing Station', 'St Margaret's Cross', 'Shogun Practical Karate', 'B Calm Ltd', '4 Shepherds retreat', and 'Beechwood Luxury Cattery Colchester'.