

Submission to the planning inspector re-Colchester local plan in particular with respect to development on the Middle wick ranges site.

Further to my initial objection. I wish to make further representations. Please see below

Summary

The Colchester local plan is flawed in that the proposed zoning of the Middlewick ranges as development land is contrary to the national planning guidelines 2012 (and indeed to the national planning guidelines 2019). It should be zoned as amenity/protected green space.

Reasons;

It is a nationally important wildlife area with a unique mix of habitats, including rare lowland acid heathland. This is enhanced by its proximity to the Roman river SSSI and thus Middlewick forms part of a wider wildlife corridor. Development would severely damage this. Habitat mitigation is not possible and loss of biodiversity would be inevitable.

This is against the council's own climate change manifesto, as well as national climate change policies.

The site has been used as amenity land for generations.

In addition the infrastructure of the area is such that the roads could not cope with the additional traffic or be widened to cope. Air pollution is already illegally high and this development will exacerbate the problem.

Schools and doctors would not be able to cope

Main Matter 1 – Legal Requirements and Overarching Issues relating solely to the policies within CLP Section 2

- Have the requirements for appropriate assessment under the Habitats Regulations been met? Have the results of the Habitats Regulations Assessment been carried forward in the CLP Section 2?

Local plan does not take into account the especially important wildlife value of the Middlewick site. It's conjunction with the Roman river SSSI, its unique habitat including the largest area of unimproved high value nature conservation sandy acid grassland in the county with many protected species or nationally rare species of fauna and flora. The whole ranges area is designated in the Local Plan as a Local Wildlife Site (ie only just one step down the hierarchy of importance from a nationally important Site of Special Scientific Interest), but in fact there is little doubt that it actually warrants a Site of Special Scientific Interest designation. It features Priority NERC Act habitat, a number of scarce plants, and most significantly an outstanding range of rare, scarce and characteristic invertebrates, including a whole number designated as Priority NERC Act species.

The land has been undisturbed by farming or development as it is an active firing range, which has contributed to this biodiversity. This is contrary to section 11 of the NPPF (2012) in particular sections 109 110 113 114 and 118

In particular section 118 as below.

- Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;
- planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;

Main Matter 3 – Environmental Assets Policies (ENV1 to ENV5 and CC1)

- Are the Environmental Assets Policies set out in CLP Section 2 justified by appropriate available evidence, having regard to national guidance, and local context, including the meeting the requirements of the CS?

The middlewick proposed development does not conform with the environmental assets policy set out in the local plan. Colchester Borough Council's own ecology report makes it clear that there would be significant loss of biodiversity and mitigation for mitigation is not possible. This is an overoptimistic report by Colchester Borough Council and not backed up by other environmental groups. The whole ranges area is designated in the Local Plan as a Local Wildlife Site (ie only just one step down the hierarchy of importance from a nationally important Site of Special Scientific Interest), but in fact there is little doubt that it actually warrants a Site of Special Scientific Interest designation. It features Priority NERC Act habitat, a number of scarce plants, and most significantly an outstanding range of rare, scarce and characteristic invertebrates, including a whole number designated as Priority NERC Act species.

Main Matter 4a – Generic Infrastructure and Mitigation Requirements (Policy PP1)

- Is the Generic Infrastructure and Mitigation Requirements policy justified by appropriate available evidence, having regard to national guidance, and local context, and CLP 1?

The infrastructure in particular the road network of South Colchester would be unable to cope with the increase in traffic generated by this development.

The local roads are already heavily congested with higher than permitted pollution levels especially at the approaches to the town centre. The it is not possible to mitigate the pollution levels noise and air pollution. As the roads cannot be widened. All traffic will have to go via the town centre to get to the

station or north Colchester industrial estates. The only access to the major trunk routes is via the hythe crossing and greenstead roundabout or berechurch hall rd. gosbecks rd, straight road, all of which are congested and cannot be widened. The only other option would be a new road but this would have to cut through the roman river SSSI.

The schools in the south of Colchester can't cope and children having to travel to schools in the north or west of Colchester will add to the congestion described above.

There is no doctors surgery in the area and to travel to the nearest doctors (if they could cope which they can't) will mean more car journeys along the very same congested roads.

Main Matter 6 – South Colchester (Policies SC1 to SC3)

- Are the policies and site allocations for South Colchester justified by appropriate available evidence, having regard to national guidance, and local context, including the meeting the requirements of the CLP 1?

The development at middle wick is inappropriate and unjustified on environmental, climate and traffic issues. The local plan has not taken this into any of this into account.

Main Matter 17 – Policies DM17 to DM19 – Retention of Open Space and Recreation Facilities, Provision of Public Open Space and Private Amenity Space

- Are the policies that relate to the Retention of Open Space and Recreation Facilities, Provision of Public Open Space and Private Amenity Space justified by appropriate available evidence, having regard to national guidance, and local context, and CLP 1?

Middlewick development is against the policies relate to retention of recreation facilities.

North section has been open public amenity space for generations.

South section is of superb wildlife value as it has been relatively undisturbed due to being a live firing range. It is home to many locally and nationally endangered species both flora and fauna. This is enhanced by it being contiguous with the Roman River SSSI. The habitat is of national importance including rare lowland heath.