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Our ref: 534945
Your ref: Colchester Local Plan Preferred Options Reg 18



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BY EMAIL ONLY

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Dear Sir/Madam

Colchester Local Plan Preferred Options (Regulation 18) Consultation 2025

Thank you for your consultation on the above dated 26 November 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We understand that the current Regulation 18 consultation includes the same version of the Preferred Options Local Plan commented on by Natural England through the Duty to Cooperate consultation, in our letter dated 20 August 2025 (ref. 518777). We also provided comments in response to the Council's Placemaking consultation, in our email of 23 July 2024 (ref. 479028). Our additional comments below are therefore limited and generally aim to reiterate previous advice on key matters to be reflected in the updated Plan. They should be read alongside our previous comments which we trust will be considered following completion of the current consultation.

Natural England welcomes removal of Middlewick Ranges as a proposed site allocation on the basis that development of the site, most of which is designated as a Local Wildlife Site (LoWS) is likely to significantly harm biodiversity including woodland and acid grassland Priority Habitat. We strongly support the proposed new enhanced biodiversity and open space dedication on the land, to ensure its importance is recognised in the long-term – **our advice is that delivery should be secured through the relevant Local Plan policy.**

Colchester Local Plan Preferred Options (Regulation 18)

Vision and approach to Local Plan

Natural England welcomes the overarching holistic and integrated approach to the Local Plan and the key aims to help address the climate emergency, biodiversity and the environment, health and wellbeing and the cost-of-living crisis. We fully support inclusion of key natural environment matters, including air and water quality, water resources and flood risk and opportunities to recover nature through the LNRS, GI and BNG, at the heart of the plan. The Local Plan seeks to address these challenges to deliver the level of growth required to meet the needs of current and future generations whilst also protecting and enhancing the environment and people's quality of life.

We note the requirement for 20,800 new homes and an additional ~ 41.7ha employment land over the plan period 2025 to 2041 to meet predicted needs. Ensuring sufficient allocation of land to accommodate growth is a key challenge, hence we strongly support aspirations to target this in the most sustainable locations, without adverse impacts on the environment and community and social

infrastructure.

Natural England supports the Council's approach to partnership working with other organisations, developers and the public to enable more positive outcomes. We welcome that the Plan approach responds directly to the growing demands linked to the creating a better environment agenda enabling delivery on climate change, health and wellbeing, improving quality of life and biodiversity requirements as well as delivering growth requirements in a way which has planning for a better environment at the heart – a Local Plan that will benefit people, place and the planet.

Natural England supports the Colchester Local Plan 'Vision', and recognition that inevitable growth brings opportunity too, to improve the quality of life for communities, create a better environment and contribute to healthy lifestyles, by maximising the opportunities provided through well connected green networks. We welcome the aim to achieve this through provision of new open spaces, biodiversity net gain and the creation of wildlife corridors to create better connections between habitats, so that people value what is unique to the district - the countryside, coast and city. Enhanced sustainable travel will encourage active lifestyles and benefit air quality and climate change. We support these initiatives and the wider themes and objectives of the Local Plan vision.

Strategic Policies

Policy ST3: Spatial Strategy

As indicated previously, siting large housing developments immediately adjacent to coastal designated sites should be avoided where possible. Where this is considered necessary, developments are likely to need to provide Suitable Alternative Natural Greenspace (SANG) to mitigate adverse recreational impacts on the Essex Coast Habitats Sites. The review of the Essex Coast RAMS may provide further information about acceptable scales and distance of development from the coast.

Policy ST4: Development in the Countryside

We advise that policy wording should ensure that development will avoid Best and Most Versatile agricultural land where possible.

Policy ST7: Infrastructure Delivery and Impact Mitigation

We would like to see green infrastructure (GI) included in this policy. GI is an important part of infrastructure provision, and this should be reflected in infrastructure planning for Colchester, e.g. included in an Infrastructure Delivery Plan and costed appropriately to ensure that it is delivered as part of new development. Our previous response should be referenced for further detail around the importance of timely delivery of high-quality natural greenspace for people's health and wellbeing and for managing recreational pressure impacts on sensitive designated sites.

Working towards a Nature Towns and Cities accreditation would help build the process of integrating and embedding GI as critical infrastructure into the Local Plan and Plan policies.

Policy ST9: The Tendring Colchester Borders Garden Community

Natural England's advice is that policy wording should stipulate that sufficient SANG will be required for this major cross-boundary proposal, to comply with Policy GN5 and mitigation for loss / disturbance of any land considered to be functionally linked to Habitats sites.

Environment

Whilst Natural England is generally supportive of these policies, including strong links to the Essex LNRS, please refer to the advice we have provided in our previous response.

Natural England strongly supports the proposed new enhanced biodiversity and open space dedication on land at Middlewick Ranges, as set out in the Sustainability Appraisal. Our advice is that it's delivery should be secured through the appropriate Plan policy i.e. EN1 or EN3.

With regard to Policy EN9: Pollution and Contaminated Land: Natural England would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on protected sites. If the Local Plan would result in other air quality impacts apart from traffic, then this will also need to be addressed.

Local authorities should consider including a local plan policy based on the suggestion below to address air pollution impacts on Habitat Sites and SSSIs. The local plan policy could include the following:

- Proposals should not significantly delay the date for compliance with environmental thresholds for air pollutants for Habitats Sites or SSSIs that are currently in exceedance of environmental benchmarks (critical levels and loads).*
- Proposals emitting air pollutants which impact Habitats Sites must rule out adverse effects on the integrity of such sites. Where this is not possible the derogations route of the Habitats Regulations should be followed.*
- To avoid and minimise air pollution impacts any development requiring Habitats Regulations Assessment, Environmental Impact Assessment (EIA) or impacts to SSSIs unrelated to EIA development should consider:*
 - the measures included which will minimise air pollution impacts on SSSIs and Habitats Sites and SSSIs during the design process of the development; and*
 - how air quality improvements have informed the design choices made about the location of the development, its layout, and distribution of buildings, on-site activities, amenity spaces and infrastructure.*

A local plan could go on to set out what would be required for different development types in more detail. This may be important where there is strong evidence that particular sources of air pollution are preventing nature recovery. For example, where agricultural development is known to be one of the main sources of air pollution, a policy could specify a buffer around a protected site within which new or intensified agricultural proposals would not be permitted, apart from in exceptional circumstances¹.

We welcome the requirement for development to demonstrate that significant harm to brownfield sites of high biodiversity value is avoided and fragmentation of habitats is minimised. The district includes significant areas identified by Buglife as an [Important Invertebrate Area](#), supporting some of Britain's rarest species and possessing unique assemblages of invertebrates. Development in these areas should be avoided; however, where this is not possible, it may be acceptable to mitigate impacts through site design (especially any on-site BNG, Green Infrastructure or SuDS) and ongoing management (i.e. Landscape Environmental Management Plan) to protect and enhance habitat features for invertebrates. [BugLife](#) has produced a [general guidance note](#) on practical measures to achieve this and is developing site-specific [profiles](#). Please contact info@buglife.org.uk for more information. Reference to this information could be usefully included in the policy wording or supporting text.

Green Network and Waterways

Whilst Natural England is generally supportive of these policies, please refer to the advice we have provided in our previous response.

Policy GN2: Green Network and Waterways: Natural England fully supports this policy and the ambition of the Council to work with landowners and other stakeholders to support the delivery of the Essex LNRS, including proposals for a Roman River corridor nature recovery area. We welcome

¹ Joint Nature Conservation Committee's (JNCC) Nitrogen Futures Project, available at: <https://jncc.gov.uk/our-work/nitrogen-futures/>

that any proposals within this area that are not principally related to nature recovery must demonstrate that they will not prevent nature recovery coming forward in the Strategic Opportunity Areas identified in the Essex LNRS and how they will contribute to delivering habitat creation in accordance with the Essex LNRS.

Natural England recommends a borough-wide mapping exercise, similar to that carried out for the Colchester Strategic Biodiversity Assessment 2025 (Fig. 3: Areas of Biodiversity Significance), to enhance interpretation of the Essex LNRS Strategic Opportunity Areas. This should help allocations / developments to deliver enhancement of ecological connections.

Nature Towns and Cities

We recommend you consider taking part in the Nature Towns and Cities [Accreditation](#) scheme as part of your local planning process. The scheme aligns to implementation of the Natural England Green Infrastructure Framework and Standards and is designed to recognise towns and cities that put nature and green infrastructure at the heart of their communities. The accreditation has been co-designed and tested with a group of local authorities, with input from the voluntary sector, independent experts and government agencies.

Achievement of accreditation demonstrates that a local authority has a strong commitment to transforming green infrastructure to benefit people, place and nature and is working with communities and other partners to create greener, healthier, resilient and thriving places.

Why apply for accreditation?

- **The process of accreditation is based on a framework that will help you plan how Green and Blue Infrastructure (GBI) can deliver across a range of priorities in your place, supporting the process of implementing a new Green Infrastructure Strategy/Plan as part of your Local Plan process.** It will support authorities in evaluating their current GBI, supported by a [self-evaluation tool](#) and to consider links between GBI and public health, climate resilience, community empowerment and nature recovery and pressing issues like economic growth, active travel, and youth skills and employment.
- **Strengthen your partnerships:** The accreditation process supports the building of partnerships to deliver change, creating a sense of shared direction and building capacity across a place. For local authorities and the public sector, this provides an opportunity to strengthen connections with communities and other partners and help everybody have their say in future plans. For the voluntary and private sectors, this is an opportunity to be part of setting the strategic direction for a town or city.
- **Get external recognition** for your plans to deliver urban landscape-scale change, which will help you make the case for investment and gain support from partners and the public.
- **Secure funding and investment:** accreditation will provide assurance to potential funders and investors that your place is equipped to deliver ambitious change. This will help to attract funding and finance from public, private and philanthropic sources.

We would be happy to support [insert place name here] if you are interested in pursuing a Nature Towns and Cities accreditation, please do get in touch if this is of interest to you. Nature Towns and Cities run a free online monthly call where interested parties can find out more about the accreditation scheme, please visit [Accreditation support series - Nature Towns & Cities](#) to sign up for forthcoming sessions.

In addition to accreditation, the Nature Towns and Cities programme is supported by a free network that you can join by entering your email address here: <https://naturetownsandcities.org.uk/join-in/events-calendar/>. The network has a free to access resource library to support planning and delivery for urban nature and green spaces, featuring:

- case studies, articles and past webinars: [Resources Library - Nature Towns & Cities](#)
- a rolling events programme: [Events - Nature Towns & Cities](#)

Policy GN5: Suitable Alternative Natural Greenspace

As indicated previously, we advise inserting the following underlined words '*All SANGs that are required must meet the Natural England standard of **a minimum of 8 hectares per 1,000 head of new population***'. The NE SANG Guidelines (2021) must be met in full. We advise that Policy GN5 includes a requirement to consult NE via the pre-application service for bespoke advice on SANG proposals, to ensure that the planning application does not get held up at the consultation stage.

Landscape and Coast

Whilst Natural England is generally supportive of these policies, please refer to the advice provided in our previous response. In particular, with regard to Policy LC2: Dedham Vale National Landscape, whilst we support the policy, we strongly recommend seeking the views of Dedham Vale National Landscape team on this policy.

Net Zero Homes and Buildings, Renewable Energy and Water

We generally support these policies for the benefits they will deliver for the natural environment and climate change, including improved air quality, water quality and resources.

Policy NZ3: Wastewater and Water Supply: We welcome that the Council will work with Anglian Water, Affinity Water, the Environment Agency and developers to ensure that there is sufficient capacity in the water supply and wastewater infrastructure to serve new development.

Natural England supports the requirement for all new buildings to include water efficiency measures, including a residential development standard of 80 litres per person per day. The nature recovery and protection obligations for local plans in relation to water scarcity are set out in Annex D of the [shared-standards-in-water-efficiency-for-local-plans.pdf](#). It is your authority's responsibility to determine that the Local Plan meets the policy and statutory obligations for nature protection and recovery, set out in Annex D of the Shared Standards in Water Efficiency for Local Plans, informed through preparation of a Water Cycle Study. We therefore welcome preparation of the Colchester Local Plan Water Cycle Study.

Economy

Policy E2: Economic Development in Rural Areas and the Countryside: We welcome that proposals in close proximity to a habitats site must demonstrate through HRA screening that the scheme will not lead to likely significant effects to the integrity of the habitats site. Where this cannot be ruled out a full appropriate assessment will be required to be undertaken. Additionally, any planning application within 400 metres of a habitats site must provide mechanisms to prevent the introduction of invasive species.

Policy E5: Colchester Zoo: We welcome policy requirements for expansion proposals to undertake wintering bird surveys at the appropriate time of year to identify any offsite SPA functional habitat and to prioritise impact avoidance. Where this is not possible we support requirements for delivery of habitat creation and management, ahead of development, to mitigate any significant impacts.

Community and social infrastructure

We support policy requirements to protect the natural environment including the integrity of habitats sites and to minimise disturbance to designated breeding and wintering species. We welcome that any future extensions to caravan parks by the coast will require their own HRA/ appropriate assessment where necessary, to demonstrate how any avoidance or mitigation measures identified in the appropriate assessment will be delivered.

Place and Connectivity

We generally support these policies and requirements for all relevant development to protect and enhance the natural environment. Policy PC6: Design and Amenity requires incorporation of a network of green infrastructure, open space and landscape as part of the design of the development to reflect the importance of these networks to biodiversity, climate change mitigation, healthy living and creating beautiful places. Natural England welcomes this.

Place Policies

Natural England welcomes removal of Middlewick Ranges as a proposed site allocation on the basis that development of the site, most of which is designated as a Local Wildlife Site (LoWS) is likely to significantly harm biodiversity including woodland and acid grassland Priority Habitat. We strongly support the proposed new enhanced biodiversity and open space dedication on the land, to ensure its importance is recognised in the long-term.

For advice on the Place Policies, please refer to advice in our previous response to the Duty to Cooperate consultation, which we will not reiterate in full here. However, our key comments focused on Green Infrastructure and sourcing evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) through Natural England's [Green Infrastructure Framework](#). In addition to the [Green Infrastructure Map](#) and [GI Mapping Analysis](#) the Essex Local Nature Recovery Strategy (LNRS) mapping can help identify priorities for new and enhanced GI. Opportunities should be taken to connect, buffer and enhance ecological networks, and relieve existing and future recreational pressure on designated sites within the local area. Embedding the Essex LNRS within the Local Plan will be important in helping the delivery of the Nature Recovery Network as set out in the 25 Year Environment Plan.

We also highlighted the need to ensure that the Local Plan is able to evidence adequate sewage treatment infrastructure / Water Recycling Centre (WRC) capacity to serve new development without increasing the nutrient and pollutant load of WRC final effluent discharges and adverse impact to sensitive designated sites. Our advice is that the completed Water Cycle Study should be used to inform policy and allocations for water quantity and quality.

Policy requirements for development to protect and enhance the natural environment, including designated sites, is welcomed:

Policy PP9: North-East Colchester: we support the requirement for a buffer to Bullock Wood SSSI, informed by a survey and opportunities taken to secure improved management to the SSSI to include protection from recreational disturbance, and connections between the SSSI and Welsh Wood and Wall's Wood LoWS.

Policy PP10: Land South of Berechurch Hall Road, Colchester: a requirement for measures to mitigate recreational disturbance impacts to Roman River SSSI is welcomed.

Policy PP24: Land Northwest of the Fire Station, Wivenhoe: we welcome policy requirements for wintering bird surveys to inform assessment of the impacts of development on the Colne Estuary SPA functionally linked land and any required mitigation.

In addition to the Essex Coast RAMS tariff and depending on the size and location of the development, additional mitigation measures may be required in conformity with our Suitable Alternative Natural Greenspace (SANG) guidelines to account for the impacts of the development taken alone. Those sites will need to have capacity to accommodate SANG (at a minimum of 8ha/1000 new population, as per Policy GN5: Suitable Alternative Natural Greenspace requirement). Alternatively, a contribution could be made to an existing accessible semi-natural greenspace (e.g. a Country Park) to uplift it to NE SANG Guidelines standard, as long as there is

sufficient capacity for additional visitors.

Habitats Regulations Assessment

As indicated in our previous response, we agree with the findings of the Habitats Regulations Assessment (HRA) and support the Next Steps which are to provide an update of the HRA to include findings from:

- an AADT traffic modelling study, particularly in relation to the A137; and
- the completed Water Cycle Study which should be used to inform policy and allocations for water quantity and quality.

Please refer to our previous advice around policy requirements for wintering bird surveys for all allocations identified as having potential for functionally-linked land.

We also remind your authority that review of Essex Coast RAMS may amend Zones of Influence (ZOIs) and may provide further clarity on the requirement for SANG when development is considered to have a likely significant effect taken alone.

Our advice is that site allocations need to reference the policy numbers in the Local Plan throughout the document for ease of reference.

Sustainability Appraisal

Natural England welcomes the discounting of Middlewick Ranges as a site allocation in the Colchester Preferred Options Local Plan, and the rationale provided:

Development of the site is likely to significantly harm biodiversity. The site is almost all LoWS, woodland and acid grassland Priority Habitat, corridor of Birch Brook. Recent ecological evidence has provided extensive updated information supported by Natural England.

As noted, above we welcome the proposed new enhanced biodiversity and open space dedication on this land, to ensure its importance is recognised in the long-term. Our advice is that its delivery should be secured through the relevant Local Plan policy.

We note that alternative 10953a (larger site including additional land to the south towards Weir Lane) was also considered. We assume that alternative site 10953a is also discounted.

Please refer to comments on the Sustainability Appraisal provided in Natural England's previous response. We have no further substantive comments to make.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Yours faithfully

West Anglia Team