

# A STARK REALITY

## INTRODUCTION

### 1. Background

1.1 During the period 2008 – 2010 Government Inspectors confirmed that the Colchester Borough council (CBC) Core Strategy and integral development Site allocations had been produced in accordance with the prescribed process. Central to development strategies were the correlated projections of 14,200 new jobs and 19,000 new homes sourced by the East of England Plan (EEP). Subsequent to this, CBC's Full Council agreed that the Core Strategy and the Site Allocations should be subject to evidence based review in 2012 for on-going appropriateness and suitability.

1.2 This review now coincides with central Government desires to streamline the planning process and the introduction of a New National Planning Policy Framework via the April 2012 Localism Act. The Act enables Government to abolish existing Regional Strategies such as the EEP.

1.3 This paper has been produced by Myland Community Council (MCC) to feed into the CBC Core Strategy Review. It does so in the context of the emerging Localism Act. The determination of Government to create 'rights for people to get involved with and direct development of, their communities' is at the heart of this paper. MCC's commitment to playing a role in development growth is witnessed, for example, by its positive contribution towards the Northfields and Severalls sites which are the latest phases of several years of house building.

1.4 Core to all national and local development policies is the concept of 'sustainable communities'. Sustainable communities can only survive if

supported by the three pillars of economic, social and environmental sustainability. This paper specifically focuses on the sustainability of site allocation land west of Mile End Road and Nayland Road, known as Chesterwell Wood, (in development terms the NGAUE), which is an additional parcel of land to those mentioned in paragraph 1.3 above. It does so from the point of view of housing demand linked to local employment growth and the supporting transport infrastructure. Equally relevant are the growing importance of environment and biodiversity and the consistent views expressed by the people MCC represents, all of which map onto those three pillars of sustainability.

## 2 Overall Conclusion

2.1 This paper evidences that the Core Strategy statement (page 26) that it will, for the north Colchester Growth Area, 'co-ordinate **housing** and **employment** development with the delivery of **transport infrastructure**, **community facilities** and **open space**', is now critically undermined. The stark reality is that:

- **Employment** projections are fatally flawed and will not materialise sufficiently to support demand for currently linked **housing** targets. (See Section 3)
- No data is available to demonstrate that the **transport infrastructure** would cope with traffic levels above those currently endured. (see Section 4)
- Development of Chesterwell Wood contravenes national and local environment and biodiversity policies regarding **open space**. (See Section 5)
- The people of Myland have consistently and overwhelmingly voiced their profound disagreement with continued development of their community, especially in the acknowledged absence of related **community facility provision**. (See Section 6).

2.2 Whilst Myland has accepted the impact of much development growth in recent years, **on current evidence as outlined in paragraph 2.1 above, the Chesterwell Wood site would not be viable as a sustainable community and should be withdrawn from the Site Allocation list. Furthermore, it is a probability that the underlying evidence base was deeply suspect at the time the Site Allocation DPD was adopted in 2010.**

2.3 **It is now abundantly clear that the only responsible course of action is to defer all decisions on planning applications related to Chesterwell Wood until post the 2012 Core Strategy Review when the evidence base must be properly and accurately re-assessed, and/or, once the impact of the Severalls development on the transport infrastructure is actually known.**

## **DETAILED COMMENTS**

### **3 Employment Growth and Housing Demand**

***(Employment projections are fatally flawed and will not materialise sufficiently to support demand for currently linked housing targets.)***

3.1 Predicted employment growth and correlated housing demand for Colchester is critical to the Core Strategy. The Strategy specifies the need to facilitate the provision of approximately 14,200 new jobs in Colchester as stipulated in the EEP. Within the Core Strategy north Colchester is designated a 'strategic employment zone'. The jobs would be delivered through the Haven Gateway Partnership arrangements. To house the implied population increase the Strategy projected demand for 17,100 new homes between 2001 and 2021, and at least 1,710 additional homes by 2023. The growth underlying these figures is not stated nor is there a critical path/risk analysis for measuring projected target achievement and the consequences of failure to meet targets.

3.2 The success of the predictions outlined at paragraph 3.1 above relied upon national and local economic vibrancy. However, the growth assumptions, whatever they were, underlying the jobs and housing requirements in the Core Strategy can no longer be credible, as the following demonstrate:

### **GDP and Unemployment Figures from 2007**

(GDP figures are for calendar years and unemployment figures are as at 31 December)

<b>Year</b>	<b>GDP(%)</b>	<b>Unemployment (%)</b>
<b>2007</b>	<b>2.5</b>	<b>5.1</b>
<b>2008</b>	<b>-3.1</b>	<b>6.5</b>
<b>2009</b>	<b>-2.5</b>	<b>7.7</b>
<b>2010</b>	<b>1.6</b>	<b>7.8</b>

Unemployment growth continues to trend higher and in the Chancellor's November Statement forecast GDP in 2011 and 2012 was revised to

<b>2011</b>	<b>0.9</b>	<b>8.1</b>
<b>2012</b>	<b>0.7</b>	<b>8.7</b>

3.3 This data highlights, not only that the national economy has declined and then stagnated, it also shows that this trend was abundantly clear at the time Colchester's Core Strategy was adopted.

3.4 It was reported by MCC in March 2010 in an alternative Masterplan proposal for Chesterwell Wood, that the economic situation had been debated by the East of England Regional Assembly (EERA), where it was concluded that all housing targets should be vigorously re-assessed. The main job growth assumptions for Colchester in the EEP included: retail 2,400; hotels and catering 2,300; banking 3,500; amongst other projections. In January 2010 CBC's Strategic Overview and Scrutiny Panel reviewed the situation and opted

to retain the original housing targets in the belief that new jobs would still emerge in the public sector, tourism and retail and because high immigration content had not previously been included.

3.5 Colchester's economic success centres upon tourism and service industries. It no longer has a manufacturing base. The public sector has undergone significant cuts in employee numbers as has the banking industry so reliance upon those sectors to boost housing demand is unfounded. Similarly, tourism will not noticeably increase housing demand, only short-term stay facilities. The retail trade is under the same economic pressures as all other employment sectors and has the added factor of being relatively low paid. This factor applies equally to immigrant workforces. There is, therefore, no employment based bedrock upon which a development such as Chesterwell Wood can become viable for some time. This was re-affirmed by the local press in September 2011 where it reported unemployment being on the increase in Colchester.

3.6 Again in its March 2010 document, MCC made a number of forecasts on the then economic climate and its impact on housing development. These were:

- National household income levels will fall in real terms;
- Disposable income for purchasing of property will remain under great pressure;
- Money supply for development and mortgages will be scarcer and more expensive;
- The slow-down in house building in Colchester over the last two years will continue.

These forecasts have proved to be accurate and will be more prolonged as the economic slow-down continues to bite. This is echoed by Mervyn King in the recent Bank of England report where he said, "The journey to a more balanced

economy will be long and arduous. The immediate impact of the decline in sentiment is that the outlook for growth of the world economy has worsened since August. That is also true here in the United Kingdom, where activity could be broadly flat until around the middle of next year. We continue to face a difficult economic environment”.

3.7 The above evidence confirms that there is no valid, sustainable or economic argument for proceeding with any development option for this site for the foreseeable future. **MCC suggests that Chesterwell Wood is removed from the Site Allocations DPD until the Northfields and Severalls site developments are complete and assured of full occupancy.**

#### **4 Transport Infrastructure**

***(No data is available to demonstrate that the transport infrastructure would cope with traffic levels above those currently endured.)***

4.1 MCC was given to understand that no SPD/ Master Plan will be produced for the North Colchester development area until results are available from a ‘travel strategy’ review. It is also understood that this relies upon completion of a project commissioned by Essex County Council (ECC) and to be performed by Mouchel.

4.2 As at December 2011 the travel strategy review remains to be undertaken. A brief produced by Mouchel in May 2011 proposing completion of the project by 15 July 2011 was questioned by MCC due to a number of concerns with the contents of the brief. This brief has been preceded by an earlier version which had been independently reviewed by URS Scott Wilson on behalf of MCC where the review concluded that the initial brief was seriously flawed and not fit for purpose.

**4.3 The need for a comprehensive and evidenced project to arrive at an effective travel strategy for north Colchester remains.** In 2008 the Government Inspector, commenting on the Core Strategy concluded that analysis undertaken at that time indicated that there were “no fundamental highway issues which would be an impediment to delivery”. However, the Inspector had also said in her report that “congestion may be one of the sticks which encourage the transfer to public transport”.

4.4 According to MCC information, the traffic data analysis referred to by the Inspector was at least 10 years out of date. It is also important to note that reference to a ‘stick’ could be construed to mean a policy is adopted to deliberately allow congestion to become so bad as to force motorists off the road in north Colchester. It is equally vital to note that the travel strategy brief referred to above recognises that a ‘modal shift’ to other means of transport other than the private car would be necessary. In line with the ECC projection this would require a 30% modal shift by residents to make Chesterwell Wood a viable development. No evidence appears to be available that this has ever been achieved or even attempted elsewhere.

4.5 MCC has pressed ECC for examples where ‘modal shift’ is operating in the UK in similar locations up to two miles from a town centre. Although some data has been provided this refers to three Government sponsored trials of large towns (Darlington, Worcester and Peterborough) where modal shift initiatives were studied over each town’s entire area over a period of years. The average modal shift was just 9%. It is hard to avoid the conclusion that the level of modal shift contemplated in Colchester (in a small part of a ward in one of Colchester’s many wards) will have negligible impact on Colchester but cause considerable inconvenience to future residents of Chesterwell Wood.

**4.6 This raises the question of whether CBC has considered obtaining specialist advice about the consequential impact on house prices/saleability**

**at a location that is dependent upon modal shift to be viable but is located up to two miles from the town centre.**

4.7 The seriousness of this area of concern can be summed up by reference to comment in the Essex County Standard newspaper dated 29 April 2011 from a previous borough planner where his informed and credible worries concluded that the road infrastructure simply will not cope with more development in Myland. His concerns are based on daily traffic volumes along the Northern Approach Road which had reached 18,600 in 2008, have increased since and will increase even further with the impending link to the new A12 junction. More recent information suggests there are 48,000 daily traffic movements under the North Station railway bridge. This is without daily traffic movements to and from 3,700 more houses (two cars per house) should both Severalls and Chesterwell Wood be developed. The nightmare is obvious and the 'stick' suggested by the Inspector is plain for all to see.

4.8 It is clear then, from an experienced planning viewpoint (see Paragraph 4.7 above) and the repeatedly expressed views and experiences of Myland actual users (see paragraph 6.2 below) that the current transport infrastructure in north Colchester is unsustainable, especially were it to be faced with greater volumes of traffic. **MCC suggests that no decision can be taken on further development in Myland until a comprehensive traffic study has been undertaken and that the study should include the real-time impact of the Severalls development.**

## **5. Environment and Biodiversity**

***(Development of Chesterwell Wood contravenes national and local environment and bio-diversity policies.)***

5.1 Colchester is an integral part of the Haven gateway Partnership which has among its Green Infrastructure Strategy (HaGGIS) the following founding principles:

- Championing green infrastructure for a high quality life;
- Supporting community action for green space development;
- Protecting and enhancing the distinctive landscapes of the region.

Green infrastructure is described as a connected system of protected sites, nature reserves, green space and greenway links.

5.2 Colchester's own green space strategies and policies are in harmony with those of the Partnership. This is very much in evidence for example in the Core Strategy itself which states, 'The preferred policy will conserve and enhance Colchester's natural environment, countryside and coastline. Strategic green breaks between Colchester Town and the rural hinterland will be protected and enhanced...The preferred option will also protect biodiversity and landscape character.'

5.3 Similarly, Natural England identifies four broad benefits associated with accessible natural green space:

- Promoting human well-being;
- Conserving urban biodiversity
- Moderating urban micro-climates;
- Attenuating pollution.

5.4 In its own right CBC has produced strategies and policies that echo the aims of Natural England, a fine example of which is the Parks and Green Spaces Strategy (PGSS). Policy PPS9 neatly encapsulates the Natural England benefits, it 'encourages local authorities to contribute to the Government objectives of rural renewal and urban renaissance by enhancing biodiversity in green spaces...so that they are used by wildlife and valued by people, thus recognising that healthy functioning eco-systems can contribute to better

quality of life and people's sense of well-being'. More recently Colchester has developed an enhanced Borough-wide Green Infrastructure Strategy that is applauded for its sensitivity towards the town's cultural, historical and rural legacy.

5.5 These policies emphasise that ever-decreasing numbers in important flora and fauna makes it imperative that areas with healthy biodiversity should be conserved and if possible enhanced (98% of flower meadows have been lost since 1950). It is evident that CBC has adopted policies to support that stance. It is important to note, then, that interim recording initiated by Colchester Natural History Society and subsequently reinforced by the local community identify the Chesterwell Wood site as a rich and varied source of local flora and fauna supporting biodiversity in the Borough. The current species list includes; 32 birds, 6 of which are on the RSPB 'red-list'; 9 bee species including a rare bumble bee on the 'biodiversity action plan list'; 3 rare fungi; a rare moth from only one two hour recording; 18 different butterflies; 18 different trees and 62 different plants and grasses, including the scarce bee orchid. This does not cover the whole site and although roe deer and munt-jac have been recorded a full mammal survey has not been performed.

**5.6 The Chesterwell Wood site should, therefore, be protected as accessible natural green space and embedded within Colchester's Green Infrastructure Strategy as an integral and key biodiversity area. Loss of such sites is not a temporary measure it is a permanent destruction of the habitats supporting flora and fauna listed at paragraph 5.5 above.**

5.7 Building on green spaces and transforming them into urban landscapes carries with it inevitable consequences for the environment and community within it, hence the emergence of national and local policies to protect such space. It has been said that climatically responsive urban design is vital to any notion of sustainability because too much building can effect a local climate resulting in the development of urban micro-climates and associated increases

in pollution, hence the considerations bullet-pointed by Natural England at paragraph 5.3 above. Development levels in Colchester in recent years and the current and planned extension to the Northern Approach Road through Myland substantially heightens the pollution impact on the local community.

5.8 Because trees and other flora are natural pollution control devices, i.e. they filter polluted air and create oxygen and soften noise levels, their presence is vital to a balanced environment conducive to the community's health and well-being. Replacing the Chesterwell Wood green site with houses with associated removal of flora levels and the introduction of air pollutants would be a doubly dangerous step as it would remove natural pollution control devices and replace them with further pollution sources.

**5.9 In the absence of any published means by which CBC's commitment to zero-carbon development would compensate for the loss of the Chesterwell Wood 'green lung', the site should be retained as open green space and a natural pollution control mechanism to protect the health and well-being of the community.**

## **6. Community Views and Wishes**

***(The people of Myland have consistently and overwhelmingly voiced their profound disagreement with continued development of their community, especially in the acknowledged absence of related community facility provision.)***

6.1 Over recent years MCC has surveyed the opinions and aspirations of its community to inform, for example, facility wish lists, the Myland Design Statement and a Parish Plan. More recently, CBC commissioned the iCES team at the University of Essex to carry out an independent 'community engagement' project to garner how local residents feel about Myland.

6.2 Publication of the University of Essex independent results evidenced a strong consistency in local public opinion. Their report 'executive summary' highlights the key points to arise from the project and identified that the people of Myland;

- Like most, the access to natural green space such as High Woods Country Park and especially the Chesterwell Wood area;
- Believe that, housing development in their community has reached saturation point;
- Know that, the transport infrastructure is inadequate and unable to support more growth in Myland.

6.3 These conclusions mirror MCC's own surveys of its residents and present the consistent views of the people who live and travel in the area and who are best informed to draw conclusions on the value of their environment and suitability of local transport viability. It is no accident, or conversely, no contrived mechanism that demonstrates that the local view upholds the evidence-based conclusions expressed by MCC in sections 3,4 and 5 above.

**6.4 The views and opinions of the people of Myland will best be served by deferring all development considerations beyond the Severalls site until occupancy of that site is assured and its impact on transport infrastructure measured in reality.**

**The stark reality is that:**

- **Employment projections are fatally flawed and will not materialise sufficiently to support demand for currently linked housing targets;**
- **No data is available to demonstrate that the transport infrastructure would cope with traffic levels above those currently endured;**
- **Development of Chesterwell Wood contravenes national and local environment and biodiversity policies.**

- **The people of Myland have consistently and overwhelmingly**