



Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) to the Public Draft Colchester Local Plan: Section Two Main Modifications Consultation – 4 October to 18 November 2021– Representation Summary

December 2021

Note for the Inspector

The table below summaries all of the representations submitted to the SA/SEA and HRA updates which support the Main Modifications to the Colchester Section 2 Local Plan. The 'Officer Comments' are intended to assist the Inspector with consideration of these representations.

Please note the full version of every representation can be viewed, together with the accompanying attachments, via the [Consultation Portal](#) by Selecting 'Sustainability Appraisal' or 'Habitat Regulations Assessment' from the Historic Documents on the portal homepage. A search on the relevant supporting document will lead straight to the full representation.

Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA)			
Rep ID	Name/ Organisation	Summary	Officer Comment
8009 object	Linda Mahon-Daly	SA lacks any background detail and makes assumptions which are not backed up SC2 Middlewick various statements not substantiated and open to dispute.*9	The SA is informed by a review of relevant plans and programmes and a significant baseline of information. The SA Framework covers all topics required by the SEA regulations and takes into account the environmental protection objectives set out at the international and national level.
8728 object	Sarah Munson	<ul style="list-style-type: none"> • SLAA not prepared according to NPPG and used as a document taken into consideration for the SA • Negative impacts of development at Middlewick hugely underestimated in New Sustainability Matrix • No mention of Green Infrastructure as monitoring indicator for Climate Change Policies • Monitoring indications for SA8 too vague and should be qualitative as well as quantitative • Mitigation and requirements for long term management of ecological areas and habitats (MM35-47) has only included an appraisal of the outcome which assumes mitigation measures to replace irreplaceable habitats are successful • SC2 modifications assume recreation of acid grassland habitat must be successful • SA does not adequately assess or update the negative impact on Health and Wellbeing 	<p>The SLAA (EBC 2.17) has been prepared in accordance with the NPPG.</p> <p>The SA has been undertaken by LUC who are considered experts in this field of work.</p> <p>The SA Framework covers all topics required by the SEA regulations and takes into account the environmental protection objectives set out at the international and national level.</p>
8999 object	Charlie Pearce	SA did not highlight Middlewick Ranges is a Local Wildlife Site, lowland acidic grassland in particular (UK Biodiversity Action Plan Habitat) and cannot be simply ignored or relocated.	The Local Wildlife Site Review 2016 (EBC 4,2) has been included within the baseline information for the SA. Paragraph C.33 of the SA

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			within the appraisal for Policy SC2 clearly identifies and acknowledges that Middlewick Ranges is a designated Local Wildlife Site.
9000 object	Anita Gregory	Why did the Sustainability Appraisal not highlight Local Wildlife Sites?	The Local Wildlife Site Review 2016 (EBC 4,2) has been included within the baseline information for the SA. Paragraph C.33 of the SA within the appraisal for Policy SC2 clearly identifies and acknowledges that Middlewick Ranges is a designated Local Wildlife Site.
9001 object	Jonathan Greenwood	Appraisal of Policy SC2 (Table 31) includes desire to avoid development on greenfield land. Amber designation with question mark awarded to the question 'Will it reduce the need for development on greenfield land' indicates that inclusion of this greenfield site is an anomaly that contradicts the aims of Local Plan	The Appraisal for Policy SC2 as proposed to be modified, is scored +/- (policy/site allocation is likely to have a mixture of both positive and negative impacts) for the question ' <i>will it reduce the need for development on greenfield land</i> '. In order to meet the housing requirement figure, development of greenfield sites is necessary and unavoidable.
9002 object	Marden Homes Ltd (Strutt and Parker)	SA does not appraise the impact of reduced number of new homes at Tiptree nor explained why this is the preferred approach	The SA concludes that there are no changes to the SA findings for MM4 and MM5 as the effects identified previously remain valid, including significant positive effects identified for SA Objective 1: Housing, as the

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			<p>Local Plan will continue to deliver the objectively assessed need (OAN) for housing identified for the Borough.</p> <p>No effects from Policy SS14 were identified in the previous SA as the policy does not propose any development but rather defers to the Tiptree Neighbourhood Plan. The SA findings remain unchanged for the Main Modifications 69-71 as any development proposed in Tiptree will be assessed against the requirements set out in the Neighbourhood Plan rather than Policy SS14.</p>
9003 object	Marden Homes Ltd (Strutt and Parker)	SA des not appraise impact of new link road in Tiptree, there is no explanation of why the approach is preferred when compared to alternatives	<p>No effects from Policy SS14 were identified in the previous SA as the policy does not propose any development but rather defers to the Tiptree Neighbourhood Plan. The SA findings remain unchanged for the Main Modifications 69-71 as any development proposed in Tiptree will be assessed against the requirements set out in the Neighbourhood Plan rather than Policy SS14.</p>

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9004 object	Bloor Homes (Strutt and Parker)	No robust evidence to justify reduction from 600 to 400 dwellings in Tiptree. SA appears to have not considered this change at all, let alone appraise it against alternatives and explain its reason for selection	<p>The SA concludes that there are no changes to the SA findings for MM4 and MM5 as the effects identified previously remain valid, including significant positive effects identified for SA Objective 1: Housing, as the Local Plan will continue to deliver the objectively assessed need (OAN) for housing identified for the Borough.</p> <p>No effects from Policy SS14 were identified in the previous SA as the policy does not propose any development but rather defers to the Tiptree Neighbourhood Plan. The SA findings remain unchanged for the Main Modifications 69-71 as any development proposed in Tiptree will be assessed against the requirements set out in the Neighbourhood Plan rather than Policy SS14.</p>
9005 object	Bloor Homes (Strutt and Parker)	SA fails to register reduction of dwelling numbers from 600 to 400 in Policy SS14 assessment. SA has not recognised provision of link road and explained the reason for requiring this as opposed to alternative options.	The SA concludes that there are no changes to the SA findings for MM4 and MM5 as the effects identified previously remain valid, including significant positive effects identified for SA Objective 1: Housing, as the Local Plan will continue to deliver

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		SA has failed to recognise what MM71 entails and what is proposed clearly has environmental, economic and social impacts.	<p>the objectively assessed need (OAN) for housing identified for the Borough.</p> <p>No effects from Policy SS14 were identified in the previous SA as the policy does not propose any development but rather defers to the Tiptree Neighbourhood Plan. The SA findings remain unchanged for the Main Modifications 69-71 as any development proposed in Tiptree will be assessed against the requirements set out in the Neighbourhood Plan rather than Policy SS14.</p>
9007 object	Dandara (David Hill)	<p>The assessment of reasonable alternatives has not been sensitive enough to accurately assess reasonable alternatives for Marks Tey and also in relation to other sites in the plan and so we do not believe that an objective view has been taken of development.</p> <p>The SA/SEA process needs to assess more reasonable alternatives in relation to the quantum of development in Marks Tey and also in relation to other sites allocated in the plan. Simply identifying 24,000 homes or 0 homes is not appropriate to be able to identify the “most appropriate strategy”.</p>	<p>A reasonable alternative to Policy SS11 was included within the SA Addendum, which had previously not been considered.</p> <p>The Regulation 16 Marks Tey Neighbourhood Plan identifies that the Marks Tey community feel strongly that strategic transport improvements should be delivered ahead of any development coming forward in the parish. Although the Neighbourhood Plan does not propose allocations, a future Local</p>

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		The SA / SEA needs to assess both a smaller scale of development and development sites in Marks Tey as an alternative to sites allocated in the plan rather than just an option of 24,000 or nothing.	or Neighbourhood Plan could allocate sites.

Habitat Regulations Assessment (HRA)			
Rep ID	Name/ Organisation	Summary	Officer Comment
8010 object	Linda Mahon-Daly	Roman River including SSSI region and Essex Wildlife Trust Nature Reserves are not mentioned or considered. Impact on wildlife corridor leading to coast continuous with Middlewick is not considered	This representation does not relate to the HRA, which is an assessment of the potential effects of a development plan or project on one or more European sites, including Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites.
8623 object	Sarah Munson	Middlewick is not included within HRA HRA fails to identify that if Middlewick is built on, the Local Wildlife Site will be lost which puts the allocation in direct conflict with one of Plans key Environmental Policy Targets for 'Zero percent loss of Local Wildlife Sites, Ancient Woodland and Priority Habitats and Species	All policies and site allocations are included within the HRA.
9010 object	O&H Properties Limited (Barton Willmore)	Given the location of the Site (Land West of Lakelands) and biodiversity surveys on site, it is our position that the Site is unsuitable for wintering birds and thus would not result in the loss of functionally linked land. The HRA should be revisited and the requirement for wintering bird surveys in Draft Policy WC2 for the Site removed	The HRA had identified the site has a moderate suitability to support qualifying bird species, a wintering bird survey is therefore required to inform the importance of the site for these birds and any specific mitigation measures.