## COLCHESTER LOCAL PLAN-ISSUES AND OPTIONS CONSULTATION

## VIEWS OF CPRE COLCHESTER GROUP

We are concerned in respect of the continuing high levels of housing and other development being proposed for the Borough. It is clear that there are insufficient services and infrastructure at present for the levels of growth we already have. Realistically, it seems almost certain from past experience that the new development will only add to the problems. In addition, this high growth will lead to the loss of significant tracts of attractive open countryside of value for biodiversity and/or agriculture.

We accept that the Council's hands are tied by national projections and the methodology of Strategic Housing Market Assessments, both of which are open to serious questions as to their validity. There is also the interpretation of the 5 year housing land requirement, which seems heavily loaded in favour of development interests and often seems to ignore market realities. Even accepting the Council's lack of room for manoeuvre, it would be reassuring to see some concerns being raised as to this level of growth and its adverse impacts.

Of the 6 options put forward, all have serious drawbacks from our perspective. We oppose options 3A and 3B. Expansion of the urban area beyond the A12 is to cross an obvious "stop line" for urban expansion. Once this road is leapt over, where would expansion cease? Would Great Horkesley be swallowed up?

As regards expansion to the west, we do not accept the assertion that the landscape impact would be less than expansion in the east. There would be a significant impact in a flat stretch of countryside. There is also the issue of the loss of good quality agricultural land.

With respect of expansion to the east, we are very concerned as to the impact on the Salary Brook valley. There is some very attractive countryside here, which is also of importance for biodiversity. This should be protected absolutely. Some of the land to the east of Colchester is also important agriculturally.

Several of the options refer to village expansion. We would not be opposed to sensible development in villages, primarily to meet local needs.

There are two other general points we would wish to make at this time. Firstly, returning to our concerns on infrastructure and services. The new plan needs to contain an enforceable mechanism that prevents development proceeding where services are inadequate.

Secondly, the plan appraisal seems to us comprehensive with one glaring exception. The loss of good quality agricultural land does not seem to figure anywhere that we can see. Given the good quality of much Borough farmland this seems surprising.

Finally, do these high levels of growth have to be accepted? May it not be that the quality of the Borough's countryside for its landscape character, for its setting for town and villages, for its biodiversity and for its agricultural productivity is sufficient to say the growth can't be accommodated? After all, the Government seem to recognise that the presence of the Green Belt could be sufficient reason not to meet the full identified housing "need".