



Butterfly Conservation
Cambridgeshire & Essex branch
c/o 165a Warley Hill
Brentwood, Essex
CM13 3AG

4th January 2024
via email

Dear Local Plan Committee,

Re: Green Network and Waterways Consultation - Middlewick Ranges

We have consistently opposed the inclusion of the Middlewick Ranges site within the Local Plan (Policy SC2) from the initial Defence Infrastructure Organisation's (DIO) proposal in 2017. Since the Adoption of Policy SC2 in July 2022, important new evidence has significantly reinforce our stance. The current consultation gives Colchester City Council the opportunity to fully integrate the Middlewick Ranges Local Wildlife Site (LoWS) within the Green Network and to remove Policy SC2 (allocation for up to 1,000 homes).

The key changes are:

1. Strong evidence from invertebrate field surveys in conjunction with the Essex Field Club have found **8 invertebrate assemblages in favourable condition**, using Natural England's own Pantheon software analysis. This easily qualifies the site for **Site of Special Scientific Interest (SSSI)** status and shows the site to be significantly more important than its current LoWS designation. A breakdown of the data gathered since 2019 shows:
 - *1348 invertebrate species, including 24 NERC Section 41 species that the Local Authority has a duty towards. 16 further NERC Section 41 Priority Species – research only. 3 species currently listed as 'Extinct' in the UK. 3 'Endangered' species, including 1 European 'Endangered'. A further 3 species 'Vulnerable' to extinction and 4 'Near Threatened'. There are 19 GB Red Data Book species, 3 'Nationally Rare', 72 'Nationally Scarce' (NS/Na/Nb) and a further 9 Nationally Notable species.*
 - *Other wildlife groups show 12 Red Listed bird species, including up to 29 singing male Nightingales and many nesting Skylarks.*
 - *There are 4 NERC Section 41 Herptile (reptile and amphibian) species on the site and 5 Protected Species of Bat. There are Badger setts present on the site (Protection of Badgers Act) and Brown Hare has recently been recorded, a NERC Section 41 species.*
 - *There are several Essex Red Data botanical species at the site, including the Nationally Scarce Lesser Calamint. There are several lichen species that are rare to Essex but have no national conservation status. Significant too are areas of Waxcap grasslands, with 6 species present. Waxcap fungi grasslands are an ancient grassland indicator and can merit SSSI designation in their own right.*

2. We understand that Natural England have been in recent communication with the Planning Department to emphasise these nationally important assemblages of invertebrates and the large areas of priority habitat (especially acid grassland) present at the site.

Not only is this important with respect to this site and Policy ENV1 (*"The Local Planning Authority will conserve and enhance Colchester's natural and historic environment,..."*), but it should feature strongly within the wider nature recovery strategy of Colchester's Green Network.

The following 2 points may be hearsay, but we wish to comment further on the development of the Masterplan and the Mitigation Proposals:

3. We understand that the Housing Masterplan may have shifted focus from that shown in the DIO Vision Document (December 2020) that informed Policy SC2. This showed the housing radiating from the Abbots Road southwards. As this would seriously impinge upon current amenity use of the publicly-accessible areas by people from Monkwick and Old Heath, we understand that the housing may now be located within the area that is currently fenced-off, i.e. the main firing range. However, this would destroy the key area of Priority Habitat at the site that was previously identified in the Stantec Report (November 2020) as the most substantive area of acid grassland. If this is being given serious consideration, then it shows a continued disregard for the ecological value of the site.
4. The area that the DIO has recently put up for sale extends beyond the original Development Area of 83ha to include a substantial area of the Birch Brook Woodland LoWS, giving a total land sale area of 120ha. Whilst we accept that this does not necessarily extend the Development Area, we understand that the 100ha land area to the south, either side of Weir Lane, will not be offered for inclusion in the Mitigation Land proposals. We previously expressed profound concerns over the Mitigation Proposals contained within the Stantec report, i.e. sulphurification of soil to attempt to create acid grassland in an area that we have since found already has its own ecological value. But it now appears that this potential aspect of mitigation has been withdrawn as it will be retained by the MoD for training. This formed a fundamental justification for the Allocation of up to 1,000 homes on the Middlewick Ranges site and its apparent withdrawal completely undermines the current Allocation.

We believe that these matters represent a significant material change in circumstances and makes Policy SC2 undeliverable and it should be withdrawn from the Local Plan. These matters fully accord with the evidenced-based views of Colchester Borough Council's then Ecological Officer with respect to the 2006 proposals for a Recycling Centre at the northern end of the site - appl. Ref: Col/06/1401. This development was 'only' 3.7 hectares in area, i.e. 4.3% of the current Development Area and was refused on ecological grounds.

SC2 is a disastrous policy both ecologically and for the people of Monkwick, Old Heath and the wider Colchester area. All the evidence supports the integration of the Middlewick Ranges site within the Green Network in its current condition.

Yours faithfully,



Robert C. H. Smith

Butterfly Survey and Recording Officer for Essex

For and on behalf of Butterfly Conservation, Cambridgeshire and Essex branch