

Middlewick Ranges (SC2)

Section 2 - Publication Draft Colchester Borough Local Plan

Representation ID: 6185

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In my original submission in 2017, I objected to the building on Middlewick Ranges on the grounds of urban sprawl and overdevelopment, leading to the destruction of open green spaces and wildlife areas. This statement, which I am submitting on behalf of Save the Middlewick Ranges campaign group, I am going to expand on these issues, addressing the following main matters and questions:

Main Matter 6 – South Colchester (Policies SC1 to SC3); especially focusing on Middlewick Ranges (SC2)

- Are the policies and site allocations for South Colchester justified by appropriate available evidence, having regard to national guidance, and local context, including the meeting the requirements of the CLP 1?

Main Matter 2 – Sustainable Growth Policies (Policies SG1 to SG8)

Are the Sustainable Growth Policies justified by appropriate available evidence, having regard to national guidance, and local context, including Section 1 of the CLP?

- Is Colchester's spatial strategy and the distribution of development as set out in Policy SG1 supported by robust and up to date evidence and otherwise soundly based?

Main Matter 4b – Colchester Town Centre (Policies TC1 to TC4)

- Are the policies and site allocations for Colchester Town Centre justified by appropriate available evidence, having regard to national guidance, and local context, including the meeting the requirements of the CLP 1?

It will be impossible to discuss these questions separately, as all aspects are interrelated, and the overriding concern relates to main matter 6, whether the building of 1,000 homes on Middlewick Ranges is justified.

Middlewick Ranges is one of the prime Local Wildlife Sites in the borough, containing rare protected habitat such as dry acid grassland and being home to large numbers of protected species. It is also a much-valued natural green space enjoyed by the local community.

Policy ENV1 on the environment states that: 'The Local Planning Authority will conserve and enhance Colchester's natural and historic environment, countryside and coastline. The Local Planning Authority will safeguard the Borough's biodiversity, geology, history and archaeology, which help define the landscape character of the Borough, through the protection and enhancement of sites of international, national, regional and local importance.'

This is in line with national planning legislation, as set out in NPPF 2012, which declares as one of the Core Planning Principles: "contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework". (Para 17)

By assigning an important Local Wildlife Site for housing, policy SC2 chooses to override these objectives, principles and policies. Colchester Borough Council justifies this with reference to their legal obligation to build 920 new homes per year in Colchester (14,720 altogether within the period of the Local Plan), as determined by the Objectively Assessed Needs (OAN) for housing (Policy SG2). The borough's Spatial Strategy is used as another justification to assign Middlewick for housing, as the site lies within the boundaries of urban Colchester, which is being prioritised over more rural locations (Policy SG1).

However, is there really the need to build up to 1,000 homes on Middlewick in order to meet Colchester's housing targets? And is meeting those targets to be prioritised at all costs over the preservation of an important site for nature and biodiversity (and the area's "green lung"), something on which we all depend for survival?

Homes completed in Colchester, 2015-2020

2015	2016	2017	2018	2019	2020
943	1149	912	1048	1165	1124

Under the Adopted Local Plan, the annual target for house building was 830. As the table shows, since 2015, Colchester has by far exceeded its house building target each single year. Not only this, it has also significantly exceeded the new target of 920 homes in all but one years. This means that the borough has built far more homes year-on-year than legally required. Surely this means that it does not matter if less than 920 homes per year will be built in the next few years, as the net result would still mean that the annual housing target would have been met on average (the period of the Emerging Local Plan period starts in 2017, hence I presume houses built since 2017 would count towards this). In fact, the overdevelopment of Colchester in excess of legal requirements did not start in 2015, but at least two decades ago. Does this mean that Colchester Borough Council has erred on the side of assigning too much space for housing in their Local Plan?

Another consideration should be the fact of new Brownfield Sites coming forward for development within Colchester, reducing the need to build on greenfield sites such as Middlewick. Recently, it was announced that the business on what remains of the old Paxman site in New Town is going to close, freeing additional space on a brownfield site within the bounds of urban Colchester. The site would approximately be able to accommodate 200 extra homes. This would further reduce the need to build on a greenfield site such as Middlewick Ranges.

Furthermore, Colchester's predictions for retail and office space, informing allocation of space in the Town Centre, may need revision. The report Employment Land and Floor Space that forms part of the evidence base for the Emerging Local Plan predicts an increase in office floor space needed in Colchester of 28-32% between 2014 and 2036.¹ In the wake of the revolution in work practices ushered in by the pandemic – the widespread introduction of work from home, more flexible working arrangements, as well as zoom meetings, will these changes, combined with the pressure on local authorities and businesses to cut costs, lead to a permanent reduction in office space? We know that Colchester Borough Council have already permanently increased flexible working and will now only be using the ground floor of their building. In the wake of these changes, do the predictions in the report therefore need to be revised downwards?

¹ Employment Land and Floorspace. Peter Brett Associates (May 2017), Table 3.4.

Another study that forms part of the evidence base for the Emerging Local Plan is the Retail and Town Centre Study.² It mentions trends such as growth of internet shopping and the polarisation between prime retail locations and more secondary locations, leading to major retailers exiting from many towns to concentrate on only a few prime locations. These trends were noticeable well before the pandemic (the study is from 2016); however, the question can be raised whether the pandemic has been a game changer in retail also, with trends towards online shopping accelerating and further pressure on major retailers to consolidate their businesses. In the years since the report was published, and especially since last year, there has been a noticeable reduction in the number of major retailers in Colchester's town centre: Debenhams, Mountain Warehouse and Argos have closed their town centre shops, while Poundland consolidated three shops into one.

The Retail and Town Centre Study notes the importance of a good mix of retail, leisure, office and residential for a vibrant town centre. While this is no doubt still true, current trends cannot be ignored and the question needs to be asked whether predictions should be updated and the allocation between housing, office, retail and leisure space should be amended in a bid to reinvigorate and reinvent the Town Centre. There is a growing market for urban living outside the capital but with the amenities of urban life such as proximity to restaurants, cafes, culture and leisure and public transport. Thus, the question should be asked, if predictions for office and retail space will be revised downwards, could these spaces be allocated for, and/or, converted into housing space, thus easing the pressure to build on green field sites such as Middlewick.

Another forecast underlying the Local Plan that may no longer be accurate is the predicted expansion of the University of Essex. During the past two decades, the expansion of the university has been a major factor in urban sprawl and loss of green field sites in East Colchester. The Emerging Local Plan (14.67) states that: 'On the basis of the current Strategic Plan, by 2018, the University will grow to some 15,000 students. Continuation of this current rate of growth in student numbers would see the University achieve a student body of approximately 20,000 by 2025 and 25,000 students by the end of the Local Plan period. Again, the question should be asked if these figures should be revised downwards post-Brexit and post-pandemic. After Brexit, EU students have to pay higher fees and hence the attractiveness of Britain as a place to study may decline. Furthermore, tighter immigration restrictions in recent years make Britain less attractive a destination for overseas students. The pandemic also negatively affects student numbers, leading to tighter finances for the university. Technological changes such as remote learning also raise the possibility of a future mix of on campus and remote study programmes, possibly leading to fewer students to reside at their place of study. All these factors make the predictions about university expansions as laid out in the Emerging Local Plan look over optimistic. If they have to be revised downward, this may impact on the housing need for Colchester, as less housing would have to be built for students, freeing more housing space for the general population.

Finally, nationwide trends also call the results of the housing need assessment into question. 900,000 people have left the country over the past 12 months; it is unknown whether they left due to Brexit or the pandemic. How many have left Colchester? If emigration leads to Britain suffering a net loss in population this also reduces the need for housing, meaning that the figures should be readjusted.

Homes do need to be built, but the ones that were built in the past did not meet the needs of the people of Colchester. In spite of 10,000 of thousands new homes being built, thousands are on the waiting list for social housing, a figure that has never gone down, and homeless has only ever been growing. Unless the system changes in a fundamental way, we will only lose ever more of our green

² Retail and Town Centre Study 2016. Cushman & Wakefield. (December 2016).

spaces and wildlife areas, while the real housing needs of the people of Colchester are not being addressed.

I am also concerned that to date, 24/03/2021 CBC are proposing changes to the environmental policies (which they have consulted on since 2015/16) in the Local Plan to put forward at the hearings. Those changes aim at throwing out the precautionary principle in relation to biodiversity. The sentence they are proposing to scrap is: "The Local Planning Authority will take a precautionary approach where insufficient information is provided about avoidance, mitigation and compensation measures and secure mitigation and compensation through planning conditions/obligations where necessary". I am concerned that they want to change the Local Plan ahead of the hearings because they know that their evidence does not hold up to scrutiny.