

Wivenhoe Town Council Submission on Consultation for Draft Local Plan.

Note to readers – The submission was entered into a clunky and confusing third-party system hosted via Colchester Borough Council's local plan pages. We could only comment on the relevant section and each individual submission is copied below according to the section of the plan. Each submission had to be accompanied by a summary of no more than 100 words. There were also drop-down boxes to rate by factors such as 'unsound' and 'Justifiable'. Please refer to each comment by the Representation ID in any communication. Additionally, the formatting may be strange in places due to the nature of the automatic response which returned our submissions to us.

Wivenhoe Town Council wishes to express its thanks to those who helped us with this submission.

Representation ID: 6274

Document: Section 1 - Publication Draft Local Plan

Section: Policy SP1: Presumption in Favour of Sustainable Development

Support/Object: Object

We object to the presumption in favour of sustainable development as this plan is clearly and demonstrably unsustainable in respect of the garden Communities in particular.

The land for the East Garden Community is rated, according to the AECOM appraisal, as being Grade A farmland. Over 80% of the site is classified as being the most productive in the South East. Any notion of sustainability must counter for long term issues such as food security. Environmentally it is accepted that locally, or even nationally, produced food sources are vital.

Only 17% of the residential dwellings are earmarked for 'local need'. Long term inward migration to North Essex is not sustainable.

This plan suggests 2500 houses raising to 9,000 though the lifecycle of the following local plan to 2048. This is a fundamental flaw as judgement is being passed on 2500 houses and there is no scope within this decision-making process to limit future growth on the grounds of unsustainable.

The finances - whilst discussed elsewhere in this submission - are not sustainable beyond the current housing markets high stock. With the reduction in house prices directly comparable with distance from the London 'bubble' any reduction would undoubtedly see an adverse impact on the provision of necessary infrastructure. Notwithstanding the substantial risks to the 'wish list' of infrastructure imbued by a developer's ability to cheat the planning process.

This is not the blueprint of a sustainable standalone community able to provide a localised self-sustaining lifestyle. The lack of community assets is staggering.

Where are the provisions for faith buildings, cemeteries, allotments, village halls?

Without a sense of place, purpose, and belonging this is merely a dormitory estate.

That is unsustainable and against all that Garden Communities are supposed to be.

If it was truly sustainable then why have we suffered an appalling lack of engagement from our local authorities? There is a deep sense of mistrust as our questions remain unanswered and our ability to help shape our area is continually

denied. Colchester Borough Council seeks only to tell us what they are doing and not engage on improving the plan and Tendring completely ignore us, offer a different plan to Colchester and have not even attempted to reach out to us. Furthermore, the adverse impact does not outweigh any perceived benefits. For the following reasons.

Unsound as we should not have to meet unmet demand from Tendring or Braintree. The bias on judging this plan on 'legal compliance' when the bodies proposing this scheme are the same ones that sanctioned the policies. There is a blatant conflict of interest here.

The Plan should be the most appropriate strategy when considered against reasonable alternatives, based on a proportionate, robust and credible evidence base. There is NO reasonable alternative offered. 9,000 houses in a rural aspect is clearly not proportionate. The financials are far from robust (discussed elsewhere) and the evidence base is not credible. The Housing Assessment is based on a series of falsehoods. The use of historical data is overplayed and there is no provision for the falling population once the 'baby boomer' generation start to diminish which is in scope of this plan. This assessment needs to be revisited urgently with local input (only 17% local provision is shocking) and the numbers suggested need to fall significantly if this plan to reach the desired levels of local acceptance mandated by the European model of Master planning.

This plan is not effective. The infrastructure offered is insufficient to protect existing communities. There are no guarantees of infrastructure provision - this is exceptionally worrying. Especially given the parlous state of local hospital provision as evidenced via the national media.

Colchester should not pay the price for being prepared to accept massive over-development over the last 20 years when many other areas of the country have simply ignored the issue.

Specific policies in the Framework or the Plan that indicate that development should be restricted.

Firstly, this is subjective. No part of the policies states the volume or change of character of this rural area.

Statement of Community involvement - This has not been met at all.

There is a disappointing and ultimately worrying lack of engagement on all key issues other than the prerogative to continually increase numbers in direct contradiction to all the efforts of those towns and villages about to be subsumed by this unwarranted over-development.

This is not justified as there is no measure of appropriateness as no other option has been tendered. Other sites include Rowhedge, Clacton, to the north of Longbridge - (originally in scope for this plan), Middlewick Ranges and to the north of the A120. None of these have been considered.

It is not justifiable, (nor sustainable) to build on Grade A rated farmland. It is not acceptable to existing communities that the Issues and Options iteration of this plan contained ZERO options. The tacit acceptance by this scheme that it will 'go there' is deeply unpalatable.

Distinct Settlement Boundary - Wivenhoe is classified as such by the local plan. It is mystifying how building 480 yards on such a scale can be considered as protecting this status.

SUMMARY

We do not believe that this is in any way sustainable. Our above representations list why with relevant points and policy references.

The adverse impact does not outweigh the perceived benefits.

Tacit acceptance that it will 'go there' is deeply unpalatable for local residents Not sustainable to build on Grade A+ Farmland Poor Engagement and huge discrepancies with duty to co-operate No reasonable alternative seriously considered.

9000 houses in a rural location is not proportionate.

This iteration should account for the development to take place post 2033 as described by CBC.

The plan is not effective as insufficient infrastructure offered.

CHANGE TO PLAN

The plan requires a full review and the number of dwellings proposed needs to drop to reflect local need only. Therefore 17% of the current proposal only. This plan needs to consider the impact of the 9,000 houses CBC\TDC intend to build on the site until 2048.

Land around Wivenhoe to the South of the A133 needs to be placed into a Trust or comparable locally orientated vessel to prevent coalescence.

Sites in and around Clacton need to be considered as it is wholly unjustifiable to port TDC housing needs to one over-developed area on the outskirts of Colchester.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Appearance at the Examination.

Representation ID: 6275

Document: Section 1 - Publication Draft Local Plan

Section: Policy SP2: Spatial Strategy for North Essex

Support/Object: Object

Wivenhoe Town Council support and agree with the statement by Wivenhoe Society below.

'These comments concentrate on the Garden Settlement proposals within the policy. It is stated "Three new garden communities will be developed and delivered as part of the sustainable strategy for growth at the locations shown on Map 3.3 below and the Proposals Map". There does not appear to be a Map 3.3 or a Proposals Map in the Part I documents. There is a Key diagram showing 3 red blobs indicating the general locations. The Colchester Proposals map shows more, not much more, detail for the East Colchester/West Tendring garden community with the proposed area lying to the north of the A133. The Tendring proposals map for the garden community shows a different area, straddling the A133.

Without any defined proposed boundaries for the communities there is insufficient information to comment on their sustainability and impact.

Much more detail on the garden communities should be provided before Part I of the Plan can be judged to be sound. This should include the precise sites being proposed and a justification for choosing these particular locations. More detail on infrastructure is needed, particularly new roads and road improvements and on the impact on existing communities. It is the impact on existing communities that most concerns us as there is no provision to protect the existing character of the area. More detail on viability is required and justification in terms of future housing needs post 2032.. '

SUMMARY

Without any defined proposed boundaries for the communities there is insufficient information to comment on their sustainability and impact.

More detail on viability is required and justification in terms of future housing needs post 2032.

There does not appear to be a Map 3.3 or a Proposals Map in the Part I documents. The Tendring proposals map for the garden community shows a different area, straddling the A133.

There is no provision to protect the existing character of the area.

Representation ID: 6717

Document: Section 2 - Publication Draft Colchester Borough Local Plan

Section: Policy ENV2: Coastal Areas

Support/Object: Object

Policy ENV2:Coastal Areas

The wording of the Policy is fine but the Wivenhoe Society wished to object to the deletion of one area of the current coastal protection belt, Bowes Farm, the land lying to the east of the settlement area shown in the attachment, on the grounds that the criteria used by the consultants do not reflect the aims as set out in the supporting text for the Policy.

In the text it states

13.10 The Coastal Protection Belt protects the open and undeveloped stretches of coastline in the Borough which could be harmed by development that might otherwise be acceptable in a countryside area.

13.8 The Colchester Coastal Protection Belt aims to protect the rural and undeveloped coastline in the Borough from inappropriate development that would adversely affect its rural, undeveloped and open character and irreplaceable assets, landward and marine sites of nature conservation importance.

A review of the Coastal Protection belt was conducted by Chris Blandford Associates. This was not made available to the public for comment until late 2016/early 2017 after the Preferred Options consultation was closed.

The Wivenhoe Society commented

"Coastal Areas Policy, paragraph 5.14 : Reference is made to an updating of the Coastal Protection Belt made in 2016. No map is provided for the proposed protected area and the review does not appear in the Borough evidence base documents. In the Neighbourhood Plan survey it was clear that residents valued the open countryside and the views down the estuary from the land to the east of the Wivenhoe settlement area and to the south of Alresford Road as well as the green slopes to the west of the settlement. The land to the east is also close to a Special Protection Area and an SSSI. We would urge that this area should continue to form part of the Coastal Protection Belt."

The consultants used different criteria from those used by Essex County Council in 1984 when the current Coastal Protection Belt was defined.

These earlier criteria included coastal views. The consultants instead used landscape character areas. The site in question was classified by the consultants as partly falling in a category "Colne Slopes" (land much further upstream was also designated as Colne Slopes) and partly as

falling in the "Wivenhoe Plateau". Where the plateau ends and the slope starts is somewhat arbitrary as the land in question continues to rise at a decreasing rate up to the Alresford Road, the boundary of the current CPB. Most of the Wivenhoe plateau neither has coastal/estuary views nor is visible from the river and the Wivenhoe Society has no issue with accepting the proposed deletion to the north west of the settlement

area which also forms part of the Wivenhoe Plateau. The land sloping down to the estuary however would seem to satisfy the criteria set out in 13.8 of the Plan text. It is coastal, rural, undeveloped and open in character.

It is worth noting that Tendring District is proposing to include the Colne slopes abutting this land in its Coastal Protection Belt.

The area proposed for deletion is also very close to the Colne Mid Essex SPA. It is likely that The Essex and South Suffolk Shoreline Management Plan (October 2010) has proposals to flood the grazing meadows just to the south (ref D6b Wivenhoe Marshes) post 2025 to create wetland. This would only be separated from Bowes Farm by the railway line. The new wetland will no doubt be colonised by species of river birds that the existing SPA seeks to protect. The Bowes farm land is likely to provide feeding grounds for these birds and would also provide a roosting site in the event of very high tides. The site therefore also therefore has the potential to be important for nature conservation.

Comment on paragraph 13.19: This states "There are also a number of new housing allocations being proposed within Abberton, Rowhedge, West Mersea and Wivenhoe which are located within the revised Colchester Coastal Protection Belt". None of the new housing allocations proposed for Wivenhoe, both in this Published Plan and in the draft Wivenhoe Neighbourhood Plan are in the proposed revised Colchester Coastal Protection Belt. One site is within the current Coastal Protection Belt but the area concerned has no inter-visibility with the estuary and it is probably appropriate that this area of land should be excluded from any revised Coastal Protection Belt. Similarly, the allocation at Rowhedge would not seem to lie within the proposed protection belt.

SUMMARY

No map is provided for the proposed protected area and the review does not appear in the Borough evidence base documents. In the Neighbourhood Plan survey it was clear that residents valued the open countryside and the views down the estuary from the land to the east of the Wivenhoe settlement area and to the south of Alresford Road as well as the green slopes to the west of the settlement. The land to the east is also close to a Special Protection Area and an SSSI.

CHANGE TO PLAN

Land to the East of Bows Farm, Wivenhoe, must remain coastal protection belt. No map is provided for the proposed protected area and the review does not appear in the Borough evidence base documents. In the Neighbourhood Plan survey it was clear that residents valued the open countryside and the views down the estuary from the land to the east of the Wivenhoe settlement area and to the south of Alresford Road as well as the green slopes to the west of the settlement. The land to the east is also close to a Special Protection Area and an SSSI.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Appearance at the Examination.

Representation ID: 6366

Document: Section 1 - Publication Draft Local Plan

Section: Policy SP6: Place Shaping Principles

Support/Object: Object

We object strongly to this aspect of the plan as this modern dormitory fails on each of the following accounts. We have taken each point in turn to allow for ease of context.

Respond positively to local character and context to preserve and enhance the quality of existing communities and their environs; Building 9,000 dwellings across 4 villages does not - at any imaginable level - respond to local character. If the aim of this plan is to preserve the quality of local communities then the simple option is not to build at this scale. Our "environs" are of a rural aspect which will be devastated by this plan. In addition, it is this kind of empty rhetoric and complete lack of understanding of existing communities that causes so much ire. This plan is in no way interested in existing local communities or local environs and bland statements such as this are disingenuous, discourteous and demonstrate the absence of community involvement. This statement needs to be removed from this plan as it is falsehood.

Provide buildings that exhibit individual architectural quality within well-considered public and private realms; We cannot comment on this as this information is not publicly available. We will take this opportunity to stress the importance of minimum room sizes, adequate parking and gardens. Fundamentally there must be provision of homes of a scale that is fit for purpose. We would dearly wish to see an aspirational community with homes that people would seek to live in and this would form a strong element of our engagement should it ever be sought.

Protect and enhance assets of historical or natural value; This should be amended to allow for other values such as the provision of (Grade A) agricultural land and the protection of existing communities.

Create well-connected places that prioritise the needs of pedestrians, cyclists and public transport services above use of the private car; as anything else will NOT work.

Where possible, provide a mix of land uses, services and densities with well-defined public and private spaces to create sustainable well-designed neighbourhoods; Mixed land uses should include agricultural, leisure, cemeteries, allotments and business provision beyond the small and clearly inadequate amount proposed.

Density should not exceed 60 units per hectare. In addition, the higher density areas should be built to the north of the site and away from existing communities.

Enhance the public realm through additional landscaping, street furniture and other distinctive features that help to create a sense of place; We cannot comment on this as this information is not publicly available. We will take this opportunity to stress the importance of creating a unique separate place able to function independently without suffocating the limited resources off the already stretched to breaking point local infrastructure assets.

Provide streets and spaces that are overlooked and active and promote inclusive access; We cannot comment on this as this information is not publicly available.

Include parking facilities that are well integrated as part of the overall design and are adaptable if levels of private car ownership fall; There should be sufficient space left

to mitigate for the much more realistic outcome that private car ownership will increase. This plan must exhibit a degree of 'common-sense' or else it will fail to be accepted by local communities. It will also fail its future residents.

Provide an integrated network of multi-functional public open space and green and blue infrastructure that connects with existing green infrastructure where possible; We would wish to see greater detail before we can comment on this.

Include measures to promote environmental sustainability including addressing energy and water efficiency, and provision of appropriate wastewater and flood mitigation measures; and There are known issues with the current sewage system that is already operating above capacity. These issues must be addressed before any development commences.

Protect the amenity of existing and future residents and users with regard to noise, vibration, smell, loss of light and overlooking.

This is very important and we would welcome the opportunity to engage in a meaningful manner with the masterplan process to ensure that protecting the amenity of existing communities is a real priority for the local plan - currently it is not.

SUMMARY

Building 9,000 dwellings across 4 villages does not - at any imaginable level - respond to local character Density should not exceed 60 units per hectare There should be sufficient space left to mitigate for the much more realistic outcome that private car ownership will increase. This plan must exhibit a degree of 'common-sense' or else it will fail to be accepted by local communities. It will also fail its future residents.

Minimum standards on size for dwellings.

CHANGE TO PLAN

There should be sufficient space left to mitigate for the much more realistic outcome that private car ownership will increase.

If the aim of this plan is to preserve the quality of local communities then the simple option is not to build at this scale.

Land around Wivenhoe to the South of the A133 needs to be placed into a Trust or comparable locally orientated vessel to prevent coalescence.

The importance of minimum room sizes, adequate parking and gardens dictates that there must be agreed standards before this plan is approved.

Not all agricultural land on the site should be lost.

the priority should be given to the private car as anything else will NOT work.

Density should not exceed 60 units per hectare. In addition, the higher density areas should be built to the north of the site and away from existing communities.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Appearance at the Examination.

Representation ID: 6280

Document: Section 1 - Publication Draft Local Plan

Section: Policy SP8: Tendring/Colchester Borders Garden Community

Support/Object: Object

Infrastructure timescale

The A120 Junction should be opened before the first occupancy of any housing.

Considering the abnormally long construction period of the Garden City it is inadequate that timescale for the delivery of infrastructure is detailed at this stage. Jacobs reports does speak of the 'rapid transit' materialising in two stages as population increases but no where is it mentioned when other critical elements are to be built.

Promoting Sustainable Transport

Submission to policy SP7 (re 5.vii changing behaviour) applies to SP8 also.

'Rapid Transit', with particular reference to East 'rapid transit' proposals.

CBC and ECC have now spent 8 years producing reports on the so-called 'rapid transit' proposals for the East development, the latest of them by Jacobs in September 2016 and May 2017 (from which the details here are taken). It is apparently intended to spend yet more money on consultants in further attempts to magic up something that is both affordable and attractive, but the fact is that the two Jacobs reports already demonstrate clearly enough that nothing that could remotely justify the term 'rapid transit' is actually on the cards.

It is now evident (1.78) that CBC want consideration of these 'rapid transit' schemes postponed until the SGDPD inquiries when 'more details' will be available of the garden communities exact sites and layouts. However, so far as the East development at least is concerned, this is an issue that needs going into now, because the reality can be demonstrated already that NO attractive rapid transit scheme is intended or practicable; that (in consequence) the unprecedentedly low postulated % of car journeys by the new residents is unachievable; and that the whole East project is as a result likely to be unsound as far as transport is concerned.

The Jacobs reports conclude with the analysis that there are only two East 'transit' schemes suitable for further pursuing:

(1) what is somewhat fraudulently referred to as 'Guided Bus Rapid Transit via East Hill'. This is in reality only proposed as 'guided bus' on the section between the University and the new settlement (on which section there will be no traffic delays

anyway). The rest of it, from North Station via North Hill, High St, East Hill, Greenstead Rd and Elmstead Rd, will be ordinary buses on the ordinary roads, without any further bus priority identified except for the cut-through Greenstead Rd - Elmstead Rd (which has not, it would seem, actually been agreed by ECC Highways). Far from being a step change to a different rapid transit scheme, it would in fact be entirely indistinguishable from the present University bus service! - a point emphasised by the note that it would have to be run by one of the main ordinary local bus companies. The route includes all three of the town's worst congestion spots - North Station roundabout, East Hill / East St / Eastgates level crossing, and Greenstead roundabout. Because of the narrowness of the roads, there is in fact very little possibility of additional bus priority. The consultants' principal justification for this unlikely-to-be-very-rapid scheme seems to be that they made a visit and took a photograph in the inter-peak period which 'proved' that East Hill is not congested! They do however note the Eastgates problem (likely to be exacerbated by more trains in future).

This scheme is stated to be 'economically viable under all but the most pessimistic assumptions'. Its viability is of course due to low costs / its low-grade nature! (but there are no opportunities for upgrading it by 'add-on' expenditure).

Also the 'bus priority' between the University and the town centre is stated to be only seen as necessary 'in the longer term' (so nothing on that front for residents in the 2020s), and there is no evidence that such priority measures are actually achievable within the constraints of the roads in question anyway; only the Greenstead roundabout cut-through is specifically mentioned, and there is no statement of support for that from ECC Highways.

(2) closing the railway line between Colchester Town and Hythe and using the track-bed for a guided busway or tram route**. If made as a tram route, that would of course require the whole of the rest of the system from North Station (?) to the East City to be a tram route also, but Jacobs make it very clear that the great extra costs of trams are 'economically unviable under all but the most optimistic set of assumptions', putting that idea firmly off the agenda. As a guided busway it is considered 'potentially viable but downside assumptions in sensitivity testing can easily push it into a negative NPV'.

** Previous work had assumed the construction of a busway alongside the railway line on its south side, for which planning protection was secured in the last Local Plan, with the railway left open. This is now rejected by the consultants - so will CBC now be abandoning the protection? As the Jacobs reports are included as supporting documents, one assumes that CBC do agree with them?

The final recommendation is that CBC/ECC should 'continue to develop the case' for option 1, and 'explore further how a later upgrade to Option 2 could be achieved'. So, far from the new residents getting a high-quality facility from the start, even the authorities are now only talking of it possibly appearing one fine day, long after residents have already settled their habits.

Plus the fact is, of course, that the likelihood of getting permission to close the railway line is minimal! - and in the case of not achieving that, the more expensive (and yet more financially dubious) option of a busway alongside the line, with costly extra bridgeworks, would have to be reverted to.

Yet the CBC Local Plan text continues to refer throughout to high-quality rapid transit being provided. Much as one expects local authorities to stretch the truth, there must surely be a point at which false terminology must be removed from Local Plans. The normal definition of 'rapid transit' is trains on separated track, or Light Rail on separated track. Even CBC themselves are not pretending that any of the options being offered in the East are in that league. (The two routes actually being proposed for West in the last Jacobs report are also ordinary bus).

There is then the question of whether, even if some abnormally attractive public transport system were provided, it would actually be of use for most of the East development residents' daily journeys. [We refer here to practicality: the question of the residents' psychological willingness to abandon their cars is covered above]. The easiest focus is on journeys to work (the only type of journey for which current census information on Colchester people's behaviour is available, but actually now less than 20% of total journeys). Here the game is given away immediately (AECOM Vol.2, Economy section) where they point out the good selection of major local work locations that would be readily accessible from the East development.

Many of them are only conveniently reached by car! The ease of getting to Severalls Park is pointed out (10 mins by car, but an hour by bus). As already mentioned earlier, it is also noted, in good old 'normality = cars' thinking, that the East development will be readily able to attract businesses to settle on the north side by the A120 because good fast road access is what modern businesses want, not town centre locations! (= the employees will come in by car).

The only main employment areas readily accessible by public transport would be the University, the town centre, and Middleborough. (This then takes us on to the point made later that an abnormally high % of town centre workers have free employer parking, discouraging them from using any 'rapid transit' however wonderful, in the same way that this factor has stunted peak-period use of the Park & Ride).

Also the real number of jobs at the Knowledge Gateway is likely to be far less than spoken of, plus University staff are known for their car-dependency despite being offered bus seasons at a quarter the normal rate.

The consultants' claimed viability levels for the East transit schemes are, they state (Jacobs May 2017 p.24), reliant on the assumption that an East Park & Ride site at the University will be present from the early days of operation and provide a base load to support the service in the period when the new community still has a low population. This notion, like the Local Plan's 'evidence-free' support for more P&R sites elsewhere despite the failure of the Cuckoo Farm service to provide any traffic relief in weekday peak periods [see next section], and its massive annual operating loss, has no justification. The Cuckoo Farm site is already easily accessible to almost all of Tendring (everywhere other than Elmstead/Alresford/Wivenhoe) via the A120, and around 30% of its current users do in fact come from Tendring. There is no reason to believe that any significant new customers would materialise for a second site which (thanks to the fast journey to Cuckoo Farm via the A120) is only 2-3 minutes journey time closer! (And most of the people who might use an East site would either be abstracted from the already-very-underused Cuckoo Farm, or from the existing Alresford/Wivenhoe bus/rail services, thereby achieving nothing). If it is

intended that residents of the new settlement should drive from home to the P&R site instead of using their nearest transit stop, that is no great achievement and hardly a justification for the £6m cost of a site! The fact is that the East P&R idea remains as it was when struck out of the last Local Plan by the Inspector - a totally un-evidenced fallacy.

Yet another P&R site is proposed off the A120 near the new junction, supposedly 'to intercept trips from the A120' - again wholly ignoring the point that A120 drivers already have access to Cuckoo Farm only 3-4 mins further off. (If Cuckoo Farm were getting over-busy this might be rational; with Cuckoo Farm heavily underused it is a nonsense).

** Supporting evidence for the above statements re Park & Ride will be found in the Colchester Bus Users Group submission.

Education

Demographic studies, (source - Cambridge Econometrics), show predictions of the likely numbers of 4-16 year olds on the east site to be 1000-1100 by 2031. Section 14. merely states that a Secondary school and primary schools will be provided. It doesn't say when, or whether this will be on within the site. According to Essex County Council there is 'no definitive plan to build a new secondary school on the site north of Clingoe Hill'. (This relates to the current ten years forecasts). As yet no private funding has been identified that could provide a 'free' school either. Wivenhoe's primary schools are at capacity and has no secondary school. Elsewhere in the document CBC suggest that secondary school pupils from Wivenhoe either attend the Colne in Brightlingsea or the Academy in Greenstead. This is very misleading and clarification should be sort from Essex county Council on actually numbers before claims of this nature are made. To Wivenhoe Town Council's knowledge (gained via the feeder schools and the Colne) in recent history only one student has attended the Academy from Wivenhoe. Guarantees that a Secondary school and two primary schools will be built on site, (and prior to occupancy of the housing) need to be made in order to preserve the consistent provision of secondary school places for all surrounding villages.

Wivenhoe Town Council also support and agree with Wivenhoe society's submission stating that:- 'This proposal is unsound on several grounds.

(1) Agricultural land: The NPPF states "Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality". Almost all of the land proposed for the new community is rated as excellent by Natural England. There is only a limited area of "excellent" land in the region and this is concentrated mainly just to the east of Colchester. In the Sustainability Appraisal for Part I objective 2, labelled "impacts", covers acceptable impacts on high quality agricultural land, important landscape features, townscape features, sites of nature conservation interest and heritage assets. The Appraisal gives an amber rating for objective 2 but this is only because the impact on agricultural land is masked by the assessments for the other impacts - landscape features etc. It would seem more usual for the

impact on agricultural land to be a separately assessed.

(2) Impact on European Designated Sites: The land proposed is used as a feeding ground for river birds from the Special Protection Area on the Colne. While a monitoring program on bird population is proposed if it is difficult to see what mitigation could then come forward if bird numbers are found to have fallen.

The Colne estuary and the other estuaries in Tendring include important Natural 2000 sites. While it is proposed that a Recreational Avoidance and Mitigation Strategy will come forward the impact on Natura 2000 of a large population increase to the eastern borders of Colchester could be high. If the intention of the proposed development is to meet local housing need then this might be thought a price worth paying. However if the aim is to meeting regional or national housing requirements then from the environmental point of view it could be argued that development should take place further to the west or, if the demand is national rather than regional, elsewhere in the country.

(3) Location relative to Colchester and to Tendring settlements: The proposed settlement lies mainly in Tendring District but will effectively be an extension of Colchester. One of the advantages of a planned garden development is that it may yield a higher proportion of affordable housing.

This affordable housing, however, will not be well related to existing settlements in Tendring. Those on Tendring District's housing list may well have links - employment, family, schools - to the areas where they are currently living.

It is poorly linked to any employment opportunities in the Tendring District and will not help to promote the economy to the east.

(4) Transportation: A major concern is the adequacy of the road network.

The A133 is already subject to severe congestion at peak times. It is the only route for cars into Colchester from Wivenhoe given that Boundary Road is a through route only for buses. Greenstead roundabout is a pinch point.

It only takes one accident for severe problems to arise. The unpredictability of journey times means that for crucial appointments a safety margin for possible delays has to be allowed when planning trips.

The congestion on the A133 and frequent hold-ups is a problem not only for Wivenhoe residents but all those who have to use Clingoe Hill and the Greenstead roundabout. Building 2,500 homes feeding on to this route will cause severe problems and it is difficult to see how a potential settlement of up to 9,000 dwellings is feasible. A route connecting the A133 to the A120 could provide some alleviation but might in practice generate additional traffic on Clingoe Hill. This is not specifically included in the proposals in SP8 nor is access off the A120 mentioned. An A120 link is shown on the Tendring map but not on the East Colchester map Section D of SP8 speaks of measures to mitigate the transport impacts and of longer term transport interventions. Without any concrete proposals

this would seem to be an empty promise. We urge the Borough to explain what mitigation measures could be put in place given the physical constraints.'

SUMMARY

The policy of 'rapid transit' as a prime means of reducing the impact of the East garden settlement is unsound, as it is already clear that nothing resembling rapid transit is achievable either physically / affordably.

The policy of P&R in the east is unsound because it is based on a wholly reality-phobic view of what P&R can achieve in Colchester generally.

CHANGE TO PLAN

The term rapid transport needs to be removed - as evidenced in this submission there is no scope for this to be anything other a limited park and ride. Logically therefore the development needs to reduce to the capacity that can be provided by traditional transport streams.

The Knowledge gateway employs circa 120 people and will never provide the scale or kind of jobs a development of this scale will require.

We urge you to read our submission again and take note of the implications of the current transport considerations .

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Appearance at the Examination.

Representation ID: 6277

Document: Section 1 - Publication Draft Local Plan

Section: Policy SP4: Providing for Employment and Retail

Support/Object: Object

It has been extremely difficult to analyse the plan since the garden community forms such a key part in the delivery of the employment and retail space that we require. Since it is based upon the concept of a garden community the plan at first sight appears flexible enough to promise major benefits but the lack of specific detail, identified funding streams or the control mechanisms required to implement the garden community reduces the effectiveness of the plan to a wish list.

The principle driver and focus for the proposed garden community is the need to provide housing. The detailed housing assessment Braintree, Chelmsford, Colchester, Tendring Objectively Assessed Housing Need Study November 2016 update attempts to identify the unknowns that can be projected through known and historical trends. The anticipated additional growth in the region is postulated through the removal of historical constraints to the supply of housing to be removed.

Page 34 outlines London's huge housing need in the South East but then assume a proportionately smaller increase for our area despite historical precedent and the anticipated increased incentive due to increasing price house price differential.

When considering how best to generate more employment and retail opportunity it is important to begin with a true assessment of the assets and advantages of a location.

Colchester Borough is categorised as having "developed a strong economy, linked to its 'central place' functions and to the town's historic character, cultural activities and the university. Major retail and leisure services are also located both within and adjacent to Colchester town".

Colchester's "central place" function has declined significantly over the last 20 years to a position where many sections of the centre struggle to retain viable employment and retail businesses. Over the same period the major developments have taken place and continue to take place at out of town locations with poor public transport necessitating the increased use of private cars.

While the ports of Felixstowe and Harwich are major assets for the U.K.

their development has been restricted relative to our European members by their poor infrastructure links and requirement for improvements to be financed by the ports themselves. While Colchester and Essex University are participants in the Essex Haven Gateway initiative trade passing between the Colchester area and the ports is low, the bulk of the commerce flowing to and from other areas of the UK.

The plan does not specify how the desired outcome of the garden community will be achieved. As stated earlier the prime driver for their creation and their finance would not be central government, as in the creation of the post war new towns, but developers.

No new additional powers or plan based prescriptive designs are envisaged in order to create the new garden community. There are many small scale examples repeated across the borough where within new developments space originally

planned as retail are redeveloped for residential use when anticipated retail clients are not forthcoming at the prices requested.

It is clear that within such a large development which is expected to provide for future employment in addition to housing requires a re-balancing of power between locally elected representatives and developers. Situations such as the development of housing between Cowdray Avenue and the river Colne despite being against the wishes of the elected representatives of Colchester need to be anticipated and incorporated within the plan.

SUMMARY

The prime objective to strengthen and diversify local economies to provide more jobs is not addressed effectively by this plan.

The reliance on the creation of a garden community to generate jobs does not focus on the key drivers that encourage businesses and start-ups to locate in an area but extrapolate job creation on the basis of the number of households and the theoretical composition of a garden community is not a plan for generating employment.

The base assumption of Colchester's assets and position as a port hinterland is incorrect which also detracts from the soundness of the plan.

CHANGE TO PLAN

More employment land needs to be added.

There must be a genuine move to create jobs locally.

A great deal more than 17% needs to be for local needs.

A mechanism to reduce future dwelling numbers based on the ability of the site to create local jobs must be factored in. This should not be building for the sake of it and garden community principles must be upheld.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Appearance at the Examination.

Representation ID: 6279

Document: Section 1 - Publication Draft Local Plan

Section: Policy SP7: Development and Delivery of New Garden Communities in North Essex

Support/Object: Object

With reference to 'Establishment of the North Essex Garden Communities Local Delivery Vehicles and funding requirements' document, it is clear that the financial model for these three developments is unsound. The current delivery mechanism is dangerously ambiguous, unresolved and naive.

Furthermore, of all the three sites the one east of Colchester is by far the greatest financial risk (Tendring borders estimates to make a 1.6% surplus Braintree borders 4.6% and West Braintree 17.2%).

North Essex Garden Communities Limited (NEGCL) are currently unrestricted by any statutory powers or regulations. This means the only scrutiny of the system they will be operating within will come from the Local Plan examination. There currently isn't the depth of detail available to do this effectively. Again with reference to above document, North Essex Garden Communities Limited have allocated 103k per hectare for land acquisition.

If they can't get the land for below this price there are no contingencies in place, therefore the overall scheme viability is at best a gamble that land owners don't get too greedy. Colchester Borough Council (CBC) have stated that 'Surveyors often use a figure of 10X agricultural land value as a notional guide figure'. Working on the basis that an average agricultural land value is 18857 per hectare and using the factor of 10; this would imply it could be brought for 188k per hectare as building land.

Which is higher than the 103k allocated.

The report also acknowledges there is a conflict of Interest - 'between the Council's role as planning authority and its role with respect to the local delivery vehicle.' But it doesn't put a workable plan in place to combat this. No procedures are in place to scrutinize or monitor this. It is totally unsound to have councillors, (with little or no experience of planning a development of this scale), sign off the scheme. Also of great concern is what experience does any of the partners have projects of this nature? The Kerslake Review provides doubt as to whether the correct expertise exists or will be brought in at the right time.

A detailed financial model has been created to assess the costs, income and overall viability of the Tendring Colchester Borders proposal. The modeling has been based upon Option 1 of the AECOM Concept Feasibility work, which delivers circa 6,600 residential units together with employment space, social infrastructure (including 4 new primary schools and 1 new secondary school, health and community facilities), local retail, and generous amounts of open space to accord to Garden City principles. The total site area is circa 300 hectares, located between the A133 to the south, Bromley Road to the north and the A120 to the east.' But when asked what guarantees there are that the infrastructure would be as detailed, CBC have stated that 'There cannot be guarantees at this stage,' and 'what is planned now will not actually be what is delivered in thirty years' time. Circumstances and needs will change and plans will need to be modified over the life time of any new Community.'

The overall borrowing implications for Colchester are high. It does not seem likely that projects with such a delayed pay back and pretty unquantifiable risks would prove attractive to private investors. The schemes imply that Colchester would be in debt for many years to come.

Should the project fail or exceed the wholly inadequate contingency no doubt it will be the public that have to bail the company out, yet they have no real say in what is being proposed. This is a key point for us as we have been hugely under-represented and our concerns continually fall on deaf ears. There is no part of this plan that meets with local favour. This whole process is undemocratic and the lack of transparency from the Masterplan group is of deep concern. This consultation is a case in point as it is far too complex for the majority of the public to engage with. The report mentions inflation but seems to think this would help the financial situation as it could imply higher prices for sale of the land as it is developed but inflation can also mean interest rate rises.

Additional areas of concern of this policy include: - Part (iii) where it states that environments will 'promote health, happiness and well-being.'

With densities of 100 per hectare being proposed by David Lock Associates, with no private amenity space available, this is hard to believe.

(iv) describes 'Sequencing of development' but gives no detail to the timing of the delivery of infrastructure or what is meant in terms of off-site provision. Where do people go to school and visit the doctors before these elements arrive on site? Or are these potential areas that will be pushed off site so the surrounding area will take the burden?

Without a definitive statement the policy cannot be judged either sound or unsound, just incomplete.

(ix) alludes to 'parking approaches and standards', but does not even a guarantee national minimum parking standards will be met.

(xi) talks of building standards, making claims about using the 'highest standards of energy efficiency'. This is totally unbelievable when you look at the low standards CBC set for their own social housing. By the time a developer is involved in the mix and planning law can do nothing to make demands of the design, it will be back to the basics of building standards and not even a nod to current technology.

(vii) is concerned with promoting Sustainable Transport and Changing Behaviour many years now CBC has pushed through massive housing developments on the basis that they were acceptable because of the 'policy'

that the extra traffic generated would be minimised by the new residents being encouraged by travel plans to make a far greater % of journeys by foot / bicycle / bus than the existing Colchester population. This being a total fantasy, it is not surprising that CBC have shown little interest in post-occupation surveys to see what really happens! Observation suggests that these new estates are actually occupied by people who live far more car-dependent lives than the established population. Most of them will not travel by other means themselves (the only significant developer-funded bus service that ever actually materialised, serving the Garrison developments and New Braiswick Park, ran every 20 minutes for a long period with low usage and could not be taken over commercially at the expiry of the s.106 money). And secondly, they make every effort to ensure that their fellow residents cannot use buses either (the service on the pre-identified bus route through the last portion of Highwoods, Gavin Way, was stopped by resident obstruction, and the residents of the new housing west of the NAR, who are happy to endure all-day car

traffic noise, successfully opposed the provision of bus stops to serve their own housing area on the NAR busway (should that ever materialise).

If surveys were done, they would most likely show an absence of older (over-50) people and a predominance of 'family' people aged 25-50 who have lives especially dependent on the daily use of multiple scattered peripheral facilities (e.g. driving to work via schools). This postulation on the age distribution of new-development residents is in fact confirmed, for each of the garden developments, by the 'population pyramids' in the recently-published Employment & Demographic Studies, which show a massive predominance of children and 25-44 year olds in the 2031 population, not altering to a normal age distribution until several decades later. The very people whose lifestyle might be more amenable to public transport use will, by the councils' own admission, simply not be living here.

For many years also CBC has been promoting 'travel plans' for large employers, similar to those for new developments. There is no published evidence to show that these business travel plans, either, have ever actually achieved anything of substance to switch people from car use to 'sustainable' modes.

Thanks to local authority 'planning', a large % of jobs (previously in inner urban areas close to the workers' housing) are now in peripheral locations like the massively-traffic-generating Severalls Park where any journey by public transport is likely to take 2-3 times as long as by car (with most having to use two buses), and it is scarcely realistic to expect changed habits in such circumstances.

** Note that CBC themselves enthuse (6.27) about the fact that the Northern Gateway land is especially suitable for employment use because it is next to the A12 (i.e. easily accessible by car but poorly by public transport).

And similarly re the north side of the East garden development being ideal for employers because it is next to the A120.

Again, whilst CBC in principle has a policy that retail and leisure facilities should be located in town centres (the only place with good access for all), and that car-dependent developments should not be accepted, they completely lose their morals on this as soon as they have the opportunity to get money for themselves from developments on peripheral lands that CBC owns! This has recently been most blatantly demonstrated by the 2,000-seat Northern Gateway cinema scheme, drawn up quite openly (in full collaboration with CBC) on the assumptions that nobody would travel to it by public transport, and that generating extra car mileage would be an achievement because it was 'bringing business to Colchester'.

Even if 'rapid transit' did materialise, a large proportion of work etc destinations would not be accessible by it.

The whole psychology of most North Essex people is in any case to assume that public transport = going by train to London, and all other travel = car. This has not been altered by years of pious local authority waffling and is never likely to be (only major increase in perceived car journey costs could alter it). The North Essex male is especially in-extractable from his car; the P&R has a 2/3rds female usage, and only 3 out of the 114 users questioned in the C-BUS survey were males under 60 who had previously driven into Colchester.

The massive spending on extra road capacity proposed in the Local Plan will of course only further encourage people to live car-dependent lifestyles.

There already is one garden community in North Essex, Great Notley, built in the late 1990s on the same basis of local facilities being provided on-site to reduce car travel. This has been a success in the sense that people like living there, but the % of journeys made by car is no different from the local average! - and the half-hourly

bus service provided from the start has recently been withdrawn leaving only a minimal ECC-supported service, making this a highly risky place for anyone without a car to settle in.

Unless CBC can produce evidence that work and estate travel plans, 'changing attitudes' policies, etc, have ever actually achieved anything of substance, and are likely to achieve anything in the garden settlements given the age profile situation and other factors discussed above, the whole of this content in the Local Plan should be rejected as unsound through non-feasibility.

Finally at the end of the policy the 'Memorandum of Understanding' between the councils is mentioned. This has to be the real juncture for deciding if the proposition is sound or unsound. When the speculation and wishful thinking is over and the real detail of what can or can't be achieved is set into a legally binding policy.

The general theme of the draft plan is a wish list without substance. Add to this, that so far all community engagement has merely been an expensive tick box exercise, it is hard to believe any of the unsubstantiated claims will come to fruition. To date all significant recommendations made by local stakeholders have been ignored by David Lock Associates. CBC are also suitably vague about where their brief came from or what changes are being made to bring their proposals inline with stakeholder feedback.

Also Wivenhoe Town Council support and agree with the statement by Wivenhoe Society below.

'The North Essex Garden Communities Peer Review (Appendix A) contains the following statements "The proposed garden communities in North Essex will add over 80,000 to the existing population- that is equivalent to the City of Bath. The narrative should explain how this increase will be successfully integrated with existing places". Particular queries raised are

- (i) "Why is major housing growth being considered in North Essex"
- (ii) "Why have the three sites been chosen?"
- (iii) "Can growth help tackle the area's challenges such as coastal deprivation".

The Plan does not adequately address question (i) posed in the Peer Review.

Focussing on the Tendring/Colchester settlement and the Colchester/Braintree proposal both of which are effectively extensions to Colchester the potential number of new dwellings post 2032 is between

17,000 and 28,000. Assuming these were built over a 15 year period this gives between 1133 and 1867 dwellings per year assuming zero development elsewhere.

No evidence is provided that there will be a housing need on this scale in the future in the Colchester area. The DCLG household projections for England (July 2016, <https://www.gov.uk/government/statistical-data.../live-tables-on-household-projections>) only go up to 2039 and are in case trend projections. House prices are one possible indicator of potential housing demand and Colchester house prices are below the national average.

In respect of query (ii) there is little evidence that alternative sites were considered.

In respect of query (iii) the choice of the site on the Colchester/ Tendring border will do little to boost growth in the more deprived parts of Tendring. Residents will look to Colchester for their services. This is evidenced by the fact that all the discussions on rapid transport focus on links to Colchester and not to Clacton.

There is no discussion as to whether it is sensible to progress all three proposed garden settlements simultaneously. For the two predominantly Colchester sites a

more sensible strategy might be to develop just one of them at a faster rate and put the other on hold. There will be problems in the initial stages of development that the communities would be too small to support an adequate range of services - schools, recreational facilities and viable public transport. With a faster build rate a community could become more self-sufficient sooner. Consideration should be given to phasing them, possibly starting with the one that performs best in viability and sustainability terms.'

SUMMARY

With reference to the 'North Essex Garden Communities LDV and funding requirements

1 -The contingency is ludicrously too low at 5% for this kind of project.

This leads to speculation (also made within the Kerslake Review) that those planning it are unqualified to do so and are being wildly over ambitious.

2 - Allowances for infrastructure are too low

3 - There is no evidence that a sound financial risk assessment has been completed
As for transport; the policy of 'promoting more sustainable travel patterns' is unsound because there is no evidence it will work.

CHANGE TO PLAN

The financial aspects, with particular reference to the inconceivably low contingency must be addressed.

The assumptions must be removed before any element of this plan can genuinely be considered feasible.

Car ownership will not diminish and behaviour change is exceptionally unlikely with zero evidence base that this is a true possibility. The plan needs to shift focus from the implausible to the practical and account for the real transport issues created by private car ownership.

We do not see the evidence that this level of housing growth is justified in North Essex and the volume of dwellings proposed (9,000 up to 2048) needs to be significantly reduced.

Local stakeholders must have a real say in shaping this plan as we have been completely sidestepped. To this end land around Wivenhoe to the South of the A133 needs to be placed into a Trust or comparable locally orientated vessel to prevent coalescence.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Appearance at the Examination.

Representation ID: 6366

Document: Section 1 - Publication Draft Local Plan

Section: Policy SP6: Place Shaping Principles

Support/Object: Object

We object strongly to this aspect of the plan as this modern dormitory fails on each of the following accounts. We have taken each point in turn to allow for ease of context.

Respond positively to local character and context to preserve and enhance the quality of existing communities and their environs; Building 9,000 dwellings across 4 villages does not - at any imaginable level - respond to local character. If the aim of this plan is to preserve the quality of local communities then the simple option is not to build at this scale. Our "environs" are of a rural aspect which will be devastated by this plan. In addition, it is this kind of empty rhetoric and complete lack of understanding of existing communities that causes so much ire. This plan is in no way interested in existing local communities or local environs and bland statements such as this are disingenuous, discourteous and demonstrate the absence of community involvement. This statement needs to be removed from this plan as it is falsehood.

Provide buildings that exhibit individual architectural quality within well-considered public and private realms; We cannot comment on this as this information is not publicly available. We will take this opportunity to stress the importance of minimum room sizes, adequate parking and gardens. Fundamentally there must be provision of homes of a scale that is fit for purpose. We would dearly wish to see an aspirational community with homes that people would seek to live in and this would form a strong element of our engagement should it ever be sought.

Protect and enhance assets of historical or natural value; This should be amended to allow for other values such as the provision of (Grade A) agricultural land and the protection of existing communities.

Create well-connected places that prioritise the needs of pedestrians, cyclists and public transport services above use of the private car; as anything else will NOT work.

Where possible, provide a mix of land uses, services and densities with well-defined public and private spaces to create sustainable well-designed neighbourhoods; Mixed land uses should include agricultural, leisure, cemeteries, allotments and business provision beyond the small and clearly inadequate amount proposed. Density should not exceed 60 units per hectare. In addition, the higher density areas should be built to the north of the site and away from existing communities.

Enhance the public realm through additional landscaping, street furniture and other distinctive features that help to create a sense of place; We cannot comment on this as this information is not publicly available. We will take this opportunity to stress the importance of creating a unique separate place able to function independently without suffocating the limited resources off the already stretched to breaking point local infrastructure assets.

Provide streets and spaces that are overlooked and active and promote inclusive access; We cannot comment on this as this information is not publicly available.

Include parking facilities that are well integrated as part of the overall design and are adaptable if levels of private car ownership fall; There should be sufficient space left to mitigate for the much more realistic outcome that private car ownership will increase. This plan must exhibit a degree of 'common-sense' or else it will fail to be accepted by local communities. It will also fail its future residents.

Provide an integrated network of multi-functional public open space and green and blue infrastructure that connects with existing green infrastructure where possible; We would wish to see greater detail before we can comment on this.

Include measures to promote environmental sustainability including addressing energy and water efficiency, and provision of appropriate wastewater and flood mitigation measures; and There are known issues with the current sewage system that is already operating above capacity. These issues must be addressed before any development commences.

Protect the amenity of existing and future residents and users with regard to noise, vibration, smell, loss of light and overlooking.

This is very important and we would welcome the opportunity to engage in a meaningful manner with the masterplan process to ensure that protecting the amenity of existing communities is a real priority for the local plan - currently it is not.

SUMMARY

Building 9,000 dwellings across 4 villages does not - at any imaginable level - respond to local character Density should not exceed 60 units per hectare There should be sufficient space left to mitigate for the much more realistic outcome that private car ownership will increase. This plan must exhibit a degree of 'common-sense' or else it will fail to be accepted by local communities. It will also fail its future residents.

Minimum standards on size for dwellings.

CHANGE TO PLAN

There should be sufficient space left to mitigate for the much more realistic outcome that private car ownership will increase.

If the aim of this plan is to preserve the quality of local communities then the simple option is not to build at this scale.

Land around Wivenhoe to the South of the A133 needs to be placed into a Trust or comparable locally orientated vessel to prevent coalescence.

The importance of minimum room sizes, adequate parking and gardens dictates that there must be agreed standards before this plan is approved.

Not all agricultural land on the site should be lost.

the priority should be given to the private car as anything else will NOT work.

Density should not exceed 60 units per hectare. In addition, the higher density areas should be built to the north of the site and away from existing communities.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Appearance at the Examination.

Representation ID: 6278

Document: Section 1 - Publication Draft Local Plan

Section: Policy SP5: Infrastructure and Connectivity

Support/Object: Object

The infrastructure and connectivity plan is not sound since it is based upon the assumption that there are existing connectivity and geographic strengths that can be built upon.

In fact, there are geographical difficulties and historic underinvestment in regional infrastructure that need to be overcome before our area can compete for infrastructure and connectivity development with locations more favourably located and closer to the national network that have received long term investment.

In the time that a vehicle can travel from a typical north London suburb Enfield, to Coventry a major network hub; a vehicle from Colchester would reach Cambridge, still remote from the major hubs. Our position at a coastal location on the east far away from the major city to city connections has been a factor in the lack of investment in our principal connections; Great Eastern Main Line (GEML), A12 and A120. While investment in these assets is identified as a pre-requirement for the plan no mechanism is identified to explain why the required investment, denied for so long, will be forthcoming now.

The proposed investment in infrastructure which envisages people using alternate modes of transport in place of their cars does not address the difficulty in encouraging people to use the alternatives.

Colchester's eastern approaches are particularly problematic. Restricted river crossings and high-volume traffic contending with traffic approaching from multiple feeder roads daily cause half hour tailbacks on the A133 Clingoe Hill. This major problem road is included in the plan only in generic detail despite its significant impact on our communities and its immediate proximity to the proposed eastern garden community site.

Colchester's population is particularly dependent upon their vehicles. A 2014 study showed Colchester to be 28th out of the 29 locations studied.

While Colchester's cycling score was improving and is likely to increase further since the survey car it is still only a small factor in overcoming the problem.

"Colchester ranked lowest for accessibility and planning. Out of all the cities, residents in Colchester are least likely to be able to get to primary school, work or the town centre by walking or public transport.

Whilst the historic centre is densely packed and walkable, more recent development has been spread more sparsely around the edges of the city, meaning longer journey times. Although residents are relatively satisfied with their railway station and should find bus passes affordable, they have the least frequent bus service to a local GP. Just over one per cent of people in Colchester commute by bike at least five times a week, which is in the top half of the rankings, but for example only a tenth of the number who commute by bike in Cambridge".

http://www.bettertransport.org.uk/sites/default/files/pdfs/Car_Dep_Scorecard_2014_LOW_RES.pdf

The car dependency of our existing communities will not be addressed by the introduction of garden communities although their design will lessen the impact of the proposed additional population adding to the existing problem. In the future the provision of broadband services will be as important as good transport connections. The report highlights the importance of this critical element to our future economy and contemplates:

"Where provision is possible broadband must be installed on an open access basis and which will need to be directly accessed from the nearest British Telecom exchange and threaded through resistant tubing to enable easy access to the fibre optic cable for future repair, replacement or upgrading".

The plan sufficient provisions of this type along with the mechanisms that will be employed to ensure that the base infrastructure is provided as communities grow. Without a method for managing free market forces within a planned development the implementation will soon drift from the originally intended plan.

Unfortunately, general statements such as "Developers are encouraged to engage with broadband providers" provides insight into how the project is planned to be managed and directed.

The plan calls for a major change in modes and routes of travel, Sustainable Travel & Major New Developments 6.21 and 6.22. No incentives or other motivation are envisaged to encourage people to change to the new arrangement. The plan appears to be based upon the assertion that build it and behaviour will change. This is not borne out at the moment since despite ongoing major traffic congestion within Colchester; the new park and ride infrastructure is not being embraced, people preferring to continue to sit in their queues of traffic.

Many cyclists and country walkers in our community will be encouraged to see that walking and other non-car modes of transport being encouraged.

Garden Communities 6.26 "Connectivity will be improved across barriers such as rail lines and major roads to bring together communities"

This is in stark contrast with the existing situation as Network Rail are currently engaged in consultation to close the majority of pedestrian footpath level crossings in East Anglia on safety grounds. The government policy even being applied to branch lines where locomotives travel far slower so the risk of crossing a track being equivalent to crossing a 60 mph road where there is only one car every 30 minutes. The Infrastructure and Connectivity plan lacks details of any practical elements that would be adopted to demonstrate how such major a change in the way we live and work can be achieved on the garden communities designed to rejuvenate our location while the same elements and political conditions that are restricting the development of established proven working communities remain in place.

SUMMARY

The Infrastructure and Connectivity plan describes the positive objectives that are sought but is not sound in the methodology set out to achieve those aims. While the planned infrastructure and connectivity of the garden communities are highlighted the plan does not identify how these new communities will attract the scale of investment required to upgrade the regional inter-urban and intra-urban links such communities would require.

Our particularly awkward geographical location is portrayed as a strength while the plan does not address the very real intra-urban connectivity problems. These points also apply to our submissions made UNDER SP7 and SP8

CHANGE TO PLAN

Major infrastructure improvements must occur before this plan is approved. The volume of dwellings exceeds the provision of infrastructure and it is imperative that it significantly reduces.

The A133 is included in the plan only in generic detail despite its significant impact on our communities and the new town must be designed in such a way that traffic enters the fabled A120 link\Bromley Rd route into Colchester and cause no additional burden to the A133 which currently operates in excess of capacity. Cycling is NOT the answer for 25,000 people and must carry significantly less weighting in transport provision.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Appearance at the Examination.

Representation ID: 6276
Document: Section 1 - Publication Draft Local Plan
Section: Policy SP3: Meeting Housing Needs
Support/Object: Object

Wivenhoe Town Council support and agree with the statement by Wivenhoe Society below.

'The National Planning Policy Framework aims to promote sustainable growth.

It requires Local Planning Authorities to provide an Objectively Assessed Housing Needs analysis. Unfortunately it gives no guidance on how needs should be assessed - whether these are local needs, regional needs or national needs. The Department of Communities and Local Government provides guidance entitled "Housing and Economic Development Needs Assessment"

<https://www.local.gov.uk/sites/default/files/documents/objectively-assessed-need-9fb.pdf>

The Guidance takes as its starting point trend projections based on ONS statistics. The effect of this is that it is assumed that if there has been a historically high rate of growth in a particular area then the area must continue to grow at a high rate. There is guidance on what adjustments might be made but these are mainly expressed in "uplifts" to trends rather than downward adjustments. The only suggestion for a possible downward adjustment is where there have been effects of large employer moving out of the area or a large housing development such as an urban extension in the last 5 years. Housing market signals are also considered relevant but this is phrased in terms of upward adjustments to trend projections.

The Guidance nowhere makes reference to the other strand in the NPPF that growth should be sustainable. The proposed housing numbers put forward in this policy assume that the trend projections must be fulfilled and take no account of sustainability.

The comments here relate primarily to the dwelling numbers for Colchester Borough but also look at Tendring District.

The Objectively Assessed Housing Need Study (OAHNS November 2016 update) used the methodology in the guidelines but has made no adjustment for the fact that Colchester, principally because of recent availability and deliverability of sites, has grown at above the national and the regional average. DCLG guidance allows for adjustments to be made if there has been a large housing development such as an urban extension in the last 5 years.

In the case of Colchester this has not been one single large development but a combination of a number of sites coming forward.

The total proposed for Colchester is 920 dwellings a year. However an additional 1,250 are also being proposed for Tendring in the East Colchester/West Tendring Garden Settlement over the plan period. This site would, in all practical, respects be an extension to Colchester urban settlement which would imply an average build rate of around 1,000 dwellings p.a. for Colchester over the lifecycle of 2 plans.

The 2014-based Household Projections: England, 2014-2039 (July 2016) project a 19% increase in the number of households by 2034 for England as a whole. If this rate of increase were applied to Colchester (assuming one dwelling per household) this would give a build rate per annum of 731 (790 correcting for an occupancy rate of 0.9264) which is considerably lower than 920.

House Prices in Colchester are below the national average. The OAHNS states that for Colchester "price signals provide no evidence of under supply: despite being on the main railway from London Colchester is one of the most affordable areas in the HMA and also in Essex. There is no justification in Colchester for applying a market signals uplift to the demographic projection. The possibility of downward adjustment does not seem to have been considered There are good reasons for arguing that a downward adjustment should be applied to the trend projections. It is not feasible for an area to continue to grow at a rate well above the national average indefinitely.

House prices in Colchester are below the national average and the Borough has now exhausted, or already allocated, its brown field sites so much of the proposed additional housing will have to be on green field sites.

There are transport infrastructure issues. There is already considerable road congestion and journey times are highly unpredictable. Some areas of central Colchester have air pollution problems. In Urban Colchester the road network still reflects its Roman and medieval past. Even with unlimited expenditure on road improvements it is difficult to see that some of the problems are soluble. The following is a quote from the NPPF:

"Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life ". One of the bullet points is "improving the conditions in which people live, work, travel and take Leisure".

Various analyses of housing need are presented in the OAHNS and different estimates produced particularly with regards to employment effects and whether this should lead to upward revision in housing need. The authors of the report seem to have adopted a pick and mix policy on which projection they use, picking the higher of the markets adjusted uplift and the future jobs uplift on the grounds that this gives a higher housing need.

For Colchester we would argue that it is appropriate for housing need should be calculated on the 2014 ONS/CLG projections but with a down shift to reflect housing market signals and on the grounds that the projections are based on past trends in a period in which a large number of sites became available for development. Given the mixed findings of the

different studies the evidence for a future job uplift is doubtful. The sustainability, in terms of quality of life for existing and future residents of the proposed building rates, should also be factored in as sustainability is one of the key themes of the NPPF.

An omission in the analysis of housing needs for Colchester and to some extent Tendring is that there is no analysis of the impact on housing demand generated by University of Essex and, to some extent, Colchester Institute students.

The proposed housing needs total for Tendring is not well justified in the OAHNS. The situation is complicated by the inconsistencies between census and other measures of population growth (UPC). The assumed rates of net inward migration cannot therefore be based on any firm evidence. House prices are low and have not risen faster than the regional rate despite the very low level of house building in recent years. If there were a strong demand for housing in the area a price rise would have been expected.

Unemployment is high in the area. It is difficult to see why a market signals uplift from the best guess 484 dwellings to a total of 550 is suggested. '

SUMMARY

Colchester should not be a victim of its trend for over-development.
Provision must be made for downward adjustment in housing numbers.
This scale of growth is unsustainable without a radical re-think of the volume of land to be used for employment.
There is no justification in Colchester for applying a market signals uplift to the demographic projection.
Unemployment is already high in the area.

CHANGE TO PLAN

The Housing Assessment should account for the exponential growth seen in Colchester in recent years and reflect a more gradual level of growth.
It is difficult to see why a market signals uplift from the best guess 484 dwellings to a total of 550 is suggested. '
This scale of growth is unsustainable without a radical re-think of the volume of land to be used for employment.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Appearance at the Examination.