



## Part 2 Local Plan for Colchester (Preferred Options 2016)

14 September 2016

Dear Sir or Madam

### Response to Colchester Preferred Options Part 2 2016

CAUSE welcomes the chance to respond to Colchester's Preferred Options Part 2. We will submit a full response to the North Essex Authorities Strategic Part 1 for Local Plans by Colchester's consultation deadline. Our comments are below.

Yours faithfully

Rosie Pearson

Secretary

<b>Colchester Policy</b>	<b>CAUSE comment</b>
3.2 ...Sustainable travel for the future will require the development of sustainable land use patterns that maximise accessibility between jobs, homes, services and facilities	CAUSE agrees that this is necessary. Housing must be located in the right place, both near to existing employment hubs and near to transport infrastructure with capacity to absorb population growth. Geography matters and a 'vision first; infrastructure first' strategy will ensure that the right locations for development are selected.  Development at West Colchester will never be sustainable. It is not just that it is premature because we have no details of the A12/A120 layout. It is likely to become a rail commuter town for London and a road commuter town for Colchester/Chelmsford, and there is little prospect of the main line to London being able to cope with forecast demand.



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3.3 Deliver economic growth...	Growth should support the local economy and encourage self-containment in the Borough. Development at West Colchester is unlikely to support the local economy. Competition for labour from London will put it at a competitive disadvantage and local job generation is unlikely.
3.4 Supporting the Town Centre as the heart of the Borough	To support the Town Centre we need a credible Transport Plan for Colchester. There was a plan but it has never been implemented and it is now forgotten. This failure further undermines the credibility of the promises made in connection with new Garden Communities.
<p><b>3.6 Improving Accessibility</b> The car currently dominates the way people travel. 55% journeys to work. 69% residents work in the Borough. 24,850 leave (2011). 25% (6250) to Greater London; 15% to Tendring; 15% to Braintree; 10% to Chelmsford.</p> <p>The Local Plan will need to manage the continuing pressures of vehicle congestion and parking while developing practical solutions to minimise the need to travel and provide non-car based alternatives to movement around the Borough</p>	The local plan should encourage modal shift from car to sustainable public transport. Unfortunately part 1 does the opposite. It ignores a sustainable alternative (the CAUSE Metro Plan) whilst concentrating development at West Tey where commuting to London is likely to be favoured.
<p><b>Vision: Colchester in 2033</b> 3.7 onwards</p> <p>3.9 The surrounding urban area of Colchester will continue to provide a focus for new housing and employment with good transport accessibility...</p>	<p>A Transport Plan for Colchester is required if this is to have credibility. In particular West Mersea cannot thrive until better road access is available, and plans for a South Circular road should be reinstated. Tiptree needs a sustainable link to the A12 is built. Wivenhoe needs a link between the A133 and A120.</p> <p>Housing should be located in relation to Colchester's three Strategic Economic Areas (University; North and Stanway).</p>
3.10 ....Working in partnership with our neighbours and local communities, two new exemplary Garden Communities to the East and West....well co-ordinated and timely delivery of high quality infrastructure and facilities; good links to the Borough's primary hub at Colchester Town Centre...	We assess this approach in our separate response to North Essex authorities strategic Part 1 for Local Plans and object to West Colchester Garden Community.
3.11 new developments – sustainable transport methods	CAUSE agrees



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<p>Pursue a range of funding options to ensure timely delivery of new infrastructure</p>	
<p>3.12 University will develop strong links to new east GC</p>	
<p>3.13 Sustainable Growth Sustainable locations Development at accessible locations which support public transport, walking and cycling and reduce the need to travel Secure infrastructure to support new development</p>	<p>We address this in our response to North Essex authorities strategic Part 1 for Local Plans</p>
<p>4 Sustainable Growth Policies The Spatial Strategy ...directs development towards the most sustainable locations SG1 sets out spatial hierarchy: Colchester; two new GCs; District Centres (Wivenhoe, Tiptree, West Mersea); 16 larger villages; all other villages</p>	<p>It is right that the Spatial Strategy should direct development towards the most sustainable locations. However, we have the following concerns which we cover in more detail in our response to North Essex authorities strategic Part 1 for Local Plans:</p> <ol style="list-style-type: none"> <li>1. CAUSE's Colchester Metro Garden Communities proposal has been ignored despite offering a highly sustainable solution;</li> <li>2. North Colchester has not been included in the Preferred Options despite its proximity to the A12 and to Colchester's northern strategic economic area. Provision of a green buffer to the north, direct links to the A12 and a mass rapid transit system would mitigate the impact on the Dedham Vale. North Colchester is close enough to Colchester to promote cycling.</li> <li>3. West Tey is not a sustainable location. Public transport options are limited. The GEML has significant capacity issues (Anglia Route Study; Aecom) and Colchester's roads are congested, thus restricting the options for mass rapid transit. It should be noted that vocal opposition followed the Lexden bus lane proposal. The lack of job proposition at West Tey (Aecom cites 'home-working'; some employment around the station, and the jobs of north Colchester as the proposed employment strategy) will reduce self-containment, creating undue pressure on the</li> </ol>

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	<p>surrounding transport infrastructure. West Tey too far from Colchester or Braintree for cycling to become a normal mode of transport. The road networks are busy and congested thus making retro-fitting of cycle-ways very difficult.</p>
<p>4.4 By focusing future development on highly accessible locations this will reduce the need to travel. Good accessibility means that the community can access their needs easily and without always needing a car. Accessibility can be improved by locating development at accessible locations and improving public transport, walking and cycling facilities and services.</p>	<p>‘Highly accessible’ needs better definition in the Local Plan. The NPPF and Colchester’s policy aim to reduce travel, and in particular car use. Future development should be focused on locations which are well connected by public transport (with capacity for increased use) and by cycling/walking routes to their urban centre and to employment zones such as Colchester’s three Strategic Economic Areas.</p>
<p>4.11 Issues and Options – three potential options: east and west; west; east and north</p>	<p>Object: We do not believe that North Colchester should have been rejected and set out our reasons in depth in our full Part 1 response.</p>
<p>4.12 Overall, the Sustainability Appraisal determined that the broad locations selected for growth to the east and west were considered to be more sustainable than alternate locations for the following reasons:</p> <ul style="list-style-type: none"> <li>● They provide good access to the Town Centre and community facilities.</li> <li>● They provide good access to public transport interchanges or services and the strategic road network and in some instances the ability to expand provision.</li> <li>● They are not designated as environmental conservation areas or identified as areas of landscape importance.</li> <li>● They provide sufficient capacity to establish new sustainable communities.</li> <li>● They will help deliver infrastructure and facilities that will support nearby regeneration areas.</li> </ul> <p>4.13 The preferred Spatial Strategy, and the results of the Sustainability Appraisal, accordingly mean that a proposal for a GC at Langham was rejected</p>	<p>Object: See analysis of Sustainability Appraisal in CAUSE response to North Essex authorities strategic Part 1 for Local Plans</p>

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<p>4.15 ...the urban area of Colchester is ranked as the most sustainable location for growth, given its high level of accessibility and concentration of housing, jobs and services</p> <p>4.16 List of economic areas. No reference to Marks Tey</p>	<p>A stand-alone settlement at West Tey is far from the jobs and services of Colchester</p> <p>West Tey is not listed as an economic focus area for Colchester</p>
<p><b>Sustainable Settlements</b></p> <p>4.17 Sustainable development (NPPF and therefore Local Plan principle). ‘Evidence’</p> <p>4.19 Garden villages are ‘programmed to be initiated during the life of the plan to allow for necessary infrastructure to be planned for and phased as required,...’</p> <p>4.20 Sustainability criteria include access to sustainable transport including up to 2,000m from train station with frequent service at least six days a week, or up to 400m from bus stop</p>	<p>We address this in our response to Part 1</p>
<p><b>SG1 – Colchester’s Spatial Strategy</b></p> <p>...growth will be located at the most accessible and sustainable locations in accordance with the spatial strategy for North Essex set forth in Policy SP6 in Part One above and with the Settlement Hierarchy set out in Table SG1.</p> <p>Development will be focused on highly accessible locations to reduce the need to travel. Development will be supported where there a real travel choice is provided and sustainable travel for different purposes is promoted throughout the day.</p>	<p>Object: a location might be highly accessible but unsustainable in the long term because of lack of transport capacity. West Tey, with its reliance on the Great Eastern main line is one example. The policy should state that growth will be located near to credible sources of new jobs and take account of underused infrastructure.</p>
<p><b>SG2 Housing delivery</b></p>	<p>We address the OAN and Sustainability Appraisal in our response to Part 1</p>
<p><b>Alternative options considered</b></p> <p>4.25 Alternative spatial strategy – The Borough clearly contains sufficient undeveloped land to accommodate required growth in alternative locations, <b>however Sustainability Appraisal work has discounted many of these potential alternative locations</b> on the basis of environmental constraints. As noted in the Explanation above, the preferred Spatial Strategy has evolved from firstly, consideration of the individual characteristics and capacity of different parts of the Borough and secondly,</p>	<p>4.25. Object: Colchester’s Metro Garden Communities has been ignored. It should be considered.</p> <p>Colchester North offers a more sustainable development option than West Tey, yet has not been included in the preferred options. It should be.</p> <p>4.32 Object: massive unevidenced allocations beyond the plan period are damaging to the community.</p> <ul style="list-style-type: none"> <li>• They blight the value of people’s homes.</li> </ul>

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<p>consideration of the overall linkages and functionality of settlements within the area and the best strategy for enhancing their sustainability.</p> <p>4.32 Alternative options considered</p> <p><b>Restrict allocations to plan period</b> -Confine allocations to those which can be delivered entirely within the plan period. This would preclude the development of Garden Communities, given their long lead time, and would not allow the Council the opportunity to optimise long-term planning.</p>	<ul style="list-style-type: none"> <li>• They drive up land prices and thus the uplift available for infrastructure.</li> <li>• They make it more difficult for the Council to resist speculative applications in the blighted areas</li> <li>• And they undermine the credibility of the entire plan, putting it at risk of rejection by the Inspector. If they are to be included we need enough infrastructure planning, traffic modelling and viability evidence to make rational decisions on location.</li> </ul> <p>The garden community allocation at Marks Tey offers too little certainty of delivery in the Plan period. The council will be quite able to ‘optimise long-term planning’ of Marks Tey beyond the plan period without needing to include 1,250 homes there in the period. Infrastructure pre-conditions must be met before West Tey garden community is started.</p> <p>We address this fully in our response to Part 1</p>
<p><b>Economic Delivery Policies</b> 4.34 economic growth to be targeted at the most accessible and sustainable locations. 80% of land is at Stanway/KGateway</p> <p><b>Strategic Economic Areas</b> 4.37</p> <ol style="list-style-type: none"> <li>1. <b>EC1 - The Knowledge Gateway and University SEA</b> reflects <u>opportunities associated with the growth plans for the university</u> and the benefits linked to the new University Garden Village to the east of Colchester.</li> <li>2. <b>NC1 - The Northern Gateway and Severalls SEA</b> responds to the potential to maximise the its <u>prime location adjacent to Junction 28 of the A12 and for enhanced connectivity to the Colchester’s Northern Gateway</u>, for the retention and expansion of the Business Park and for opportunities to deliver an enhanced sports and leisure hub.</li> </ol>	<p>We address this in our response to Part 1</p>

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<p>3. <b>WC1</b> - The third SEA at <b>Stanway</b> continues to be a favoured location for strategic economic opportunities given its relative sustainability taking advantage of good access to the A12.</p>	
<p><b>Strategic Infrastructure Policy</b>          ...delivery of new homes and jobs needs to be supported by necessary infrastructure.... Issue of particular concern to existing residents and businesses          ...will prepare <u>Infrastructure Delivery Plan</u></p> <p>4.59 In the event that essential infrastructure cannot be appropriately delivered to support new development in spite of best efforts to secure this, policy will be used to restrict development from being commenced or, in certain cases, from being permitted, in the absence of proven infrastructure capacity.          SG6 Strategic Infrastructure</p>	<p>It is essential that infrastructure is delivered before garden communities are started. West Tey cannot go ahead without a dualled A120, without interventions <u>in place</u> on the GEML to meet projected passenger increases and without funded and delivered mass rapid transit and external cycle-ways*</p> <p>We not believe that it is possible to respond to this preferred options consultation in a considered way given the lack of Infrastructure Delivery Plan.</p> <p>We set out detailed criteria, conditions and trigger recommendations in our response to Part 1.</p>
<p><b>6.12 North Colchester</b></p>	<p>We believe that North Colchester was wrongly rejected and offers greater sustainability than West Colchester</p>
<p><b>6.41 East Colchester</b></p>	<p>We support growth around the economic hub of the University on an infrastructure first basis, including the new A133/A120 link and new school facilities so as to show net betterment to existing communities such as Wivenhoe.</p>
<p><b>6.94 Selection of the garden settlement sites has been made on the basis of their levels of sustainability and deliverability.....</b></p>	<p>Object: our response to part 1 shows that there is insufficient evidence to support the selection of garden settlement sites. There is no infrastructure plan, external costs such as the costs of upgrading the Great Eastern Main Line are ignored, there is no appropriate traffic modelling and there is no acceptable viability study.</p>
<p><b>6.95 The Sustainability Appraisal did not support an option submitted by landowners to the north of Colchester at Langham</b></p>	<p>Object: our response to part 1 shows that the Sustainability Appraisal's conclusions flawed. There is plenty of land available without encroachment upon the AONB. The main infrastructure argument cited is that West Colchester</p>

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	will help bring forward central government investment in the roads, a political argument that is out of place in a sustainability appraisal and should be ignored.
<b>7.105 Promoting Sustainable Transport and Changing Travel Behaviour</b>	A report from Tim Pharoah, Living Transport forms part of our response to Part 1.