Colchester City Council Local Plan Review – Regulation 19 Consultation

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

Placemaking Statement for Langham Parish Council (Report SR8)

Introduction

1. This representation objects to the inclusion of proposed housing allocation **PP37 – Land north of Park Lane, Langham**, comprising approximately **850 dwellings**, on the basis that the proposed scale of development has not been adequately justified in placemaking, settlement-character, infrastructure or sustainability terms.

2. The objection is not that Langham should accommodate no development. Rather, the issue is whether approximately 850 dwellings represents an appropriate scale of growth for this particular settlement, having regard to its existing size, structure, character, services, infrastructure, connectivity and environmental constraints.

3. The Council's own evidence establishes that the scale of growth at individual settlements must be related to their size, infrastructure, opportunities and constraints. The evidence does not demonstrate that PP37's proposed quantum satisfies that requirement.

4. The objection therefore engages principally with the soundness tests of **justification, effectiveness and consistency with national policy**, and also raises a question concerning whether the Plan has been positively prepared in relation to the spatial distribution and form of growth.

---

1. Relevant soundness tests

5. The representation engages principally with the following soundness requirements:

- **Positively prepared:** whether the allocation represents an appropriate strategy for meeting identified development needs while taking account of Langham's characteristics and constraints;
- **Justified:** whether the proposed scale and location are supported by a robust evidence base and represent an appropriate strategy when reasonable alternatives are considered;
- **Effective:** whether the allocation is capable of being delivered successfully, with the necessary infrastructure and supporting facilities; and
- **Consistent with national policy:** whether the allocation accords with the NPPF requirements concerning sustainable development, well-designed places, local character, accessibility and infrastructure.

---

2. The Council's Spatial Strategy requires proportionate growth

6. The Council's **Spatial Strategy Topic Paper (October 2025)** states that medium settlements are capable of accommodating growth appropriate to the **"size, scale, infrastructure and constraints of the settlement"** (para. 4.32, p.24).

7. The same Topic Paper goes further in relation to settlements lower in the hierarchy, stating that identifying villages as lower in the hierarchy enables growth to be **"proportionate to the existing size of the settlement and constraints"** (para. 4.34, p.24).

8. Langham is expressly identified as a **Medium Settlement** in the Council's preferred settlement hierarchy (Spatial Strategy Topic Paper, para. 5.2, p.27).

9. The Council therefore has an express evidential and policy framework requiring the scale of growth at Langham to be related to the settlement's existing size, infrastructure and constraints.

10. This is not merely an argument based upon local preference. It is a direct application of the Council's own stated methodology for distributing growth.

11. The preferred Spatial Strategy states that an appropriate level of growth is to be allocated to large, medium and some small settlements **"based on the opportunities and constraints of each settlement and informed by the wider evidence base"** (Spatial Strategy Topic Paper, para. 5.2, pp.25–26).

12. It further states that the approach is intended to ensure that existing settlements maintain their distinctive character and role (para. 5.2, pp.25-26).

---

3. The scale of PP37 is exceptional in Langham's context

13. The Council's **Settlements Evidence Part One (November 2024)** records that Langham comprises two areas of settlement, **Langham Moor and St Margaret's Cross**, linked by School Road. It also records the former WWII airfield between the two areas and the mixture of historic properties, farmhouses and more recent development (Langham section, para. 5.36, pp.59–60).

14. The same evidence records a 2021 Census population of approximately **1,000** and **420 households** in the parish (Settlement Evidence Part One, pp.59–60).

15. An allocation of approximately 850 dwellings would therefore provide approximately **twice the number of households recorded for the entire parish in the 2021 Census**.

16. This is plainly a major transformation of the scale of Langham rather than incremental village growth.

17. The Council's own evidence describes the settlement as having two distinct areas connected by School Road. The introduction of an allocation of this scale between those areas would consequently have a fundamental effect on the settlement's existing morphology.

18. The Council has not adequately demonstrated why a development of this exceptional scale is proportionate to the existing settlement, as required by its own Spatial Strategy evidence.

---

4. Langham's existing facilities and infrastructure

19. The Settlements Evidence records that Langham contains a public house, community café, community shop, community centre, recreation ground, playground, football pitches and tennis courts (pp.61–62).

20. It also records that the closest GP is in Ardleigh, approximately 3 miles away, and that Colchester North Station is approximately 6 miles away (p.62).

21. Public transport provision is described as limited: the 81/81A operates five times a day Monday–Saturday, with no Sunday service, while the 93 service does not provide a return service via Langham to Colchester (p.62).

22. The Council's settlement-level constraints specifically identify **limited access to public transport** and capacity issues at Langham Sewage Treatment Works, together with poor capacity to manage surface water and foul water (Settlement Evidence Part One, p.62).

23. The Council nevertheless identifies opportunities for growth to enhance infrastructure and potentially bring the two settlement areas together (p.62).

24. That latter observation cannot properly be interpreted as evidence that approximately 850 dwellings is an appropriate quantum. It identifies a potential opportunity for growth, not a demonstrated capacity for growth of this magnitude.

25. Indeed, the distinction is important: the Council's evidence identifies both opportunities **and constraints**, and its Spatial Strategy requires both to inform the appropriate level of growth.

---

5. The Council's own site-selection methodology requires the quantum to be justified

26. The **Site Allocation Process Topic Paper (October 2025)** expressly distinguishes between identifying sites capable of accommodating development and determining the appropriate quantum of development.

27. Paragraph 4.2 states that testing multiple residential sites in a settlement did **not** signify a level of growth appropriate for that settlement; it provided comparative evidence to inform later decisions (p.15).

28. Paragraph 4.3 states that the Council initially tested site capacities using promoter figures before applying a more standard approach of 30 dwellings per hectare, with factors used to vary the figure higher or lower (p.15).

29. Most importantly, paragraph 4.4 states that the Council considered **housing needs, local character and appropriate building forms**, and refined the starting density by taking account of:

- local character;
- appropriate building form;
- green space;

- landscaping;
- known site constraints;
- highways considerations; and
- other relevant considerations affecting density.

30. The Council expressly states that more rural locations may require a lower density to respond to their characteristics (Site Allocation Process Topic Paper, para. 4.4, p.15).

31. This methodology establishes that a site's physical capacity cannot, by itself, justify its allocation quantum.

32. It follows that the Inspector should require the Council to demonstrate how the specific characteristics of Langham and PP37 justify **850 dwellings**, rather than merely demonstrating that the land is physically capable of accommodating that number.

33. Paragraph 4.5 further states that site numbers were to continue to be tested by further evidence and consultation so that the Plan could be refined and **"justified as being sound"** (p.15).

34. The Council's own site-selection methodology therefore supports the proposition that the allocation quantum remains a matter requiring substantive justification.

---

6. The audit trail for PP37 does not adequately establish its quantum

35. The Regulation 19 Sustainability Appraisal appendices contain the Council's **Appendix E Audit Trail of Decision Making for Site Options Considered for the Submission Draft Local Plan**.

36. Site **10664 – Land north of Park Lane, Langham** is identified as being included in the Plan as PP37.

37. The Council's stated reasons for allocating site 10664 are that it was considered suitable, available and achievable; well-related to the existing settlement; capable of delivering community infrastructure and open space; and capable of contributing to wastewater improvements and connecting separate parts of Langham (Appendix E, p.260).

38. However, the audit trail does not provide a quantified demonstration of why **850 dwellings**, rather than a materially lower figure, is the appropriate scale of development for Langham.

39. The assertion that the site is "large scale" and can deliver community benefits is not equivalent to evidence that its proposed housing quantum is proportionate to the settlement.

40. This distinction is particularly important because the Council itself rejected another Langham site, site 10665, partly because it was considered more detached from facilities and services and was not considered justified for allocation (Appendix E, p.260).

41. The audit trail therefore demonstrates that the Council considered relationship to services and settlement form relevant to the justification of allocations. It does not, however, explain why the very large scale of PP37 remains appropriate once Langham's infrastructure and service constraints are taken into account.

7. Healthy and Connected Places evidence

42. The **Healthy and Connected Places Topic Paper (November 2025)** states that healthy places should be well connected and integrated with their wider built and natural environments (para. 2.3, p.3).

43. It specifically states that buildings and services should be within walking and cycling distance, with inclusive footpaths, cycleways and public transport routes designed to encourage active and sustainable travel (para. 2.3, p.3).

44. The Topic Paper also states that a well-connected place can provide a sense of community and encourage physical activity and social interaction (para. 2.3, p.3).

45. The Council's evidence therefore provides a direct test against which PP37 should be assessed: not merely whether residents can technically reach existing facilities, but whether the development can create a well-connected neighbourhood in which everyday services and facilities are conveniently accessible.

46. The same Topic Paper identifies access to education, employment and healthcare infrastructure as one of the central components of healthy and connected places (paras. 2.1–2.2, p.3).

47. These principles are particularly significant for PP37 because the scale of the allocation would create a population requiring services and infrastructure substantially beyond those required by a modest village extension.

---

8. Local services and the absence of a local centre

48. The Council's **Retail Study: Local Centres Evidence (October 2025)** explains that Local Centres have an essential role in providing small shops and services to meet the basic needs of local communities and serve a small catchment (para. 2.2, p.2).

49. The report further states that Local Centres provide small shops and services specifically to meet the needs of local neighbourhoods (para. 3.1, p.3).

50. PP37 does not provide for a dedicated new Local Centre.

51. The existing Langham community shop and other facilities are valuable community assets, but their existence does not demonstrate that they can serve an additional population generated by approximately 850 dwellings.

52. The Council's own Healthy and Connected Places evidence emphasises access to services, community amenities and local facilities, while its Local Centres Evidence identifies the role of local centres in meeting basic neighbourhood needs.

53. The absence of an equivalent local-centre provision within PP37 is therefore a significant weakness in the placemaking case for an allocation of this scale.

54. This is not to suggest that every housing allocation requires a formally designated Local Centre. The point is that, where the Council proposes a development of approximately 850 homes in a rural settlement with limited services, it should demonstrate how the resulting community's everyday needs will be met.

---

9. Education infrastructure directly challenges the scale of PP37

55. The **Colchester Infrastructure Audit and Delivery Plan Stage 4 (August 2026)** provides particularly important evidence concerning Langham.

56. The IADP states that the majority of growth within the Colchester Primary A: North (Langham) planning group relates to the PP37 proposal, described in the IADP as a 773 qualifying-unit proposal at Park Lane.

57. It states that there is **insufficient space to significantly expand Langham Primary School on its current site**, and that a development of this size is unlikely to make two schools viable.

58. It further states that relocation of the existing school would result in a significant funding gap borne by the taxpayer, while a dual-campus solution would be sub-prime in education and management terms.

59. Most significantly, the IADP records that pre-application discussions with the promoters had **not yet identified an acceptable alternative solution** (IADP Stage 4, para. 3.1.8, p.44).

60. The IADP further records that Essex County Council did not support the level of growth at Langham because of the cost of primary and secondary school transport (para. 3.1.15, p.46).

61. If the Council proceeds with PP37, the IADP states that approximately **2.18 hectares** of land for primary school and Early Years & Childcare use should be included to keep options open for an alternative solution (para. 3.1.15, p.46).

62. This is powerful evidence against treating existing village infrastructure as adequate for the proposed quantum.

63. It demonstrates that the education consequences of PP37 are not simply a matter to be resolved through routine developer contributions at application stage. The Council's own infrastructure evidence identifies a substantive capacity and funding problem.

---

10. Wastewater infrastructure is similarly a placemaking and deliverability issue

64. The IADP Stage 4 records that the Langham Water Recycling Centre has **no baseline capacity**.

65. Its Table 5-14 identifies Langham WRC as having no capacity before the proposed growth (IADP Stage 4, para. 5.6.10, p.173).

66. Table 5-15 calculates that, after growth, Langham WRC would have a headroom capacity of **-372 m³/day**, equivalent to approximately **-88% capacity** (IADP Stage 4, p.174).

67. The IADP identifies Langham, Dedham and West Bergholt as WRCs already at capacity and requiring either a new discharge permit and/or infrastructure upgrades (para. 5.6.11, p.175).

68. It further records that Langham has no investment planned and no baseline capacity in the relevant assessment (p.176).

69. The IADP states that early phasing of growth at Langham may be restricted until improvement plans are developed and funded for 2030 onwards (para. 5.6.??, p.179).

70. These findings materially undermine any proposition that PP37 can simply rely upon existing infrastructure.

71. The wastewater issue is relevant to this representation not merely as a technical infrastructure objection, but because the ability to provide functioning wastewater infrastructure is a fundamental component of creating a sustainable and healthy community of the scale proposed.

---

11. National policy on well-designed and sustainable places

72. The December 2024 NPPF provides an important national policy framework against which the proposed allocation must be assessed.

73. Paragraph 131 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

74. Paragraph 134 requires plans to set out a clear design vision and expectations and states that local design guides and codes should reflect local character and be consistent with the National Design Guide and National Model Design Code.

75. Most importantly, paragraph 135 requires planning policies and decisions to ensure that developments:

a. function well and add to the overall quality of the area over their lifetime;

b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c. are sympathetic to local character and history, including the surrounding built environment and landscape setting;

d. establish or maintain a strong sense of place;

e. optimise the potential of the site to accommodate and sustain an **appropriate amount and mix of development**, including green and other public space, and support local facilities and transport networks; and

f. create places that are safe, inclusive and accessible and promote health and well-being.

76. These requirements are directly relevant to the question of whether approximately 850 dwellings is an appropriate allocation for PP37.

77. Paragraph 135(c) requires PP37 to be sympathetic to Langham's local character, history and landscape setting.

78. Paragraph 135(d) requires a strong sense of place. The introduction of approximately 850 dwellings between existing parts of Langham would fundamentally alter the physical identity of the settlement and therefore requires particularly careful justification.

79. Paragraph 135(e) is especially material because it requires the **amount and mix of development to be appropriate** and to support local facilities and transport networks.

80. Paragraph 139 provides an additional safeguard against development that is not well designed, particularly where it fails to reflect local design policies and government guidance.

---

12. Application of the NPPF to PP37

81. The Council's own evidence demonstrates that Langham has a relatively limited service base, limited public transport, significant wastewater constraints and significant education constraints.

82. Against that evidential background, the allocation of approximately 850 dwellings requires the Council to demonstrate why this amount of development is an appropriate amount within the meaning of NPPF paragraph 135(e).

83. The evidence presently demonstrates the need for substantial new infrastructure but does not demonstrate that the infrastructure necessary to support 850 dwellings is sufficiently certain, funded and deliverable.

84. The Council's own Healthy and Connected Places Topic Paper reinforces this conclusion by identifying integration, walking and cycling, access to services and community infrastructure as essential components of successful places (paras. 2.2–2.20, pp.4–8).

85. The evidence therefore does not establish that PP37, at its proposed scale, will function as a well-integrated extension of Langham rather than as a substantially separate new neighbourhood dependent upon existing facilities and extensive travel elsewhere.

---

13. Site suitability is not the same as justified placemaking capacity

86. The Council's Site Allocation Process Topic Paper provides an important distinction between **site suitability** and **appropriate site capacity**.

87. The Council states that site testing initially used promoter-provided capacities, but subsequently applied a standard starting point of 30 dwellings per hectare and refined that figure according to

local character, building form, green space, landscaping, constraints and highways considerations (paras. 4.3–4.4, p.15).

88. The Council expressly recognises that rural locations may require a lower density to respond to their characteristics (para. 4.4, p.15).

89. PP37's allocation of approximately 850 homes must therefore be justified by reference to Langham's particular characteristics rather than simply by reference to the amount of land available.

90. The Council's evidence has not adequately demonstrated that the cumulative implications of settlement character, infrastructure, services, movement and community facilities support 850 dwellings.

---

14. Sustainability Appraisal evidence

91. The Regulation 19 Sustainability Appraisal confirms that the PP37 assessment involved a high-level methodology and that its site-option effects were assessed on a "policy-off" basis before taking account of the detailed mitigation and infrastructure requirements of PP37.

92. The Council's response to representations concerning PP37 expressly acknowledges that the appraisal of criterion 5g was based on the principle of development of **900 homes** and did not take into account the infrastructure required by PP37 or a specific proposal for the site (SA Appendix, A.73, pp.40–41).

93. The Council states that PP37 nevertheless requires proposals to demonstrate adequate wastewater capacity, including phasing or alternative solutions.

94. This is important because it demonstrates that some of the infrastructure upon which the Council's allocation case depends was not incorporated into the underlying site-option assessment.

95. The Council's Appendix E audit trail subsequently states that PP37 would contribute to wastewater improvements and provide community infrastructure (Appendix E, p.261).

96. The issue is therefore whether those benefits are sufficiently certain and deliverable to justify the allocation quantum, rather than whether they could theoretically be secured at some later stage.

97. The Regulation 19 SA itself records that the Council's assessment of PP37 relies upon the mitigation requirements contained in Policy PP37 and that the Council must decide whether to allocate the site in light of that and other evidence (SA Appendix A.61, pp.32–33).

98. The subsequent IADP Stage 4 evidence is therefore highly material because it provides updated evidence of the actual infrastructure position, including the significant education and wastewater constraints described above.

---

15. Internal inconsistency in the evidence base

99. The Council's evidence contains a tension which the Inspector should examine.

100. The Spatial Strategy states that growth at medium settlements must be appropriate to their size, scale, infrastructure and constraints.

101. The Settlements Evidence identifies Langham's limited public transport, wastewater constraints and limited range of services.

102. The Healthy and Connected Places Topic Paper requires well-connected neighbourhoods with access to services, community facilities and sustainable transport.

103. The IADP subsequently identifies major education and wastewater constraints associated with PP37.

104. Yet the site audit trail relies upon the proposition that PP37 is a suitable and sustainable location capable of delivering community infrastructure and wastewater improvements.

105. The Council has not adequately reconciled these propositions.

106. In particular, it has not demonstrated how the scale of approximately 850 dwellings follows logically from the Council's own settlement hierarchy and infrastructure evidence.

---

16. The masterplan cannot cure an inadequately justified allocation

107. The requirement for a comprehensive masterplan is appropriate for dealing with detailed matters of layout, movement, landscaping, open space and infrastructure.

108. However, a future masterplan cannot itself establish that the **allocation quantum of approximately 850 dwellings is justified**.

109. The allocation must be sound at the point at which the Local Plan is adopted.

110. It would not be appropriate for fundamental questions concerning the appropriate scale of growth, school provision, wastewater capacity, local services and settlement integration to be deferred entirely to a later planning application.

111. This is particularly so given that the IADP Stage 4 records that an acceptable education solution had not yet been identified and that Langham WRC has no baseline capacity.

112. The masterplanning process should refine a sound allocation; it should not be used to discover whether the allocation is capable of functioning at all.

---

17. Local character and settlement identity

113. The Council's Settlements Evidence identifies Langham as comprising two settlement areas connected by School Road and separated by the former WWII airfield.

114. The allocation would introduce a very substantial new residential area into this existing settlement structure.

115. This is not simply a matter of architectural design. It concerns the scale and form of the settlement itself.

116. The Council's Spatial Strategy states that its approach is intended to ensure that existing settlements maintain their distinctive character and role (Spatial Strategy Topic Paper, para. 5.2, p.25).

117. The Inspector should therefore consider whether the proposed quantum is compatible with maintaining Langham's distinctive character and role.

118. The evidence presently does not demonstrate that it is.

---

18. Placemaking consequences of 850 dwellings

119. A development of approximately 850 dwellings would generate a new population potentially equivalent to twice the existing population of Langham parish.

120. It would therefore require the creation of a substantial new neighbourhood rather than merely an extension of the existing village.

121. The Council's own Healthy and Connected Places evidence indicates that such neighbourhoods need integrated movement networks, accessible services, community facilities, green infrastructure and appropriate infrastructure.

122. The absence of a dedicated local centre, the limitations of existing services, the education constraints and the wastewater capacity problem collectively indicate that the necessary degree of self-containment has not yet been demonstrated.

123. The development should not be described as sustainable merely because it is close to the A12. Sustainable placemaking requires consideration of the full range of services, facilities, transport choices and infrastructure required by the resulting population.

---

19. Soundness assessment

Soundness test	Assessment	Evidence-based reason
Positively prepared	**Not adequately demonstrated**	The allocation meets housing supply objectives but the Council has not demonstrated that approximately 850 homes is the appropriate distribution and scale of growth for Langham.
Justified	**Not demonstrated**	The Spatial Strategy requires growth to reflect settlement size, scale, infrastructure and constraints. The evidence does not adequately justify 850 homes against those criteria.

Soundness test	Assessment	Evidence-based reason
Effective	**Not demonstrated**	IADP Stage 4 identifies unresolved education and wastewater constraints, including no baseline wastewater capacity and no acceptable education solution identified at the time of assessment.
Consistent with national policy	**Not adequately demonstrated**	The allocation has not been shown to satisfy the December 2024 NPPF requirements concerning well-designed places, local character, appropriate development quantum, accessibility and support for local facilities.

---

20. Overall conclusion

124. PP37 is an exceptionally large allocation in the context of Langham's existing size and settlement structure.

125. The Council's own Spatial Strategy requires growth at medium settlements to be appropriate to their size, scale, infrastructure and constraints.

126. Its Settlements Evidence identifies approximately 420 households, limited public transport, a limited range of facilities, a GP located approximately 3 miles away, and significant wastewater constraints.

127. The allocation of approximately 850 dwellings would therefore represent a major transformation of the settlement.

128. The Council's own Site Allocation Process Topic Paper confirms that housing quantum should be refined having regard to local character, building form, green space, landscaping, constraints and highways considerations.

129. The evidence has not adequately demonstrated why those considerations lead to a quantum of approximately 850 dwellings.

130. The Council's Healthy and Connected Places evidence reinforces the requirement for well-connected development with accessible services, facilities, community infrastructure and sustainable transport.

131. The absence of a dedicated local centre, together with the limited existing service base, raises a material question about whether the proposed development can provide an appropriately self-sustaining community.

132. The IADP Stage 4 provides particularly significant evidence against the present allocation. It identifies insufficient space to significantly expand Langham Primary School, an unresolved education solution, concerns regarding school-transport costs, and the need to reserve land for a possible new primary/Early Years facility.

133. It also identifies no baseline capacity at Langham WRC and a substantial post-growth capacity deficit.

134. These are not peripheral technical matters. They go directly to whether 850 dwellings can form a sustainable, healthy and effectively serviced community.

135. The December 2024 NPPF requires development to function well, respond sympathetically to local character and history, establish or maintain a strong sense of place, accommodate an **appropriate amount and mix of development**, support local facilities and transport networks, and create safe, inclusive and accessible places.

136. The Council has not demonstrated that PP37 at approximately 850 dwellings satisfies those requirements.

Requested modification

137. The preferred course is for the Council to **delete PP37 in its present form and reconsider the allocation through the evidence base and site-selection process**, having regard to the cumulative infrastructure, transport, environmental, landscape, heritage and placemaking constraints.

138. Alternatively, if the Inspector considers that the principle of development at PP37 is capable of being retained, the allocation should be **substantially reduced and modified** so that its scale is demonstrably proportionate to Langham's settlement character and infrastructure capacity.

139. Any revised allocation should be supported by clear evidence demonstrating:

a. why the proposed housing quantum is appropriate for Langham;

b. the capacity and funding arrangements for necessary infrastructure;

c. a deliverable education solution;

d. a deliverable wastewater solution with identified funding, phasing and implementation;

e. provision for local services and community facilities commensurate with the resulting population;

f. safe and convenient walking and cycling connections;

g. effective public transport provision;

h. an appropriate relationship with the existing settlement;

i. protection of landscape and heritage character; and

j. a deliverable masterplan and infrastructure strategy capable of implementation from the earliest phases of development.

140. The Inspector is respectfully invited to conclude that the current PP37 allocation is **not sufficiently justified or demonstrated to be effective**, particularly at the proposed scale of approximately 850 dwellings, and that modification is necessary before the allocation can properly form part of a sound Local Plan.