

Langham Parish Council Report to CCC Local Plan Committee

Background

Langham Parish Council were first alerted to the proposed 900 homes Langham allocation late evening Tuesday 4th February 2025, less than two weeks before the Committee vote on Regulation 18 adoption of the Draft Local Plan scheduled for 17th February 2025. There had been no prior indication at all of any possibility of such a huge and village-destroying allocation. This seems unreasonable given the magnitude of the proposed allocation. For comparison, 900 homes during the Plan period is more than half the size of Colchester's share of the proposed Tendring Garden Community project during the Plan period, and that strategic project has been under preparatory study for several years. To make another comparison, 900 homes in Langham equates to nearly 20% of the 4,861 home allocation for the whole of Colchester City during the same Plan period. The only conclusion we can draw from this bizarre situation is that the proposed Langham allocation is an attempted quick-fix solution to the allocation problem created by the last minute decision to withdraw Middlewick from the draft housing allocation list. The suspicion of an ill-considered rush-job is further strengthened by a number of very significant misalignments with Colchester City Council's own carefully developed Strategic Themes and Policies, as outlined in the main section of this report below.

Examples of Langham's poor fit with CCC Themes and Policies

All references below relate to Paragraph numbering in the "Colchester City Council Preferred Options Local Plan, Regulation 18 Consultation, 2025" document as submitted within the 17th February 2025 Local Plan Committee Meeting agenda

Strategic Theme: Well-Connected

CCC's two stated objectives under this strategic theme are:

- (1) better public transport corridors to reduce congestion and increase active travel making cycling and walking more effective
- (2) create communities which reduce the need to travel, particularly by car for most of their daily needs

Langham Parish Council view:

Langham currently fails spectacularly in supporting these objectives, due to a lack of convenient public transport, and extremely poor footpath and cycle path connectivity with Colchester. Increasing public transport connectivity *may* be relatively simply achievable, in response to a dramatic population increase. Improving footpath and cycle path connectivity to Colchester would involve very substantial expense which is likely to be unaffordable within any overall S106 package funded by the development.

Strategic Theme: Sustainable

CCC's five stated objectives under this strategic theme are:

- (1) improve existing facilities, sustainable infrastructure, green water, wastewater, road and schools
- (2) access to high quality healthcare that is deliverable and where needed

(3) facilitate affordable clean secure energy through the delivery of sustainable energy to achieve radical reductions in greenhouse gas emissions

(4) ensure development helps Colchester to adapt and increase its resilience to the effects of climate change

(5) support the reduction of waste in line with the waste management strategy

Langham Parish Council view:

Langham's WRC is currently operating above its permit limit without any new housebuilding. Langham's sewer pipe network is also suffering the worst groundwater infiltration problem in Anglian Water's entire network outside of the Norfolk Broads (confirmed to us by Anglian Water at our last public meeting with them a year ago). Langham's existing sewerage infrastructure will need an upgrade package of at least £10m, maybe significantly more, to accommodate the flows from 900 new homes.

Langham's main road network is currently totally inadequate to support 900 new homes. Major upgrades would be required to the dangerous A12 junction heading north (which has already seen two accidents in the last two years where cars have crashed into the house just north of the junction). Major widening and straightening would be required in School Road. Upgrade cost to be confirmed by Essex Highways, but probably running into several £m.

Langham currently has no GP surgery, and the closest surgery in Ardleigh is already heavily overloaded so a new surgery would be required, at considerable cost TBC.

The very high water table in the proposed housing development site, together with the known "leaky" sewerage network, currently renders Langham uniquely susceptible not just to surface water flooding, but to storm sewage flooding following high rainfall events. Climate change is making such events more frequent over time, even without the effects of any additional housebuilding. Langham is the very worst place for CCC to consider building new homes, if it cares about climate change resilience. Some residents in Langham have suffered internal sewage flooding of their homes twice since 2016 and this situation is likely to get worse even without any new housebuilding.

Spatial Strategy Policy ST3

Para 3.23 states: "Creating a distinction between the large, medium and small settlements enables small scale development, which has been identified as a desire in some of the small settlements through engagement undertaken as part of the Issues and Options. The settlement hierarchy identifies medium and small settlements where growth is allocated appropriate to the size of the settlement and its constraints."

Langham Parish Council view:

900 new homes in Langham is quite clearly not appropriate to the size of our settlement.

Infrastructure Delivery Policy ST7

The Policy wording here is aspirational but it is clear that securing sufficient infrastructure funding through S106 and potential new CIL funding remains a tough and unresolved challenge. Para 3.67 states that the "Council continues to work with relevant government departments, infrastructure providers, developers and other partners to determine and facilitate the delivery of the wide range of infrastructure required to support development."

Langham Parish Council view: in view of the potential funding gap for required new infrastructure, it would seem sensible that Local Plan allocations seek to maximise use of existing infrastructure and minimise the requirement for new infrastructure build, so as to minimise any residual funding gap. Viewed from this perspective, Langham is a very poor choice for strategic growth, given the many known deficiencies in existing infrastructure support, most notably in sewerage, sustainable transport, roads and GP services. The cost of required upgrades will almost certainly far exceed what can be funded by developer contributions.

Place Shaping Principles Policy ST8

Principle e) states that placemaking should “Respond positively to local character and context to preserve and enhance the quality of existing places and their environs”.

Principle h) states that placemaking should “Create well-connected places that prioritise the needs of pedestrians, cyclists and public transport services above use of the private car, providing opportunities for easy access to most daily needs without a car in a reasonable time.”

Langham Parish Council view:

Principle e) is totally violated by a 900 home allocation into the open rural heart of Langham. Principle h) could only be addressed by very substantial infrastructure investment in new cycleway and footpath connections across the A12 into Colchester, together with a major overhaul of current bus service provision.

Flood Risk Policy EN8

This includes the statement that “Planning permission will only be granted where it has been demonstrated that (a) the site will remain safe from all types of flooding throughout the lifetime of the development and (b) flood risk will not increase on or off site as a result of the development.”

Langham Parish Council view:

The flat topography and well known very high water table at the proposed development site are almost certain to preclude a SuDS solution using on-site soakaways. The existing drainage ditch next to School Road (just north of the site) is currently non-operational with no proven flow route towards the Black Brook. In combination with the known leaky sewerage pipe network, there is a serious likelihood not just of increased storm flooding but of storm sewage flooding in the surrounding area due to hydraulic overload of the existing sewer network. Langham will need not just an upgraded WRC but also a replacement new sealed and larger capacity sewerage network to properly mitigate flooding and sewage contamination risks. Anglian Water will not currently fund this because in their opinion “when it doesn’t rain, the sewer network operates as it should”.

Landscape Policy LC1

This includes the statement that “Development must safeguard or strengthen tranquillity, features and patterns that contribute to the landscape character and local distinctiveness of the area, protect rural openness and sense of place and protect natural landscape features where they make a contribution to the historic environment.”

Langham Parish Council view:

The proposed development will totally obliterate Langham’s current rural openness and sense of place.

Dedham Vale National Landscape Policy LC2

This includes the statement that “Applications for major development within or in close proximity to the boundary of the Dedham Vale National Landscape will be refused unless in exceptional circumstances it can be demonstrated that the development is in the public interest, and this outweighs other material considerations.”

Langham Parish Council view:

The distance between the proposed site and the National Landscape boundary is in places less than 900m. Given this proximity and the large size of the proposed development, policy LC2 should be given significant weighting as part of the decision making process. The proposed development is likely to cause a significant increase in vehicular movement and visitors, together with potential for adverse effects on the “Dark Skies” initiative.

Wastewater & Water Supply Policy NZ3

The Policy includes the following statement:

“Proposals within the catchments of the following Water Recycling Centres: Dedham, Fingringhoe, Great Tey, Langham and West Bergholt must demonstrate they have confirmed with Anglian Water that treatment capacity at the Water Recycling Centre (WRC) is available to serve the development at the point of anticipated connection and where appropriate phasing triggers to support development to be agreed.”

Langham Parish Council view:

Anglian Water cannot be trusted to “mark their own homework” in these matters. CCC are well aware of this. The Environment Agency need to continue to be involved in the sign-off process.

The Policy also includes the statement:

“Development within the drainage catchments of Copford, Tiptree and West Bergholt WRCs must not discharge surface water to the foul sewer network.”

Langham Parish Council view:

The exclusion of Langham WRC from this policy seems totally bizarre given the longstanding problems with the Langham sewerage network.

The Policy justification section includes para 7.17 which states that:

“The WCS has found that in the catchments of the following WRCs Colchester, Copford, Tiptree and West Bergholt, additional connections to sewer systems which have existing capacity would result in sewer flooding risk or sewer overflow spill frequencies. Additional surface water into these sewer networks could exacerbate either of these issues.”

Langham Parish Council view:

Another bizarre statement which seems to imply that the Langham’s sewer network is not believed to be subject to sewer flood risk. Even Anglian Water have finally recently admitted to Langham

Parish Council in writing that their Langham sewers have sometimes been subject to hydraulic overload under prolonged wet weather conditions.

Examples of Inconsistencies between Interim Water Cycle Study Report & IADP Stage 3 Report

A brief interim Water Cycle Study Report has just been published on the CCC Local Plan website (following a further delay in the full WCS Report which has now been put back again to March 2025).

Among many vague and caveated assertions (presumably provided to AECOM by AWS), there is a statement that “AWS have identified improvement plans for the WRC in the AMP8 investment period hence the level of growth is likely to be achievable in the longer term.” This is in direct contradiction to Anglian Water’s 2023 DWMP document, the IADP Stage 1 & 2 Report issued in Dec 2024, and the IADP Stage 3 Report issued in Feb 2025 – all three of which make it very clear that “Langham WRC currently has no headroom available for future growth and there are no medium or long term plans for providing capacity for future population growth.”

Langham Parish Council view:

The complete disconnect between the newly issued Interim WCS and the IADP lays bare the unseemly rush with which CCC is trying to drive forward into Regulation 18 adoption of the Local Plan.

Conclusion & Recommendation to Local Plan Committee

In the light of the significant issues raised above, the following questions must be asked:

Has there been a proper exploration and investigation of any reasonable alternative options which might prove substantially more compliant with CCC’s declared Policies?

Can evidence of reasonable due diligence be demonstrated, or is the Langham housing allocation an unacceptable rush-job?

If Councillors cannot provide clear and documented reassurance on these basic questions, then the Local Plan Committee should not grant the Regulation 18 approval. Instead they should approve a short delay to facilitate an urgent rapid review tasked with researching whether any more Policy-compliant allocation options can be identified.

A short delay in the adoption process may potentially lead to a short gap in ‘live’ Local Plan coverage in early 2026. During this gap period a slightly higher than usual number of speculative planning applications may be submitted by developers. However, NPPF rules and general planning rules will still be in force, so this potential risk must not be overstated compared to the risks of knowingly pushing ahead with obviously flawed site allocations that demonstrably fail to meet the very policies CCC is aspiring to implement via an updated Local Plan! There is, in truth, no ‘Sword of Damocles’ hanging over Committee Members’ heads should they choose to impose a short delay to Regulation 18 approval, in order to secure a more Policy compliant Local Plan.

Prepared by Langham Parish Council

12th Feb 2025