

## **Response to CBC 'issues and options' consultation on behalf of Colchester Natural History Society.**

### Introduction

Although our concerns have implications for other parts of the plan, our comments will be confined to those aspects of most immediate concern for the protection of informal green open spaces and biodiversity.

### Question 6 (p. 12) 'Vision'

The CBC support for 'garden city' principles is very welcome, despite past policy breaching these principles extensively. Our vision for Colchester is one in which historical/ archaeological heritage and informal green spaces are seen as the interconnected core of what gives Colchester its distinctive identity. These sites and pleasurable linkages between them for walkers, cyclists and other non-motorised transport can be enjoyed by all – existing residents, future residents and visitors alike. Any new development allocations should be assessed on the basis of whether or not they contribute or detract from this key set of unique local assets. In-filling of urban green spaces (eg Mile End), Cowdray Avenue riverside 'development' etc have been very damaging to this vision. Open spaces within the urban envelope are, a. most important for the largest number of residents for health, well-being and exercise and b. of very great importance for biodiversity/ wildlife conservation. Significantly, several of our top wildlife sites are also important historically archaeologically: Hilly Fields, Gosbecks, High Woods among them.

### Question 26/ 27 The natural environment

CNHS has 4 main areas of concern:

1. The proposed development to the east of Colchester (options 1 and 3), spanning Tendring and east Colchester. This threatens the integrity of one of Colchester's most important and highly valued green spaces: the Salary Brook Valley. You will already be aware of the concern this has aroused among local residents and conservationists. The valley is much valued for its landscape features, and as a scarce open space accessible to densely populated estates adjacent to it. Should any development take place within the area between Colchester and Elmsted Market, the valley if protected would be an important green space for future residents, too. Currently both councils appear to be conceding a 'gap' between the development zone and the Colchester fringe. We consider this inadequate for the following reasons:
  - a. CNHS holds a considerable quantity of data on biodiversity in the valley (CBC should also have access to some of this via the museum resource centre), and parts of it are already designated as local wildlife sites. We currently have records of protected species including otter, water vole, dormouse, lesser spotted woodpecker and several bat species. Our surveyors have produced a report of 120 aquatic species, several of which are nationally scarce. The meadows/ wetland are also very rich in wildflowers, several of them (e.g. sneezewort and devil's-bit scabious) very scarce or non-existent elsewhere in north-east Essex). There are also significant extents of ancient woodland, some of them in private ownership and so not yet surveyed. These features render the negative and residual category 'gap' wholly inappropriate. They have great POSITIVE conservation value on several grounds.
  - b. We have evidence that the university and local developer wish to extend the university's business/ technology park across the A133 into the lower part of the valley, adjacent to the existing designated zone. This must be resisted as the valley has to be understood as

a complex and interconnected whole 'living landscape'. Current ecological/ conservation knowledge clarifies that attempts to conserve biodiversity in isolate 'pocket' reserves is futile. Connectivity and landscape scale are essential both for biodiversity, and for human well-being. In our view the university's claims should be reviewed. How realistic are their expansionary aspirations? They currently appear to be selling off parts of the campus for housing. Is this so? If it is, could they not use their existing land holdings for the technology park expansion if it is a priority for them? If they cannot do this, then why not shift their aspirations for expansion elsewhere within the proposed development zone to the east, beyond the limits of the Salary Brook valley (ie towards or beyond Slough lane)?

- c. CBC's expectation for the eastern development zone (options 1 and 3) is that there would be 3000 houses each side to the Colchester/ Tendring boundary. Given the current line of the boundary, we can see no possibility for 3000 houses on the Colchester side which does not severely encroach on the valley and eliminate its key wildlife, habitat, landscape and amenity value. This would be compounded by the reduction of Bullock Wood, Welshwood and other local habitats to isolated fragments
  - d. CBC has shown some sympathy for the concept of a walking/ cycling 'orbital' route, with 'spokes' between periphery and central Colchester as advanced by CGLOS (to which CNHS is affiliated). The route of this orbital passes through the valley. A commitment to simply preserving the route, while welcome, is insufficient. If CBC is serious about promoting a 'mode shift' to sustainable transport, and actually addressing the manifestly unsustainability of its current transport 'system' it is **not enough** just to **retain** footpaths, bridleways etc. **These need to be links that are intrinsically pleasurable to use, and that serve as connections between places of value (eg green/ historic sites) or utility (shops, homes, schools, places of work).**
2. CNHS notes indications that the eastern extension of Cymbeline meadows into Colchester, along the river Colne, might be include in the development options. The complex of Cymbeline meadows/ Hilly Fields/ Spring Lane reserve is a wonderful local asset for biodiversity, green exercise and landscape. What is especially valued is that it forms a green wedge right to the centre of town. You could not have a clearer example of implementation of Garden City principles. Efforts should continue to include the easterly meadows into the Cymbeline meadows complex and subjected to the superb management regime currently followed by CBC. It might be added that the river and its environs are highly valued for amenity and as wildlife corridor. Recent development close to the river has been much regretted but please do not compound these losses.
  3. The area around the current zone of the zoo also appears to be up for consideration for development zoning. It is well within the Roman River Valley, which is of immense importance both for amenity but also for its unique biodiversity assets. Much of the valley is already protected by SSSI designation or Nature Reserve acquisitions, but like the Salary Brook Valley, it must be seen holistically as an integrated mosaic of often highly sensitive habitats. CNHS conducted a large scale survey, published as a 'special report' in 1983, and for the past 5 years we have worked with EWT on an up-date of that report. This will be published in 2015, but already we have a great stock of data on biodiversity in the whole valley, and are very concerned that development might be contemplated within the valley. If the proposed development is zoo-related, and there is any prospect of agreement, then we strongly urge that CNHS/EWT be involved as stakeholders in any discussions. Already our members have detected pollution in the river from run-off form the zoo. Fortunately the zoo

reacted well and the problem was rectified, but the incident does point to the need to be vigilant.

- Options 1 and 2 include a very sizable development zone to the west of Colchester. If this is genuinely developed in line with garden City principles it could well provide housing and environmental benefit. Our main concern would be that the higher reaches of the Roman River pass through the indicated zone. These reaches are accessible only in a few places, but our surveyors have found that much of the biodiversity of lower reaches is also present here. Also, of course, any pollution entering the upper reaches as a result of development activity itself or from the resulting development must be avoided. Again, great caution and regular monitoring would be required.

Question 29. Our view is that the 'objective' assessment of future housing 'need' should be reviewed. Colchester suffers from far too much, far too rapid development pressures, and should meet housing need stemming from the current population as a priority. Further commuter-oriented development may meet market demand, but not necessarily housing 'need'.

If we have to select which of the options is 'least worst' then it would be a highly conditional version of option 2. Currently all options include development in and at the edges of the current urban area. As explained above this runs counter to the concept of a Garden City, which, above all, seeks to **expand** green open spaces within the urban realm, the opposite of which has been CBC practice in the current planning period.

Question 31: YES!

Edward (Ted) Benton

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**On behalf of Colchester Natural History Society**