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From: QUINCE, Will

Date: Mon, 5 Apr 2021 at 22:37

Subject: Colchester Local Plan Submission

To: <a href="mailto:copseyandrea@gmail.com">copseyandrea@gmail.com</a>>

Cc: GREEN, Fabian

Dear Andrea,

Please find below my further submission.

Should you have any questions, please do not hesitate to contact me.

Best wishes

Will

Will Quince MP

Member of Parliament for Colchester



I am writing as Member of Parliament for Colchester to oppose the inclusion of 1000 houses at Middlewick Ranges in the Local Plan, (Site SC2) I feel such an inclusion fails the soundness test of Colchester Borough Council's local plan and therefore should be removed.

In stating my opposition, I want to make it clear that I fully accept the need for increased housing supply in Colchester and the surrounding area. More and more people want to live here and it is easy to see why. Our corner of Essex affords the enviable quality of life in the rural East of England with the unique benefits of our close proximity to the capital. Colchester is a prosperous town situated between the Haven ports and London Stansted Airport. Due to the strategic location along the A120 corridor, the opportunities for Economic Growth are unprecedented and homes and communities secure the long-term prosperity that we want to see in this area.

I am aware of the complexities of meeting the housing demands from central government and the burden that places on local authorities such as Colchester Borough Council with planning development for future generations without having jurisdiction for some of the key transport and social infrastructure provisions. These responsibilities lie with the County Authority and other Government Agencies. I therefore acknowledge the holistic work taken by Colchester Borough Council in their approach to Garden Communities, to ensure all facets of planning need are

addressed and all the key stakeholders have a seat at the table to plan intelligently. I believe strongly that you cannot have large scale increases in housing numbers without the key transport and social infrastructure in place, but I also acknowledge that you need a critical mass of houses to justify the requisite infrastructure improvements. Therefore, the onus has to be on building communities and not just homes, and I believe that it is incumbent on Colchester Borough Council to reaffirm those principles when looking at all sites in this local plan.

An alternative to this intelligent approach, is a series of large developments either tagged on to existing urban boundaries and therefore creating urban sprawl, or developments within existing urban boundaries ensuring increased strain on Colchester's buckling infrastructure network. This approach has not served Colchester well over the past decades and it is imperative that we learn the lessons of the past.

The strain of 1000 properties on the current infrastructure could be mitigated if there was a comprehensive master plan to address the infrastructure concerns. There is no obvious master plan that would secure: health, transport, community building, and shopping facilities to serve what is essentially a new community. Without the master plan you have urban sprawl.

I have an overwhelming number of representations from my constituents detailing their profound concern about increased traffic in the Mersea Road vicinity and the impact on pollution. With a lack of information about sustainable transport planning including public transport and cycle paths, the increase in the carbon footprint would have immeasurable long term impact for the health of nearby residents. I see this as totally unacceptable when there is no need for the development to meet the Council's independent housing need.

The principle of need is key to my objection. Colchester Borough Council's independently assessed need housing for Colchester is 920 houses per year and Colchester is currently delivering in excess of that. addition to this, we also have a commitment to a new garden community, and I therefore question the need to include these numbers in the plan.

Furthermore, I have become alarmed that the process by which the Middlewick Ranges site was assessed and identified runs counter to the NPPF, in particular the four soundness tests set out in paragraph 182 of the NPPF, and national policy. In particular, I believe that the following policies have not been followed:

- 113. LPAs should set criteria-based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged
- 114. LPAs should set out a strategic approach in Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure
- 117. To minimize impacts on biodiversity, local policies should: Plan for biodiversity; Identify
  and map components of local ecological networks; Promote preservation, restoration, recreation of priority habitats, ecological networks, protection and recovery of priority species
  populations,
- 123. Policies should aim to identify and protect areas of tranquility which have remained relatively undisturbed by noise and are prized for their recreational and amenity value
- 157. A LP should identify land where development would be inappropriate
- 158. Adequate, up-to-date evidence base

For a housing scheme of this size, it is alarming to see that certain policy procedures have not been met properly, and this alone brings into question whether the allocation of 1,000 homes on the Middlewick Ranges can indeed be found sound.

I am also yet to be convinced that the current outlined plan is the best use of the Middlewick Ranges site. I previously wrote to the Ministry of Defence to enquire as to the status of the disposal of the Range site in line with their rationalisation process. In line with Treasury guidelines, it was required to be placed on a Government Property Unit (GPU). This provided an opportunity for Colchester Borough Council to express an interest before the site was placed on the open market. Colchester Borough Council could have had the opportunity to develop the green space for real community benefit, a desirable open space for the use of the nearby community that would receive local support. Whilst the MOD were always unlikely to gift the land, there was the opportunity for Colchester Borough Council to have ownership of a community asset and direct the site's future for residents and not be led by developers.

Linked to this is my deep concerns surrounding the ecological issues that this new development poses. I remain concerned that the ecological surveys by Stantec are not fit for purpose, with the important habitat, acid grasslands being disregarded and declared worthless. Of course, this is the proposed area in which to build the houses. Moreover, the sustainability appraisal for Middlewick is not fit for purpose, as it ignores the fact that Middlewick is a greenfield and Local Wildlife Site (LWS). With over 600 species having so far been recorded on Middlewick with many designated as Nationally Notable, Nationally Scarce, Essex Red Data or UKBap species, I remain concerned that this development would have a huge impact on the ecology of a key green space in our town.

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