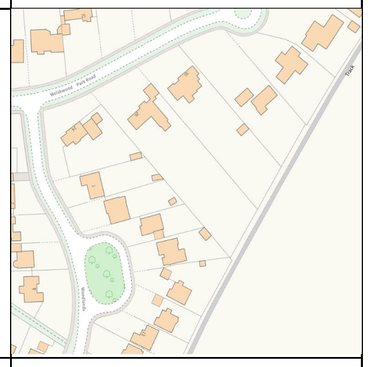
Ref.	Issue raised	Source	Review	Recommendations	Relevant legislation or policy	Plan/Map/Image
1	Emerging Allocations Biodiversity Study states “Development is likely to have a significant impact on the SSSI’s condition through increased recreational disturbance, noise, and lighting.” The mitigation measures listed in the Emerging allocations biodiversity study, "such as buffering the SSSI, retaining hedgerows, and securing improved management, are necessary but insufficient in practice."	St John's Field 2.5 and 2.6, Appendix 4	It would be possible to mitigate the potential impacts of development on the condition of the SSSI, although this requires a robust and coherent approach involving preventing or closely managing public access, improving management and the creation of a signficant, buffering edge habitat. The buffer set out in the North East Colchester Masterplan Framework department does not appear to be adequate. The wording in PP9 may not be sufficient or specific enough to ensure adequate mitigation.	Strengthen wording in PP9 to specify minimum buffer to Bullock Wood and other required mitigation elements. Include the need to consult Natural England and incorporate any of their requirements.	Evidence base - Emerging Allocations Biodiversity Study	
2	Emerging allocations biodiversity study states: The Study also identifies potential for on-site Biodiversity Net Gain (BNG) through woodland creation and connectivity enhancement." However, achieving genuine net gain within a major residential scheme of this scale is inherently contradictory	St John's Field 2.7	BNG is a recognised methodology, mandatory for many planning applications and would apply to this allocation. There is no reason why BNG cannot be integrated with residential developments, and the scale of the scheme should mean that it has more chance of succes, if it is strategically planned within the site layout. The effectiveness of measures included as BNG will depend on rigorous oversight of planning, delivery and ongoing management. It should be noted that BNG requirements will be over and above any measures identified as necessary for the mitigation of impacts to the SSSI (such as buffering habitat)	The Emerging Allocations Biodiversity Study rased the possibility of requiring more than 10% BNG for the combined allocation because of the strategic opportunities presented for enhancing biodiversity on this site. The wording of PP9 could be amended to focus BNG provision on strategic elements such as site-wide connectivity between ecological feature and acid grassland (where subsrates are appropriate).	Evidence base - Emerging Allocations Biodiversity Study	
3	Emerging allocations biodiversity study states: The combined allocation of Sites 10256 and 10616 (totalling around 2,000 dwellings) was identified as having “high strategic relevance” because of the cumulative effect on Bullock Wood SSSI and nearby Local Wildlife Sites. This confirms that the harm is not only localised but strategic and irreplaceable.	St John's Field 2.8	The high strategic relevance identified in the study relates to the contribution that the allocation site could make to local ecological networks, as set out in 1.15 of the report, and does not consider the effects of development on any designated sites	No change necessary	Evidence base - Emerging Allocations Biodiversity Study	
4	The Strategic Biodiversity Assessment (January 2025) outlines that local plans must: - Protect and enhance statutory and non-statutory ecological networks; - Strengthen habitat connections; - Avoid harm before considering mitigation or compensation; and - Enhance the biodiversity value of land outside recognised ecological networks. The allocation of St John’s Fields fails each of these criteria.	St John's Field 2.12 and 2.13	The Strategic Biodiversity Assessment suggests that a biodiversity strategy for a local planning authority area should inlude these as core measures - it doesn't say that Local Plans must deliver them	No change necessary	Evidence base - Strategic Biodiversity Assessment	
5	The Habitat Regulations Assessment (February 2025) identifies St John’s Fields within the Zone of Influence of the Dengie, Blackwater Estuary, Essex Estuaries, and Stour & Orwell Estuaries SPA/Ramsar sites The absence of completed Appropriate Assessment at plan stage means the Council cannot lawfully conclude that there will be no adverse effects on the integrity of these habitats. Proceeding with allocation prior to this assessment is premature and inconsistent with the Habitats Regulations	St John's Field 2.15 and 2.16	The HRA includes Appropriate Assessment at Chapter 5. The Essex Coast RAMS Strategy provides mitigation for strategic impacts relating to increased recreational disturbance from new residents associated with developments included within the Local Plan. This requires funding of mitigation measures at the designated sites and the inclusion of sufficient Suitable Accessbile Natural Greenspace as part of the development. Individual planning applications will have to demonstrate that there is no functional link to the designated sites that could result in adverse effect on integrity by the completion of wintering bird surveys, which is required by the wording in Policy PP9 - s). Policy EN1: Nature Conservation Designated Sites outlines protection for Habitats Sites and will ensure that no development is supported where there is potential for adverse effects to integrity to arise.	No change necessary	Evidence base - HRA	
6	The Local Nature Recovery Strategy (LNRS), guided by the Lawton Principles, seeks to create ecological networks that are “more, bigger, better and joined.” Development of St John’s Fields would have the opposite effect, introducing an urban barrier that fragments one of the most strategic ecological corridors in Colchester.	St John's Field 2.19	The allocation site was not identified as an area of biodiversity signficance in the Strategic Bioidversity Assessment, although it is adjacent to the corridor of Salary Broook, which was. Ecological connectivity across St John's Field appears to be poor at present and measures to secure BNG and mitigate the potential impacts on Bullock Wood might reasonably be expected to improve this.	No change necessary	LNRS	
7	Paragraph 188(c): Fails to minimise biodiversity impacts or deliver measurable net gain.	St John's Field 2.21	NPPF references are incorrect. 187d) . Without a detailed planning application, it is not possible to determine whether the development will minimise biodiversity impacts. The site is considered to be generally of low biodiversity value, as fields under conventional agriculture. Any application will have to demonstrate at least the mandatory 10% BNG.	No change necessary	NPPF	

8	Paragraph 190: Proposes development where significant harm cannot be avoided, mitigated, or compensated.	St John's Field 2.21	193a) this paragraph applies to planning decisions and not local plan preparation.	No change necessary	NPPF	
9	Paragraph 191: Fails to contribute to a strategic nature recovery network aligned with the LNRS.	St John's Field 2.21	No applicable reference. Much of the area of St John's Field is highlighted as a strategic opportunity for the creation of woodland and scrub habitat in the Essex Local Nature Recovery Strategy (LNRS), which will serve to encourage the integration of these habitat types in any development's green infrastructure. Government has been clear that LNRS opportunity areas should not prevent development. Policy ST2 aligns the Local Plan with the LNRS.	No change necessary	NPPF	
10	The proposal conflicts with Policy ST2 (Environment and Green Network), EN3 (Biodiversity and Geodiversity), and GN2 (Strategic Green Spaces and Nature Recovery), all of which require development to protect and enhance ecological networks and prioritise habitat creation in opportunity areas. St John's Fields would instead fragment those very networks.	St John's Field 2.22	Any application would beed to satisfy these policy requirements in addition to PP9,		Local Plan	
11	In this case, Bullock Wood's ecology is uniquely tied to the plateau hydrology of the surrounding fields: the wood includes rare Plateau Alder communities that thrive on seasonally high water tables. A technical hydrological note prepared for the community explains that the site's high ground feeds water into the woodland laterally; if one "changes run-off or cut hedgerow/ditch networks, you will dry the woodland edge and degrade the SSSI interest". In other words, the woodland's health is fragile and dependent on the surrounding plateau's drainage regime.	St John's Field 3.2 and App 4 3.3	Maintenance of hydrological conditions is a key part of the management of any woodland and consideration of any possible changes to groundwater would be expected as part of a full ecological impact assessment, as would be required to support any planning application.	The wording of Policy PP9 should be amended to include specific reference to the need for hydrological impact assessment in relation to Bullock Wood.	Impacts	
12	The allocation of this site is in direct conflict with Policy EN4: Irreplaceable Habitats, which states that development resulting in the loss or deterioration of ancient woodland will not be permitted except in cases of wholly exceptional need. No such justification is evident in this case. It also breaches Policy EN1: Nature Conservation Designated Sites, which clearly states that proposals leading to adverse effects on the integrity of a SSSI will not be supported.	St John's Field 3.8	Planning consent will depend on the application demonstrating that there will be no loss or deterioration of ancient woodland and no adverse effects to the integrity of the SSSI.	The wording of Policy PP9 should be amended to clarify this requirement.	Local Plan	
13	Furthermore, the proposal is inconsistent with Policy EN3: Biodiversity and Geodiversity, which requires major developments to be underpinned by appropriate ecological surveys carried out by a suitably qualified professional. The absence of robust habitat and species data at this stage contradicts the policy's precautionary approach and undermines the requirement for proportionate, evidence-led decision-making. As such, the allocation cannot be considered justified in policy or ecological terms.	St John's Field 3.9	This level of ecolgocial detail is only required at application stage.	Amend Policy PP9 to specify minimum survey requirements for validation of any application.	Local Plan	
14	Inappropriate Dormouse survey methods	St John's Field Appendix 3, Appendix 4 - 4.6, etc.	There is limited evidence to support this assessment, although there is also no reason to doubt the claims. Full surveys in accordance with published guidelines would be expected in support of any planning application.	Applicants to be made aware of concerns and to ensure full and proper surveys are completed in advance of any planning application.	European Protected Species	
15	Ecological connectivity to nearby LoWS, hedgerows and woodlands	St John's Field Appendix 4 - 3.1, 3.4.1, etc	St Johns Field is bounded by dense residential development to the west and south, the railway line and A137 to east; and the A120 a short distance to the north. Ecological connectivity is therefore relatively poor and there are no clear ecological links to the other sites mentioned.	PP9 should specify a need to strengthen ecological connectivity	Impacts	
16	Woodland edge integrity	St John's Field Appendix 4 - 3.4.3, etc.	Photos in App 4 show that there is no functional edge at present with trunks on the boundary and canopy overhanging the adjacent managed field margin, which is typical of many woodlands in Essex. PP9 already requires a buffer, which would allow the establishement of an effective woodland edge if applied correctly	Amend wording in PP9 g) to be more specific about buffer and woodland edge requirements.	Impacts	

17	Urbanisation, cumulative impact: trampling and soil compaction along woodland edges; nutrient enrichment from dog fouling; disturbance to nesting birds and woodland mammals; informal access routes, desire lines and cycling trails; fire risk, littering and garden waste tipping; spread of invasive or non-native garden species; increased levels of domestic cat predation artificial light and soil compaction along woodland edges;	St John's Field Appendix 4 - 4.4, etc.	Policy PP9 requires protection from recreational disturbance, which is likely to mean excluding people entirely, if possible, or robust visitor management.	Amend Policy PP9 to specify a presumption for the exclusion of public access from the wood or for strict visitor management and exclusion areas	Impacts	
18	Loss of darkness	St John's Field Appendix 5 - 3.4.2, etc	The St John's Field area is described as a dark corridor, but the signficance of this appears to be overstated, given it's urban edge position and its generally poor ecologcial connectivity. The impact of artificial lighting on any ecological features of value that are sensitive to artificial, including bat commuting routes and woodland edges, will be an important part of the impact assessment process at planning application stage, and appropriate mitigation will be expected	Amend Policy PP9 to include reference to the maintenance of dark corridors	Potential impacts	
19	Key species considerations - information gaps	St John's Field Appendix 4 - 3.6, Chapter 5	Information is presented on the species considered to be likely present, but there is currently no evidence presented to support this. Full surveys in accordance with published guidelines would be expected in support of any planning application.	Amend Policy PP9 to clarify minimum survey requirements	Potential impacts	
20	BNG - consideration of irreplaceable habitats, onsite constraints and offsite limitations	St John's Field Appendix 4	The feasibility of delivering BNG is questioned on the basis of several elements that have no relevance to it. BNG does not apply to irreplaceable habitats, as acknowledged in the report. No loss of such habitats would be acceptable under the current wording of PP9. BNG of a minimum of 10% will be a requirement of any planning application and will be tested at that point alongside any mitigation required in relation to the SSSI. Government policy allows that any shortfall on site can be addressed by offsite measures. BNG is solely based upon habitat areas and condition and so other ecological functions are not relevant to its consideration.	No change necessary	BNG	
21	Sustainability Appraisal, misunderstands nature conservation legislation at C90 and C91. Assessment criteria in Table D8 omits veteran trees	Welshwood 2.7 and Appendix 5	A question for those that carried out the SA and prepared Preferred Options. Agreed that the nature conservation legislation point is an error in the SA, but scoring of SA8 is given as signficant negative effect so this is unlikely to have affected the conclusions of the SA or the site's inclusion in the Preferred Options Plan	Review SA and Preferred Options assessment for this site to determine if the outcome would have been different	Evidence base	
22	Inconsistent approach to negative biodiversity impact	Welshwood 2.9 and Appendix 5	A question for those that carried out the SA and prepared Preferred Options	Review SA and Preferred Options assessment for this site to determine if the outcome would have been different	Evidence base	
23	Emerging allocations biodiversity study: the ecological value of the site has not been fully assessed by the Council	Welshwood 2.31 and Appendix 5	True, but this wouldn't be expected at this stage	No change necessary	Evidence base	

24	Veteran Trees, metapopulation with Wivenhoe Park, eligible for LoWS status; presence of veteran trees would change harm assessment; impacts can't be mitigated	Welshwood 2.34 and Appendix 5 - 2.1 to 2.7	The Sibbett report identifies four veteran trees, two of which are coppice stools and one is called a "successor veteran". The Sylva Consultancy report only identifies two trees as veterans, doesn't mention the coppice stools and identifies three "successor trees", which are mature oaks. This is not considered to be an unusual concentration of veteran trees. There is no evidence of a strong connection between veteran trees on the site and those at Wivenhoe Park. It is generally considered that the invertebrates that specialise in dead wood in veteran trees (saproxylic species) have limited dispersal abilities (for example, see https://ptes.org/campaigns/wood-pasture-parkland/wildlife/ancient-and-veteran-tree-wildlife/) and so the likelihood of a metapopulation is limited. There is no evidence to suspect that the veteran trees present support signficant invertebrate assemblages and no data to support that opinion. The fact that a tree or group of trees is/are veteran is not sufficient to designate a LoWS, otherwise there would be a proliferation of LoWS across many agricultural field boundaries and in urban settings. Although not explicit in the Emerging Allocations Biodiversity Assessment, veteran trees cannot be treated in the same way as other irreplaceable habitats for the same reasons as mentioned for LoWS selection above. The presence of two veteran trees in a field boundary that is expected to be retained and protected would not have been sufficient to change the assessment, but it should be noted that there is reference to mature/veteran trees in the assessment of 10616 As stated, veteran trees are considered as irreplaceable habitat and so are protected within national planning policy and by	Amend policy PP9 to include specific reference to the presence of veteran trees and to clarify the need to avoid impacts to them.	Impacts	
25	Harm to Welsh Wood as a result of recreational use would change harm assessment, can't be mitigated	Welshwood 2.39 and Appendix 5 - 2.8 to 2.13	As stated, Welsh Wood is already used by the public and has been damaged as a result, although it retains a diverse and extensive ground flora. The harm scoring in the Emerging Allocations Biodiversity Assessment recognises that there would be an impact to the site, but does not consider it to be signficant. An assessment of the impact of any development on Welsh Wood and appropriate mitigation measures would be expected as part of any planning application.	Amend Policy PP9 to include specific reference to the potential impact on Welsh Wood from recreational pressure and the need for appropriate avoidance and mitigation measures	Impacts	
26	Additional area of Ancient Woodland, should be LoWS and buffered; impacts can't be mitigated	Welshwood 2.40 and Appendix 5 - 2.14 to 2.15	The area mentioned appears to be 0.16ha and forms part of the garden of 26 Welshwood Park Road, with a range of non-native species present below retained woodland trees. Gardens of a normal residential scale are generally excluded from LoWS designation as this is considered unreasonable to the landowner. As is noted, there are remnants of parkland and woodland throughout Welshwood Park and it is considered to be inapproppriate to select them as LoWS. The vegetation of this fragment is not consistent with native woodland flora.	No change necessary	Impacts	
27	Harm to Walls Wood as a result of recreational use would change harm assessment; Impacts can't be mitigated	Welshwood 2.41 and Appendix 5 - 2.16 to 2.18	Walls Wood LoWS is in private ownership and is outside of the Masterplan area. A substantial part of it has no public access. The harm scoring in the Emerging Allocations Biodiversity Assessment recognises that there would be an impact to the site, but does not consider it to be signficant. An assessment of the impact of any development on Walls Wood and appropriate mitigation measures would be expected as part of any planning application.	Amend Policy PP9 to include specific reference to the potential impact on Walls Wood from recreational pressure and the need for appropriate avoidance and mitigation measures	Impacts	
28	Protected species impacts, including Skylark	Welshwood 2.49 and Appendix 5 - 2.19 to 2.20	Information is presented on the species considered to be likely present, but there is currently no evidence presented to support this. Full surveys in accordance with published guidelines would be expected in support of any planning application.	Amend Policy PP9 to clarify minimum survey requirements	Impacts	
29	Constraints	Masterplan Map at 4.7	The map is out of date - does not include reviewed LoWS boundaries from 2015 or 2025	Promoters to accurately recognised ecological constraints	Evidence base	

30	Bullock Wood	Masterplan	The Masterplan Framework Key Features set out and illustrated on page 39 sugges 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 cannot be multi-use in this way and is expected to form part of protection from recreational impacts. It is likely that 15m will be insufficent and the buffer should be from the canopy/RPA of boundary trees, not from the mapped boundary of the wood.	Amend PP9 to more clearly state the requirements for a buffer to Bullock Wood SSSI. Consider implication for deliverable housing numbers	Evidence base	
31	Rail crossing	Masterplan	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. The applicants should be encouraged or required to provide an ecologically designed, green bridge crossing	Consider including a requirement for a green bridge link over the railway into PP9	Evidence base	
32	Green Infrastructure	Masterplan 4.3.3	The plan on page 42 implies a scale of green infrastructure, in the form of corridors and open space, 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.	Clarify GI requirements in PP9 and consider any implication for deliverable housing numbers	Evidence base	