

Objector Name: John Macrae

PP9: North East Colchester.

Site IDs: 10616, 10616a and 10616b.

Consultation Point: Soundness of the Local Plan

Objection Summary: The Plan is Unsound

I am writing to formally object to the proposed allocation of the site referenced above. I consider the Local Plan to be **UNSOUND** on the grounds that it is **Not Justified, Not Effective, and Inconsistent with National Policy**.

The allocation fails to acknowledge critical evidence within the Council's own technical library, specifically regarding coalescence, landscape value, and infrastructure deliverability.

1. NOT JUSTIFIED: Contradiction of the Evidence Base (Coalescence)

To be "**Justified**," the plan must be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence. This allocation fails this test:

- **The "Red Risk" Warning:** The Council's own *Strategic Land Availability Assessment (SLAA) Stage 2* report identifies this site as a "**Red Risk for coalescence**," stating explicitly that development here would make a "**significant contribution to coalescence**."
- **Cumulative Impact:** With the imminent delivery of the Garden Community, this site acts as the final strategic gap. Developing it extends the built form up to the City Council boundary, resulting in the merging of settlements.
- **Conclusion:** It is logically inconsistent to allocate a site that the technical evidence base has flagged as a fundamental risk. The proposal ignores the "Red Risk" warning, promoting urban sprawl and the permanent loss of separation between settlements.

2. INCONSISTENT WITH NATIONAL POLICY: Landscape & Heritage

The proposal conflicts with the NPPF regarding the protection of the natural environment and "valued landscapes" (NPPF para 187a).

- **Valued Landscape Status:** The site is part of a landscape with a long history of recognition:
 - **1985:** Designated a *Special Landscape Area* (ECC) and *Countryside Conservation Area* (CBC).
 - **2005:** Salary Brook Valley recorded as 'High Value' and recommended as an *Area of Landscape Conservation Importance*.
 - **2024:** LUC Landscape Character Assessment identifies the Ardleigh River Valley as having **high landscape value**.
- **Harm to Character:** Development would destroy the surviving historic field patterns, including pre-18th-century irregular fields and remnant enclosed meadow pasture.

- **Agricultural Land:** The SLAA incorrectly classifies the land as Grade 3b. It is, in fact, Grade 2 and 3—**Best and Most Versatile (BMV) agricultural land**. Its loss is a significant material consideration that has not been justified against the availability of lower-grade land.

3. INCONSISTENT WITH NATIONAL POLICY: Brownfield First

The allocation contradicts the core NPPF principle of prioritizing brownfield land before releasing Green Belt or Countryside land.

- **Available Alternatives:** The SLAA Stage 2 report discounted several brownfield sites (IDs: 10946, 10947, 10963, 10973, 10975, 11008).
- **Countryside Intrusion:** The site is currently outside the settlement boundary. There is no justification for expanding the boundary into the countryside when valid brownfield alternatives have been discarded.

4. NOT EFFECTIVE: Deliverability and Land Ownership

To be "Effective," a plan must be deliverable over the plan period. This allocation fails the deliverability test due to severe land ownership constraints.

- **Ransom Strips & Access:** Essential access to the north and south of the railway line relies on land owned by 7–8 different parties, including private homeowners.
- **Lack of Consent:** None of this access land was included in the "Call for Sites," and to our knowledge, no landowners have agreed to sell. Without these parcels, the site is inaccessible.
- **Conclusion:** The site fails the "Availability" criteria. Allocating land that cannot be legally accessed renders the plan ineffective.

5. NOT EFFECTIVE: Infrastructure Failure

The *Stage 3 Infrastructure Audit and Delivery Plan* reveals a funding gap of **£811m**, casting doubt on the delivery of essential services.

- **Healthcare:** NHS England confirmed as early as 2017 that Parsons Heath Medical Centre has no capacity. As of Dec 2023, *all* medical practices in Colchester are operating above capacity.
- **Highways:**
 - The cancellation of the A12 improvement scheme (J19-25) fundamentally alters the traffic assumptions for the area.
 - Access relies on a single track onto a fast, unsighted section of Bromley Road.
 - Traffic congestion in the area can be severe, especially when the A12 closes due to works or accidents. On a daily basis, I see numerous near accidents on local roads due to traffic density and speed. Some of the junctions e.g. St John's Road/ Harwich Road mini roundabout are incapable of taking much more traffic safely. I would happily walk to town but the current level of noise pollution caused by traffic makes this an unpleasant experience already. To add even more traffic would destroy the amenity completely – yet we are encouraged to

walk rather than take the car. Thus the proposed development is inconsistent with amenity and health goals of local residents especially when the plan intends to remove the alternative of walking the land to the north and east of Welshwood Park. Where will we go?

- The "Monitor and Manage" approach proposed by National Highways is reactive and insufficient for a development of this scale on an already failing network. Other countries are noted for their habit of building the infrastructure before the housing thus achieving growth without straining existing infrastructure to the limit as we do in the UK.

- **Utilities:**

- **Electricity:** Marks Tey/Parsons Heath face a demand deficit by 2041. There are no funded UKPN projects to address the £50.95m capacity upgrade required.
- **Water:** The region faces a supply deficit by 2025. The suggested target of 80 l/p/d per person is unrealistic and relies on behavioural changes that cannot be guaranteed by planning policy.

6. ENVIRONMENTAL IMPACT: Biodiversity & Amenity

- **Harm to Designated Sites:** The site abuts Ancient Woodland (Welsh Wood, Home Wood) and Local Wildlife Sites. Even with a 15m buffer, the pressure from recreational use (desire lines, soil compaction, dog walking) will degrade these irreplaceable habitats.
- **Protected Species:** The site supports Sky Larks, Slow Worms, Grass Snakes, and potential Great Crested Newts. The *Habitat Regulation Assessment* notes significant effects including damage to functionally linked land.
- **Loss of Amenity:** This area provides essential green space for residents.
 - I have already mentioned the loss of amenity due to noise, traffic speed and density that makes walking to town or local shops unpleasant. If we are to have sustainable, pleasant communities, planning for people, not just homes, is imperative. Current growth has isolated me from going to town as is now unpleasant – the proposed plan removes the only other place to go for exercise, the Welsh Wood and the fields to the east of Welshwood Park. When I look at the map of Colchester, I see modern planning has created and allowed for large areas of green space in almost every area except this one. I have to ask why the importance of amenity is being ignored in the proposed plan.

Conclusion and Request

The proposed allocation is **unsound**. It ignores the "Red Risk" regarding coalescence, relies on unavailable land for access, and lacks the funded infrastructure to support it. It risks isolating some members of the community by the removal of green spaces and increasing traffic.

I respectfully request that the Inspector removes this allocation from the Local Plan.