

## **Colchester Borough Council Local Plan Preferred Options Consultation July 2016 – Representation Submitted by Suzanne Whitworth, 36 Oxley Parker Drive, Colchester**

I have reviewed the Local Plan Preferred Options Consultation document and ‘**OBJECT**’ in principle to the planning and sports/ recreational strategy for North Colchester.

In particular, I object to the following components of the strategy which are not considered to be positively prepared, justified, effective or consistent with national policy;

- 1) The proposed housing & POS allocations at the Mill Road Sports Ground;
- 2) The omission to utilise receipts from proposed employment uses at Mill Road Sports Ground (& elsewhere within NGSEA Zone 1), to fund any relocation of the Rugby Club;
- 3) The proposed policy & recreational/ financial justification associated with the limited range of sports activities identified within NGSEA Zone 3;

In summary, the case for the loss/ redevelopment of Mill Road Sports Ground for alternative (housing, employment and open space) uses remains ‘unproven’, as there is a continuing need to retain a significant part of the area for sports/ recreational purposes as evidenced below. The Council is therefore requested to **AMEND** the text, policy and inset map for the North Colchester area, to retain an appropriate area of land for continued use for sport/ recreational purposes as follows, i.e. for use/ further development by;

- ❖ The Colchester Cavaliers Cricket Club;
- ❖ The Colchester Gladiators American Football Club;
- ❖ The Eastern Rhinos Rugby League Club; and
- ❖ The Colchester Archery & Icen Dog Training Clubs, if suitable provision is not made north of the A12;

In short, adequate quantitative and qualitative provision for loss of the existing sports facilities/ infrastructure is not made within the Zone 3 strategic sports area.

An indicative amended North Colchester Policies NC1, NC2 & NC3 inset map is annexed to this representation.

**Northern Gateway Policy Area (NGPA)**

**The Proposals Do Not Meet Objectively Assessed Need**

Objection is made on the basis that important aspects of the NGPA are not supported by an objectively assessed evidence of need, and therefore do not represent the most appropriate strategy when considered against the reasonable alternatives – they are therefore unjustified and unsound.

As a result, the proposals are considered to harm the sport, recreational, community, social and environmental interests and character of the local area, and warrant amendment to ensure that all these needs and environmental interests are fully met and appropriately safeguarded by the future development strategy for the Northern Gateway Area.

### **There is no Financial Case for 100% Redevelopment of Mill Road Sports Ground**

It is evident that all the Borough Council's land at Axial Way lies within the Northern Gateway policy area.

If the relocation of the Rugby Club is seen as a key part of the Gateway Strategy then financial receipts secured from the disposal of the western part of the Mill Road Sports Ground (identified in yellow on the inset map for employment uses) and owned by the Borough Council (and other land at Axial Way in CBC ownership as necessary) can be used to facilitate the provision of expanded and upgraded facilities for this sports club.

This approach would obviate the need to lose the existing investment made by the Borough Council in an established, accessible and fit for purpose strategic sports facility, which is required to be retained to meet the reasonable needs of existing users as outlined below.

As a strategy it is not therefore the most appropriate option or the most financially cost effective (or financially justified) as there is a better and more appropriate alternative which has more sport, community, environmental and policy merit, and continues to meet the needs of existing sports clubs which are not catered for in the draft Local Plan.

### **The Sports & Recreation Proposals – An Inappropriate & Inequitable Strategy**

Whilst the Borough Council have devised a sports strategy which fully meets the interests (and aspirations) of Colchester Rugby Football Club (CRFC) who would clearly be the beneficiary of the plan making process and enhanced Borough Council funding (£5 million+), the majority of the other sports clubs and recreational organisations have largely been ignored and their interests remain unmet, as summarised below;

#### **Colchester Cavaliers Cricket Club**

I understand that the 'Cavaliers' have been based at Mill Road since the early 1980's and play in the 'Two Counties' and 'North Essex' Cricket Leagues running two weekend and one mid-week evening league sides.

The Cavaliers are known to be a friendly and inclusive local club who are always looking to increase their playing and social membership. They utilise two pitches at Mill Road throughout the season (April – September) where the standard of the 'squares' play to a good standard.

The Cavaliers funded their own Pavilion in 2010, and use the CRFC clubhouse for changing room, toilet and shower facilities and for spectating from the balcony which provides a good viewing point for both pitches.

It is common knowledge locally that the Cavaliers make full use of the Mill Road site where they wish to remain. The only logistical factor they encounter through 'co location' with the rugby club is a constraint on the fixture programming as the cricket and rugby seasons overlap in April and September, and there is insufficient space for both activities to take place concurrently.

In the event that CRFC relocate to a site north of the A12, an important opportunity would present itself for the Cavaliers to become further established at (and make greater use) of the site. Increased use could also be made of the existing clubhouse facilities, including the bar and club rooms which are currently only utilised by CRFC.

With full access to the clubhouse facilities along with unconstrained use of two home pitches, the Cavaliers would be presented with an excellent opportunity to expand its membership and generally flourish as a local and accessible community based cricket club.

By utilising the Borough Council (and Cavaliers) existing investment in sports infrastructure and facilities (including parking) at Mill Road and supporting the cricket offer, this would represent a more appropriate and cost effective sports strategy than currently being consulted on, which prescribes the cessation of all sports activities, loss of the site as a sports resource and its arbitrary redevelopment for employment, housing and open space.

Whilst the Cavaliers do not have such an extensive requirement for new facilities as CRFC, some modest investment in new facilities over time would be desirable, such as new sight screens and a score box, and in the longer term perhaps cricket nets adjoining the far side of the clubhouse, and a synthetic track which could be used by the local schools as well.

### **Colchester Gladiators American Football & Cricket**

The Gladiators have been established since the early 1980's and play in the National League, winning the accolade of 'National League Champions' in 2013. They run a senior, junior and youth sides, although only the senior side currently play at Mill Road due to the lack of pitch capacity.

The Gladiators also have a cricket team but currently have no home ground to call their own.

In a similar vein to the Cavaliers, in the event that CRFC relocate to a site north of the A12, an opportunity would present itself for the Gladiators to base the entire playing and social club (including cricket team) at Mill Road.

With 'fit for purpose' and locally accessible playing facilities, clubhouse and parking all available, the Gladiators would be able to become established at the site, and share use (and running costs) of the existing clubhouse facilities, including the bar and club rooms with the Cavaliers.

The two cricket tracks at Mill Road could also be shared by all the cricketers who may even merge into an enlarged social and playing club.

By utilising the Borough Council's existing investment in sports infrastructure and facilities (including parking) at Mill Road and supporting the American Football and cricket offer, this would represent a more appropriate and cost effective sports strategy than currently being consulted on, which prescribes the cessation of all sports activities, loss of the site as a sports resource and its arbitrary redevelopment for housing.

It is understood that the Gladiators have developed an outline business case for use/management of the Mill Road Clubhouse, which envisages a viable approach for its continued operation.

### **Eastern Rhinos Rugby League**

The Eastern Rhinos first established in 1992 and play in the Southern Premier Division of the Rugby League Conference. They run two senior teams, three junior teams and a ladies team, and are based at Mill Road.

In a similar vein to the Cavaliers and Gladiators, in the event that CRFC relocate to a site north of the A12, an opportunity would present itself for the Rhinos to become fully established, and further develop, at Mill Road.

With 'fit for purpose' and locally accessible playing facilities, clubhouse and parking all available, the Rhinos would be able to become established at the site, and share use (and running costs) of the existing clubhouse facilities, including the bar and club rooms with the Cavaliers and Gladiators.

By utilising the Borough Council's existing investment in sports infrastructure and facilities (including parking) at Mill Road and supporting the rugby league offer, this would represent a more appropriate and cost effective sports strategy than currently being consulted on, which prescribes the cessation of all sports activities, loss of the site as a sports resource and its arbitrary redevelopment for housing.

### **Colchester & District Archery Club**

The Archery Club first established in 1954 and holds competitive events, including tournaments and teaching courses at its home in Mill Road. The Club has a large and active membership including activities for ladies and gents, junior ladies and junior gents.

It is understood that the Archery Club wish to stay at Mill Road and if the use of the clubhouse was widened beyond CRFC, it could act as a social amenity and community facility for this recreational group.

By utilising the Borough Council's existing investment in sports infrastructure and facilities (including parking) at Mill Road and supporting the archery club, this would represent a more appropriate and cost effective sports strategy than currently being consulted on, which

prescribes the cessation of all sports activities, loss of the site as a sports resource and its arbitrary redevelopment for housing.

### **The Icení Dog Training Club**

The Icení Dog Training club was established in 1976 and is based at Mill Road. It provides advanced, junior and basic training for all types of dog breeds. Single person, joint and family memberships are also available to the whole community at a nominal cost.

The local area is particularly well represented with dog owners and the accessible and friendly recreational pursuits provided by Icení are highly regarded and participated locally.

Icení has an annual 'club day' and utilised the CRFC clubhouse and bar facilities at its 2013 event which was well attended, and wish to remain at Mill Road.

The loss of the Mill Road ground as a recreational resource and its redevelopment for housing is not therefore considered to be an appropriate sports and recreational strategy.

The neglect and recent loss of the Royal London Sports Ground nearby, has already markedly reduced the level of sports pitches and ancillary facilities that are realistically accessible to the local community by foot and cycle. The potential loss of the Mill Road Sports Ground would be an extremely harmful policy option, which does not warrant support in the light of the unmet needs outlined above.

### **Mill Road Site – Its Social & Environmental Contribution as an Asset of Community Value & Visually Important Open Space**

#### **Positive Community Contribution**

In addition to the clear case for its retention and continued investment to meet existing and unmet sport's needs (separate from Rugby Union) the Mill Road Site performs an important function as an asset of community value, as it;

- Furthers the social wellbeing and interests of the local sports and recreational community;
- Promotes social interaction and social relationships between local residents;
- It would continue to do so in the event that CRFC vacated the site, as evidenced above;

In view of this there is no policy justification for the loss and arbitrary redevelopment of the Mill Road Sports Ground for employment, housing and open space uses.

#### **Positive Environmental Contribution**

The Mill Road Site makes a positive contribution to the character of the area as a visually important open space and 'green lung' serving the residential communities in North Colchester.

Its 100% redevelopment for alternative use, would result in irreversible harm to the character, visual amenity and ambience of the Myland area, and loss of a highly accessible and well regarded and used landscaped open space.

In the light of the better and more appropriate alternative strategy option, to utilise development values from land that has been specifically allocated for commercial use at Axial Way (to facilitate the Borough Councils investment plans for the Northern Gateway), it is evident that there is no business case or policy justification for the loss of all the strategic sports facilities at Mill Road and its redevelopment for employment and housing.

### **An Inappropriate Housing Site**

The focus for meeting future housing needs within the Borough should be the reuse of previously developed and underused land, which serves no useful purpose by being retained in its current use or state.

None of these criteria apply to the Mill Road Site which indicates that its use for housing is clearly unjustified, undesirable and inappropriate.

### **Conclusions**

For the reasons outlined above, it is evident that there is no sport, community, social, environmental, housing or financial case for the proposed sports strategy in its current form.

It is not the most appropriate land use and development strategy available, as there is a better alternative which has more sport, community, social, environmental and policy merit – this is based on the retention and continued use of part of the Mill Road Site to meet the reasonable existing and as yet ‘unmet’ future sport and recreational needs of the local community, as summarised above.

For these reasons the proposed strategy is considered to be inconsistent with the;

- National Planning Policy Framework;
- Sport England Policy Guidance;
- Reasonable alternatives to provide for a sound Development Plan;

and policy objectives for the retention and investment (including making the best use of) existing sport, recreation, community, and social facilities. It also conflicts with policy objectives for the preservation and enhancement of valued and finite environmental assets and natural resources.

It is respectfully requested that the Borough Council revise the Colchester Northern Gateway Policy Area Strategy to address the needs based evidence and rationale set out above.

I also understand that the local community are not supportive of the current strategy.

15<sup>th</sup> September 2016



S WHITWORTH  
REPRESENTATION

DOES NOT PROVIDE FOR NEEDS  
ASSOCIATED WITH ALL EXISTING  
SPORTS CLUBS  
AT MILL ROAD  
(ZONE 3)

/// = RETAIN SPORTS USES / PITCHES

USE FINANCIAL RECEIPTS  
TO FUND RELOCATION OF  
RUGBY CLUB  
(ZONE 1)

