Colchester City Council

For the attention of Councillors Karen Syrett, Simon Cairns, Sandra Scott

11 December 2023

Dear Councillors Syrett, Cairns and Scott,

Middlewick Ranges housing allocation

We write in relation to the Colchester City Local Plan housing allocation for Middlewick Ranges.

It has been brought to our attention that the developer's Ecological Evidence Base report (Stantec,Project Ref: 50035/Eco, Rev: A, Date Nov 2020) relies heavily on a single case study to justify their compensation/mitigation proposals. This case study relates to work undertaken at our Minsmere reserve in Suffolk.

The Council will be aware of the mitigation hierarchy that sets out a series of steps in protecting ecological habitats from harm by development, namely avoid the damage in the first instance; mitigate by reducing adverse impacts, and lastly compensate where avoidance or mitigation are not possible (*per* Essex Wildlife Trust letter to localplan@colchester.go.uk dated 14 November 2021). Underpinning the latter are the fundamental principles that any mitigation or compensation must be bespoke, deliverable and effective.

The RSPB wish to advise the Council that the Minsmere case study presented in the Stantec report is **not** comparable or analogous to the proposed compensation site for Middlewick Ranges and we do not consider that any mitigation/compensation would be suitably bespoke, deliverable or effective.

We would not wish the work at Minsmere to be used to legitimise or justify the destruction of acid grassland or heathland (priority habitats) at Middlewick. The Minsmere case study was a strict habitat creation project with a conservation objective to create suitable habitat from farmland of low biodiversity value for breeding Stone Curlews (one of the UK's rarest birds). It was not a replacement for sensitive ecosystems such as acid grassland supporting an outstanding invertebrate assemblage of over 1,400+ species known to exist at Middlewick. Fundamentally, the soil conditions at Minsmere are light, whilst those at the Middlewick compensation site are a heavy loamy clay, which are nutrient-rich and currently provide important habitats in their own right.

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The RSPB is part of Birdlife International, a Partnership of conservation organisations working to give nature a home around the world.

Chair of Council: Kevin Cox **President:** Dr Amir Khan **Chair, Committee for England:** Jennifer Ullman **Director, RSPB England:** Emma Marsh
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We would like to draw the Council's attention to our *Planning Naturally* [1] report, produced in conjunction with the Royal Town and Planning Institute (RTPI) and the Chartered Institute of Ecology and Environmental Management (CIEEM). This sets out twelve principles of good spatial planning and we wish to highlight the following:

- Plans should contribute to sustainable development by enhancing the natural environment and ensuring that social and economic development takes place within environmental limits.

- Plans and projects should be based on up-to-date and scientifically robust evidence, including evidence on the value of the natural environment

- Plans and projects should be rigorously assessed for their environmental impacts, and the results used to improve the plan.

- Alternative options should be considered, particularly alternatives that are less damaging to the environment, and the reasons for rejecting any options should be made public.

Finally, the Council will need to consider their responsibilities in relation to the emerging Local Nature Recovery Strategies (LNRS).

We trust that this information is of assistance to the Council and please treat this letter as public domain. Colchester environmental organisation en-Form has been informed of this correspondence.

Yours sincerely,



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[1] Available here - https://cieem.net/wp-content/uploads/2019/02/planning-naturally.pdf

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