



29th July 2026

Sandra Scott
Colchester City Council

By email only

Dear Sandra

Thank you for consulting Place Services with regard to ecological information submitted concerning Preferred Options Policy PP9 in the emerging Local Plan.

Introduction

Colchester City Council commissioned Place Services to review ecological issues and submitted information related to a housing allocation proposed in the Reg. 18 consultation draft of the new Local Plan. The scope of the review is as follows:

- Consider the robustness of the supporting ecological appraisals;
- Assess the ecological concerns and conclusions presented in the submitted material;
- Advise whether the identified impacts could be appropriately avoided, mitigated, or compensated through policy requirements; and
- Provide recommendations, where appropriate, to inform the Local Plan drafting.

The material reviewed is as follows:

- Document from Carpenter Planning on behalf of St John's Field Residents Association and Others, incorporating:
 - Ecological Review of St John's Field and Bullock Wood SSSI – Essex Ecology
- Letter from Andrew Martin Planning on behalf of Welshwood Park Residents Association, incorporating:
 - Ecological Appraisal – Sibbett Ecology
 - Arboricultural Report – Sylva Consultancy
- North East Colchester Masterplan Framework – SLR on behalf of Gladman and Gleeson Land

A site visit was carried out on 5th June 2026, consisting of a walkover of the allocation areas using public footpaths.

Consider the robustness of the supporting ecological appraisals

Both ecological reports appended to the planning statements have been prepared by suitably qualified ecologists and both consider the habitats and species to be found in their respective survey areas, broadly land to the northwest of the railway line (St John's Field) and land to the southeast of the railway line (Welshwood Park). In general, the planning documents repeat and summarise the points raised in the appended ecological report.

Neither report is based upon any significant field work, the conclusions being drawn from single walkover surveys in autumn and desk-based sources. Information about species is only based upon a high-level assessment of suitability with no surveys completed.

St Johns Field

The St John's Field Ecological Review is somewhat repetitive and makes claims that are poorly evidenced and without any references to support assertions. This includes describing the area as part of a woodland arc across northeast Colchester, the "convergence of ... ecological linkages" creating a "connective zone" and a "continuous dark corridor network", none of which is supported by substantive evidence. Ecological connectivity within and beyond the site is overstated (See Figures 1 and 2).



Figure 1 - Looking west to Bullock Wood, showing low hedgerow that provides the only east-west connectivity



Figure 2 - Looking north from same position as Figure 1 showing low hedgerow and absence of other east-west connectivity

The report rightly highlights the potential impact of the development on the Bullock Wood SSSI, particularly from changes to hydrology and from recreational disturbance. These are important matters that would need to be addressed in any planning application. It also sets out in detail the ways in which residential development could be detrimental to the habitats present but does not consider whether any appropriate mitigation is available.

The review's summary suggests that the ecological impacts on Bullock Wood of development on St John's Field are "difficult or unrealistic to mitigate" but does not explain why that is the case. The Carpenter report considers the application of buffers to protect the SSSI more fully, reporting that "Natural England and The Woodland Trust evidence indicates that a buffer of up to 100m around Bullock Wood... is needed..." The source of this evidence is not cited.

There is a lack of consistent evidence on the necessary buffer width to avoid impacts to Ancient Woodlands in published guidance, and there is considerable disagreement amongst relevant agencies. Government standing advice (*i.e.* Natural England) states a minimum of 15m but allows that a wider buffer may be needed in some cases. Wildlife and Countryside Link, a coalition of environmental organisations, produced a statement in response to the publication of the Government standing advice in 2025 suggesting that the buffer zones should be at least 100m. This is based on the principle that development adjacent to or close to Ancient Woodland should be required to restore the woodland by allowing its expansion by natural colonisation, rather than just protecting the root protection areas of the existing woodland trees, which is what a 15m buffer would do. The Woodland Trust in its 2019 report "*Planning for Ancient Woodland - Planners' Manual for Ancient Woodland and Veteran Trees*" suggests a minimum buffer of 50m as a starting point with evidence required to demonstrate that a lesser buffer will serve.

Welshwood Park

The Sibbet Ecology report repeats an assessment that suggests that buffers of at least 1km should be applied to veteran trees and Welsh Wood and even that might not be sufficient to prevent harm, with the implication that no alternative mitigation measures are available. Although the assessment of green space visiting is based in evidence, it is not intended to be used for the protection of individual veteran trees, or even non-statutory nature conservation sites. While the risk of impacts to veteran trees and LoWS from recreational pressure is valid, other methods of mitigation are available, as set out below.

The focus on veteran trees appears, in part, to be on the basis that their presence wasn't recognised in the Emerging Allocations Biodiversity Assessment. However, the assessment for 10616 Land north of Bromley Road, Colchester includes "mature trees (possible veterans)" in the Description of habitats, and sets out the need for their retention, and that they would be considered irreplaceable, in the mitigation requirements.

The report inaccurately describes remnant woodland habitat in a garden as having "natural ground vegetation" despite the very apparent presence of a range of non-native shrubs and trees, which would have been visible at the time of the survey visit (see figure three).



Figure 3 - Suggested parkland remnant showing evidence of garden management (examples of non-native shrubs ringed in red)

The report's conclusion assume that no mitigation is possible for the identified impacts, although this is not fully evidenced by consideration of all mitigation options, in addition to a buffer.

The Sylva report refers to The Woodland Trust's Ancient Tree Inventory website for its baseline of veteran trees on site and did not assess those trees already listed (T1 and T2). Three further trees were assessed during the site visits, but none of the assessment data has been included in the report. One of the trees assessed on the site visit as a "mature oak" has subsequently been added to the Inventory as a veteran. The website is based upon user submission, with only minimal information submitted, which does not constitute a full assessment of veteran status. Veteran status should be confirmed by a suitably qualified arboriculturalist using a recognised survey methodology, such as Treeworks' Specialist Survey Method for Veteran Trees.

The Andrew Martin Planning report summarises the Sibbet Ecology report.

Assess the ecological concerns and conclusions presented in the submitted material

Appended is a spreadsheet breakdown of the issues raised in the reports with a review of their validity in relation to the site.

The accepted ecological impacts that could result from the development, as identified in the reports can be summarised as:

- Environmental impacts to Bullock Wood SSSI (hydrology and woodland edge)
- Recreational and disturbance impacts to Bullock Wood SSSI
- Recreational impacts to Welsh Wood and Walls Wood LoWS
- Impacts to veteran trees

- Connectivity provided by existing hedgerow network
- Artificial light
- Impacts to protected species

Advise whether the identified impacts could be appropriately avoided, mitigated, or compensated through policy requirements

As set out in the appended spreadsheet of issues, there are various ways in which Policy PP9 could be strengthened to adequately avoid, mitigate or compensate for ecological impacts. The extent to which impacts can be avoided, mitigated or compensated is dependent on the scale, character and layout of the development that is proposed, which would be fully assessed at application stage. It is self-evident that there exists a quantum of development that could be accommodated alongside any mitigation requirements, although the scale and density of development and the extent and nature of mitigation would need further testing as part of masterplanning.

Policy PP9 currently calls for a minimum of 10% open space, which amounts to 7ha, while the Gladman Masterplan states that approximately 40% of the site will be retained as green space, which amounts to 28ha.

A 50m buffer on the southwest and southeast edges of Bullock Wood would occupy approximately 3.5ha. This would be difficult to accommodate with other green infrastructure requirements with 10% open space, but it would appear to be feasible with 40% open space, if well designed and laid out. This buffer is incompatible with the existing Masterplan.

The table below sets out the accepted impacts of the development with notes on the feasibility of avoiding, mitigating or compensating for them. The mandatory requirement for 10% biodiversity net gain is not included here.

Impact	Feasibility of avoidance, mitigation or compensation
Environmental impacts to Bullock Wood SSSI (hydrology)	If hydrological studies are used in combination with mapping of plateau alder wood to understand the reasons for its presence and the movement of water through the wood, the layout and scale of any buffer could be designed to protect this resource and highlight any other risk to ground water levels from the proposed development. Natural England must be consulted over SSSI impacts and approve any mitigation measures.
Recreational and disturbance impacts to Bullock Wood SSSI	Although dimensions need to be tested, a buffer that is not accessible could prevent impacts to the woodland edge from recreation and disturbance. There are established footpaths in Bullock Wood, and it is already used by the local community, meaning that excluding people from it is unlikely to be possible. Robust visitor management measures could be introduced to limit adverse impacts, and some exclusion zones should also be established to protect more sensitive species and ecological features.
Recreational impacts to Welsh Wood and Walls Wood LoWS	Welsh Wood is publicly accessible and would be more vulnerable to increased recreational use, but a robust

	management plan with visitor management measures in place to protect important and sensitive species and ecological features could avoid and mitigate the risk of impacts. Walls Wood is largely private and so measures to limit the impact from new residents would have to be agreed with the landowner but could include robust fencing of public rights of way and boundaries.
Impacts to veteran trees	An appropriate veteran survey and management plan by a suitably qualified arboricultural consultant (with a Vet Cert qualification) would identify the risks to any veteran trees from construction or public access impacts and set out an appropriate approach to impact avoidance or mitigation.
Connectivity provided by existing hedgerow network	Existing linear green infrastructure should be protected and used as the basis for a coherent green infrastructure strategy across the development site. Connectivity is currently poor across St John's Field but good across the Welshwood valley. Although there are likely to be breaches in existing field boundaries for access, it should be possible to maintain and enhance existing connectivity.
Artificial light	A well-designed lighting strategy and plan could avoid spill into sensitive habitats and minimise all artificial light throughout the development.
Impacts to protected species	Avoidance, mitigation and compensation requirements will be determined through full ecological surveys prior to application stage. No consent should be granted without sufficient and thorough surveys having been completed. It is unlikely that there are any protected species impacts that could not be avoided, mitigated or compensated.

Provide recommendations, where appropriate, to inform the Local Plan drafting.

Recommendations for the strengthening of the wording in PP9 are included in the appended table and are summarised below:

- Provide clarity about the need for Natural England to be consulted in relation to impacts to Bullock Wood and the need to avoid any loss or deterioration of ancient woodland
- Strengthen reference to mitigation requirements in relation to Bullock Wood, including clarity about what access or recreation features Natural England would accept in the woodland buffers, *i.e.* while footpaths for informal recreation as part of SANG provision may be acceptable, more formal play equipment encouraging sustained activity may not be. Consider specifying a minimum buffer in excess of the 15m from Government standing

advice, subject to the results of any specialist surveys. Specify natural regeneration as the preferred method for the establishment of woodland edge in the buffers

- Consider more explicit requirements concerning the form and location of onsite biodiversity net gain, such as setting a minimum on-site contribution; a focus on site-wide connectivity; inclusion of acid grassland, etc.
- Consider specifying minimum protected species survey requirements, including the need for evidence that survey methods have been carried out correctly (particularly in relation to Dormouse)
- Include reference to sensitive lighting plan requirements, to avoid all light intrusion to sensitive habitats, to retain dark corridors and to minimise light levels throughout the development
- Include specific reference to the identification, retention and management of veteran trees informed by a survey by a Vet Cert qualified arboricultural consultant
- Include specific reference to the need for impact assessment in relation to Welsh Wood and Walls Wood and the need for appropriate avoidance and mitigation measures

The Masterplan Framework document submitted by the site promoters as part of their representation to the preferred option plan is not considered to be adequate in its current form and should not form part of any policy wording. The submitted Framework has not been accepted by the Council, and it is noted that Policy PP9 already includes a requirement for a masterplan to be agreed by the Council.

The following issues are noted:

- The constraints map at 4.7 is out of date and does not include reviewed LoWS boundaries from 2015 or 2025, which includes extensions to Walls Wood
- The Masterplan Framework Key Features set out and illustrated on page 39 suggests that the buffer to Bullock Wood will be 15m and will include walking routes and incidental play. As the buffer will be essential mitigation for impacts to the SSSI, it needs to be acceptable in its design and appropriately managed. It is likely that 15m will be insufficient
- This development would provide an opportunity to strengthen ecological links between the Salary Brook corridor and Bullock Wood and in particular address the ecological barrier currently presented by the railway line. Developers should be encouraged or required to provide an ecologically designed, green bridge crossing (see Figure 4), informed by masterplanning and the more detailed ecological surveys required in support of planning applications.
- The plan on page 42 and the quoted figure of 40% open space implies a scale of green infrastructure that is not obviously apparent on the Masterplan Framework Key Features plan on page 39. GI measures should be focused on linking the designated woodland habitats, with habitats of an appropriate type and extent.



Figure 4 - Railway line as an ecological barrier (from Shaw's Farm track bridge looking northeast)

Yours sincerely,

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Place Services provide ecological advice on behalf of Colchester City Council

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.