

Table 1.1: North Essex Section One Local Plan: Consultation comments on HRA of Main Modifications plus LUC response

Comment by	Summary of consultation comments	LUC response
Mrs Christine Burden (61763)	<p>The Habitat Regulation Assessment is rightly concerned about the impact of development on Essex and Suffolk coastal regions, but, since this is a Braintree Local Plan, I am concerned that there is no mention of safeguarding habitats within Braintree District. There are a number of ancient woodlands within this area, which would certainly be adversely affected if any attempt were made to revise the Garden Village schemes. Ancient woodland is a nationally scarce habitat, so needs cherishing.</p> <p>On a purely local level there should be a strategy to ensure that in areas, both urban and rural, efforts are made to make them as hospitable to wildlife as possible. Local people could be encouraged to maximise the usefulness of their gardens for wildlife, and open areas such as parks should have extensive wild areas Even road verges have a part to play, if managed for wildlife, not just mown down by contractors who know nothing about managing for wild flowers or dormice for instance. Altogether less tidiness in Braintree District would be wholly beneficial to wildlife.</p>	Not relevant to HRA – No further comment.
Rosie Pearson (1248577)	<p>It is extremely concerning that the possible effects of Section 1 (a new town at east Colchester) and Section 2 (920 homes a year in Colchester) on the RAMSAR sites of the Colne Estuary and the water quality of the estuary itself are ignored in the HRA. There can be NO certainty that the ecologically sensitive Colne estuary will not see a deterioration in water quality. With regards to treatment of wastewater, note that in 2019 the Colchester waste recycling centre spilled sewage 342 times for 7,248 hours[1], straight into the protected habitats of the Colne Estuary and upstream of the popular beaches of Brightlingsea, Frinton, Mersea.</p> <p>This situation will only get worse with the level of development proposed at E Colchester and in Section 2. Sewage overflows are supposed to be a last resort. In this case it is clear that the sewage infrastructure is at breaking point and it is clear that additional development will lead to further sewage dumping.</p> <p>I believe that this risk to the RAMSAR sites and ecologically sensitive waters must be specifically acknowledged as a problem which needs addressing, otherwise there may be a risk of legal challenge.</p> <p>It is not enough to trust the water companies to deliver:</p> <p>Government's report 2 Oct[2] into the performance of water and sewerage companies in 2019 showed that their performance deteriorated for the second year in a row.</p> <p>Anglian Water is one of the worst performing companies, with only two stars out of five.</p> <p>Anglian Water and Thames Serious were responsible for over half of serious pollution incidents, with Anglian Water seeing an increase in 2019 with twelve incidents.</p>	<p>The HRA report fully considers the effect of changes in water quality and quantity.</p> <p>The HRA Screening (summarised in Table 3.2) identified that Likely Significant Effects in relation to changes in water quality could not be ruled out for several European sites including Essex Estuaries (paragraphs 3.40-3.47), Stour and Orwell Estuaries SAC (paragraphs 3.99-3.103) and Colne Estuary SPA and Ramsar sites (paragraphs 3.59-3.66).</p> <p>An Appropriate Assessment was completed to determine whether changes in water quality as a result in the plan would result in Adverse Effects on the Integrity (AEol) of the sites qualifying features (see paragraphs 5.124 – 5.134 of the HRA).</p> <p>The HRA concluded, in light of the avoidance and mitigation measures in place, that the Section 1 Local Plan would not result in AEol.</p> <p>This conclusion was supported by Anglian Water, the Environment Agency and Natural England as the Statutory Consultee.</p>
Essex Swifts (Mr john smart - 1249050)	Dear Sirs:- Please may we take this opportunity to make a case for "Swift Conservation" in the "Local Plan" New Build development sites. Whereby integral Swift nest boxes are installed in residential New Powered by Objective Online 4.2 - page 2 Build in numbers that are meaningful for the size of development.We are "Essex Swifts", a partnership between the "Essex Wildlife Trust" (37,500 members) and the "Essex Birdwatching Society". I attach a "Method Statement" document that fully explains the conservation initiative - Thank you.	Not relevant to HRA – No further comment.

Comment by	Summary of consultation comments	LUC response
Mr John Camp (226167)	<p>The assessment whilst appearing thorough, is a daunting document of 150 pages -somewhat off putting to close scrutiny.</p> <p>It is of great concern that some 25 important sites for birds will be significantly affected, including Abberton Reservoir and the Stour Estuary and Colne Estuary due to the loss of foraging habitat for the birds.</p> <p>It talks in a number of places, of the need for further dialogue with Natural England. The time it has taken to get the DP to this stage should have been used to carry out this process and come up with a much more precise and effective HRA, instead of which we are presented with a woolly and unspecific document. In my opinion, it is therefore not sound.</p>	<p>The HRA fully considers the potential for impacts to birds at the SPAs and Ramsar sites referred to in relation to loss of offsite foraging habitat (paragraphs 5.7-5.15) and recreational effects (paragraphs 5.16-5.123).</p> <p>The consideration of recreational effects within the Appropriate Assessment provides a detailed update of the current status of the 'Essex Coast Bird Aware' recreational mitigation strategy which has been adopted by each of the Essex Authorities and developed with, and endorsed by, Natural England.</p> <p>Section 6 of the HRA concludes that the above impact types will not result in Adverse Effects on the Integrity of the European Sites. This conclusion has been endorsed by Natural England.</p>