Colchester City Council Local Plan Review PP37 – Regulation 19 Consultation

Soundness Representations concerning Draft Policy PP37: Land north of Park Lane, Langham

Sustainable Transport Statement for Langham Parish Council (Report SR4)

1. Summary

1.1. Policy PP37 proposes approximately **850 dwellings at Land North of Park Lane, Langham**. The allocation should be found unsound in transport terms because the Council has not demonstrated that this scale of development is located in a place which is, or can be made, sustainable in accordance with the December 2024 National Planning Policy Framework (NPPF).

1.2. The principal concern is not that residents will use private cars. The NPPF does not require car-free development and private cars remain a legitimate means of transport.

1.3. The issue is whether PP37 can provide a **genuine choice of transport modes**, limit the need to travel and prioritise sustainable transport modes, as required by the December 2024 NPPF.

1.4. The Council's latest August 2026 evidence actually demonstrates the difficulty of doing so. It identifies:

- limited cycling infrastructure in rural parts of Colchester;
- poorer bus provision in rural areas;
- limited bus services outside peak periods;
- a substantial package of new sustainable transport infrastructure required specifically for Langham;
- approximately **£6.13 million** of identified Langham sustainable-transport projects which currently have **no secured funding**;
- delivery of those projects largely scheduled for **2031/32–2036/37**;
- transport measures which remain at a high level and require further modelling and design after plan adoption;
- rural new-development trips remaining approximately **72% car-based** even after the modelled sustainable-transport interventions; and
- an explicit statement from Essex County Council that the **level of growth at Langham is not supported because of the cost of school transport**.

1.5. Taken together, these matters raise a fundamental question of soundness:

How can the Council demonstrate that PP37 is a location which can be made sustainable for 850 dwellings when the infrastructure required to improve its sustainable transport accessibility is presently unfunded, incompletely designed, scheduled substantially into the future, and is not expected to remove the underlying high level of rural car dependency?

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2. Applicable national policy

2.1. The principal policy framework is the **December 2024 NPPF**, which is the appropriate primary framework for a Local Plan proceeding through the legacy plan-making system.

2.2. NPPF paragraph 109 requires transport issues to be considered from the earliest stages of plan-making through a **vision-led approach**, identifying transport solutions which deliver well-designed, sustainable and popular places.

2.3. Paragraph 110 provides the central site-selection test:

“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

2.4. Paragraph 111 requires planning policies to support an appropriate mix of uses across an area and, within larger-scale developments, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.

2.5. Paragraph 115 requires sustainable transport modes to be prioritised when assessing sites for allocation, taking account of the vision for the site, its type and location.

2.6. Paragraph 117 requires development to give priority first to pedestrian and cycle movements and, so far as possible, to facilitate access to high-quality public transport.

2.7. The issue for PP37 is therefore not simply whether its highway network can accommodate traffic. **Highway capacity and sustainable location are separate planning questions.**

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3. The Council's own evidence establishes weak rural sustainable transport provision

3.1. The August 2026 Stage 4 Infrastructure Audit and Delivery Plan (IADP) provides important evidence concerning the existing transport context.

3.2. It acknowledges that cycling provision is limited in rural areas and that rural active-travel provision largely consists of National Cycle Network and leisure walking routes.

3.3. It also states that:

“Bus service provision is notably poorer in the more rural areas of the borough.”

3.4. The IADP further identifies limited services outside peak periods.

3.5. These are not assertions made by objectors. They are findings in the Council's own August 2026 evidence base.

3.6. This matters because PP37 is a major rural allocation. Its sustainability therefore cannot reasonably be assessed on the basis that existing urban levels of public transport and active-travel provision are available.

3.7. The evidence instead establishes a relatively weak baseline from which PP37 would have to be **made sustainable**.

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4. PP37 requires substantial new infrastructure to improve sustainable transport

4.1. The August 2026 Regulation 19 Transport Evidence identifies a specific package of transport measures for Langham and Boxted.

4.2. These include:

A. Langham cycle route

A proposed cycle route connecting Langham towards the Park & Ride facility and the Rapid Transit System, through School Road, Moor Road and Langham Lane.

B. Langham Mobility Hub

A new mobility hub intended to support integrated transport and higher-quality public transport.

C. Langham–Boxted bus connection

A new or improved bus connection/service linking Langham with the Park & Ride facility at Boxted Road.

4.3. The fact that these measures have been identified is itself significant.

4.4. The Council is effectively acknowledging that **the existing transport network is insufficient to provide the desired level of sustainable connectivity** and that significant intervention is necessary.

4.5. The issue therefore becomes whether those interventions are sufficiently certain, funded and timely to demonstrate compliance with NPPF paragraph 110.

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5. The Langham sustainable-transport package is currently unfunded

5.1. The August 2026 IADP Stage 4 Project Schedule identifies the following costs and funding positions.

Langham measure	Estimated cost	Funding status	Proposed delivery
Langham cycle route	£4.60m	**No funding secured**	Phase 2: 2031/32–2036/37
Langham Mobility Hub	£0.43m	**No funding secured**	Phase 2: 2031/32–2036/37
Langham–Boxted bus connection	£1.10m	**No funding secured**	Phase 2: 2031/32–2036/37
Total	**£6.13m**	**None secured**	Phase 2

5.2. These are not minor improvements. They represent approximately **£6.13 million of infrastructure specifically identified as necessary to improve sustainable transport connectivity in the Langham area**.

5.3. Yet the Council's Stage 4 Project Schedule records the funding position for each of these projects as **TBC / No Funding Secured**.

5.4. The proposed funding mechanism does not alter that fact. A proposal that development contributions may fund infrastructure is not equivalent to funding being secured.

5.5. The Inspector should therefore distinguish between:

- infrastructure which is funded and committed;
- infrastructure for which a realistic funding mechanism exists; and
- infrastructure for which funding remains merely anticipated.

5.6. The Langham measures currently fall into the latter category.

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6. The timing creates a significant effectiveness problem

6.1. The identified Langham cycle route, mobility hub and bus connection are all scheduled within **Phase 2, 2031/32–2036/37**.

6.2. This raises an important question about the sustainability of the first phases of PP37.

6.3. If housing begins to be occupied before those measures are delivered, residents may initially have access only to the existing relatively weak rural sustainable transport network.

6.4. The resulting pattern of travel may become established before the proposed infrastructure is available.

6.5. This is particularly important because the Council's own evidence indicates that rural bus services are poorer and that active-travel provision is limited.

6.6. The Council should therefore demonstrate:

a. when PP37 housing is expected to start;

b. when the first sustainable-transport interventions will become operational;

c. what proportion of the allocation will be occupied before each intervention;

d. what mechanism prevents occupation progressing substantially ahead of those interventions; and

e. what happens if the infrastructure cannot be funded or delivered on schedule.

6.7. Without such evidence, the Council has not demonstrated that PP37 is **effective** in the sense required by the soundness tests.

7. The Council admits that the transport package is not yet fully developed

7.1. The Stage 4 IADP states that the mitigation measures identified at this stage remain **high level** and require further refinement through additional modelling and design development.

7.2. It indicates that this further work will most likely occur **beyond plan adoption**.

7.3. This is potentially significant.

7.4. If the transport measures required to make PP37 sustainable remain at a high level at the point when the Local Plan is submitted for examination, the Council cannot simply assume that they will subsequently prove technically feasible, affordable and deliverable.

7.5. The issue is not whether detailed design can appropriately be left to a later planning stage.

7.6. The issue is whether there is sufficient evidence **now** to establish that PP37 is capable of being made sustainable at the scale proposed.

7.7. A strategic allocation should not depend upon an unresolved proposition that future modelling and design work will eventually identify a satisfactory solution.

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8. The Council's own modelling demonstrates continuing high rural car dependency

8.1. The August 2026 Transport Evidence contains modelling of the expected effects of sustainable transport measures.

8.2. Importantly, the modelling does not demonstrate a transformation from car-dependent rural travel to predominantly sustainable transport.

8.3. For new Local Plan development, the modelled AM peak car mode share for **local rural trips** is approximately:

77% before the sustainable transport measures → 72% after them.

8.4. In the PM peak the corresponding figures are approximately:

78% → 72%.

8.5. These figures are not presented as PP37-specific modal shares and should not be represented as such.

8.6. They are nevertheless highly relevant because they represent the Council's own modelling of the difficulty of achieving modal shift for new development in rural circumstances.

8.7. Even following the proposed sustainable-transport interventions, approximately **72% of local rural trips remain car-based** in the model.

8.8. The Council's evidence therefore does not demonstrate that sustainable transport measures will remove rural car dependency.

8.9. Rather, it demonstrates that significant car dependency is expected to remain.

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9. This creates a direct issue under NPPF paragraph 110

9.1. The relevant NPPF test is whether PP37 can offer a **genuine choice of transport modes** while limiting the need to travel.

9.2. A development in which approximately three quarters of relevant rural trips remain car-based after the assumed sustainable transport interventions raises a serious question about whether that choice is genuinely available in practical terms.

9.3. Again, this does not mean that a 72% car share is automatically contrary to the NPPF.

9.4. The point is that the Council must explain how a location with this level of anticipated car dependency nevertheless satisfies the paragraph 110 requirement.

9.5. In particular, it should identify:

- which journeys are realistically capable of being made without a car;
- which destinations are accessible by those modes;
- the frequency and reliability of the public transport service;
- the likely walking and cycling catchments;
- how the substantial amount of remaining car travel is consistent with limiting the need to travel; and
- why better-connected alternative locations are not preferable.

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10. The Council itself recognises the need for sustained modal shift

10.1. The August 2026 Transport Evidence concludes that accommodating the planned growth requires **sustained mode shift away from private car dependence**.

10.2. This is important because it demonstrates that the Council itself recognises private-car dependence as a strategic transport issue arising from the Local Plan.

10.3. The question is therefore not whether car use is acceptable.

10.4. The question is whether the Council has demonstrated that the particular locations chosen for substantial growth are capable of achieving the required modal shift.

10.5. PP37 presents particular difficulties because:

- it is a large rural allocation;
- the existing rural active-travel network is limited;
- bus provision is poorer in rural areas;
- substantial new sustainable-transport infrastructure is required;
- that infrastructure currently has no secured funding;
- delivery is scheduled substantially into the future; and
- the Council's own modelling predicts continuing high rural car use.

10.6. These factors collectively provide a strong basis for questioning the soundness of the allocation.

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11. The Essex County Council school-transport evidence is particularly significant

11.1. The Stage 4 IADP records an important position from Essex County Council.

11.2. ECC states that:

“the level of growth at Langham is not supported due to the cost of school transport (primary and secondary).”

11.3. This is highly relevant to sustainable transport and accessibility.

11.4. It is not simply a general observation that children might travel by car.

11.5. The relevant infrastructure authority has expressly identified the scale of Langham growth as creating an unacceptable or problematic school-transport burden.

11.5. The IADP identifies the need for a self-funding solution and indicates that land should be included for primary school and Early Years/Childcare provision so that an alternative solution can be found.

11.6. This reinforces the wider point that PP37 generates substantial additional travel requirements which cannot simply be assumed to be accommodated by existing local infrastructure.

11.7. The Council should explain how the allocation satisfies NPPF paragraph 111's requirement to minimise the number and length of journeys required for education and other activities when its own evidence identifies significant school-transport implications.

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12. The absence of a local centre increases the travel problem

12.1. PP37 is a large allocation but does not provide the equivalent range of local services which would be expected to minimise travel demand at a development of this scale.

12.2. This is relevant to NPPF paragraph 111.

12.3. A substantial new population will require journeys for:

- food shopping;
- employment;
- education;
- healthcare;
- leisure;
- community activities;
- rail travel; and
- other services.

12.4. Where these destinations are not available locally, the number and length of journeys necessarily increase.

12.5. Where public transport and active-travel alternatives are weak, those additional journeys will disproportionately be made by private car.

12.6. The Council should therefore demonstrate how PP37 can satisfy the NPPF requirement to minimise the number and length of journeys associated with larger-scale development.

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13. Highway capacity does not resolve the sustainable-location issue

13.1. The Council may seek to demonstrate that highway impacts can be mitigated.

13.2. That is a separate issue from whether PP37 is a sustainable location.

13.3. A road can have sufficient capacity to accommodate additional vehicles without the location being sustainable in the sense required by NPPF paragraph 110.

13.4. Likewise, junction improvements can mitigate congestion without reducing the underlying need for car travel.

13.5. The examination should therefore distinguish between:

“Can the highway network accommodate the traffic?”

and:

“Is this an appropriate location for 850 dwellings having regard to the requirement to limit travel and provide a genuine choice of modes?”

13.6. The second question remains unresolved by demonstrating highway capacity.

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14. The 2026 NPPF provides additional supporting weight

14.1. The December 2024 NPPF should remain the principal policy framework for the examination of a legacy plan.

14.2. Nevertheless, the 2026 NPPF provides useful additional supporting weight because it reinforces rather than reverses the relevant transport principles.

14.3. The revised framework places greater emphasis upon a **vision-led approach**, sustainable patterns of movement and the use of the **Connectivity Tool** in assessing development locations.

14.4. It also expressly emphasises limiting the need to travel, **particularly by private car**, and providing a genuine choice of transport modes.

14.5. The 2026 changes therefore provide further confirmation that transport sustainability is a **site-selection issue**, not simply a matter of mitigating traffic after a site has been selected.

14.6. The 2026 framework should not, however, be relied upon as though it were retrospectively the operative policy test for the legacy Local Plan.

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15. Soundness assessment

15.1. Not positively prepared

15.1.1. The allocation is not demonstrated to be positively prepared in transport terms because the Council has not demonstrated that locating 850 dwellings at PP37 represents an appropriate sustainable pattern of development.

15.1.2. The Council's own evidence identifies weak rural sustainable transport provision and substantial infrastructure requirements.

15.1.3. The resulting transport strategy remains dependent upon future intervention rather than demonstrating that the location is inherently capable of supporting sustainable travel at the proposed scale.

15.2. Not justified

15.2.1. The Council has not adequately demonstrated why PP37 is preferable to locations with better existing connectivity and sustainable transport opportunities.

15.2.2. The Council should provide a clear comparative assessment explaining why the substantial additional investment required at Langham is justified.

15.2.3. This is particularly important where the Council's own evidence anticipates continuing high car dependency in rural areas.

15.3. Not effective

15.3.1. The transport strategy depends upon approximately £6.13m of Langham-specific sustainable transport measures which currently have no secured funding.

15.3.2. The principal measures are scheduled for 2031/32–2036/37.

15.3.3. The measures remain at a high level and require further modelling and design development.

15.3.4. The Council has therefore not demonstrated that the transport infrastructure necessary to make PP37 sustainable will be delivered when required.

15.4. Inconsistent with national policy

15.4.1. In the absence of stronger evidence, PP37 has not been demonstrated to comply with the December 2024 NPPF requirements concerning:

- sustainable locations;
- limiting the need to travel;
- genuine choice of transport modes;
- minimising journeys;
- prioritising sustainable transport; and
- prioritising walking, cycling and public transport.

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16. Questions for the Inspector

The following questions should be put to the Council.

A. Sustainability of the location

1. What evidence demonstrates that PP37 is a location which is **or can be made sustainable** for 850 dwellings?
2. What proportion of PP37 journeys is expected to be undertaken by private car, walking, cycling and public transport?
3. What evidence supports those assumptions?
4. How does the Council define and measure the **"genuine choice of transport modes"** required by NPPF paragraph 110?

B. Existing transport provision

5. Given the IADP's finding that rural cycling provision is limited, what existing cycling routes provide meaningful access to employment, education, shopping and other services from PP37?
6. Given the IADP's finding that rural bus provision is poorer and limited outside peak periods, what existing public transport service provides a realistic alternative to the private car for PP37 residents?

C. Required mitigation

7. Why does PP37 require a new £4.6m cycle route, £430,000 mobility hub and £1.1m bus connection if the existing location is already considered sustainable?
8. Are these measures **necessary to make PP37 sustainable**, or are they merely desirable enhancements?
9. If they are necessary, why has the Council not secured their funding?

D. Funding

10. What proportion of the £6.13m Langham sustainable-transport package is currently secured?
11. What specific S106/S278 obligations are proposed?
12. What evidence demonstrates that the necessary contributions will be sufficient?
13. What happens if development viability prevents the full contributions being secured?
14. What alternative funding source will meet the shortfall?

E. Timing

15. Why are the principal Langham sustainable-transport measures not scheduled until **2031/32–2036/37**?
16. What proportion of PP37 will be occupied before those measures are operational?
17. What mechanism prevents substantial occupation occurring before the infrastructure required to make the site sustainable is delivered?
18. What is the Council's contingency if the proposed funding is not secured by the scheduled delivery date?

F. Modal shift

19. Why does the Council's modelling anticipate approximately 72% car mode share for local rural new-development trips even after sustainable-transport interventions?
20. What PP37-specific evidence demonstrates that modal shift at PP37 will be better than the rural modelling assumption?
21. If it will not be better, how does the Council consider such a level of car dependency consistent with NPPF paragraph 110?

G. Education

22. How does the Council reconcile the allocation with ECC's recorded position that the **level of growth at Langham is not supported because of school transport costs**?
23. What measures will ensure that PP37 does not generate substantial additional school-related car journeys?
24. What evidence demonstrates that the proposed education solution will be available in time to reduce those journeys?

H. Site selection

25. What comparative assessment has been undertaken between PP37 and alternative sites in respect of:

- existing public transport;
- walking accessibility;
- cycling accessibility;
- access to services;
- expected car dependency;
- infrastructure costs; and
- deliverability of sustainable transport measures?

26. Why is it justified to allocate 850 dwellings at a relatively poorly connected rural location when the Council's strategy requires sustained modal shift away from private-car dependence?

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17. Requested modification

17.1. The preferred outcome is that **PP37 should be deleted or very substantially reduced** unless the Council can demonstrate that the site can satisfy the sustainable transport requirements of the December 2024 NPPF.

17.2. If the Inspector is not prepared to delete the allocation, the minimum necessary modification should be a substantially strengthened site policy which:

- makes occupation conditional upon delivery of defined sustainable-transport infrastructure;
- specifies the infrastructure required before each phase of occupation;
- identifies realistic funding mechanisms;
- establishes enforceable triggers;
- provides for monitoring of actual modal share;
- contains a mechanism for corrective action if sustainable transport targets are not achieved; and
- ensures that sustainable transport infrastructure is delivered sufficiently early to influence travel behaviour from the outset.

17.3. In particular, it would not be appropriate simply to identify the £6.13m Langham transport package as an aspiration in the IADP while leaving its funding, detailed design and delivery largely unresolved.

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18. Conclusion

18.1. PP37 represents a major expansion of Langham and would generate a substantial new population in a location where the Council's own evidence identifies comparatively weak rural sustainable transport provision.

18.2. The Council has identified approximately **£6.13m of Langham-specific sustainable transport infrastructure** as part of the response to that problem.

18.3. However, the Council's Stage 4 Project Schedule records **no secured funding** for the principal Langham cycle route, mobility hub or Langham–Boxted bus connection.

18.4. Those interventions are scheduled largely for **2031/32–2036/37**, while their detailed design and modelling remain to be developed.

18.5. The Council's own modelling indicates that rural new-development journeys will remain approximately **72% car-based** even after the proposed sustainable-transport interventions.

18.6. Essex County Council has additionally stated that the **level of growth at Langham is not supported because of the cost of school transport**.

18.7. The evidence therefore does not demonstrate that PP37 can provide the genuine choice of transport modes required by NPPF paragraph 110 or that it can sufficiently limit the need to travel.

18.8. The fundamental issue is not whether private car use is permitted. It is whether an allocation of 850 dwellings in this location can realistically provide residents with a **genuine and practical alternative to private car use for a meaningful proportion of their everyday journeys**.

18.9. On the evidence presently before the Council and the examination, that has not been demonstrated.

18.10. PP37 is consequently not shown to be:

- positively prepared;
- justified;
- effective; or
- consistent with the sustainable transport requirements of the December 2024 NPPF.

18.11. The subsequent 2026 NPPF provides additional supporting weight to this conclusion by reinforcing the vision-led approach to transport, the importance of limiting travel particularly by private car, the provision of a genuine choice of modes, and the use of connectivity evidence in site selection.

18.12. The Inspector is therefore invited to find the allocation unsound unless the Council can provide substantially stronger evidence of **site-specific sustainable transport accessibility, funding, deliverability, timing and achievable modal shift**.