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Respondent: Mr Christopher Luff

“There is insufficient infrastructure to support any further housing development in this area. Public transport will not be available as the bus companies are going to withdraw routes. This will increase traffic in the surrounding area, causing environmental damage. The lack of public transport will cause hardship to those who do not own their own transport, possibly causing the estate to become isolated.”

Introduction

I believe that the Middlewick Ranges forms an important part of the character, history and identity of South Colchester and the site is of great amenity value to the local community as an open natural green space and a space of tranquillity with ever growing importance to mental health and wellbeing of Colchester residents. Every area of urban Colchester has access to wild areas and this is the only significant wild area accessible to residents of South Colchester including the two Abbot's Road Estates, The Willows, Barn Hall, Old Heath, Monkwick, Blackheath and Birch Glen. CBC claims it is against urban sprawl and also promotes public open space, health and wellbeing. Middlewick offers the division against urban sprawl and is a space that should be promoted by Colchester Borough Council as it is already going against two of its own aims including CO2 traffic omissions.

Inclusion in Local Plan

At the time of the consultation in 2017 it was unknown as to where the houses were going to be built which meant that no documents were available with regards for contamination tests but also wildlife reports. The master plan submitted so late in the day was presented as "fait accompli" as it was stated by Colchester Borough Council that 1,000 houses had to be put into the local plan without dissent because there was a danger of more housing being proposed by the MOD. Also, it seems that it had been added because the Ministry of Defence decided it is no longer required for military purposes, not because it was considered as part of the strategic planning of the Council. The Council made a "fanfare" that they refused the application for 2,000 houses from the MOD but accepted 1,000 (as they had to).

I have since found out that the Middlewick Ranges MOD development did not strictly need to be included in the local plan as Colchester Borough Council's independently assessed needs for housing for Colchester is 920 houses per year and it was delivering in excess of this already in 2017. In 2014/15 Colchester delivered 943 houses and in 2015/16 Colchester delivered 933 houses and then came the commitment of two Garden Communities, East and West of Colchester/Braintree District borders. The Council were not prepared to fight for this land not to go into the local which I am surprised at because it is as an LoWs boarding onto an SSSI.

Urban Sprawl

Middlewick Ranges offers an identity to the south of Colchester. If this is lost then the South of Colchester just becomes one large housing estate with no deviation. This area needs to be left as a green space and a buffer against urban sprawl as the proposed development would link four estates into one super estate (Speedwell, Abbots Road, Willows, Monkwick).

CO2 Emissions

Colchester is already drowning under the weight of traffic and meeting air quality emissions there is very little fresh air to be had. To willingly destroy open unique wildlife areas and fields for yet more houses and cars is not considering our future generations - where will they play, walk, explore, breathe? Although this may be immaterial to the development on Middlewick Ranges, this area of South Colchester has had significant new housing with development on former Garrison land over many years and yet there has been little improvement in the infrastructure .

Transport and Roads

The original consultation in 2017 stated there are a number of B roads in the area around Middlewick Ranges. Old Heath Road and Mersea Road are already problem areas. Old Heath Road is used to access the already congested Hythe area, East, Mersea Road can only go to Mersea, South, Mersea Road to Berechurch Hall Road to Gosbecks Road etc, all slightly upgraded country lanes. No improvements were made to Berechurch Hall Road when all the Solus Estates were constructed (also Garrison land that was sold). The Abbots Road area, land alongside the Willows, across to Boadicea Way, Norman Way on which both ends were built but again no infrastructure. Mersea Road and Old Heath Road have from late Victorian to mainly 1920's and 30's housing along both sides with numerous junctions for smaller residential roads, you cannot improve traffic flow on these roads and they are already at a standstill during term time.

The transport policy for the Middlewick Ranges development was not based on sound evidence in the 2017 consultation. Appendix 1 of the full Sustainability Appraisal Report (16.8) South Colchester Allocations (Policy SC1) including Middlewick Ranges (Policy SC2) notes for Middlewick Ranges (COL71): The site was previously rejected at the Preferred Options Plan stage due to concerns surrounding issues including required highway improvements. Para 14.66 in the Emerging Local Plan noted that 'Development that will add pressure to the transport network will be required to help mitigate the impact.' Policy SC3 on Transport in South Colchester proposes improvements that are mostly located in the southwest Colchester (junctions Circular Road South/Berechurch Rd, Shrub End Rd/Maldon Road; Gosbecks Rd); none of the road improvements address the routes that will be most impacted by development at Middlewick Ranges, i.e., Mersea Rd, Old Heath

Rd, Wimpole Rd/Brook St. This is because it is impossible to widen these roads; hence whatever will be done the problem of traffic bottlenecks will remain unsolved.

The transport report carried out by Stantec on behalf of the DIO and submitted in October 2020, to form part of the evidence base for Policy SC2 showed that the traffic surveys were undertaken at the end of November and early December 2019 but there is no information about the time of day the data was collected; was it during peak times or outside peak times, when the schools were open? The 2018 traffic survey reports evidenced that that circa 11,000 cars flow in both ways on average in a day, however the surveys were not carried out at the busiest junctions that will be affected by the development (Mersea Road/St Botolph's Roundabout, Old Heath Road/Wimpole Road/Brook Street), on main routes into town centre, or other possible routes, such as via Whitehall Road/Haven Road onto Greenstead Roundabout and Cowdray Avenue. The report only claims that identified junctions are analysed as being within capacity (using the volume over capacity criteria from the strategic model, rather than from junction capacity assessments) with the 1,000 dwellings, but did not include the additional developments being undertaken in Colchester. According to the recently issued Topic Paper 5 on Middlewick 'the evidence work concludes that the highway network adjacent to the site is generally able to cope with the flows that use it during most times of the day outside of the traditional weekday peak periods. It should be noted that any road accidents occurring in Colchester (which is frequent) causes bottlenecks on the roads around Middlewick Ranges on any day or time it happens.

I note the remedy proposed for a new road linking Mersea Road and Abbot's Road providing an alternative route for some of the existing traffic currently using Abbot's Road between Mersea Road and Old Heath Road;' (3.4.6), however, this new road would negatively impact the green space space available and does not solve the problem of congestion nearer town centre.

Transportation - busses

There needs to be more bus services to get to all areas of Colchester directly, and services to allow for weekly and monthly tickets for all different bus companies, which are more affordable than currently the only dailey Inner Borough tickets. It is currently cheaper to drive than take a bus for some people. Bus services have also been withdrawn and reduced which hinders employment opportunities for those who work and means that a car is used for most journeys to get to work on time. You also often have to go into town and get another bus to travel to a different area in Colchester which is not efficient. For example to get to the main station of Colchester for the faster trains to Chelmsford and London this is what you would need to do. The transportation strategy for Colchester is not joined up to take these issues into consideration.

Infrastructure - Doctor Surgeries.

If the population of this area increases there needs to be doctor surgery which can cope which there currently isn't. The nearest one is Abbey Fields. I note that the vision document states there is an opportunity for space for a doctor surgery, however this is an assumption and not given.

Infrastructure - Water, draining and sewage pipes - impact on our Roads

I also note the water, drainage and sewage pipes that will need to be installed to allow the development to go ahead. The need for these will impact the whole traffic situation across Colchester, the dust, noise and disturbance will cause distress to all residents near to Middlewick Ranges and those near to Rowhedge and the Hythe. The infrastructure for water, drainage and sewage is of major concern for the whole of Colchester where these are currently stated as inadequate by Anglian Water and the sewage overflow pipe on Hythe Quay is in danger of collapsing. From a practical point of view as the sewage system is already at a critical level, how could this cope with the construction of a 1000 new homes on Middlewick Ranges? This has already been addressed in a statement submitted for the Hearings.

Land Contamination

I am concerned that contamination of the land has not been looked at in any detail, and before the changes in law on sales to scrap dealers, locals could easily smelt a saleable quantity of lead from a single shovelful of soil. The Ranges have been used for 150+ years by the Military with live rounds and projectiles being found, some of the ammunition containing explosives still being found and reported in the training areas beyond the fence. There will also be high levels of lead and nickel (carcinogen) from countless full metal jacket rounds being fired. What measures are there being put in place for mitigation for these issues.

I am also concerned with regards to biological contamination where some areas of the site were used for the disposal of livestock remains during the last Foot and Mouth disease outbreak in the UK in 2001. Reports are desktop studies with the last testing taking place in 2011.

Infrastructure on Site:

In the Vision document, I am concerned with the amount of the landscaping required on the site, including sport facilities, including sports fields, BMX track, and enhanced pathways. It sounds good but it all detracts from the biodiversity and ecology of the site.

In Annexe 3 of the ecology report, It has been stated that walking Routes will include measures to keep residents 'on the path' to reduce littering, and dog walking off the path' areas This is likely to include advertised circular routes, a mix of surfaced non-motorised user paths and use of sandy mounds along the paths planted with shrubs. In Birch Brook to discourage off-route walking, provision of seats along the paths.

I also understand that Birch Brook will need to be modified which has not been explained adequately in the reports to date and the MOD will also keep the area on the other side of Birch Brook for training purposes where restricted access will be required.

Some the plans sound good in theory, but in practice this distracts from the 63% amount of the Wick for the public access and negates a possible nature reserve/country park which the majority of Colchesterians wish this site to be (which Colchester Borough Council has promised a feasibility study will be undertaken funded through the Local Plan and a forum set up also for this. The feasibility study was recorded in the CBC Budget zoom meeting and forum has widely been reported in the press.

The length of time to build the housing

At 4.7 of the Middlewick ranges: local plan evidence base summary it , it has "assumed that the construction period for each phase will be completed at an average rate of approximately 150 units per year. For example, the construction period for Phase 1 equates to approximately 18 months for 229 dwellings and in 4.11. This would allow for a 10 year build out period to achieve the 1000 homes in the Local Plan period". This is a long time for residents to be subject to the disruption of this build.

Abnormal Costs

I see that the Middlewick ranges: local plan evidence base summary report at 4.4 states that "The appraisal considers build costs, against sales values and takes into account the abnormal costs that are likely to be associated with the ecological mitigation and makes an allowance for a higher than average infrastructure cost since the site is currently completely clear and will need substantial road access and services improvements. However, I believe that the abnormbas costs for the development may not allow for "a policy compliant scheme of 30% affordable housing".

Soundness Test

I submit that the soundness test for the Middlewick Ranges Development is not met as the development does not meet the objectives in The Council's 2016 sustainability Appraisal and should be taken out of the Local Plan.

- 1.To provide a sufficient level of housing to meet the objectively assessed needs of the Borough to enable people to live in a decent, safe home which meets their needs at a price they can afford
2. To ensure that development is located sustainably and makes efficient use of land
3. To achieve a prosperous and sustainable economy that improves opportunities for local businesses to thrive, creates new jobs and improves the vitality of centres
4. To achieve more sustainable travel behaviour, reduce the need to travel and reduce congestion
- 6, To improve and reduce inequalities in health and wellbeing and tackle crime issues by keeping our communities safe and promoting community cohesion
- 7 . To conserve and enhance the townscape character, and the heritage and cultural assets of the Borough
8. To value, conserve and enhance the natural environment, natural resources and the biodiversity of the Borough
- 10.. To reduce climate change impacts, support mitigation, encourage adaptation and protect water quality

Conclusion

The benefits of any development are significantly outweighed by the negative consequences and should not be in the Local Plan. The Save Middle Ranges Campaign Group will continue to fight this development in every way we can.