

**Appendix A summary of the responses to consultation on the Main Modifications to Section 2 Colchester Local Plan (04/10/2021-18/11/2021)**

<b>MM Ref (Policy / Para)</b>	<b>Number of Reps</b>	<b>Summary of Objections issues / comments raised</b>
<b>MM1 (Whole Plan)</b>	<b>1</b>	Insufficient revisions made to take account of the final adoption of Section 1 and the removal of the CBBGC.
<b>MM3 (SG1)</b>	<b>1</b>	Object to the removal of the word “highly” in front of accessible locations” and request it is re-instated
<b>MM4 (SG2)</b>	<b>2</b>	<ul style="list-style-type: none"> <li>Housing numbers and timescale for Copford with Easthorpe are not appropriate given the limited facilities in the Parish</li> <li>Indefensible use of greenfield site ref Hall Road Copford</li> </ul>
<b>MM5 SG2 Table- appendix 1)</b>	<b>13</b>	<ul style="list-style-type: none"> <li>Housing provision Number for Copford with Easthorpe is disproportionate to neighbouring areas elsewhere in Colchester</li> <li>Should be a provision for housing made in Marks Tey- the Plan has consider 24,000 or 0 houses</li> <li>Further assessment of smaller scale development at Marks Tey is required</li> <li>Increased numbers at Stanway should be reconsidered due to limited capacity for further growth</li> <li>Further clarification required on the numbers referring to Tiptree (allocations and existing commitments)</li> <li>Reduction of numbers at Tiptree is unjustified</li> <li>Impact on climate change and pollution of building more houses</li> <li>Houses at Middlewick will not be delivered in the timescale indicated- need alternative sites to ensure numbers are met- (Marks Tey referenced)</li> </ul>
<b>MM7 SG3 (and appendix 2)</b>	<b>2</b>	<ul style="list-style-type: none"> <li>Concern about the reduction in the employment provision particularly in Stanway and the impact on ability to create sustainable neighbourhoods. Request this is reconsidered and the mixed use allocation at Stanway is re-instated.</li> <li>Reinstate the employment land at Marks Tey previously omitted- correct map to illustrate area accurately (Relates to Policy Map)</li> </ul>
<b>MM8 (SG4)</b>	<b>2</b>	<ul style="list-style-type: none"> <li>Constraints to Local Employment area in Tiptree are no recognised in the Modification</li> </ul>
<b>MM10 (SG6)</b>	<b>2</b>	<ul style="list-style-type: none"> <li>Modification MM10 is not consistent with National Policy nor justified by any exceptional circumstances. References to proposals (either in or edge of centre) being of an appropriate scale and type and maintaining or adding to the viability and vitality of the centre should be removed.</li> </ul>

		<ul style="list-style-type: none"> <li>Further clarification required regarding which elements apply to in, edge or out of centre (Tollgate District centre)</li> </ul>
<b>MM11 (SG6)</b>	<b>1</b>	Seek clarification of application of impact thresholds set out in Table 6
<b>MM12 (SG7)</b>	<b>1</b>	Policy SG7 omits a main modification that was agreed between Colchester Borough Council and Essex County Council as outlined in the Statement of Common Ground signed 9 April 2021 and published on the Section 2 Local Plan webpage. The agreed, but omitted modification to Policy SG7, is outlined in the SoCG under 'CBC Rep number 6203'. This would include additional text to the policy at the end of the 4th paragraph, and will provide a clear reference to CIL (ECC)
<b>MM13 (SG8)</b>	<b>3</b>	<ul style="list-style-type: none"> <li>Revised wording is not supported and should be amended as follows- <i>"Once a Neighbourhood Plan is made, this becomes part of the Development Plan. In cases where a Neighbourhood Plan has not been made, responsibility for all planning matters within that area will revert to the Local Planning Authority."</i></li> <li>Policy no longer clear what happens if NHP fails revised wording proposed to provide certainty / clarity</li> <li>Over reliance on the NHP to deliver homes – specifically in relation to Tiptree</li> </ul>
<b>MM14 (para 13.3- Habitats Regs)</b>	<b>1</b>	The Habitats Regulations requirements need to be applies to Middlewick Ranges (comments also made to MM37)
<b>MM17 (para 13.8)</b>	<b>1</b>	Further clarity required regarding Biodiversity Net Gain requirement should not be as absolute as worded
<b>MM18 (para 13.9)</b>	<b>2</b>	<ul style="list-style-type: none"> <li>Paragraph 13.9 omits a modification agreed between Colchester Borough Council and Essex County Council as outlined in the signed Statement of Common Ground (SoCG) between the two authorities on 9 April 2021. The agreed, but omitted modification is outlined in the SoCG under 'CBC Rep number 6207'. This is a factual change to ensure consistency with legislation and the representation was made by ECC in 2017 at the Regulation 19 stage.</li> <li>The text should similarly acknowledge that the large swathes of Lowland Dry Acid Grassland at Middlewick Ranges is also difficult to recreate and loss would impact severely on the habitats supported- add reference to this point in para 13.9 referring to lowland acid grassland at Middlewick</li> </ul>
<b>MM20 (ENV1)</b>	<b>4</b>	<ul style="list-style-type: none"> <li>Seeks clarification in the wording relating to criterion (iii) and (v) in the modification in relation to Biodiversity Net Gain- also to confirm that both BNG <b>and</b> Mitigation are required rather than <b>or (NE)</b></li> <li>Lowland acid grassland should be recognised as an irreplaceable habitat and ref to this added to the policy in section D</li> <li>Flexibility should be required around Biodiversity Net Gain</li> </ul>
<b>MM23 (ENV5)</b>	<b>1</b>	There is no reference to light pollution which is necessary to determine what is acceptable

<b>MM24 (para 13.49)</b>	<b>3</b>	<ul style="list-style-type: none"> <li>• Modifications do not include the third element in the cited canopy-cover study: 'targets and strategies for increasing tree cover should be set according to species, size and age composition of the existing urban forest, based upon a ward/district level and land-use assessment' We propose inclusion of the cited extract from the Canopy-cover study.</li> <li>• The proposed requirement for a canopy cover assessment is ineffectual as: <ul style="list-style-type: none"> <li>• Additional burden to a planning application submission</li> <li>• NPPF continue to evolve in regard to this topic</li> <li>• Rigid and broad 10% quantitative increase in tree cover is ineffective</li> </ul> </li> </ul> <p>Suggested policy amended to refer to exploration through landscaping whilst taking into account the sites characteristics</p>
<b>MM25 (CC1)</b>	<b>4</b>	<ul style="list-style-type: none"> <li>• Modifications do not include the third element in the cited canopy-cover study: 'targets and strategies for increasing tree cover should be set according to species, size and age composition of the existing urban forest, based upon a ward/district level and land-use assessment' We propose inclusion of the cited extract from the Canopy-cover study.</li> <li>• The proposed requirement for a canopy cover assessment is ineffectual as: <ul style="list-style-type: none"> <li>• Additional burden to a planning application submission</li> <li>• NPPF continue to evolve in regard to this topic</li> <li>• Rigid and broad 10% quantitative increase in tree cover is ineffective</li> </ul> </li> </ul> <p>Suggested policy amended to refer to exploration through landscaping whilst taking into account the sites characteristics</p> <ul style="list-style-type: none"> <li>• <b>Urge early plan review to ensure climate change challenges can be met</b></li> </ul>
<b>MM26 (PP1)</b>	<b>2</b>	Mitigation to include requirements for contributions to the cost of infrastructure and/or community facilities should not be negotiable. Include installation of potentially life-saving publicly accessible defibrillators to all major developments of more than 10 dwellings.
<b>MM27 (TC1)</b>	<b>2</b>	<p>Policy TC1 should include shared mixed-use spaces and short-term uses should also include outdoor or outdoor covered spaces to provide wider range of diverse mix of uses.</p> <p>Add wording between "mix of uses" and "and extend"- <i>including shared mixed-use spaces and short-term uses including festival, arts and other events which encourage visitors and enhance tourism</i></p>
<b>MM29 (TC3)</b>	<b>1</b>	<p>Vineyard gate Delete "" provide a residential-led "</p> <p>Replace with: "provide affordable homes, and an extension to the bus interchange,</p> <p>Reason: The original text is too prescriptive and will not permit changes of direction in the near future</p> <p>St Botolphs - Delete "Mixed use scheme providing cinema, hotel; restaurants cluster; retail; student accommodation; Creative Business Centre (1.86 ha)</p> <p>And replace with "Mixed use scheme including leisure, tourist and cultural facilities"</p>

		Reason: The original text is too prescriptive ADD under "requirements" Retain existing public rights of access to homes and businesses to the north of the site less
<b>MM35- MM47 all relate to Middlewick Ranges</b>		
<b>MM35 (para 14.54)</b>	<b>284</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory Consultees indicated for reference);</p> <ul style="list-style-type: none"> <li>• Inadequate Infrastructure including impact of additional traffic- capacity / congestion;</li> <li>• Traffic impact on the wider network</li> <li>• Impact on the biodiversity and local wildlife site- it is not possible to create Biodiversity Net Gain required or to mitigate ecological habitats;</li> <li>• Incompatible with the ecological evidence base</li> <li>• Conflict with Boris Johnson's recent statement regarding building on greenfield sites;</li> <li>• Loss of open space / it should be a country park green infrastructure evidence is out of date</li> <li>• Lack of nearby employment</li> <li>• Impact on pollution</li> <li>• The houses are unnecessary</li> <li>• Inadequate capacity at foul sewer and treatment plant</li> <li>• Impact on Flood risk / surface water flooding from Birch Brook</li> <li>• Impact on historic / heritage of the area</li> </ul> <p><b>Will Quince MP-</b> Housing is not needed, there is no justification of "opportunities" and concern over the potential wildlife and ecological damage caused by the proposals</p> <p><b>EWT</b> – Justification is not provided for destroying a nationally rare ecological habitat. The houses are not necessary therefore is no exceptional need to justify the damage</p> <p>Comments- if the Site is to be developed the points below to be considered / addressed;</p> <ul style="list-style-type: none"> <li>• Infrastructure to be put in place before the houses are built;</li> <li>• Homes to be carbon neutral and include measure to off set climate impacts;</li> <li>• Create a southern bypass</li> <li>• Ensure consultation and early involvement of natural England in Masterplanning for the site</li> </ul>

<b>MM36 (para 14.55)</b>	<b>136</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p> <ul style="list-style-type: none"> <li>• Diverse environment should be preserved for future generations</li> <li>• Loss of wildlife and habitats (including irreplaceable habitats)</li> <li>• Infrastructure is inadequate</li> <li>• Traffic congestion / capacity impacts locally and wider network</li> <li>• Impact on air quality and pollution- Middlewick currently provides a buffer to adjoining AQMAs</li> <li>• Lack of an overall masterplan for South Colchester and managing traffic impacts</li> <li>• Impact on the open space which should be retained for local enjoyment</li> <li>• Will increase CO2 emissions</li> <li>• </li> </ul> <p><b>Will Quince MP</b>-Despite the drive towards increased sustainable transport infrastructure and the active travel agenda the increase in traffic is a concern particularly the impact on air pollution in an area which is already exceeding the legal limits</p> <p>Comments- if the Site is to be developed the points below to be considered / addressed;</p> <ul style="list-style-type: none"> <li>• Acknowledge installation of cycle lanes is impractical along some parts of routes</li> <li>• Assessments and Road infrastructure must take account of other developments in the area (eg Willows Estate and Berechurch).</li> <li>• Ensure CO2 emissions do not exceed the recommended levels</li> <li>• Any permission for development must be conditional on the road network being capable of the accommodating the additional traffic, and be masterplanned</li> <li>• Need to be realistic about modes of travel and modal shift</li> <li>• Modification to go further and indicate that that if the traffic constraints cannot be adequately addressed then the number of houses is not just scaled down but the site potentially removed altogether.</li> <li>• Mitigation will need to form part of the Transport Assessment to manage impact on air pollution and flood risk as well as congestion</li> <li>• Investigate the feasibility of a bridge for cyclists and pedestrians across the River Colne to help reduce the impact of development at Middlewick</li> </ul>
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<b>MM37 (para 14.56)</b>	<b>213</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p> <ul style="list-style-type: none"> <li>• Impact on the wildlife species and habitats including rare species (UK Biodiversity Action Plan habitat 1) many of irreplaceable</li> <li>• Loss of LWS</li> <li>• Biodiversity net gain is not achievable</li> <li>• Take account of the expert ecology advice provided to EiP by objectors and not just rely on the Stantec evidence</li> <li>• Loss of open space / Green Infrastructure strategy is out of date</li> <li>• Loss of historic grassland and woodland / damage heritage and archaeology</li> <li>• The area should have SSSI status. Recent survey evidence has been submitted to NE who have advised it is “scientifically interesting” “has merit in being considered...”</li> <li>• Should be a nature reserve / country park ( managed by egs- EWT / RSPB / CBC)</li> <li>• Inadequate infrastructure to support the development</li> <li>• Flood risk in the area</li> <li>• Loosing Middlewick will set a precedent to loosing other important open spaces in Colchester and elsewhere</li> <li>• Has been no consultation with residents</li> <li>• Houses are not needed</li> </ul> <p><b>Will Quince MP</b>-Concerned that he ecology / wildlife reports prepared by Objectors for the EiP have been ignored. Concern whether the Inspector understands that the acid grassland is a nationally significant habitat</p> <p><b>EWT</b>- The wording of the Main Modifications lacks clarity due to the conflation of the terms ‘mitigation’ and ‘compensation’. The Main Modifications also fail to adhere to the good practice principles for the application of Biodiversity Net Gain</p> <p><i>Comments- if the Site is to be developed the points below to be considered / addressed;</i></p> <ul style="list-style-type: none"> <li>• Reduce the allocation area to the area currently fenced off to prevent over building on the larger allocation</li> <li>• Wait for the replacement habitat (acid soil / grassland) has worked before allowing building to take place</li> </ul>
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		<ul style="list-style-type: none"> <li>• should the site remain in the plan, the following additional modification is required: “No development can commence on Middlewick Ranges (SC2) until a team of independent ecologists &amp; wildlife experts, funded (but not managed) by the developer, are satisfied that the new acid grassland mitigation habitat has established to a satisfactory level.”</li> <li>• If development is agreed, it must be environmentally-led. The least and most minimal damage, and this damage be properly mitigated in a proven way and before development occurs.</li> <li>• Avoid building on the acid grassland as much as possible</li> <li>• Further protection offered - more than the wording affords here. We should also make specific reference to ensuring the highest protected areas are not built on and safe. A country park and wildlife corridor should be a minimum expectation for the area.</li> </ul>
<b>MM38 (para 14.57)</b>	<b>119</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p> <ul style="list-style-type: none"> <li>• Loss of only remaining green lung / buffer in this area of Colchester</li> <li>• Loss of open space / should be a country park</li> <li>• Traffic impacts and capacity of network to take additional traffic</li> <li>• Impact on LWS and biodiversity and habitats and protected species</li> <li>• Contradicts Government drive to move away from greenfield developments</li> <li>• Impact on CO2 emissions</li> <li>• Conflicts with the Climate Change agenda</li> <li>• Impact on pollution and air quality</li> <li>• New open space will not meet the needs of the residents whose interest is nature and this will be at the expense of existing habitats and wildlife</li> <li>• New open space is not needed if the site is left undeveloped</li> <li>• Implications arising from the burial of cows following foot and mouth and associated contamination</li> </ul> <p><b>Will Quince MP</b> - concerned the type of green space areas instructed by the Inspector fall short of replacing the ecological and environmental diversity on the Middlewick Ranges. I'm also concerned these alternatives do little to replace the natural habitats of 600 rare species residing on-site.</p> <p><i>Comments- if the Site is to be developed the points below to be considered / addressed;</i></p> <ul style="list-style-type: none"> <li>• Ensure evidence base and masterplanning work adequately reflects full range of environmental considerations.' The Green Infrastructure Strategy 2011 is out-of-date, being ten years old. It refers to the Middlewick Ranges as a farmland plateau, not acid grassland.</li> </ul>

		<ul style="list-style-type: none"> <li>• Strengthen the wording to protect / enhance the existing dog walking</li> <li>• To maintain the Local Wildlife value of the site, no development should take place on the area of acid grassland that connects to the Colchester Orbital. Alternative green spaces that degrade the natural habitat should not be allowed.</li> <li>• The plans need to state that "The range of typologies must include accessible natural greenspace, formal playing pitches, parks and play space, green corridors and land for future cemetery use (including potential for a woodland cemetery), if suitable and required." The word 'may' in the plan, needs to be changed to 'must'. Also, some commitment to the actual percentage of these different areas need to be stated in the plans.</li> <li>• Add the following words to paragraph 14.58 Anthropogenic pressures could additionally harm the quality of the habitat at the Birch Brook Wood LoWs. The developer will be required to address those impact as part of the mitigation strategy.</li> </ul>
<b>MM39 (para 14.58)</b>	<b>7</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p> <ul style="list-style-type: none"> <li>• Ensure that the site is fully investigated (archaeology) in accordance with all appropriate requirements.</li> <li>• The archeological report ignores the historical social use of the Wick, which can be seen as old footpaths (some without numbers) crossing to lost places like Old Heath Port. Eg from Cherry Tree, Cabbage Hall Lane, across the Wick to Wick Rd of Speedwell, down a track to the Colne.</li> <li>• This is a site of historic interest.</li> <li>• Why would management be required for the redoubt.</li> <li>• No trees should be touched there are many ancient trees which can't be touched.</li> </ul> <p><i>Comments- if the Site is to be developed the points below to be considered / addressed;</i></p> <ul style="list-style-type: none"> <li>• The assurance that if any 'heritage assets' are found then this will not involve building a visitor centre over more valuable green land to attract a few visitors a year.</li> </ul>
<b>MM40 (new para)</b>	<b>56</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p> <ul style="list-style-type: none"> <li>• High voltage cables overhead and potential impact on health within specific proximity of power line, also are an intrusion in the landscape</li> <li>• Concerns about run-off pollution into Birch Brook and wider flood risk concerns</li> <li>• Ecological mitigation is not achievable</li> </ul>



		<ul style="list-style-type: none"> <li>• Green Infrastructure strategy is out of date and wrongly refers to Middlewick Rages as a farmland plateau, not acid grassland.</li> <li>• Inadequate infrastructure</li> <li>• Loss of open space</li> <li>• Loss of LWS and impact on habitats and wildlife</li> <li>• Constraints will result in housing being concentrated in a small area of the site making it unsuitable for the area</li> <li>• Landscape impact</li> <li>•</li> </ul> <p><i>Comments- if the Site is to be developed the points below to be considered / addressed;</i></p> <ul style="list-style-type: none"> <li>• A full safety check to ensure that this area is safe to house 1,000 houses. To me, screening visual intrusion's would mean large areas of trees, not fields and large gardens to ensure as much greenery is kept as is possible. Also, developments taking place over a long period of time to avoid disruption.</li> <li>• Any future housing should move it as far South as possible and enclose it so it cannot be seen surrounded by a Country Park. (Proposal referred to by Sir Bob Russell)</li> <li>• This modification needs to be strengthened – Conserve and manage existing woodland and hedgerows needs 'and adjacent buffer zone to preserve existing biodiversity' needs to be added.</li> </ul>
<b>MM41 (para 14.59)</b>	<b>5</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p> <ul style="list-style-type: none"> <li>• There is no mention of use of UXDs on the site and mention of of BSE contamination</li> <li>• Concern about fly-tipping will increase</li> <li>• The excavation of the buried contaminated cows will be admitted to and looked into / concern this could present a health risk</li> <li>• Inadequate policies on contamination</li> </ul> <p><i>Comments- if the Site is to be developed the points below to be considered / addressed;</i></p> <ul style="list-style-type: none"> <li>• The LP should include the specifics of contamination and that a risk assessments will be needed in respect of UXDs and BSE contamination not just desk top surveys.</li> <li>• a clause needs to be added to ensure the MOD remains liable for future contamination issues for the next 30 years.</li> </ul>
<b>MM42 (para 14.60 &amp; 14.62)</b>	<b>14</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p>

		<ul style="list-style-type: none"> <li>• Concern about serious road flooding along major network roads;</li> <li>• Concern about the Brook and also underground springs and flooding</li> <li>• Existing drainage system is inadequate for additional development</li> <li>• Impact of building on water filtering into the brook</li> <li>• Create a cemetery extension</li> </ul> <p><b>AW-</b> Support the changes to the wording in the Modification</p> <p><i>Comments- if the Site is to be developed the points below to be considered / addressed;</i></p> <ul style="list-style-type: none"> <li>• Should be modified to say all areas around the Middlewick Ranges including the status of the Hythe were the water pipes will come from and sewage.</li> <li>• The developer must determine the additional impacts that will arise from any proposed development on Middlewick, and commit to a legal mechanism to ensure financial contributions commensurate with resolving these are determined at time of application.</li> <li>• On site flood management provisions need to be part of the proposed development.</li> </ul>
<b>MM43 (new para)</b>	<b>8</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p> <ul style="list-style-type: none"> <li>• Lack of confidence about adequate community engagement</li> <li>• Communication to date very poor</li> <li>• Should not rely on all having access to a computer</li> <li>• Expect sustainable construction of any houses</li> <li>• Engagement needs to go beyond website and ensure wider community is engaged with</li> </ul> <p><i>Comments- if the Site is to be developed the points below to be considered / addressed;</i></p> <ul style="list-style-type: none"> <li>• Masterplan should include highways networks upgrades</li> <li>• Wider public consultation is required that extends across the whole of Colchester as a minimum and be more widely accessible to the public than the previous public engagement exercises. Given the ecological significance of this site, the masterplan will be supported, as appropriate, with site wide parameter plans, design codes or design guidance, and detailed, i.e. phase 2 ecological assessment.</li> <li>• The masterplan process MUST include engagement of the local community.</li> </ul>
<b>MM44 (para 4.61)</b>	<b>9</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p>

		<ul style="list-style-type: none"> <li>• Lack of confidence that developers will come through with the necessary contributions</li> <li>• Wording should refer to a legal requirement rather than stating ...“will be sought...”</li> <li>• Infrastructure should include potentially life saving defibrillators</li> <li>• Importance of open space for enjoyment and health benefits</li> <li>• All references to ecology, habitat, education, community infrastructure, accessible green space appear to have been removed</li> <li>• Concern about contamination and verification of evidence</li> <li>• Concern that costs associated with this development are met by the developer and not the Tax Payer</li> </ul> <p><i>Comments- if the Site is to be developed the points below to be considered / addressed;</i></p> <ul style="list-style-type: none"> <li>• Staged payments and complete funding before start of last phase</li> <li>• Developer contributions will be a legal requirement for mitigation.... including ecological mitigation to ensure protected and section 41 species of flora and fauna present at Middlewick colonise the compensatory habitats successfully</li> <li>• Include requirement for the inclusion of potentially life saving defibrillators</li> <li>• The developer will be required to pay in full for the extra costs of this development including ecological mitigation etc and flood management and sewage infrastructure. It should also be a condition that adequate accessible green space and public open space is made available to existing residents in the surrounding housing estates and should never have existing access reduced</li> </ul>
<b>MM45 (para 14.63)</b>	<b>77</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p> <ul style="list-style-type: none"> <li>• Inadequate evidence was available on Biodiversity Net Gain which should have been requested at EIP- The ecological assessment underpinning Policy SC2 is fundamentally deficient and does not advance biodiversity objectives. The errors are so central to the site allocation that Policy SC2 is not supported by a robust and credible evidence base</li> <li>• Green Infrastructure Strategy is out of Date- inadequate assessment</li> <li>• Lack of reference to Habitat loss</li> <li>• Should be protected as open space / country park for benefit of wildlife and local residents</li> <li>• Mitigation cannot be achieved and if left alone would not be necessary</li> <li>• Mitigation hierarchy has not been followed logically</li> <li>• Impact on the LWS</li> <li>• evidence is needed now to help inform the masterplan work, not in the middle of the next plan period.</li> <li>• Concern about more details re the removal of turves</li> </ul>

		<p><b>Will Quince MP-</b> concerned the Inspector's modifications don't acknowledge the risk and difficulty of replacing the current grassland, and they seemingly ignore submissions throughout the Local Plan process from ecologists, who highlighted extreme concern at the loss of this habitat and the high risk of the mitigation proposed. There's no guarantee this acid grassland can be replaced.</p> <p><b>EWT-</b> the application of the Defra Metric is underpinned by a series of principles. Principle 2 states the following: Avoid impacts on irreplaceable biodiversity - these impacts cannot be offset to achieve No Net Loss or Net Gain. Bespoke compensation is required when development destroys such a habitat. The land to the south, where it is proposed to recreate acid grassland, cannot be included in the net gain calculation. It must be treated as bespoke compensation and delivered separately from the net gain calculation. The mandatory 10% net gain must be delivered on the remainder of the site, which is unachievable</p> <p><i>Comments- if the Site is to be developed the points below to be considered / addressed;</i></p> <ul style="list-style-type: none"> <li>• firm guarantees should be in place that demand mitigation is successfully completed (as verified by independent conservation experts) before any development is allowed to begin.</li> <li>• Allow the work to start at the beginning at the period to feed into any Masterplan work</li> </ul>
<b>MM46 (new para)</b>	<b>76</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p> <ul style="list-style-type: none"> <li>• Flawed Defra metric 2.0 does not include irreplaceable distinctive habitats</li> <li>• There is concern by ecologists that the use of sulphur along with any other chemicals to do this will have an effect on Birch Brook and the wildlife around this area.</li> <li>• Should demonstrate acid grassland can be replaced before any development</li> <li>• Concern if management company folds or does not act appropriately</li> <li>• 30 years is not sufficiently long term</li> <li>• Mitigation will not be effective</li> <li>• Irreplaceable damage to the LWS</li> <li>• Needs to be 5 years of monitoring habitats before decision to build is made</li> <li>• Environmental partner to manage areas to be chosen by independent agency- Not CBC or MOD</li> <li>• Concern about use of sulfur affecting birch brook and wildlife</li> </ul> <p><b>CPRE (Essex)-</b> 1. Middlewick Ranges provide such a rare and precious habitat, the proposed mitigation measures to replicate this off-site are critical in meeting the biodiversity net-gain. 2. no guarantees that an acid grassland can be successfully re-created.</p>

		<p>3.The Inspector's modifications are to be welcomed in respect - requirement for a management company to look after the establishment of acid grassland at an alternative site.</p> <p>The timing of this will be crucial in relation to the development of the site.</p> <p>successful implementation of the mitigation measures and prevents premature destruction</p> <p><i>Comments- if the Site is to be developed the points below to be considered / addressed;</i></p> <ul style="list-style-type: none"> <li>• The Council will require the developer to enter into an appropriate legal agreement to secure the long term (minimum 100-year) management and monitoring of retained protected habitats, the biodiversity mitigation, compensation and net gain land, by the nature conservation organisation, including a mechanism for funding and governance that ensures both the nature conservation value and local community interest. The landowner of the mitigation land will need to be party to such an agreement.</li> <li>• State that the partner agency will be independently appointed.</li> <li>• the acid grassland creation should first be undertaken and proven that it works before any master plan is put in place.</li> </ul>
<b>MM47 (SC2)</b>	<b>82</b>	<p>Objections / concerns raised cover the following issues as well as some requesting that the allocation at Middlewick be removed from the Plan. (Comments from Statutory / specific Consultees indicated for reference);</p> <ul style="list-style-type: none"> <li>• This is not viable</li> <li>• Need to provide local employment</li> <li>• The classification as acid grassland has been overlooked</li> <li>• The site includes protected species under the Wildlife and Countryside Act</li> <li>• Modification re part vi) is incorrect. The built footprint has been sited on habitat areas that have not been adequately assessed</li> <li>• Ecological evidence has not demonstrated effective mitigation can be achieved</li> <li>• Loss of LWS</li> <li>• Surveys are out of date</li> <li>• Impact on air quality, water supply and management</li> <li>• Policy aims are not achievable</li> <li>• Concern about traffic impact</li> <li>• Loss of open space</li> <li>• No mention of the latest cycling standards LTN1/20(2)</li> <li>• Allocation is inconsistent with the LP ENV1 Policy of national policy</li> <li>• Concern about inadequate travel connectivity</li> </ul>

		<ul style="list-style-type: none"> <li>• Wording to be stronger to protect or enhance exiting habitat including a country park</li> <li>• Stronger wording regarding community led to develop better confidence</li> <li>• Houses are not needed at Middlewick</li> <li>• Contrary to the declared policy of Government</li> </ul> <p><b>EWT-</b> this is patently not sustainable and does not conform to the guidelines in the NPPF. The Main Modifications pertaining to Middlewick Ranges lack clarity, have misapplied Biodiversity Net Gain, and are unjustified</p> <p><b>DIO-</b> Support the Modifications related to Middlewick but request a modification to policy in respect of timing of a masterplan- the DIO considers the wording to both should be amended to read: - <i>“A Masterplan for the whole site is to be agreed with the Council prior to <b>approval</b> of any planning application.” (Our emphasis) The proposed change to the wording would increase the effectiveness of the policy.</i> It currently refers to prior to submission of a planning application. Also seeks clarification on wording in criteria vi <i>“The built footprint of the development has been sited to minimise the effects on protected habitats and species, <b>within the context of the wider strategy of ecological mitigation and bio-diversity net gain.</b>”</i></p> <p><b>Natural England-</b> Middlewick Ranges not a nationally designated site, NE did not previously comment. Site is designated a Local Wildlife Site and the LPA will need to demonstrate it has had regard to statutory duty to conserve biodiversity when it develops masterplan and determines any planning application. Consideration to NPPF and relevant Local Plan policy including ENV1. <b>Further comments include;</b></p> <ul style="list-style-type: none"> <li>• Ensure consistency of wording in the term used to describe compensation/mitigation land, mitigation land and net gain land required.- define this area on the Policies Map</li> <li>• Consistency with wording around BNG- clarify to avoid ambiguity and confusion</li> <li>• Include preamble text about Mitigation hierarchy in the policy</li> <li>• Ensure sufficient evidence to support acid grassland turf can successfully be translocated</li> <li>• Update para 15.58 to reflect royal assent of Environment Bill</li> </ul> <p><i>Comments- if the Site is to be developed the points below to be considered / addressed;</i></p> <ul style="list-style-type: none"> <li>• Tackle the issue of no local employment in the masterplan</li> <li>• should be made clear in the definitions that where improvements to cycling are referred to later, these improvements should follow the spirit and letter of LTN 1/20,or its successor documents</li> <li>• Management company should be indefinitely and not 30 years</li> </ul>
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		<ul style="list-style-type: none"> <li>Amend the wording of the policy requiring a masterplan prior to <b>approval</b> in place of prior to <b>submission</b></li> <li>Amend criteria vi to add emboldened wording- criteria vi “The built footprint of the development has been sited to minimise the effects on protected habitats and species, <b>within the context of the wider strategy of ecological mitigation and bio-diversity net gain.</b>”</li> <li>NE comments reflect in policy amendments</li> </ul>
<b>MM48 (SC3)</b>	<b>1</b>	Time for Highways to examine and progress a dedicated southern circular route linking Stanway with the eastern garden community to address the current dire situation. Development such as at Middlewick will worsen the situation suggest a need to build a dedicated southern circular road.
<b>MM54 (WC2)</b>	<b>3</b>	<ul style="list-style-type: none"> <li>The change from a mixed-use sustainable development at Lakelands West to a housing only development is a backwards step and does not support or promote sustainable living- Re-instate an element of employment use allocation at this site.</li> <li>Confirm delivery of infrastructure in Stanway including primary school and highways improvements ahead of any planning consent.</li> </ul> <p>question the need for such Wintering Bird Surveys in relation to land to the West of Lakelands as the Site is unsuitable for wintering birds and thus would not result in the loss of functionally linked land. The HRA should be revisited and the requirement for wintering bird surveys in Draft Policy WC2 for the Site removed</p>
<b>MM56 (WC3)</b>	<b>1</b>	The site incorporates Gosbecks Scheduled Monument as well as archaeological remains. Expect to see significant public benefit for historic environment in any proposed scheme, informed by Heritage Impact Assessment (HIA). Area under intensive cultivation, keen to see this taken out of cultivation and incorporated in adjacent Gosbecks Archaeological Park and within integrated conservation management plan. Expect to see this in Policy WC3 the same Scheduled Monument), and within an integrated conservation management plan that preserves, interprets, promotes and makes accessible this important site as a whole. We would expected to see this stipulated in Policy WC3
<b>MM58 (SS4)</b>	<b>4</b>	<ul style="list-style-type: none"> <li>Failure to consider the setting of listed buildings in relation to the allocation at Copford</li> <li>Refers to additional heritage assets to be included in the policy and further reference to the setting (PC)</li> </ul>
<b>MM59 (SS5)</b>	<b>1</b>	The Neighbourhood Plan has been made and it identifies the settlement boundary for the village and identifies specific sites for housing allocations. To bring the policy into consistency and to ensure certainty for the role of the Neighbourhood Plan, the relevant modification should be amended and added to so that it is clear that proposals for development outside of the settlement boundary will not be supported unless the NP or other Local Plan policy specifically allows for it. This would bring the policy into line with that of the modification for Wivenhoe.

<b>MM62 (SS8)</b>	<b>1</b>	Great Tey is not sustainable for the housing numbers indicated. Comments also ref a planning application which is not relevant to this consultation
<b>MM65 (SS11)</b>	<b>2</b>	<ul style="list-style-type: none"> <li>The wording of LP Policy SS11 does not therefore convey the NP policy provisions for larger as well as smaller schemes to also come forward as exceptions on the edge of the village</li> <li>Suggest that the word “small” should be deleted from the modification referring to allocation of sites in the Marks Tey NHP</li> </ul>
<b>MM66 (SS12b)</b>	<b>3</b>	<ul style="list-style-type: none"> <li>This policy (SS12b) applies to proposals for development on the seaward and landward side of Coast Road, West Mersea and sets out the criteria that such proposals would need to comply with. Criterion (iii) relates to the consideration of effects on adjacent Habitats sites and references the Essex Coast RAMS. As worded in the main modification, this policy would require that development <b>either</b> has no likely significant effect on the adjacent Habitats Site <b>or</b> that it provides mitigation in accordance with the Essex Coast RAMS. As these development proposals could include residential development, there is the potential for both direct impacts as well as in-combination impacts and it is recommended that the modified wording is amended <i>by the deletion of “or” and insertion in its place of the words “and, where appropriate,”</i>. (NE)</li> <li>The “exceptional circumstances” paragraph in the Coast Road section should either be deleted or modified so the exceptional circumstances “OVERWHELMINGLY outweigh all other material considerations”</li> <li>In connection with Houseboats it should be made clear that any new or replacement houseboat or any modification to an existing Houseboat needs Planning Permission</li> </ul>
<b>MM69 (new para 14.219&amp; para 14.221)</b>	<b>7</b>	<ul style="list-style-type: none"> <li>Further modifications must be included to alleviate the current absence of a reasonable range of new housing sites in Tiptree and the dearth of available land generally. Modifications are required to reflect the absence of a NP and to address the deficiencies identified by the NP Inspector.</li> <li>The plan should clarify how cross boundary issues such as road building will be managed.</li> <li>Whilst generally supportive of this modification I am suggesting a few minor changes to more clearly express what the Neighbourhood Plan should be expected to achieve.</li> </ul> <p><b>Changes to plan:</b> To 'consider' (rather than 'address') cross boundary issues (paragraph 1, line 1) This will include 'acknowledgement of' (inserted words) the additional traffic forecasts.... (paragraph 1, line 2) To support the delivery of 'at least' (inserted words) 400 houses (TPC)</p> <ul style="list-style-type: none"> <li>Update text to read: Infrastructure necessary to deliver the growth up to 2033 will need to consider cross boundary issues with neighbouring Local Planning Authorities and neighbouring Parishes. This</li> </ul>



		<p>will include acknowledgement of the additional traffic generation forecasts for the proposed new junction 24 onto the A12 as well as from the growth locations. With the northern growth location there is potential for a new road which would ultimately link the B1022 and B1023. The Tiptree Neighbourhood Plan will be expected to deliver the first phases of the road through a design which allows future completion/linkage</p> <ul style="list-style-type: none"> <li>• Refer to housing numbers as “at least” / a minimum</li> <li>• No adequate evidence to confirm that a link road is the only appropriate strategy or if it is deliverable</li> </ul>
<b>MM71 (SS14)</b>		<ul style="list-style-type: none"> <li>• Essex County Council as the Highway Authority, request that the second sentence of part iv) to Policy SS14 is amended to clarify that the neighbourhood plan does not need to undertake a “detailed transport assessment”, but rather a "strategic transport appraisal" is required and considered more appropriate. (ECC)</li> <li>• Paragraph 113 of the NPPF explains that detailed transport assessments are required to assess planning application submission. It does not mention development plan documents- suggest the requirement be changed to “strategic transport appraisal”</li> <li>• Support but suggest a few further changes: <ol style="list-style-type: none"> <li>1. Removal of the preferred direction of growth arrow to the south-west. Changes to text: Policies Map change requested</li> <li>2. Within the preferred directions of growth shown on the Tiptree policies map, to the 'north and north west' (rather than 'south west and north/north west), subject to existing constraints.... (line 2). 3. This will include a 'strategic transport appraisal' (rather than a 'detailed transport assessment'). (point (iv), lines 4 &amp; 5) (TPC)</li> </ol> </li> <li>• Further modifications must be included to alleviate the current absence of a reasonable range of new housing sites in Tiptree and the dearth of available land generally. Modifications are required to reflect the absence of a NP and to address the deficiencies identified by the NP Inspector.</li> <li>• object to part of Policy SS14 amended within Main Modification 71, that identifies that development outside of either the settlement boundary or the Tiptree Neighbourhood Plan will not be supported</li> <li>• Over reliance on NHP in the delivery of homes in Tiptree</li> <li>• Object to the reduction of the number of homes in Tiptree from 600 to 400 it is not adequately justified</li> </ul>

<b>MM72 (SS15)</b>	<b>3</b>	A further modification to MM72, Colchester's Policy SS15, would strengthen West Bergholt's Neighbourhood Plan. It will also provide an approach consistent with other made Neighbourhood Plans in the existing Local Plan and provide greater clarity of the policy context for West Bergholt. A change is suggested to bring the wording into line with the wording for other made Neighbourhood Plans- specifically Wivenhoe. (WBPC)
<b>MM75 (OV2)</b>	<b>2</b>	The words Small and Appropriate should be defined objectively to avoid confusion with potential future applications regarding other Council policies on this matter
<b>MM76 (DM1)</b>	<b>2</b>	No provision is made for increased Health Provision and this will have a damaging effect on both Physical and mental well-being. Also refers to transport assessments and Travel Plans (CwETPC)
<b>MM80 (DM5)</b>	<b>1</b>	Tourism etc Developments should of course be subject to the Relevant areas' Planning Policy
<b>MM81 (DM6)</b>	<b>1</b>	Whilst noting that this main modification (to move the text from preamble to Policy) responds to one of our previous recommendations, a further minor modification might give more clarity to the meaning of the statement. This would be achieved by moving the second sentence to the end so that it would read as follows: 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 fly tipping, the introduction of invasive species and vandalism (NE)
<b>MM91 (DM22)</b>	<b>1</b>	There needs to be a policy for dealing with parking , not only at any new development but also in the locality
<b>MM92 (15.133)</b>	<b>1</b>	Concerns raised about the impact of building on open land in the vicinity of Birch Brook on flooding. Conflicts with the declaration of a Climate Emergency.
<b>Appendix 1 SG2 table</b>		See comments above under MM5
<b>Appendix 2 SG3 table</b>		See comments above under MM7
<b>Main Modifications (Policy / Paras) receiving no objections / representations or only Support.</b>		
<b>MM references</b>	MM2, MM6, MM9, MM15, MM16, MM19, MM21, MM22, MM28, MM30, MM31, MM32, MM33, MM34, MM49, MM50, MM51, MM52, MM53, MM55, , MM57, MM60, MM61,MM63, MM64, MM67, MM68, MM70, MM73, MM74, MM77, MM78, MM79, , MM82, MM83, MM84, MM85, MM86, MM87, MM88, MM89, MM90, , MM93, MM94, Appendix 3, Appendix 4	

**Appendix B Summary of responses to the consultation on the updates to the Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA) and a Habitats Regulations Assessment (HRA) for the Modified Section 2 Local Plan (04/10/2021-18/11/2021)**

<b>SA / HRA Ref (Policy / Para)</b>	<b>Summary of Objections issues / comments raised</b>
SA - SG2 and SS14	SA does not appraise the impact of reduced number of new homes at Tiptree nor explained why this is the preferred approach
SA - SS14 (Tiptree)	Sa des not appraise impact of new link road in Tiptree, there is no explanation of why the approach is preferred when compared to alternatives
SA – SG2	No robust evidence to justify reduction from 600 to 400 dwellings in Tiptree. SA appears to have not considered this change at all, let alone appraise it against alternatives and explain its reason for selection
SA - SS14 (Tiptree)	SA fails to register reduction of dwelling numbers from 600 to 400 in Policy SS14 assessment. SA has not recognised provision of link road and explained the reason for requiring this as opposed to alternative options. SA has failed to recognise what MM71 entails and what is proposed clearly has environmental, economic and social impacts.
SA – SC2 (Middlewick)	SA did not highlight Middlewick Ranges is a Local Wildlife Site
SA – SC2 (Middlewick)	Appraisal of Policy SC2 (Table 31) includes desire to avoid development on greenfield land. Amber designation with question mark awarded to the question 'Will it reduce the need for development on greenfield land' indicates that inclusion of this greenfield site is an anomaly that contradicts the aims of Local Plan
SA – SC2 (Middlewick)	SA failed to highlight Local Wildlife Sites
SA –SC2 (Middlewick)	SA lacks any background detail and makes assumptions which are not backed up SC2 Middlewick various statements not substantiated and open to dispute
SA - General	<ul style="list-style-type: none"> <li>• SLAA not prepared according to NPPG and used as a document taken into consideration for the SA</li> <li>• Negative impacts of development at Middlewick hugely underestimated in New Sustainability Matrix</li> <li>• No mention of Green Infrastructure as monitoring indicator for Climate Change Policies</li> <li>• Monitoring indications for SA8 too vague and should be qualitative as well as quantitative</li> </ul>

	<ul style="list-style-type: none"> <li>• Mitigation and requirements for long term management of ecological areas and habitats (MM35-47) has only included an appraisal of the outcome which assumes mitigation measures to replace irreplaceable habitats are successful</li> <li>• SC2 modifications assume recreation of acid grassland habitat must be successful</li> <li>• SA does not adequately assess or update the negative impact on Health and Wellbeing</li> </ul>
HRA	Roman River including SSSI region and Essex Wildlife Trust Nature Reserves are not mentioned or considered. Impact on wildlife corridor leading to coast continuous with Middlewick is not considered
HRA	<p>Middlewick is not included within HRA</p> <p>HRA fails to identify that if Middlewick is built on, the Local Wildlife Site will be lost which puts the allocation in direct conflict with one of Plans key Environmental Policy Targets for 'Zero percent loss of Local Wildlife Sites, Ancient Woodland and Priority Habitats and Species</p>

**Appendix C summary of the responses to consultation on the Additional Modifications and Policies Maps – Section 2 Colchester Local Plan (04/10/2021-18/11/2021)**

<b>AM / PM Ref (Policy / Para)</b>	<b>Summary of Objections issues / comments raised</b>
SS11	MM7 'Reinstatement of Employment Land at Marks Tey' is supported, however this needs to be reflected on the policy map
Omission	Registered Parks and Gardens are missing from Castle Park and Layer Marney Tower.
WC1-5	The LWS on Land to the south of Tollgate West (DZ3) designation should be removed  Key to West Colchester Policies WC1-5 should be amended to refer to 'District Centre'  Removal of Retail Frontage
PM6	Support for changes to the employment boundary and District Centre
PM6	Object to the change to the West Colchester Proposals Map that removes Stane Leisure Park from the defined Tollgate District Centre
PM13	Modification PM13 states that Policy Map SS9: Langham will be modified to 'Add Employment' allocation at Lodge Lane as previously omitted but noted in Policy SS9'. Notwithstanding this, the Policies Map has not been updated to indicate this. It currently omits the allocated site at Lodge Lane and does not indicate the entirety of the existing Business Centre. In order therefore for the Policies Map (for Langham and also that for North Colchester) to be consistent with Policy SS9, the Map needs to include additional purple shading around Lodge Park Business Centre and the adjacent parcel of land to the East
PM17	Removal of the preferred direction of growth arrow to the south-west
PM19	The adopted Wivenhoe Neighbourhood Plan (WNP) contains a Proposals map. The suggested amendments to the Local Plan Wivenhoe map do not cover all the land use policies presented in the WNP Map. Given the new wording for policy SS16 'All development proposals in Wivenhoe parish will be determined against and be required to comply with policies in the Wivenhoe Neighbourhood Plan' the land use shown in the WNP proposals map should be used rather than the version put forward in this consultation or there should at least be a reference to the WNP proposals map as a footnote to the consultation version. There are policies in the WNP which impose restrictions on development - WIV4 Settlement Coalescence, WIV5 Protecting the setting of the River (River Colne Special Character Area) and WIV10 Local Green Spaces The consultation version does not show these areas. There are other policies which allow development which are also not mapped in the consultation version. The employment

	<p>land allocated in the WNP adjacent to Keelars Lane (Policy WIV 22) is not included, nor is the land allocated for a care home adjacent to the land allocated for housing behind the Fire Station. Other allocations – for a cemetery and for additional allotments at two sites are not shown</p> <p>While the key to the various maps shows a Conservation Area designation the Conservation Area does not seem to be shown on the Wivenhoe map nor, I think, generally on the proposals maps. (This is not shown on the Wivenhoe Neighbourhood Plan Proposals Map as this is a Borough designation)</p>
AM14	<p>note the inclusion at AM14 of the requirement for retail assessments to be carried out in accordance with “the Councils” updated main town centre Uses Assessment Specification (March 2021). This document itself states that it does not purport to replace national policy and guidance but to provide further detail on how sequential and impact assessments should be undertaken (paragraph 1.3). As such, we would suggest that the wording here is altered as follows (changes shown in bold):</p> <p>Where a retail assessment is required this should include an assessment of be carried out <b>in accordance with having regard</b> to the guidance set out in the Assessment Specification 2021 or any updated guidance which applies at the time.</p>
AM15	<p>AM15 – “For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Examples of types of infrastructure are provided in the glossary appended to this plan. Regard should be had to the latest version of the ECC Developers' Guide to Infrastructure Contributions (2016) as well as Council Guidance.”</p>
AM19 Clause 13.2	<p>Amend sentence first line, add after particularly, “significant and established” sea level rise....</p> <p>Reason</p> <p>Data earlier this year about projected rise in sea levels. Confirmed by UN. “Between 2013 and 2021 sea levels have doubled compared with the rise from 1993 to 2002. There have been 4.4mm rises every year in the last eight years due to loss of ice mass from glaciers and ice sheets - and it continues to rise.”</p> <p>Source COP26 the World Meteorological Organisation (WMO).</p>
AM21 Clause 13.19	<p>Amend</p> <p>Word “irreplaceable” should be retained. Therefore should read “The Coastal Protection Belt has a unique and irreplaceable character, which should be strongly protected and enhanced.”</p>
Am19 &23	<p>Replacement para. 13.11 with</p> <p>Climate change resulting in sea level rise which is likely to regularly impact on access, or flooding resulting from seawall breaching or topping, should be taken into consideration when development is being considered</p>
AM23	<p>Specific targets for increasing tree canopy cover as this nature based solutions are one element of Anglian Water’s own pathway to get to net zero by 2030</p>

AM23 Para 13.50	Amend At end add “ Recognition is given to the concern expressed about sea levels and impact it will have of coastal communities and areas such as the Hythe. Appropriate account will be taken of rising sea levels and impact.”
AM59 New Para 15.4	Amend Add at end. “Ensure within this that patients should be offered a face-to- face consultation if that is their wish. It should also not diminish the need for new doctor’s premises where there has been a well established need.”