



G.06, Allia Future Business Centre,
London Road, Peterborough, PE2 8AN

E-mail: info@buglife.org.uk

By e-mail only: karen.syrett@colchester.gov.uk, simon.cairns@colchester.gov.uk
sandra.scott@colchester.gov.uk

19th December 2023

Dear Colchester City Planning Officers

Re: Colchester Local Plan Review

Buglife - The Invertebrate Conservation Trust would like to make the following comments on the Colchester Local Plan Review, specifically with regards to the land at Middlewick Ranges. Middlewick Ranges is one of the largest Local Wildlife Sites (LoWS) in the region and despite long-standing recognition as an important wildlife site, it is currently allocated for housing development within the Local Plan.

Middlewick Ranges- a Nationally Important Invertebrate Site

An outstanding 1,480 species of invertebrate have been recorded at Middlewick Ranges, of which 167 species hold a conservation designation as 'Species of Conservation Concern', 11% of all species recorded. It is generally considered that sites supporting 10% Species of Conservation Concern are of national importance, indicating how valuable this site is for invertebrates. The entire Middlewick Ranges site is part of the revised Essex Coast Important Invertebrate Area (IIA)¹. IIAs are nationally or internationally significant places for the conservation of invertebrates and the habitats upon which they rely.

15 Species under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 have been identified on the site. These include the Silky Gallows Spider (*Phycosoma inornatum*), Necklace Ground Beetle (*Carabus monilis*), Phoenix Fly (*Dorycera graminum*), Four-banded Weevil-wasp (*Cerceris quadricincta*), and Five-banded Weevil-wasp (*Cerceris quinquefasciata*).

The site supports an overall diverse assemblage of rare and threatened species, including several communities that are of Site of Special Scientific Interest (SSSI) quality according to the Pantheon tool designed by Natural England and Centre for Ecology & Hydrology². Assemblages recorded in 'favourable condition' include those associated with bare sand & chalk, rich flower resource, scrub edge, scrub-heath & moorland, bark & sapwood decay, open short sward, heartwood decay and epiphyte fauna. These assemblages illustrate the value of the mosaic of habitats present on site, enabling a wide diversity of species to be supported.

¹ [Important Invertebrate Areas - Buglife](#)

² <https://pantheon.brc.ac.uk/>

Potential Loss of a Local Wildlife Site and associated Priority Habitat

As a LoWS, the Ranges are a key biodiversity site in the area, supporting one of the largest areas of the Priority Habitat Acid Grassland in Essex. Any development on this site will result in the loss of this Priority Habitat and an overall loss of biodiversity, contravening National Planning Policy Framework (NPPF) biodiversity policies. Paragraph 179 (b) of the NPPF (2021) states that planning policies should “*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity*”.

As well as its inherent wildlife value, Middlewick Ranges is also important as part of a network of sites supporting local biodiversity in the Essex Coast IIA. Paragraph 174 of the NPPF (2021) states that “*planning authorities and decisions should contribute to and enhance the natural and local environment by a) protecting and enhancing valued landscapes, sites of biodiversity and b) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*”.

The Local Plan Review presents a clear opportunity to include Middlewick Ranges within the Green Infrastructure Plan of the Borough and secure the future of this site. Buglife argues that to meet the Government targets for 30% of land to be protected by 2030³, LoWS should be protected from inappropriate development. In the context of a biodiversity crisis, this site is a biodiversity hotspot and development needs must be met on sites of less value. This is not only to fulfil the requirements for developments to avoid significant harm to biodiversity, but also to ensure meaningful uplift can be achieved through enhancements and Biodiversity Net Gain.

Buglife urges Colchester City Council to include Middlewick Ranges as an important green space within the Local Plan Review and protect it from development.

Please do get in contact if you require any further information.

Yours sincerely



Jamie Robins

Programmes Manager

³ [Delivering 30by30 on land in England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/delivering-30-by-30-on-land-in-england)