

Green Infrastructure (GI) Strategy Consultation Statement

Introduction

The draft Strategy was approved for public consultation by the Planning and Licensing Committee on 15 November 2018. The consultation was held between 5 December 2018 and 23 January 2019. The consultation period was longer than the statutory minimum as the consultation period included the Christmas period. All the people and organisations on the Council's Local Development Plan (LDP) mailing list (over 1120) were notified of the consultation. 23 responses were received, the majority of which were detailed and substantial. Consultation responses were received from the following

Table 1: Who made representations.

Local Authorities	Statutory Consultees	Individuals / organisations	Businesses / landowners
Chelmsford City Council	Environment Agency	Members of the Public x3	Dartmouth Parks Estates
Essex County Council	Forestry Commission	A Maldon Harbour Improvement Commissioner	Gladman Developments
Langford and Ulting Parish Council	Historic England	Essex Bridleways Association & British Horse Society	Maldon Wick Ltd
Maldon District Council (MDC) Planning and Licensing Committee (response received from Chairman and Vice-Chairman of the Committee)	Natural England	Maldon Society	
South Woodham Town Council	Port of London Authority	The Royal Society for the Protection of Birds (RSPB)	
Woodham Walter Parish Council	Sport England		

Table 2: Comments made and Maldon District Council's response

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
General comments				
Councillor Mrs PA Channer MDC Planning and Licensing Committee	Maps	The colours in the maps are too similar; it is difficult to distinguish between different elements e.g. the inland and tidal rivers on Fig 2.2.	We will seek higher contrast for the map elements	The colouring on the maps has been reviewed and revised.
Natural England	General	<p>Natural England is supportive of the ambition and scope of the document and we welcome the partnership working that has informed the strategy.</p> <p>The current approach of the Supplementary Planning Document (SPD) as submitted is supported and Natural England welcomes the strategic approach to GI within Maldon's area. We would highlight the need to consider GI, not just quantitative, but also take a qualitative approach to ensure the greatest benefits.</p>	Noted	
Historic England	General	<p>No specific comments</p> <p>We do however recommend that the advice of your local authority conservation and archaeological staff is sought as they are best placed to advise on local historic environment issues and priorities, including access to data, indicate how historic assets</p>	Advice will be sought from the Council's Conservation and Heritage specialist as projects are developed.	

APPENDIX C

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		<p>may be impacted upon by the Plan, the design of any required mitigation measures and opportunities for securing wider benefits for the future conservation and management of the historic environment.</p>		
Chelmsford City Council	General	<p>Chelmsford City Council welcomes and supports Maldon’s GI Strategy, its policy principles and projects.</p>	Noted	
Maldon Society	General	<p>The need to update the previous study is wholly endorsed.</p> <p>In the main the proposals are enthusiastically supported as we cherish our green environment and the proposals to promote and develop it along with its wildlife.</p> <p>However, we have focussed on two omissions. Both focus on the need to be more assertive with our other governmental ‘partners’. [These comments are reported at the sections the comments relate to.]</p> <p>Without that assertiveness the effectiveness of these policies will on certain issues become meaningless.</p>	Noted.	
Individual	General	<p>Does it really matter if we have any concerns?? You approve it in the end any way.</p>	<p>Consultation on the GI Strategy gives the opportunity for anyone to make their views known on the Strategy. All</p>	None

APPENDIX C

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			responses to the consultation will be carefully considered and changes may be made to the Strategy to address the comments made.	
Port of London Authority (PLA)	General	The PLA has no comments to make.	Noted	
Essex Bridleways Association (EBA) and British Horse Society	General	Because the Maldon District has such a low proportion of routes accessible to equestrians, and the narrow lanes characterised within this area are too dangerous because of the volume and speed of traffic, Maldon District Council need to be creative in looking at other ways in which to accommodate all user groups safely, and this Strategy is vitally important to inform the Council as to how this can be done. In accordance with the Local Plan, any new off-road routes which are created should be multi-user by default, accessible to everyone, and not just limited to one or two user groups.	Principle 5 has been amended to take the issues of accessible by different user groups into account.	See EBA comment on para 1.2 below – changes made to Principle 5, para 3.18
Maldon Wick Ltd	General	Maldon Wick Ltd. has concerns regarding the Council’s intended purpose of the draft GI Strategy in the context of the revised NPPF, July 2018, and the National Planning Policy Guidance (PPG).	Para 3.48 clearly states that the proposed policy wording relates to a future review of the LDP. As such it does not introduce new policy now, it suggested wording that can be considered	None

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		<p>The text at Page 1 ‘Introduction’ of the GI SPD appears to adhere to this national policy and guidance. This identifies that the purpose of the consultation draft GI Strategy, is to provide an update to the adopted Maldon District GI Strategy (2011), specifically, to reflect the change in the adopted policy context since its preparation.</p> <p>At national level, the NPPF was introduced in 2012 and revised in 2018 and at local level, the new Local Development Plan (LDP) was adopted in July 2017. The LDP text sets out that the draft GI strategy is intended to reflect any changes to existing GI assets in the District and opportunities for their expansion that may have been introduced through these adopted policy documents. In addition, the proposed SPD (paragraph 3.47) recognises that it is not the purpose of the SPD to introduce policy which is not in the parent LDP.</p> <p>But, despite these statements, this does not appear to be the approach the Council and its consultants have taken to produce the proposed principles or projects in the draft GI SPD. This is evident in the suggested new GI policy (at paragraph 3.48) indicating “...the suggested policy set out below has</p>	<p>for inclusion to a future revision of the LDP.</p> <p>This GI Strategy builds upon the GI Study undertaken for the LDP in 2011. It is reasonable to expect SPD to be based on up to date evidence, where available. Much of the evidence used to support the GI Strategy was already available as individual datasets; for the Strategy it has been collated and analysed as a whole.</p> <p>The GI Strategy does not allocate land for development. It identifies projects that will help deliver the aims of the LDP, namely (first sentence of LDP policy N1 Green Infrastructure Network) “A strategic multi-functional network of green infrastructure will be identified, managed, and where possible enhanced”. Therefore Principle 2 and the proposed GI projects are directly related to the policy requirements in the LDP.</p>	

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		<p>been informed by the desk based study, stakeholder engagement and policy analysis in Appendix 4.”</p> <p>This, therefore implies that SPD is informed by an entirely new evidence base, to create additional future policy, rather than comply with the Maldon LDP (MLDP) GI policy and the evidence base underpinning the recently adopted MLDP (2017), Infrastructure Delivery Plan, or other recently adopted site specific SPDs such as the South Maldon Garden Suburb (SMGS) Strategic Masterplan Framework (2018).</p> <p>It follows that Principle 2 includes one aim to develop a coherent ecological network, primarily through implementing 19 ‘GI Projects’; however, Maldon Wick Ltd, is concerned that the proposed GI projects go beyond the remit of an SPD into ‘plan-making’.</p> <p>In summary, MDC should revisit the draft SPD to ensure it aligns to existing commitments and adopted policies relating to the District’s GI network. National policy and guidance is clear that SPDs should not enter the remit of plan making.</p>		

APPENDIX C

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Woodham Walter Parish Council	General	The Parish Council supports the Green Infrastructure initiative in principle but there are a number of issues that in the opinion of this Parish Council need correcting, clarifying or incorporating.	Noted	
Woodham Walter Parish Council	General	It is considered that the document does not contain enough detailed information on each point and therefore its generic nature leaves too many questions unanswered to comment on any defined policy proposal.	The GI Strategy provides an outline of the individual projects. As each project is developed further, more information will become available.	None
South Woodham Ferrers Town Council	General	We notice that you refer to Brexit many times in your Plan. Is it likely that you will have to revisit the Plan once the outcome of Brexit is clearer?	The references to Brexit relate to comments made by stakeholders attending the workshops. No, the GI Strategy will not need to be revisited.	None
Introduction				
Maldon Society	1.1	The report is flawed in its focus in that it limits itself artificially to that which is within its direct control? In practice, as with the new South Maldon housing developments, it is clear that the landscaping by roads is unduly determined by the Essex County Council (ECC) highways authority. We would wish MDC to be significantly more robust in its setting of joint policy with ECC. In particular, the good practice at earlier developments in screening new housing	Any SPD needs to be implementable, and therefore is limited to that which is within the Council’s control. Masterplans for both Garden Suburbs were prepared collaboratively with all stakeholders, landowners and developers including ECC Highways and to adoptable	None

APPENDIX C

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		with significant hedging and trees has been all but abandoned. There needs to be policy statements for more robust joint working when the policies of other authorities conflict with what Maldon District Council (DC) would wish in landscaping terms.	standards. The masterplans and consideration of design quality in new development is an integrated approach in accordance with the endorsed/ adopted Masterplans, Maldon District Design Guide SPD and endorsed Strategic Design Codes as set out in national and local policy.	
Internal - Maldon District Council	Introductory paragraphs	It is not clear that the GI Strategy is an SPD	Footnote added to the introductory paragraphs	<p>Maldon District Council commissioned LUC to develop a Green Infrastructure (GI) Strategy <u>Supplementary Planning Document (SPD)</u> (footnote: <u>Supplementary planning documents (SPD) are non-statutory documents that can form part of the Local Development Plan. They provide more detailed advice and guidance on policies in local plans and are a material consideration when planning applications are being assessed.</u>)</p> <p><u>The need for a GI Strategy was initially identified in the February 2017 Local Development Scheme. This GI Strategy SPD (referred to as the ‘GI Strategy’)</u> follows the Maldon District Green Infrastructure Study that was published in 2011 which informed the emerging</p>

APPENDIX C

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				future growth and infrastructure requirements in the District.
Internal Maldon District Council	Introductory paragraphs	Reference to the NPPF needed to reflect the 2019 updates	The introductory text and para 1.10 will be updated.	<p>...National Planning Policy Framework (NPPF) in 2012 and its replacement in 2018 <u>which incurred minor revisions during 2019</u></p> <p>Para 1.10Published in 2018, with minor amendments made in 2019, the revised NPPF (<u>footnote updated;</u> Ministry of Housing, Communities and Local Government (20189) National Planning Policy Framework) guides on the plan...</p>
Essex Bridleways Association & British Horse Society	Para 1.2, pg 2	Access to greenspace is paramount and we would like to see more emphasis on the aspiration to ensure that access is available to as many user groups as possible. This aspiration should be embedded from the top down within this Strategy and should be reflected within the overall Vision and aims.	Principle 5, para 3.18 will be revised to make it clear that increased access to the natural environment must, wherever possible, be accessible by a range of users.	3.18 ...Deficiencies have been identified within the District which should be addressed. <u>Where new off-road routes are proposed or Public Right of Way (PROW) are upgraded, the resulting scheme should be, wherever possible, multi-user by default and suitable for a range of user groups...</u>
Maldon Wick Ltd	1.7	Recognising the expectations for an SPD set out in the NPPF / PPG (i.e. to provide further detail on adopted policies in the MDLP), reference should be made to all three of the adopted LDP GI Policies (N1, N2 & N3) at Section 1 (policy context) of the SPD, rather than just the one (N1).	Paragraph 1.7 will be revised to include policies N2 and N3.	<p>1.7 new bullet points:</p> <ul style="list-style-type: none"> • <u>Policy N2: Natural Environment, Geodiversity & Biodiversity seeks to protect and enhance internationally, nationally and locally designated sites and to deliver net biodiversity and geodiversity gain in new development.</u>

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		<p>This seems to be an omission, given that MDC’s ‘Statement of Representation Procedure’ states that the Draft SPD is intended to provide: ‘...’further guidance on Policies N1, N2 and N3 of the Maldon District Local Development Plan...’</p>		<ul style="list-style-type: none"> • Policy N3 Open Space, Sport and Leisure aims to protect PROW, spaces and facilities contributing towards the integrity of the green infrastructure network, from loss or damage from development. Developments are required to contribute towards improving the provision, quality and accessibility of open spaces, sports, community and leisure facilities.
Dartmouth Parks Estate	1.8	<p>Dartmouth Park Estates supports the direct reference to the adopted South Maldon Garden Suburb (SMGS) Strategic Masterplan Framework (SMF), at paragraph 1.8 of the Draft GI SPD. This aligns with the intended purpose of an SPD, which is to “add further detail to the policies in the development plan”</p> <p>The paragraph recognises the positive contribution that the new Garden Suburb will make to the District’s GI Network, with 40% of the allocation assigned to strategic GI, as the provision of green infrastructure and the creation of a network of green spaces is a key component of the garden suburb.</p>	An additional reference to the SMGS SMF will be added to para 1.8.	1.8 First bullet point ...SPD assigns 40% of the allocation as strategic green infrastructure, <u>as shown on Figure 4.3 of the South Maldon Garden Suburb SPD</u> . The document...

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		<p>However, Dartmouth Park Estates request that greater clarity should be provided by way of reference to Figure 4.3 ‘Green Infrastructure Plan’ (on page 55 of the SMGS SMF). This plan clarifies that the 40% provision of GI is the total proportion to be provided across the entire Garden Suburb, albeit that this proportion varies across each development parcel as per the SMF (and the three separate planning applications which are approved or have resolution to grant for each development parcel).</p>		
Sport England	Page 4	<p>Support for the inclusion of a ‘Promoting Healthy Living’ theme as one of the themes of the GI Strategy as this recognises the important role that green infrastructure plays in providing opportunities for promoting healthy and active lifestyles.</p>	Noted	
Maldon Society	1.8	<p>The provision of green ‘walls’ along development peripheries we believe directly contributes to the wellbeing of both the drivers using the roads in visual terms, and the residents in terms of both visual benefit and air quality.</p> <p>The presence of an existing green wall on one side of Limebrook Way has not been echoed on the other side, which is a serious flaw. When queried, it was confirmed that the views of the Highways Authority were</p>	<p>The SMGS Masterplan SPD and endorsed Strategic Design Codes’ rationale is to integrate new development to the built, natural and historic environment as set out in local and national policy. Screening development from view is considered a negative design approach. The Masterplan Garden Suburb Design Principles set out a landscape</p>	None

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		considered paramount. Clearly MDC policy was insufficiently robust	led approach where built form is softened by green infrastructure and provides a setting and backdrop for built form to nestle within as well as the visual, ecological and biodiversity gains to the new development. New development visible from the highway is a visual cue to motorists that pedestrians and cyclists are also using the highway and is considered an effective tool to slow down traffic.	
Natural England	1.11	The Essex Coast Recreational disturbance Avoidance and Mitigation Strategy - In light of the emerging strategic solution and the role of Green Infrastructure (GI) as on site mitigation measures, Natural England welcomes reference to the Essex Recreation Disturbance Avoidance Mitigation Strategy (RAMS) strategic solution. We would anticipate reference to the importance of Green Infrastructure within the context of the recreational disturbance pressures currently being faced on the Essex Coast designated sites. We would direct you to our previous correspondences on this matter, in particular the letter dated 16	Additional text on the importance of GI in the context of recreation pressure on the coast will be added.	...new dwellings in the study area. <u>In the context of the recreational disturbance pressures currently being faced by the Essex Coast designated sites, the existing green infrastructure network and new provision will be of growing importance.</u> In terms of green infrastructure, the mitigation is expected to be varied and could include <u>on-site green infrastructure</u> , habitat creation and enhancement, improved management of recreation activities along the coast and additional wardens to communicate the benefits of using the coast in a positive way. <u>The Essex</u>

APPENDIX C

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		<p>August 2018 (reference 244199) and the enclosed recommendations regarding on-site provisions for large scale developments. These on-site mitigation measures should be incorporated into good practice for the relevant residential developments and as such this SPD provides opportunity to encourage these practices.</p>		<p><u>Coast RAMS provides an opportunity for on-site green infrastructure provisions to be incorporated into large scale developments.</u> The RAMS is a joint project between 11 local authorities (Basildon, Braintree, Brentwood, Castle Point, Chelmsford, Colchester, Maldon, Rochford, Southend, Tendring and Thurrock). The SPD Essex Coast RAMS document will be available for public consultation in Spring <u>the late summer of 2019.</u></p>
Natural England	1.11	<p><u>Biodiversity enhancement</u> This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the NPPF. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment.</p> <p><u>Landscape enhancement</u> The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for</p>	<p>These issues are already covered by the Maldon District Design Guide’s technical document on Landscape and Green Infrastructure, which is already referred to in the MDDG part of para 1.11.</p>	None

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		<p>example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p><u>Other design considerations</u> The NPPF (para 180) includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity.</p>		
South Woodham Ferrers Town Council	1.11	We welcome the emerging Essex Coast Recreation Disturbance Avoidance Mitigation Strategy (RAMS) in view of the many designated sites in the South Woodham Ferrers parish.	Noted	
Natural England	1.13	An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other	Para 1.13 will be expanded to make it clear that individual GI projects may need assessment under the HRA process.	<u>...A number of the projects within this GI Strategy are within close proximity to the coastal European sites, and as such require due consideration under the Habitats Regulations assessment process.</u>

APPENDIX C

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		<p>plan or project; in this instance we note that a number of the projects enclosed within the SPD are within close proximity to the coastal European designated sites and as such require due consideration under the Habitats Regulation Assessment process.</p>		
RSPB	1.13 pg 9	<p>It is of the utmost importance that any project that may come forward must not have an adverse effect on the internationally important features of the Blackwater Estuary Special Protection Area (SPA).</p> <p>In particular, the Water Sports Awareness Programme (Section 2) and the developing work around the RAMS strategy has to be robust and must not overtly promote activities that could have serious impacts on sensitive species.</p>	<p>Some of the projects will provide recreational opportunities away from the estuaries, thus potentially diverting recreational pressure away from the most sensitive areas of the District.</p> <p>The Water Sports Awareness Programme has clear synergies with the RAMS, in that both aim to reduce the recreational impacts on the Estuaries.</p> <p>Para 1.13 has been expanded to cover HRA for individual projects.</p>	See above
Protecting & Enhancing Wildlife				
RSPB	Page 11	<p>We fully support the inclusion of the two Turtle Dove Friendly Zones (TDFZs) that fall within the council’s boundary.</p> <p>The first RSPB reserve is Old Hall Marshes, not the Blackwater Estuary National Nature</p>	The reference to the RSPB reserves will be corrected	Two RSPB reserves, the Blackwater Estuary National Nature Reserve <u>Old Hall Marshes</u> and Wallasea Island ...

APPENDIX C

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		Reserve (NNR), which is an entity in its own right.		
Cllr A St Joseph MDC Planning and Licensing Committee	Page 11	Correction: Two RSPB reserves - Blackwater Estuary NNR is incorrect. The second RSPB reserve is Old Hall Marshes.	The reference to the RSPB reserves will be corrected	Two RSPB reserves, the Blackwater Estuary National Nature Reserve <u>Old Hall Marshes</u> and ...
RSPB	2.8 page 13	<p>It would be helpful for those using the strategy to separate out these important SPA Feature species in to ‘breeding’ and ‘wintering’:</p> <p>Breeding: Pochard, Ringed Plover and Little Tern</p> <p>Wintering: Hen Harrier, Dark-bellied Brent Goose, Dunlin, Black-tailed Godwit, Grey Plover</p> <p>Wintering features, particularly Black-tailed Godwits may be present in internationally important numbers in every month from August through to April. Typically, birds that are present in the spring and autumn will have spent the winter months further south in western Europe (coastal France, Portugal). When they arrive in spring, they are less habituated to the regular human activities that long-staying over-wintering birds have acclimatised too. It follows that birds present for a shorter period of time</p>	Para 2,8 has been expanded to cover the points raised.	<p>These are designated on the basis of the coastal and estuarine habitats and species assemblages they support, and in particular populations of wintering (<u>Hen Harrier, Dark-bellied Brent Goose, Dunlin, Black-tailed Godwit, Grey Plover</u>) and breeding birds (<u>Pochard, Ringed Plover and Little Tern</u>) including dark bellied geese, hen harrier, red knot, grey plover, common pochard, dunlin, ringed plover, black tailed godwit, little tern. <u>Over Wintering species, particularly Black-tailed Godwits, may be present in internationally important numbers from August through to April. This prolonged period of up to nine months has to be a significant consideration when assessing impacts of any projects. Typically, birds that are present in the spring will have spent the winter months further south in western Europe. When they arrive in</u></p>

APPENDIX C

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		will show a disturbance effect at a greater distance than over-wintering birds. This prolonged period of up to ten months has to be a significant consideration when assessing impacts of any projects, as per our comment in paragraph 1.13 above.		<u>spring, they are less habituated to the regular human activities that long-staying over-wintering birds have acclimatised too. It follows that birds present for a shorter period of time may show a disturbance effect at a greater distance than over-wintering birds.</u>
RSPB	2.10	The RSPB does not manage Tollesbury Wick. Our reserve is called Old Hall Marshes	The reference to the RSPB reserves will be corrected	...Tollesbury Wick Marshes (EWT and RSPB) and Old Hall Marshes (RSPB)
MDC Planning and Licensing Committee A St Joseph	2.10	Correction: Tollesbury Wick is an Essex Wildlife Trust (EWT) reserve, not a RSPB reserve.	The reference to the nature reserves will be corrected	...Tollesbury Wick Marshes (EWT and RSPB) and Old Hall Marshes (RSPB)
Essex County Council	2.11	<p>The Maldon District supports a wealth of biodiversity assets, including a large number of locally, nationally and internationally designated sites, as well as extensive areas of open countryside which supports a range of habitats (many lying within farmed landscapes).</p> <p>Reference to the Wallasea Island project is out of date, as all construction work has been completed, and the site is now naturally re-seeding/colonising and open to the public. Reference in paragraph 2.11 should be updated.</p>	Para 2.11 will be updated as suggested	... Wallasea Island <u>is open to the public, and</u> can be accessed by boat from Burnham-on-Crouch. The island is currently undergoing transformation, the largest <u>conservation and engineering project</u> of its kind in Europe... Crossrail scheme in London. <u>The construction work has been completed and the site is naturally re-seeding/ colonising.</u>
RSPB	2.12	Should read Turtle Dove Friendly Zone, not Conservation Zone	Agreed, this will be corrected	A Turtle Dove Conservation <u>Friendly</u> Zone was...

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Forestry Commission	General	<p>In comparison to other districts in East Anglia, there is higher density of ancient woodlands in Maldon District. Advice on Ancient woodlands provided to assist the Council in assessing the appropriateness of sites for future development with regard to any which may be near to Ancient Woodland.</p> <p>The resilience of existing and new woodland is a key theme of the Forestry Commission’s work to Protect, Improve and Expand woodland in England. The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives highlighted above.</p>	Add a section to ‘Protecting & Enhancing Wildlife’ (after para 2.12) on the importance of ancient woodlands based on the Forestry Commission response.	<p>Additional text after para 2.12</p> <p><u>Ancient Woodland</u> <u>Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).</u></p> <p><u>In comparison to other districts in East Anglia the Maldon District has a high density of ancient woodlands. There are 12 ancient woodlands in the Danbury / Baddow area, 11 in the Wickham Bishops / Great Baddow area and 12 between Danbury and Cold Norton. (source: Forestry Commission response to the GI Strategy consultation) These woodlands are important landscape features, will have great biodiversity and are therefore a great natural asset locally and at a regional level.</u></p>
Chelmsford City Council	Fig 2.1	Danbury Ridges is identified as part of a Core Biodiversity Area (C3) in Chelmsford’s GI SP. This area crosses the boundary with Maldon District and includes Woodham Walter Common Sites of Special Scientific Interest (SSSI). Figure 2.1 in Maldon’s GI	Thank you for bringing this to our attention. It appears to be a formatting anomaly on this map. The map area for figure 2.1 will be changed to show the	Fig 2.1: Adjust the area of the map coverage to include all of the District (as per the other maps) and to include the whole of the Woodham Walter SSSI complex.

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		Strategy fails to show this SSSI or how it connects with the rest of Danbury Ridges.	whole of the District and the Woodham Walter SSSI complex.	Change MDC boundary style to match the other maps.
RSPB	Strengths and Opportunities (page 14)	<p>1. We recommend a re-wording of the last bullet point to:</p> <p>The Essex Little Tern Group (ELTG) is a group of public, private and non-governmental organisations who are working to restore little tern populations around the district. Old Hall Marshes and Tollesbury Wick are key sites. Through a combination of vegetation management, deployment of little tern decoys and the use of oyster-shells (provided by local oystermen) to raise the beach-crest which provides safer nesting habitat, the number of successfully breeding birds is increasing.</p> <p>2. Furthermore, could we request that an additional bullet point is included as follows: RSPB, Essex Wildlife Trust, Maldon District Council, Natural England, Environment Agency, The Farming and Wildlife Advisory Group (FWAG), local water companies and landowners are currently establishing a Blackwater Conservation Strategy. It's focus is on protecting and enhancing key species and habitats by working more closely together to share ideas, management methods, our experiences and knowledge.</p>	The desk based study findings (page 14) will be amended as suggested.	<p>Delete the last bullet point on page 14 and replace with:</p> <ul style="list-style-type: none"> • <u>The Essex Little Tern Group (ELTG) is a group of public, private and non-governmental organisations who are working to restore little tern populations around the district. Old Hall Marshes and Tollesbury Wick are key sites. Through a combination of vegetation management, deployment of little tern decoys and the use of oyster-shells (provided by local oystermen) to raise the beach-crest which provides safer nesting habitat, the number of successfully breeding birds is increasing.</u> <p>Add an additional bullet point (page 14):</p> <ul style="list-style-type: none"> • <u>RSPB, Essex Wildlife Trust, Maldon District Council, Natural England, Environment Agency, The Farming and Wildlife Advisory Group (FWAG), local water companies and landowners are currently establishing a Blackwater Conservation Strategy. Its focus is on protecting and enhancing key</u>

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		<p>A map showing the boundary of this area is attached as a separate pdf.</p> <p>Integrated partnership working is broadly referenced in the stakeholder comments section on page 15, the Analysis on page 17 (paragraphs 2.13/2.16) and enshrined within Principle 2 ‘Protecting and Enhancing Biodiversity (page 62). The Blackwater Conservation Strategy will be a prime mechanism for delivering this fundamental principle.</p>		<p><u>species and habitats by working more closely together to share ideas, management methods, our experiences and knowledge.</u></p>
Woodham Walter Parish Council	Protecting and Enhancing Wildlife	<p>Throughout the document there appears to be no mention of Woodham Walter Common, an important site with SSSI status. On various maps it has been designated as F5 and annotated as being ‘Little Baddow and Danbury Wooded Farmland’. Both Little Baddow and Danbury fall outside of the MDC boundary yet the Common is under the control of the Woodham Walter Parish Council and managed for them by The Essex Wildlife Trust. It is therefore separate from any other area outside of the Parish boundary and with a different characteristic. This Council considers that this should be corrected, as it is an important factor in the area landscape character and should be a</p>	<p>Unfortunately, the map for Fig 2.1 ‘Protecting and Enhancing Wildlife’ had a formatting error that meant that not all the District was shown, resulting in Woodham Walter SSSI being missed off the map. This is being rectified.</p> <p>Additional text will be added to the section on designated nature conservation sites (page 13) for the Woodham Walter SSSI, as it is the largest inland SSSI in the district.</p>	<p>Fig 2.1 to be reformatted, to show the whole of the District and the Woodham Walter Common SSSI.</p> <p>Additional paragraph after 2.11: <u>Woodham Walter Common SSSI is the largest inland SSSI in the district, and extends into the neighbouring local authority and the parishes of Little Baddow and Danbury. The SSSI is an extensive area (almost 80ha) of ancient woodland and woodland that has developed on former heathland.</u></p>

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		material consideration when dealing with local issues.		
Individual	Protecting & Enhancing Wildlife	<p>I wish to emphasise the importance of:</p> <ul style="list-style-type: none"> • retaining and enhancing existing green spaces, including Primrose Meadow, and the natural environment of Promenade Park and Millennium Wood; • preserving the major hedgerows along the main roads of Maldon, for wildlife, visual screening and as noise barriers; • liaising with the Essex Wildlife Trust, especially in relation to Wick reserve, which is destined to be surrounded by housing, as well as on other relevant issues. 	<p>The Prom Park (including Millennium Wood) and The Wick have their own projects in the GI Strategy reflecting their importance to the local community.</p> <p>The hedgerow mapping sub project will be expanded in Maldon’s Hidden Landscapes project.</p> <p>However, the Council has limited powers relating to hedgerow protection.</p>	<p>Maldon’s Hidden Landscapes sub projects: Mapping of historic hedgerows in the <u>District Dengie</u>, to promote wildlife, landscape and heritage benefits.</p>
Essex County Council	Figure 2.0: Green Infrastructure Baseline: All Green Infrastructure	<p>Figure 2.0: Green Infrastructure Baseline: All Green Infrastructure ECC recommend reference is made to Local Geological Sites (LoGS) to accompany Local Wildlife Sites (LoWS) and Local Nature Reserves in Figure 2. These can be evidenced via the following link for Maldon District: http://geoessex.org.uk/maldon.html</p>	LoGS will be added to figures 2 and 2.1	Fig 2 and 2.1 will be amended to include Local Geological Sites.
Natural England (NE)	SEA Screening	We note that based on the assessments in appendices 1 and 2 of the Strategic Environmental Assessment (SEA) Screening Report, the Council considers that the green	The detailed officer response is provided in the SEA Screening section of this report (page 98).	2.13 There are international nature designations along Maldon District’s coastline and estuaries, with a number of local nature designations inland as

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		<p>infrastructure initiatives promoted through the Strategy would not have a significant negative impact on the environment, but would in fact see significant improvements to both informal and formal open space and green infrastructure features across the district.</p> <p>Point g. in Appendix 2 of the report indicates that the Strategy assists with implementation of LDF policies to protect designated wildlife sites, by ensuring that appropriate consideration is given to green infrastructure provision. The report states that the Strategy does not set out the policy framework for protecting and enhancing these (statutorily designated) areas; it provides guidance on delivery mechanisms.</p> <p>Natural England’s advice is that in order to enable the SEA (and HRA) screening report to conclude ‘no significant environmental effect’ the Strategy should incorporate clear objectives and commitments to ensure the protection and enhancement of designated sites, including internationally designated sites, SSSIs and Local Wildlife Sites; and to secure the delivery of any GI mitigation required to address the adverse effects of development, particularly through</p>	<p>In response to the NE comments, additional wording has been added to para 2.13 and 2.16</p>	<p>well as along the coast. Both the desk based study and stakeholder findings identified existing initiatives, <u>such as the Essex Coast RAMS</u> that aim to protect and enhance these designations, as well as species, but there is scope for partnerships to be strengthened. In contrast, there is increasing recreational pressures on habitats, whilst the intensification of agricultural practices has historically affected biodiversity in Maldon District.</p> <p>2.16 The key priorities for Protecting and Enhancing Wildlife in Maldon are:</p> <ul style="list-style-type: none"> • <u>Protecting international, national and local</u> wildlife designations, ensuring that their integrity is maintained and enhanced, whilst also helping identify and protect non-designated natural greenspace. A suggested framework to help achieve the latter is presented in Appendix 2 • Managing the recreational pressure exerted on <u>international, national and local</u> wildlife sites, providing places for Maldon District’s residents and visitors to enjoy the District’s natural environment and

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		<p>increased recreational pressure and disturbance.</p> <p>This should also reflect the current work being undertaken to develop the emerging Essex Coast strategic solution, the Essex Recreational Avoidance and Mitigation Strategy (for further information on this we would refer you to our interim advice letter dated 16th August 2018 reference 244199).</p> <p>Our advice is that the Strategy and SEA screening report be amended accordingly.</p>		<p>experience the benefits provided by access to nature, whilst managing potential impacts <u>through mitigation projects and partnerships.</u></p>
Creating Resilient Water Environments				
Environment Agency	Creating Resilient Water Environments	<p>Shoreline Management Plan</p> <p>The draft document refers to current standards of protection offered to the area and that there will be additional development to create new homes. What it does not cover, or refer to, is the Shoreline Management Plan (SMP). The SMP is the strategic document for managing the coastline (and is linked into planning and development). Funding for delivering the preferred policies in the SMP are not guaranteed and maintaining the standards of tidal flood protection may be challenging. It will require a partnership approach with developers, with the potential to seek</p>	<p>Additional bullet point on the SMP will be added to the Weaknesses and Threats box on page 22</p>	<p>New bullet point (Weaknesses and Threats page 22)</p> <ul style="list-style-type: none"> • <u>The Shoreline Management Plan (SMP) is the strategic document for managing the coastline (and is linked into planning and development). Funding for delivering the preferred policies in the SMP are not guaranteed and maintaining the standards of tidal flood protection may be challenging. It will require a partnership approach with developers, with the potential to seek contributions towards maintaining or improving</u>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		contributions towards maintaining or improving the levels of protection from flooding.		<u>the levels of protection from flooding.</u>
Environment Agency	Creating Resilient Water Environments	<p>Natural Flood Management</p> <p>The recent change in emphasis in the NPPF for the consideration of natural flood management techniques to reduce the causes and impacts of flooding should be considered. There are potential benefits in encouraging the implementation of natural flood management techniques on and around small watercourses in catchment headwaters. At a development site level, small scale natural flood management measures can potentially be incorporated within the site boundary and there is some potential to overlap these with Sustainable Drainage Systems (SuDS) measures, but these are only likely to yield small benefits in flood risk management on individual sites. Greater gains from natural flood management are likely to only be achieved over a wider catchment scale and would benefit from strategic coordination and acknowledgment within the Green Infrastructure Strategy.</p>	Text on natural flood management will be added after 2.25	<p>New paragraph after 2.25: <u>Natural Flood Management</u> <u>The NPPF encourages the use of natural flood management techniques to reduce the causes and impacts of flooding. Natural flood management is when natural processes are used to reduce the risk of flooding and coastal erosion. Examples include: restoring bends in rivers, changing the way land is managed so soil can absorb more water and creating saltmarshes on the coast to absorb wave energy There are potential benefits in encouraging the implementation of natural flood management techniques on and around small watercourses in catchment headwaters. At a development site level, small scale natural flood management measures can be incorporated within the site boundary and there is some potential to overlap these with SuDS measures, resulting in benefits in flood risk management for the individual site. However, greater gains from natural flood management</u></p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				<u>could be achieved when applied over a wider catchment scale.</u>
Environment Agency	2.17	It would be useful to add to this paragraph that <u>“the envisaged impact of climate change on the water environment means that the risk of flooding within the district is likely to increase over the next 100 years”</u> .	Para 2.17 will be amended as suggested	2.17 additional sentence: <u>The potential impact of climate change on the water environment means that the risk of flooding within the district is likely to increase over the next 100 years</u>
Environment Agency	2.19	This paragraph should have the addition of the following word (shown in italics) to convey the correct interpretation of the Environment Agency spatial flood defence maps: “The Environment Agency’s Spatial Flood Defences map shows <i>where</i> there is a standard of protection equal to or better than 1 in 100 (1%) for rivers and 1 in 200 (0.5%) from the sea.”	Para 2.19 will be corrected	...The Environment Agency’s Spatial Flood Defences map shows <u>where</u> there is a standard of protection equal to or better than 1 in 100 (1%) for rivers and 1 in 200 (0.5%) from the sea.”
Environment Agency	2.22	We welcome that smaller watercourses have been identified as presenting localised flood risk. It would be useful to add <u>“Holloway Road ditch, Heybridge”</u> and <u>“Heybridge Hall ditch”</u> to this example given the frequency of flooding and local concern and awareness of issues relating to those watercourses.	2.22 will be expanded as suggested	Smaller water courses, such as Spickett’s Brook, <u>Holloway Road ditch and Heybridge Hall ditch</u> , present localised flood risk...
Environment Agency	Creating Resilient Water Environments	<u>Watercourses and Flood Risk</u> We support the principle of maintaining natural features such as ditches and watercourses, particularly in relation to the Garden Suburbs. There are significant	This point will be added to the text.	New para after 2.22 page 12: <u>There are significant benefits in leaving green corridors around watercourses and setting these within public open space or as part of a green link route as</u>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		benefits in leaving green corridors around watercourses and setting these within public open space or as part of a green link route as there is less risk of householder modification of these features. If these areas remain as public open space, the risk to habitat through culverting or increased local flood risk etc. is reduced.		<u>there is less risk of householder modification of these features. If these areas remain as public open space, the risk to habitat through culverting or increased local flood risk etc. can be reduced.</u>
South Woodham Ferrers Town Council	Page 21	We are concerned about the dissolved oxygen and ammonia levels within the River Crouch.	The water quality in the lower reaches of the River Crouch (below Wickford) is better than it is upstream. However, there are a number of environmental issues along the length of the River Crouch including diffuse and point source pollution and invasive species, which are of concern and could impact on the Crouch Estuary. This GI Strategy can only influence the waterways flowing into the estuary from within Maldon District.	None
Environment Agency	2.27	It may be worth adding in this paragraph that approximately 30% of the land area of the Maldon District lies within Flood Zone 2 and Flood Zone 3. Reference here could be made to the map in Figure 2.2.	Para 2.27 will be amended as suggested.	...large areas of the District lie within flood zones <u>(approximately 30% of the land area in the District is within Flood Zones 2 and 3. See fig2.2)</u> , and are subject to...

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Essex County Council	Stakeholder comments pg 22	<p>Under ‘Stakeholder comments’ (page 22) reference is made to there being a lack of distinction between SuDS and accessible green infrastructure in development proposals and as such, there is a potential conflict between the provision of SuDS and open/recreation space. It is unclear within the Strategy if this has been addressed.</p> <p>As Lead Local Flood Authority (LLFA) the County Council considers that whenever possible SuDS features should be incorporated with Public Open Space (POS). This approach maximises deliverability, minimises land take and provides access to SuDS to help educate people about their use as well as providing blue green amenity benefits. It is preferable to design features in a way that allows their use for as much of the time as possible. If a dry feature, such as a detention basin, is used it is likely that it will only be used during heavy periods of rain, when there is reduced usage of the area for POS. Furthermore, a well-designed feature that is properly drained could allow for that part of the site to drain more quickly than a stand-alone area, which would allow increased potential usage.</p>	Public Open Space (POS) has a function and practicality in its own right. POS by its very nature has to be accessible and useable. If a percentage of POS is required to meet the needs of all residents it should not be dominated by SuDs features as a detention basin is not practical for POS whether wet or dry. POS is diverse in its use; to have an informal ‘kick about’, to have a picnic or to ride a cycle. It must be accessible to all users including families with pushchairs, wheelchair users, motor scooter users and walkers. Whilst SuDs features are considered an element of POS within the Garden Suburb Masterplans and Strategic Design Codes, SuDs features should not dominate the POS. Other options should be considered as alternatives to SuDs detention basins including Rain Gardens, Tree planting or underground SuDs features to ensure there is sufficient POS	<p><u>New para on SuDS after 2.25</u></p> <p><u>SuDs in Public Open Space (POS)</u> <u>All development must contribute towards improving the provision, quality and/or accessibility of local and strategic open space, sports, community and leisure facilities, biodiversity and habitat. Direct provision of POS should form part of a green infrastructure network. POS should be accessible, functional and practical for all users. POS is diverse in its use, to have an informal ‘kick about’ or for other ball games’ to have a picnic or to ride a cycle. POS must not be dominated by Sustainable Drainage Systems (SuDs) features whether wet or dry and should not encumber use of the POS for informal recreation and play or impact upon direct routes to facilities and services for pedestrians, cyclists, motor scooters, wheelchairs and those with pushchairs and buggies. SuDs features should be incorporated into existing site features including watercourses and ditches. Where SuDs features overly dominate the POS provision, alternatives or complementary SuDs should be considered including ‘Rain</u></p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
			<p>and that is functional and practical to the development.</p> <p>Reference should be made to C21 MDDG SPD ‘Future Proofing’</p>	<p><u>Gardens’ tree planting or an underground drainage network.</u></p> <p><u>Footnote:</u> <u>Maldon District Design Guide SPD and supporting Landscape and GI Technical Document are available at:</u> https://www.maldon.gov.uk/info/20048/planning_policy/9226/urban_design/2 <u>Designing Rain Gardens: A Practical Guide, Urban Design London is available at:</u> https://www.urbandesignlondon.com/resources/designing-rain-gardens-practical-guide/</p>
Environment Agency	Para 2.29 and 3.5	<p>Water Quality: We welcome and support the priorities identified in the strategy, specifically for Water quality. In particular, paragraphs 2.29 referring to a resilient water environment, and paragraph 3.5 outlining that Maldon DC will work with key bodies including the Environment Agency to help improve water quality in the district.</p> <p>Water quality is mentioned as an issue in the Strategy. A countrywide ruling came into force in April 2018 called Farming Rules for Water, where all farmers need to meet new rules to protect water quality. Further information can be found here</p>	A footnote will be added to para 3.5	<p>Footnote to para 3.5 page 62 <u>In April 2018 ‘Farming Rules for Water’ were introduced to help farmers and landowners reduce the risk of pollution to protect water quality. Further information is available at:</u> https://www.gov.uk/guidance/rules-for-farmers-and-land-managers-to-prevent-water-pollution</p>

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		<p>https://www.gov.uk/guidance/rules-for-farmers-and-land-managers-to-prevent-water-pollution . If appropriate, these rules should be mentioned in the Strategy to help improve river habitat quality.</p>		
Essex Bridleways Association & British Horse Society	Para 2.29, pg 22	<p>Para 2.29: the key priorities paragraph includes the bullet point regarding increasing access; again, the aspiration to include as many user groups as possible should be embedded here. This document is sadly lacking if it blatantly discriminates against one user group in its aspirations and this should be addressed.</p>	<p>The bullet point does not need changing as it is already inclusive: ‘Increases access to the coastline, rivers and canals, whilst managing associated impacts’</p>	None
Individual	Figure 2.2	<p>Figure 2.2 could be misleading Maldon replicated as their zone 2 & 3 flood zones the old 5m contour lines that the Environment Agency hurriedly introduced about 10-15 years ago, to show possible flood areas, across the whole country. There was nothing scientific about the area shaded blue on their maps. For example in our area they didn’t take any regard for the fact that sea walls & other barriers were in existence - nor that 4.5 m is a mountain in a flood zone if all the other land round and about is at 4m or less.</p> <p>Since then EA have produced a much more detailed map, whilst not suitable for planning, it allows people to make a</p>	<p>The map uses the flood zones identified by the Environment Agency. The map also shows the extent of the spatial flood defences. The link to the Environment Agency interactive map will be added at the end of the Flooding section (pg 20)</p>	<p>Add footnote to para 2.22 <u>The Environment Agency’s interactive flood risk map is available at:</u> https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastings=587569.15&northing=203622.58&address=100091258901&map=SurfaceWater</p>

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		<p>judgement. In my personal case my house whilst in the middle of the 5m contour and therefore your flood zone 2 and 3, & the deep blue of the EA map, is in fact a low risk property. My house is unlikely to flood, therefore is in a white zone. Your map as the old broad brush EA map, gives the wrong message about my and of course other people's property. Perhaps some appropriate comment can be added to your figure 2.2. For individual houses use the following link. https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastings=587569.15&northings=203622.58&address=100091258901&map=SurfaceWater</p>		
Supporting Local Landscape Character page 25				
Woodham Walter Parish Council	Supporting Local Landscape Character	<p>This Council believes that there should be a much greater emphasis on local landscape character types. In this respect we do not consider that the document goes far enough in its coverage to avert the degeneration of green areas from inappropriate and indiscriminate development, whether purporting to be tourism focussed or otherwise, that do not respect the local character or views.</p>	<p>Landscape protection is already covered by a number of policy documents, and this Strategy should be read in conjunction with these other policies, and not in isolation.</p> <p>GI Strategy policy Principle 3 (page 63) focuses on conserving and strengthening links with our landscape. LDP Policy D1 design quality & built environment protects landscape settings, the natural environment and</p>	None

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
			<p>encourages development to contribute to and enhance local distinctiveness. Paragraph 3.5 expands on this policy. The Maldon District Design Guide at B03 and B04 covers landscape character in some detail, as does the accompanying technical document Landscape and Green Infrastructure.</p> <p>Where appropriate, a landscape and Visual Impact Assessment (LVIA) or an assessment of impact on local landscape character can be required for development proposals.</p>	
Individual	Supporting Local Landscape Character	<p>I wish to emphasise the importance of:</p> <ul style="list-style-type: none"> • preserving the major hedgerows along the main roads of Maldon, for wildlife, visual screening and as noise barriers; 	<p>Hedgerow mapping is included within Maldon’s Hidden Landscapes project, to clearly identify historic hedgerows and raise awareness of their value. However, the Council has limited powers relating to hedgerow protection.</p>	<p>Maldon’s Hidden Landscapes sub projects: Mapping of historic hedgerows in the <u>District Dengie</u>, to promote wildlife, landscape and heritage benefits.</p>
Celebrating Cultural Heritage				
G Courtney A Maldon Harbour Commissioner	Cultural heritage	I am concerned to see no references to the marine industry heritage in this policy document.	The section on Supporting Economic progress and Tourism at paras 2.95 and 2.96 (page 56) refer to the strong maritime	None

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
			economy and culture of the district. In the Celebrating Cultural Heritage section, the district’s maritime heritage is an identified strength (page 32)	
Essex County Council	Celebrating Cultural Heritage	Strengths and Opportunities - Reference should be made to the significance of the historic coastal grazing marshes and the widespread evidence of the Late Iron Age and Roman salt-making industry (Red Hills) within the marshes.	This section is missing reference to non-designated heritage assets. The Council is embarking on a parish by parish assessment of non-designated heritage assets to develop a List of Local Heritage Assets. In addition, there are historic landscapes and non-designated assets of archaeological value that should be recognised in the Strategy. Text on non-designated heritage assets has been added.	<p>New paragraphs after 2.43: <u>Non-Designated Heritage Assets</u> <u>The District contains over a thousand listed buildings, which are protected by law. There are many historic buildings which, although they may not meet the criteria for national listing, possess local value because of their architectural and historic interest. The District Council is developing Lists of Local Heritage Assets to identify and celebrate these locally important buildings in each parish. Inclusion on a Local List does not of itself bring any additional consent requirements over and above the existing requirement for planning permission. However, it does mean that a building's heritage significance will be a material consideration in the planning process.</u></p> <p><u>Within the wider landscape, there are other non-designated heritage assets of historical and archaeological interest, such as the remnants of the late Iron</u></p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				<p><u>Age and Roman salt-making industry (Red Hills), and the historic coastal grazing marshes that are of significance to the cultural heritage of the district.</u> Footnote: <u>The Historic Environment Characterisation Project (2008) provides an overview of the district and the Historic Environment Record. Available at:</u> www.maldon.gov.uk/publications/LDP/pre-submission/2%20Design%20and%20Climate%20Change/EB018%20Maldon%20District%20Historic%20Environment%20Characterisation%20Project.pdf</p>
Essex County Council	Celebrating Cultural Heritage	<p>Reference is made to the district’s strong cultural heritage, which is reflected in the number and range of designated features within the landscape. Consequently, reference should be made to the Historic Environment Characterisation Project (2008) that provides an overview of the district and the Historic Environment Record. www.maldon.gov.uk/publications/LDP/pre-submission/2%20Design%20and%20Climate%20Change/EB018%20Maldon%20District%20Historic%20Environment%20Characterisation%20Project.pdf</p>	This will be included as a footnote to the new Non-Designated Heritage Assets text.	See above.

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
South Woodham Ferrers Town Council	2.47	<p>We support the proposed Coastal Footpath connecting South Woodham Ferrers with Burnham on Crouch, although looking at Ordnance Survey maps, there would seem to be difficulties in proposing a direct route. Details of which can be found www.gov.uk/government/publications/england-and-coast-path-in-essex</p>	<p>The challenge of identifying a safe, simple route is identified in the River Crouch Greenway project. This project will need to rely upon Natural England’s England Coast Path (ECP) for its route. The proposal for the Wallasea to Burnham-on-Crouch stretch of the ECP is due to be published later in 2019.</p>	None
Essex County Council (ECC)	Promoting Healthy Living	<p>ECC supports reference to Green Infrastructure having the potential to make a significant contribution to the health and wellbeing of local communities (physical and mental), providing recreation destinations, influencing how people travel between their homes and places of work and leisure, and the promotion of active travel and the inclusion of Active Design principles.</p> <p>As lead advisors on public health ECC has been engaged throughout the preparation of the Strategy through attendance at workshops and the ongoing provision of public health datasets. ECC welcome involvement in the potential preparation and implementation of Green Infrastructure projects, where there is a public health input and benefit.</p>	Noted	None

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
ECC	Promoting Healthy Living	ECC recommend health inequality and green infrastructure requires further consideration in particular. Public Health England and UCL Health equity evidence work published in 2014 considered improving access to green space, and included information and evidence on access for all social groups. It can be viewed by the following link. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/357411/Review8_Green_spaces_health_inequalities.pdf	Add a footnote to the end of para 2.64 page 41, for this report, as this paragraph refers to health inequalities.	Footnote to 2.64: <u>Further information on improving access to green space for all social groups, to reduce social equality, is available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/357411/Review8_Green_spaces_health_inequalities.pdf</u>
Essex County Council	Promoting Healthy Living New development and Recreational spaces	Recommend that the Fields in Trust (FiT) guidance for outdoor sport and play is referred to. These guidelines are a useful tool for designing outdoor recreational space and may help form the expected standards for new developments.	Add text to the end of para 2.61	<u>The Fields in Trust guidance for outdoor sport and play is a useful tool for designing outdoor recreational space. Footnote: Fields in Trust Guidance for Outdoor Sport and Play, available at: http://www.fieldsintrust.org/guidance</u>
MDC Planning and Licensing Committee & St Joseph	Healthy Living section:	Public Rights of Way - .A partnership (between MDC, ECC, landowners etc) is needed to solve the Public Rights of Way (PRoW) issues in the countryside (eg missing bridges, impassable tracks, footpaths being used by cyclists/horse riders/vehicles) and to make the PRoW network as usable as possible. There is huge potential to raise awareness of PRoW in the District, and to make sure that the individual elements of	The ECC Rights of way improvement Plan is due for review in 2019. MDC will ensure that the aspirations of the GI Strategy and the GI projects will be embedded in MDC's response to this. As part of the Essex Cycle Strategy, Essex Highways published the Maldon District	Add new para after 2.48 <u>The Essex Cycling Strategy sets out the key elements of a long term plan that will lead to a significant and sustained increase in cycling in Essex. Two key commitments of the Essex Cycling Strategy are to:</u> <ul style="list-style-type: none"> • Establish a coherent, comprehensive and advantageous cycle

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		<p>the PRoW network are better connected together. This could be a potential scheme for RAMS (Recreational disturbance and Avoidance Mitigation Strategy) funding, to draw people away from the coast.</p> <p>The key thing the District needs is a safe cycle network alongside roads, radiating out between the main communities. Due to funding constraints, this may need to be tackled incrementally, initially dealing with pinch points.</p> <p>Unless there is more money spent on maintaining sea walls, they are unsuitable for cycle routes (PRoW or permissive routes).</p>	<p>Cycling Action Plan in 2018. The purpose of the Essex Cycling Strategy is to set out the key elements of a long term plan that will lead to a significant and sustained increase in cycling in Essex. Two key commitments of the Essex Cycling Strategy are to:</p> <ul style="list-style-type: none"> Establish a coherent, comprehensive and advantageous cycle network in every major urban area, utilising a combination of on-carriageway and off-carriageway cycle facilities; and Ensure each District has an up to date Cycling Action Plan (renewed every 5 years). 	<p><u>network in every major urban area, utilising a combination of on-carriageway and off-carriageway cycle facilities; and</u></p> <ul style="list-style-type: none"> <u>Ensure each District has an up to date Cycling Action Plan (renewed every 5 years). As part of the Essex Cycle Strategy, Essex Highways published the Maldon District Cycling Action Plan in 2018. This includes potential cycleway projects that would support the GI projects in this Strategy. It is recognised that effective partnership working will be key to delivering both the GI projects and the Cycle Action Plan projects.</u> <p>Footnote: <u>Maldon District Cycling Action Plan (2018) is available at:</u> https://www.essexhighways.org/uploads/files/Getting%20Around/Cycling/Maldon-District-Cycling-Action-Plan.pdf</p>
Woodham Walter Parish Council	Promoting Healthy Living	There appears to be an emphasis on the promotion of sports and physical recreation activities but little recognition that sports facilities in some areas are being undermined by proposed development that will detract from the joined up green infrastructure and bear little resemblance to the surrounding area characteristic. It is this	The Green Infrastructure Strategy will be a Supplementary Planning Document that supports the LDP, it cannot introduce new policy. LDP policy N3 already protects open space, sports and recreational land and buildings.	None

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		Council’s view that there should be a policy for preventing the loss of such facilities and dealing with the impact of such inappropriate and indiscriminate development where the LDP appears unable to do so.		
Essex Bridleways Association & British Horse Society	Para 2.50, pg 37-38	Promoting Healthy Living: the Strategy correctly states that access to public rights of way are paramount to encouraging people to take more exercise, but it appears to be promoting access for cyclists rather than any other user group. Whilst the links necessary for sustainable travel to work/school etc are undisputed, recreational access is also very important and this should encompass all user groups, not just pedestrians and cyclists. After all, the large proportion of horse riders are usually women and children, two groups who are most frequently targeted to increase their uptake of exercise, but the lack of safe off-road routes are a barrier to this uptake. This needs to be addressed; the Maldon district has the lowest proportion of bridleways in Essex at only 7% of the total (Essex ROWIP) and this Strategy needs to aspire to increase such access. After all, if a route is accessible for equestrians, it is accessible for all other user groups – walkers, cyclists, equestrians and the	Additional text on bridleways will be added after para 2.64	<u>Recreational access to the countryside is important and the lack of safe off-road routes can be a barrier to this. Wherever possible, new or upgraded routes should be accessible by all user groups, including walkers, cyclists, riders and people with disabilities.</u>

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		disabled, especially those in mobility scooters.		
Sport England	Pages 38-39, para 2.50-2.55	<p>The summary of formal recreation space provision is welcomed as this forms an important part of Green Infrastructure.</p> <p>However, there is a concern that the GI Strategy’s evidence base for formal recreation space provision needs and issues is reliant on the 2011 GI Study. While this may have been a robust study at the time it was prepared, the supply and demand data upon which the study was based is now over 8 years old and will not have accounted for changes in the intervening period. Furthermore, the industry standard methodology for assessing outdoor sports needs for instance has changed over this period and local standards are no longer appropriate for use when applied to new developments. For example, paragraph 2.55 advises that grass pitch provision meets the needs of recreational football, cricket and rugby but the relevant governing bodies for these sports have advised that the findings of the 2011 GI study are no longer up-to-date and that there are playing pitch needs that have not been identified. The need to update the evidence base for formal open space is justified by paragraph</p>	A review of pitches, NEAPs and LEAPs etc for all parishes in the District will be carried out as part of the Playing Pitch Strategy review (target date 2021). Principle 6 has been amended to reflect this.	See changes for paragraphs 3.20-3.21

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		<p>96 of the NPPF and the Council will be expected to update this as part of the emerging review of the Maldon Local Plan. However, this should also be updated to support the delivery of the GI strategy as an up-to-date understanding of formal open space needs and issues will help inform the identification and delivery of projects in the action plan. For example, an up-to-date playing pitch strategy would be expected to provide new recommendations and actions for the sports facilities at Promenade Park which in turn should be used for informing the proposed project to prepare a long term strategy for the park. It could also identify additional partners and funding sources for delivering the priorities in such a long term strategy for the park.</p> <p>To address this, the action plan (as part of implementing Principle 5) should make it explicit that that the formal open space study will be updated and reviewed to inform the delivery of the GI strategy.</p>		
MDC Planning and Licensing Committee St Joseph	2.57	Page 39 – delete Bradwell Shell Bank from the list of recreation destinations, due to its biodiversity importance.	Agreed	...Oxley Meadow, Bradwell Shell Bank , Maldon ...

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MDC Planning and Licensing Committee St Joseph	Page 40 – Table 2.1	Natural & semi-natural greenspace - Standard ‘to apply a higher level of policy protection to Local wildlife Sites.’ – not sure of the need to highlight this or why higher protection is necessary. If this relates to policy NE2 in the LDP, then this should be made clear	These are the standards used to support the preparation of the LDP. The reference to policy protection was carried through in policy NE2 which provides protection for locally designated sites.	Add asterix to ‘To apply a higher level of policy protection to Local Wildlife Sites’** At foot of table add: <u>** This relates to policy NE2 MDLDP.</u>
Sport England	Page 41, para 2.61	<p>The reference to Sport England’s Active Design guide is welcomed as this signposts to detailed guidance on how green infrastructure can be designed to promote physical activity and thereby support healthy living.</p> <p>However, the GI Strategy does not build on this and provide strategy proposals or actions on how green infrastructure in new development or enhancements to existing GI will be designed to encourage physical activity.</p> <p>To address this, the action plan should explicitly expect developments to consider how they can provide or enhance green infrastructure to encourage physical activity and should specifically encourage consideration to be given to the Active Design guidance. Furthermore, reference is advocated to the use of the new Essex Design Guide (which Maldon DC has been</p>	<p>This issue is addressed in the Maldon District Design Guide technical document: Landscape and Green Infrastructure. This is addressed in GI Strategy policy principle 5: Improving access, fitness and contact with nature (page 64).</p> <p>Text added to the ‘Essex Design Guide’ section in Appendix 4.</p>	<p>Text added to the ‘Essex Design Guide’ section in Appendix 4:</p> <p><u>A4.6 The Essex Design Guide¹³² is the UK’s first interactive web-based design tool, embedding these ten active design principles and has been produced collaboratively with the Essex Planning Officers’ Association. Within its ‘Landscape and Greenspaces’ section, the guide specifically refers to green infrastructure stating that it should be used to offset the built environment as well as ‘shape and structure developments, while good landscape design should provide wayfinding cues and sensory stimulation – features which can provide valuable reassurance to older people and those with dementia’. The section concludes with a series of targeted questions of how a future development provides or enhances green infrastructure to meet</u></p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		<p>engaged with through the EPOA) for designing green infrastructure as Active Design principles have been embedded into the new Guide e.g. in the Landscape and Green Spaces theme.</p>		<p><u>the physical and mental health needs of future residents of all ages and abilities and does it contribute to a multifunctional biodiversity network.</u></p> <p><u>A4.7 The revised Essex Design Guide (2018), has been widened in scope to cover topics including Highways Technical Manual; Sustainable Drainage Systems (SuDS); Garden Communities; Local Authority Profiles; and new themes regarding ageing populations, digital and smart technology, active design and health and wellbeing. The revised Essex Design Guide (2018) is not endorsed by MDC. However, reference should be made to the EDG where Essex County Council is the lead authority including Flood Risk, SuDs and Highways. Reference should be made to the EDG Home Page ‘Essex Local Authorities’ that lists all relevant policy documents and sets out key policy requirement for each Local Authority Area. The EDG should be referenced in relation to locally adopted design guidance, key policy and supporting documents</u></p>

APPENDIX C

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Essex Bridleways Association & British Horse Society	Para 2.61 pg 41	Para 2.61 quotes from the adopted Local Plan but appears to omit equestrians for some reason; the actual wording in Policy S3 point 8 is thus: “there will be a network of safe and usable paths and streets for pedestrians, cyclists, horse riders and vehicles. This network should prioritise accessibility to open spaces, education and health facilities”. The correct wording puts a completely different slant onto the following paragraphs where any mention of equestrians is omitted and should be rectified. It seems very odd that Maldon District Council are not complying with their own adopted Local Plan, subtly omitting certain areas and then implying that this is the correct wording. The footnote references strangely refer to the Pre-submission document rather than the adopted version which may of course be the reason, but it seems strange that the Pre-submission document is being used in drawing up this Strategy rather than that which has been subject to rigorous public examination by a Planning Inspector and adopted by the Council itself.	This was a transcription error. Para 2.61 and footnote will be corrected.	2.61: ...provide a network of safe and usable paths and streets for pedestrians, cyclists, <u>horse riders</u> and vehicles... Footnote 58: Maldon District Council (2017) Pre-Submission Local Development Plan 2014-2019. Available at:
South Woodham Ferrers Town Council	Page 42	Rochford District Council are currently developing plans to provide a Coastal pathway along the Southern banks of the Crouch.	The viability of any ferry/ boat proposals is a key concern. Any such proposals would need detailed consideration to	None

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		<p>Connecting to pathways on the Southern banks of the Crouch is of interest but we have concerns about the viability of ferries across the Crouch. Such ferry at South Woodham Ferrers would be subject to sufficient water depth as the nearest practical ferry would be at North Fambridge.</p>	<p>ensure that the proposal was practical, viable and did not damage the biodiversity interest of the estuary. The River Crouch Greenway project identifies opportunities for river crossings at North Fambridge and Burnham-on-Crouch, but identifies that there are viability issues for these.</p>	
Essex County Council	Para 2.63	<p>ECC recommend paragraph 2.63 is amended to read:</p> <p><i>Maldon District Council will be producing, in conjunction with ten other Essex councils, the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) to address the potential effects from new residential development upon coastal European sites (61). The RAMS aims to avoid impacts in combination with other plans and projects whilst encouraging visitors to behave appropriately to protect sensitive coastal areas and its internationally important wildlife. Ensuring that sufficient recreational space within new development is provided for new residents is a consideration for the District Council when determining planning applications, in order to avoid impacts from each development</i></p>	<p>The paragraph will be amended as suggested. Reference to SANGS included.</p>	<p>Maldon District Council will be producing, in conjunction with ten other Essex councils, the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) to address the potential effects from new residential development upon coastal European sites (61). The RAMS aims to avoid impacts in combination with other plans and projects whilst encouraging visitors to behave appropriately to protect sensitive coastal areas and its internationally important wildlife. Ensuring that sufficient recreational space (for example, Suitable Alternative Natural Green Space) within new development is provided for new residents is a consideration for the District Council when determining planning applications, in order to avoid</p>

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		<u>alone and meet the requirements of the Habitats Regulations.</u>		<u>impacts from each development alone and meet the requirements of the Habitats Regulations.</u>
Essex Bridleways Association & British Horse Society	Page 43, last paragraph	Page 43, last paragraph, mentions the towpath along the Chelmer and Blackwater Navigation and the aspiration to use it for a walking/cycle route from Maldon to Chelmsford. If any upgrading is planned, then it should be made accessible to ALL user groups, including equestrians, rather than just pedestrians and cyclists. It is inherently wrong to use public money to improve routes for selected user groups and discriminate against others.	This reports comments made at the stakeholder workshop. The Chelmer and Blackwater Access project could deliver an upgraded towpath between Heybridge Basin and Chelmsford. As well as providing a strategic walking and cycling route, this could also offer the opportunity to extend the bridleway which currently only links Heybridge Basin to Elms Farm Park.	None
Nurturing Communities page 45				
Individual	Nurturing communities	I wish to emphasise the importance of: <ul style="list-style-type: none"> retaining and enhancing existing green spaces, including Primrose Meadow, and the natural environment of Promenade Park and Millennium Wood; giving consideration to greening of the larger areas of communal space in the Poets Estate, which are currently quite bare and bleak; 	The Community Greenspaces, and Promenade Park projects could meet some of these aspirations.	None
Cllr P Channer MDC Planning and	2.71	Obesity and Mental Health are major issues in the District. This section needs expanding.	Agreed. Para 2.71 will be replaced.	<u>Generally, the health of residents in Maldon District is better than the England Average. There are however</u>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
Licensing Committee				<p><u>certain elements of health which are concerning for the District. Adult obesity rates in the District are high with almost six in ten being overweight or obese¹. There are various factors which will influence obesity and lack of interaction with the environment or green spaces can fuel obesity; just below half of all Maldon District residents will do any walking at least five times per week², similarly only 15% of residents will use walking as a method of transport at least three times a week - which is significantly worse than the rest of the County³. The issue of obesity is reflected in both Reception and Year 6 children, who are on average more overweight than the rest of the County⁴.</u></p> <p><u>When considering physical activity and green space, there has been a study which has examined obesity levels in European countries which has found that areas with large amounts of green space are three times more likely to be physically active than people living in areas where there is little green space⁵. Therefore, we understand that residents in the District who have more access to</u></p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				<p><u>green space will be more likely to be physically active and henceforth reap the benefits of doing so, for example, exercise and physical activity can reduce the likelihood of an individual dying from coronary heart disease⁶.</u></p> <p><u>Mental health is another health priority of the Council. The proportion of estimated mental health disorders in young people (5-16) is better than the county average⁷, however, the overall suicide rate for both males and females is marginally worse than the County average⁸. Access to green space has an important role to play with mental health. It has been shown that people living in a green urban area will exhibit significantly lower levels of mental distress and higher levels of wellbeing⁵. Linking physical activity, mental health and green spaces together, evidence has found that people who engage with physical activity in a natural environment would experience additional benefits to mental wellbeing than would be experienced with similar levels of indoor physical activity⁹. The District has an ageing population¹⁰, which will mean that there will be increased demand on health, social care</u></p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				<p><u>services and support needed in the District. Issues surrounding an ageing population may also be amplified in the future with adults who are becoming more overweight. Older adults in the future may be more susceptible to developing more rapid and life changing illnesses and issues due to excess weight. Therefore, having the opportunity to be physically active and explore the green spaces that the District has to offer could significantly benefit the health and wellbeing of residents.</u></p> <p><u>Footnotes:</u> <u>1 Public Health England (2018) Local Authority Health Profile 2018: Maldon District. Percentage of adults (aged 18+) classified as overweight or obese (2016/17). Available at: https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E12000006?search_type=list-child-areas&place_name=East</u> <u>2 Public Health England (2018) Local Authority Health Profile 2018: Maldon District. Percentage of adults who do any walking at least five times per week (2014/15). Available at:</u></p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				<p>https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E12000006?search_type=list-child-areas&place_name=East3 Public Health England (2018) Local Authority Health Profile 2018: Maldon District. <u>Percentage of adults walking for travel at least three times per week (2016/17).</u> Available at: https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E12000006?search_type=list-child-areas&place_name=East4 Public Health England (2018) Local Authority Health Profile 2018: Maldon District. <u>Reception: Prevalence of overweight (including obese)(2016/17); Year 6: Prevalence of overweight (including obese) (2016/17).</u> Available at: https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E12000006?search_type=list-child-areas&place_name=East5 White MP, Alcock I, Wheeler BW, Depledge MH. (2013) <u>Would you be happier living in a greener urban area? A fixed-effects analysis of panel data.</u> Psychological science. 24(6):920-8.</p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				<p>6 <u>Heran BS, CHen JMH, Ebrahim S, Moxham T, Oldridge N, Rees K, et al. (2011) Exercise-based cardiac rehabilitation for coronary heart disease (Review). The Cochrane Collaboration. (7):1-97.</u></p> <p>7 <u>Public Health England (2018) Local Authority Health Profile 2018: Maldon District. Estimated prevalence of mental health disorders in children and young people: % population aged 5-16 (2015). Available at: https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E12000006?search_type=list-child-areas&place_name=East</u></p> <p>8 <u>Public Health England (2018) Local Authority Health Profile 2018: Maldon District. Suicide rate (Male)(2015-17); Suicide rate (Female) (2015-17). Available at: https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E12000006?search_type=list-child-areas&place_name=East</u></p> <p>9 <u>Coon JT, Boddy K, Stein K, Whear R, Barton J, Depledge MH. (2011) Does Participating in Physical Activity in Outdoor Natural Environments Have a Greater Effect on Physical and Mental</u></p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				<p><u>Wellbeing than Physical Activity Indoors? A Systematic Review. Environmental Science & Technology. 45(5):1761-72</u> <u>10 Public Health England (2018) Local Authority Health Profile 2018: Maldon District. Age Profile: ONS Mid-year population estimates. Available at: https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E12000006?search_type=list-child-areas&place_name=East</u></p>
Sport England	Page 49, para 2.82	The reference to green infrastructure aiming to promote active lifestyles and accessibility by sustainable transport modes as the focus of the ‘Nurturing Communities’ theme is welcomed.	Noted	None
Internal - Maldon District Council	Page 41	The ‘analysis’ section is missing	Analysis text will be provided	<p>Additional text added after the stakeholder comments on page 47: <u>Analysis</u> <u>The existing green infrastructure network provides a range of spaces (formal and informal), places and routes for Maldon District’s residents and visitors to engage in an active lifestyle.</u></p> <p><u>However there appears to be a lack of safe routes for cycling and horse riding, with the majority of the Public Rights of Way comprising footpaths. There</u></p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				<p><u>should be a focus on connecting schools, places of work and recreational areas to settlements (being mindful of impacts on designated coastal habitats). This provision would encourage the use of active transport for commuting and sustainable modes of travel to places of recreation such as parks and sports facilities.</u></p> <p><u>The key priorities for Promoting Healthy Living are:</u></p> <ul style="list-style-type: none"> • <u>Enhancing connectivity through the District through increased provision of, or the enhancement of, the public footpath network, including increased provision of other modes of sustainable transport such as cycling and horse riding;</u> • <u>Ensuring new developments promote active lifestyles by providing interactive spaces for children and adults on or near residential sites and connecting the sites to walking and cycling routes.</u> • <u>Ensuring potential conflicts, such as increased access and recreation activities occurring within close proximity to wildlife sites, are acknowledged and addressed.</u>

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Sustaining productive landscapes page 51				
MDC Planning and Licensing Committee St Joseph	Page 52	<p>There appears to be too much emphasis on salt production (one company) at the expense of the importance of farming and food production in the District. For example, one farm in the District produces enough wheat to supply the whole of Essex with bread for two months. Further information on farming in the District would rebalance the emphasis of the Sustaining Productive Landscapes section.</p>	<p>The paragraphs have been re-ordered and additional information has been added.</p>	<p><u>Move para 2.86 on the Agricultural Land Classification to above 2.84, so it is the first paragraph in this section.</u></p> <p>At the end of 2.84 (agricultural employment) add: <u>The following examples of businesses give a flavour of the productive landscape in the District.</u></p> <p><u>New paras after employment (formerly paragraph 2.84)</u> <u>Dengie Crops Ltd is the UK's leading grower and producer of Alfalfa, which is used in the production of high quality animal feeds. They also operate a farmers' co-operative which can provide a full service to farmers, from crop drying through to grain marketing, and a buying group through which considerable savings can be made on the purchase of a long list of products and services. Run as an extension of members' farm offices, its Agricultural Division works exclusively on each individual member's behalf.</u></p> <p><u>North Maldon Growers Ltd, wholesale producers of UK grown handpicked fresh vegetables since 1964, is a co-</u></p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				<p><u>operative farming business of four local Essex families. They have been producing top quality field fresh vegetables for over 50 years in mid Essex on the Blackwater estuary. Reclaimed fertile soil and maritime climate combined with vast expertise and experience in this area has provided a winning formula for them to produce sweetcorn, squashes, pumpkins, courgettes, and purple sprouting broccoli and kale.</u></p> <p><u>Part of the Wilkin & Sons (Tiptree jams) 'Tiptree' farm estate is in the District, with farms near Goldhanger and Tollesbury. Much of the fruit used in the preserve-making business is grown on the 'Tiptree' farms, with the company aiming to be self-sufficient in the fruits that will grow well in the area. Today, the farm grows fruit not only for the preserve-making business but also has a blossoming trade in fresh and frozen fruit for shops. The farm estate is managed sustainably, to LEAF (Linking the Environment and Farming) standards and is one of the LEAF Demonstration Farms. The LEAF Marque is a leading global environmental</u></p>

APPENDIX C

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				<p><u>assurance system recognising sustainably farmed products.</u></p> <p><u>Ernest Doe is a long established family firm, whose headquarters are based in the Maldon District, and have a network of branches in the South and East of England. The current Managing Director Colin Doe is the fourth generation of the family to have taken the helm during the company’s 100+ years of trading. They are the UK’s largest agricultural, construction and ground care machinery dealership, a major agricultural equipment supplier in East Anglia, and represent some of the best known and well respected names in the industry, supplying every type of agricultural equipment from cultivation machinery, spreaders, balers, tractors, through to combine harvesters.</u></p>
<p>MDC Planning and Licensing Committee A St Joseph</p>	<p>Page 53 para 2.90</p>	<p>Second sentence needs revising to make its meaning clear.</p>	<p>Agreed – the sentence has been re-written.</p>	<p><u>The influence of the national and international economy and policy has shaped the agricultural sector in the district, which has responded successfully to change by diversifying or by increasing efficiency through economies of scale. is very prominent in</u></p>

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				the District and the District has responded through diversifying.
MDC Planning and Licensing Committee A-St Joseph	Fig 2.8 – Baseline for Sustaining Productive Landscapes	The farm land managed under the Environmental Stewardship Scheme is not seen as contributing to Green Infrastructure by the public even though approximately a third of the District’s land area is managed under this scheme. Having the land management for around a third of the District focused on environmental themes is stunning. We need to enthuse farmers to carry on doing this. How do we recognise their contribution to GI? How do we raise awareness amongst the public? How can MDC support this?	Additional text has been added to para 2.89	New text at the end of para 2.89 (ALC para) <u>In addition, large areas of the district are farmed under the Countryside Stewardship or Environmental Stewardship Schemes. The main priority for these schemes is to protect and enhance the natural environment, the diversity of wildlife (biodiversity) and water quality. As a result, these areas contribute significantly to the Green Infrastructure of the district.</u>
Supporting Economic Progress and Tourism page 55				
Maldon Society	Page 55-59 2.92-2.100	Section on supporting economic progress and tourism. It is unfortunate that these two aims have been bracketed together as they can, as the strengths and weaknesses comment implies, be mutually exclusive. Nowhere is this more exemplified in the fact that apart from a small blob on one of the maps, the proposal for a new nuclear station at Bradwell appears not to be mentioned? Yet this would clearly have a direct and adverse effect on at least of the three commendable projects which are detailed separately. These are The proposal for a	It is recognised that the proposed new power station at Bradwell will have both positive and negative impacts. However, it is beyond the remit of the GI Strategy to deal with Bradwell in any detail. Large infrastructure projects can become tourist attractions in their own right, for example when the Channel Tunnel was being constructed it had it own visitor centre and viewing platform.	None

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		<p>Bradwell/Tollesbury ferry - it is clearly assumed by default that tourists would want to approach a mega building site? The same could be said of the proposed Bradwell and St Peters circular walk project. The construction and emissions could also have a direct effect on the safety and quality of watersports activity, another project objective.</p> <p>All three of these projects deserve support and are to be commended. In this case the views of MDC in promoting and needing tourism has to be robustly directed at Essex County Council and even the national government, since whether or not tourists come here is a matter of how the landscape is perceived by them.</p> <p>The report defines the area by Bradwell B as drained estuarial marsh, and it also states baldly that there is a risk of total inundation and of the seawalls being overtopped - these undisputed facts need to be conveyed to those who would otherwise develop the area for nuclear power generation and distribution.</p>	<p>As with all the GI projects, these projects will need to be developed further.</p> <p>The St Peter’s Circular Walk is a long-term project, which is likely to come forward after the power station is constructed.</p> <p>The Water Sports Awareness Programme aims to educate the water sports and boating communities about the impact of their sports on vulnerable habitats and species, enabling them to act responsibly when using the estuary. As such the construction of the power station will have little impact on this programme itself.</p> <p>The appropriate safety assessments, and flood risk assessments and mitigation measures will be undertaken as part of the Development Consent Order process.</p>	
Essex Bridleways	P56 Para 2.97	Para 2.97 again mentions improving access for pedestrians and cyclists but no mention	The majority of the Causeway Area is not a suitable location	None

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
Association & British Horse Society		of equestrians, despite sections of the towpath in that area already being designated bridleway. It follows that any linking routes should also be of bridleway status.	for encouraging horse riding. Where appropriate, horse riding access will be considered for routes linking to the Navigation.	
Action Plan page 61				
MDC Planning and Licensing Committee A St Joseph	Fig 3.1 (Map)	I'm not sure how realistic the ferry connection across the Blackwater would be. There are alternative routes that could be considered in addition to the indicative route shown on the map (such as Ramsey Island to Thistly Rd, Tollesbury, or Bradwell to north east of Tollesbury Wick Marshes) that could provide an all-tide service.	As with all the GI projects, this project will need to be developed further to ensure that it is practical and viable.	None
MDC Planning and Licensing Committee A St Joseph	Page 61 Fig 3.1 word cloud	The word cloud has very little on landscape, and nothing on food production, or integrating farming and landscape, yet over 50% of the District's area is for food production and it is the economic driver for most of the countryside. As it illustrates the views of the people attending the stakeholder workshops, it would suggest that the workshops didn't have the right people present. The diagram needs to be amended.	Although representatives of the agricultural sector did not attend the technical stakeholder workshop, representative bodies, businesses and individuals from the farming community were consulted with through the public consultation on the GI Strategy, and had that opportunity to make comments on the GI Strategy. The word cloud is being moved to Appendix 3 as it reflects the comments made by the	3.1 The vision for this GI Strategy has been informed by stakeholders, as outlined in the methodology, Appendix 1 . Each stakeholder who attended the green infrastructure workshops was asked to list three words or very brief phrases which summed up what green infrastructure means to them or what they would like Maldon District's green infrastructure to look like in the future. The word cloud in Figure 3.1 illustrates their views.

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			<p>stakeholders. As a result, paragraphs 3.1 and 3.2 have been amended to take into account this change.</p> <p>The sections on sustaining productive Landscapes has been revised to better represent the importance of agriculture to this district and the contribution the sector make to green infrastructure through the Environmental and Countryside Stewardship Schemes. In addition, the Wildlife Friendly Farming project has been given a higher priority.</p>	<p>3.2 Using the above wording, the Vision for The Maldon GI Strategy is set out below. In addition to the wording found in Figure 3.1, The Vision reflects the findings of the responses from other elements of the stakeholder consultation as well as the desk review findings outlined in Chapter 2 of this GI Strategy. The Vision encompasses the already well-functioning GI network, and its importance in defining the District’s character, but also identifies that the GI network needs to be promoted and enhanced to maximise the delivery of benefits for local communities.</p> <p>Move word cloud to appendix 3 with the following text from para 3.1: <u>Each stakeholder who attended the green infrastructure workshops was asked to list three words or very brief phrases which summed up what green infrastructure means to them or what they would like Maldon District’s green infrastructure to look like in the future. The word cloud in Figure 3.1 illustrates their views.</u></p>

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Essex County Council	Vision	<p>ECC generally supports the Vision, but recommends the following amendments to better reflect the key messages arising from national planning policy and the Strategy document.</p> <p>The Maldon GI Strategy will deliver a connected <u>multi-functional</u> landscape for communities and wildlife, which celebrates and promotes the District’s distinctive landscape character, heritage, biodiversity, coast and watercourses. Opportunities to enhance the green infrastructure network will deliver a range of benefits for local communities, <u>promote healthy living</u>, whilst providing mitigation for development and population growth.</p> <p>The recommended amendments are consistent with policy contained in the National Planning Policy Framework (NPPF 2018), including the definition of ‘Green Infrastructure’, as contained in Annex 2: Glossary of the NPPF. NPPF, para 91c states planning policies and decisions should aim to achieve healthy, inclusive and safe places.</p>	These amendments are in line with the NPPF and are acceptable.	The Maldon GI Strategy will deliver a connected <u>multi-functional</u> landscape for communities and wildlife, which celebrates and promotes the District’s distinctive landscape character, heritage, biodiversity, coast and watercourses. Opportunities to enhance the green infrastructure network will deliver a range of benefits for local communities, <u>promote healthy living</u> , whilst providing mitigation for development and population growth.
Essex Bridleways Association &	P61 para 3.2	Para 3.2: as mentioned initially, the Vision Statement should include an aspiration to include access to green infrastructure to as	The proposed changes to the vision suggested by ECC, on creating a connected, multi-functional landscape and	See the above changes

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
British Horse Society		many user groups as possible and should be embedded within the Vision.	promoting healthy living cover this point.	
Essex County Council	Policy Principles	The policy principles encourage the protection, enhancement and creation of green infrastructure and will be used to deliver the Vision. These are generally supported.	Noted	
Environment Agency	Para 2.29 and 3.5	<p>Water Quality: We welcome and support the priorities identified in the strategy, specifically for Water quality. In particular, paragraphs 2.29 referring to a resilient water environment, and paragraph 3.5 outlining that Maldon DC will work with key bodies including the Environment Agency to help improve water quality in the district.</p> <p>Water quality is mentioned as an issue in the Strategy. A countrywide ruling came into force in April 2018 called Farming Rules for Water, where all farmers need to meet new rules to protect water quality. Further information can be found here https://www.gov.uk/guidance/rules-for-farmers-and-land-managers-to-prevent-water-pollution. If appropriate, these rules should be mentioned in the Strategy to help improve river habitat quality.</p>	A footnote will be added to para 3.5	Footnote to para 3.5 page 62 <u>In April 2018 ‘Farming Rules for Water’ were introduced to help farmers and landowners reduce the risk of pollution to protect water quality. Further information is available at: https://www.gov.uk/guidance/rules-for-farmers-and-land-managers-to-prevent-water-pollution</u>
RSPB	3.6	This should be written as Sustainable Drainage Systems (SuDS). The lower case ‘u’	Agreed, this will be corrected.	...new developments will incorporate <u>Sustainable Drainage Systems (SuDS)</u>

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		<p>does not mean ‘urban’. Leaving this uncorrected could falsely imply that issues of water management/flood risk and alleviation are solely an issue in urban environments.</p>	<p>The other references will be corrected as necessary.</p>	<p>sustainable urban drainage systems (where necessary)...</p> <p>All other references to SuDs will be checked and corrected</p>
Individual	3.7	<p>Flood defence enhancement should be refused unless a need is proven. When is that need. For example has the predicted sea rise occurred. Is it threat now or in epoch 3 which is 100 years away. Has the sea wall deteriorated etc, are there better alternatives such as managed retreat?</p> <p>In some cases when land has been reclaimed, managed retreat is a better environmental option especially if a smaller amount of earth works can be undertaken to join to high contour points instead of defending a much longer stretch of sea wall defending low lying land taken from the sea, or old marsh land. The sea is only reclaiming what was stolen from it a 100 years ago or less.</p> <p>Clay and soil for such approved working is better taken from on site , instead of imported , the landscape /water scape which will then be beneficial to birds and wild life.</p>	<p>It is highly unlikely that flood defence enhancement works would be undertaken if there was not an identified need. Although these are valid points, the engineering and construction methods aspects of such proposals are beyond the remit of the GI Strategy.</p>	None

APPENDIX C

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		<p>There is a limit to the amount of imported clay available and should go to needy walls such as the north of the blackwater, where sea walls are not so well made as on the south.</p> <p>The EA of such significant works on the greater population must be considered against the smaller short term financial interests of those proposing the schemes,</p>		
South Woodham Ferrers Town Council	3.7	Any new or improved flood defences on the River Crouch should not have adverse effect on settlements further upstream.	New or improved flood defences at one location should not make the situation worse elsewhere. The assessment of economic, environmental and social impacts of proposed flood protection schemes will include both positive and negative impacts of the scheme. This policy principle deals with green Infrastructure issues only. Other issues are outside the remit of this Strategy.	No change
RSPB	Principle 2: Protecting and Enhancing Biodiversity	<p>We recommend that the order of the three themes in this section is changed to better reflect their magnitude. They should read:</p> <ul style="list-style-type: none"> • Development of a coherent ecological network • Partnership Working 	Agreed, this change reflects the existing text in para 3.8.	Principle 2: Protecting and Enhancing Biodiversity (paragraph 3.8, page 62) Place para 3.9 protection and enhancement of biodiversity in new developments after para 3.11 partnership working.

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
	(paragraph 3.8, page 62)	<ul style="list-style-type: none"> Protection and Enhancement of Biodiversity in New Developments <p>We are fully supportive of protecting and enhancing biodiversity in new developments, but it has to be recognised that as developments are new, there will be little or no biodiversity interest to start with. The priority of Principle 2 has to focus on protecting and enhancing the priority habitats and species already present in the ecological network.</p>		
Environment Agency	Page 62, para 3.9 and page 64 para 3.18	The Strategy will be key in helping offset the impact on flora and fauna by the proposed and current development in the Maldon area.	Noted	
Essex County Council	Action Plan	Principle 5: Improving Access, Fitness and Contact with Nature and Principle 6: Increasing Local Food Supply - could be strengthened with reference to public health benefits supported by related data where applicable.	Both these principles already refer to the potential benefits to physical and mental health. Therefore, the suggested change is not necessary.	None
Essex County Council	Principle 5 - Improving Access, Fitness and Contact with Nature	<p>With regards increasing Water Based Activity Levels the following amendment is recommended to paragraph 3.26.</p> <p>However, particularly in coastal locations, such measures will fully consider ecological sensitivities, with a partnership approach taken to ensure impacts are avoided <u>and</u> mitigated in accordance with Recreational</p>	If impacts are avoided, there is no need for mitigation, whilst mitigation would only occur if there were impacts that could not be avoided. Therefore, the text is correct: 'avoidance or mitigation'.	None

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		Disturbance and Avoidance Measures (RAMS).		
Woodham Walter Parish Council	3.19-3.20	The provision of local (and neighbourhood) equipped areas for play is noted and areas for such have been highlighted. It is noted that Woodham Walter has been excluded despite the fact that currently there is no provision for a LEAP or a NEAP in the Village. Having noted the omission within the consultation documents, the Parish Council is taking the initiative to provide one to supplement the existing practice goal posts on the general recreation area of Bell Meadow.	The text for this section was not as clear as it should have been. The list of parishes used was incorrect: the list was of parishes with a deficit of parks and open spaces from the GI Study, rather than a deficit in play provision from the Play Strategy. However, the evidence base for the Play Strategy is now dated and it is not felt appropriate to include this list in the GI Strategy. A review of NEAPs and LEAPs will be carried out as part of the playing pitch strategy review (target date 2021). This section has been revised accordingly.	3.19 As set out in Table 2.1 of the Promoting Healthy Living theme in this GI Strategy, there is a deficiency in areas for play in some parts of the District. <u>A review of NEAPs and LEAPs for all parishes in the District will be carried out as part of the Playing Pitch Strategy review (target date 2021).</u> Therefore, opportunities to provide Local Equipped Areas for Play (LEAP) and Neighbourhood Equipped Areas for Play (NEAP) shall be assessed within the following areas: <ul style="list-style-type: none"> • Asheldham • Dengie • Great Braxted • Great Totham • Hazleigh • Little Braxted • Langford • North Fambridge • Stow Maries • Ulting • Wickham Bishops • Woodham Mortimer <p>3.21 New developments within these areas shall assess the local provision of NEAPs and LEAPs and will</p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				be required to provide these within their development unless it can be demonstrated that this is not appropriate due to the scale or design of the development, or likely impacts in relation to biodiversity, cultural heritage, landscape or flood risk.
Gladman Developments	3.21	<p>It is accepted that development should contribute towards both LEAPs and NEAPs to provide play space for new and existing communities in the area.</p> <p>However, this should be in line with the Greenspace Standards set out in the Maldon Landscape and Green Infrastructure Technical Document and should have regard to Regulation 122 of the Community Infrastructure Regulations 2010.</p>	<p>Principle 5, refers back to table 2.1 (page 40) the greenspace standards set out in the GI Study 2011, which are the same standards used in the Maldon District Design Guide Landscape and Green Infrastructure Technical Document.</p> <p>A footnote will be added to the end of para 3.21 for the Community Infrastructure Regulations 2010.</p>	<p>3.21 add footnote: <u>Any developer contributions will need to meet the requirements of the Community Infrastructure Regulations 2010 (or any successor regulations).</u></p>
Sport England	Page 64, para 3.23	<p>While the actions in the action plan relating to Principle 5 are welcomed, as set out in other comments, there should be actions relating to updating the formal open space evidence base and explicitly expecting new development to be designed to promote physical activity.</p>	<p>The Maldon District Design Guide provides technical guidance on the integration of open space, sport and play facilities into new development, recognising the health benefits that high quality greenspace brings. The Design Guide itself states that ‘Streets should be</p>	<p>Add text to para 3.18, after the 2nd sentence: ...natural environment. <u>New development, where ever possible, should be designed to promote physical activity, following the guidance in the Maldon District Design Guide.</u> Deficiencies have been...</p>

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
			<p>designed to feel part of the local area. They should serve many functions, not just to the circulation of traffic, but also walking, cycling, play, social interaction and to encourage healthy living and direct connections to public transport and local facilities and services.'</p>	<p>Additional text added to the end of the paragraph: <u>The Playing Pitch Strategy is expected to be reviewed (target date 2021) ahead of the Local Development Plan review. The outcomes of this will inform the LDP review.</u></p>
RSPB	<p>Paragraph 3.26 (page 64) – Increasing Water Based Activity Levels</p>	<p>We are cautious about the title and wording of this section. Whilst recognising that this will cover other areas of water aside from the estuary, we do not consider it appropriate to overtly promote an increase in activity on the Blackwater Estuary SPA. Given the year-round importance of the estuary (the presence of ‘winter’ features like black-tailed godwits overlap with breeding birds such as little terns), the likelihood of an increase in water-based activity having an adverse effect on the SPA are significant and the GI Strategy should not be promoting this.</p> <p>The emphasis, as underpinned by the CIEEM-endorsed mitigation hierarchy and the first principle of biodiversity net gain (https://www.cieem.net/data/files/Publications/Biodiversity_Net_Gain_Principles.pdf) is</p>	<p>Your concern is understandable. The paragraph already explicitly refers to the coast’s ecological sensitivities and the RAMS. The paragraph will be amended.</p>	<p>3.26 - Opportunities to facilitate enjoyment of the water environment within and surrounding the district will be identified. This <u>could</u> will include promoting access to water, taking steps to improve water quality and <u>improving</u> e health and safety at access points.</p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		to “Do everything possible to first avoid and then minimise impacts on biodiversity”.		
Gladman Developments	3.32	<p>The provision of allotments in new development should be made in line with Regulation 122 of the Community Infrastructure Regulations 2010 and should be supported by evidence of the need for new facilities in the settlement within which the new development is located.</p> <p>It may be that no need exists in a particular area because of an overprovision of exiting allotments or that a better use of S106 monies would be to improve the facilities at an existing allotment, rather than provide new ones.</p> <p>Any requirement for allotments should therefore be flexible enough to allow a more bespoke approach towards provision.</p>	If there is sufficient provision within the local area for community infrastructure, then developer contributions would not be required. This issue has been dealt with by adding a footnote to para 3.21 regarding developer contributions.	See new footnote for para 3.21
Environment Agency	Para 3.48	Recommended Policy Framework, point 3.48. In particular bullet points one and three should be included in any LDP review.	Noted.	
Chelmsford City Council	Page 67	For clarity, the figure of the Green Infrastructure themes on page 67 of Maldon’s GI Strategy could be introduced at the beginning of Chapter 2 rather than in Chapter 3.	This diagram is introduced on page 4 of the Strategy and is repeated in Chapter 3. It is not proposed to include it in Chapter 2.	No change
RSPB	3.52	We ask for clarification of what the funding mechanism is for the proposed projects.	The GI Strategy and Projects equips the Council and its key partners with an agenda for change which is ready to	<p>New para after 3.52 page 75</p> <p><u>Delivery and Monitoring</u></p>

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
			<p>form the basis of future funding bids and applications.</p> <p>Text on delivery and monitoring has been added.</p>	<p><u>All the projects will need to be progressed in partnership with other organisations and landowners. Delivery will also require funding. In the most cases, funding has not been identified. The Green Infrastructure Strategy, however, equips the Council and its key partners with an agenda for change which is ready to form the basis of future funding bids and applications.</u></p>
Maldon Wick Ltd	Funding	<p>In addition, the consultation documents are not clear how these GI projects will be funded or implemented. Paragraph 3.52 identifies indicative project costs of between £10,000 - £50,000 but also that some projects ‘could cost considerably in excess of this’.</p> <p>The PPG is clear that SPDs “should not add unnecessarily to the financial burdens on development”. MDC must therefore provide greater clarity on delivery and funding of these projects in the draft SPD. Maldon Wick Ltd. Also request that the text includes a specific statement that, if pursued, the ‘business plans’ will be informed by up to date surveys (e.g. an ecology survey on principle 2), made publicly available with opportunities for comment from interested/affected parties.</p>	<p>All the projects will need to be progressed in partnership with other organisations and landowners, and this is made clear in the GI Projects document.</p> <p>Text on delivery and monitoring has been added.</p>	<p><u>As individual projects are further developed, there will be opportunities for stakeholder input and, where appropriate, further opportunities for public engagement.</u></p> <p><u>A regime of monitoring and review should be established to ensure the action plan is kept up to date. Progress on GI Projects should be reported regularly and corrective actions taken where necessary. Progress reports should be made publicly available so that stakeholders, local residents, businesses and the wider public have the opportunity to engage with and shape the different projects as they progress.</u></p>
Sport England	Action Plan	There does not appear to be a section in the action plan which explains how the action plan will be monitored and delivered to assess progress on delivering the generic actions and the GI projects that have been	Text on delivery and monitoring has been added.	

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		<p>identified. Without this, there would be a concern about whether and how the action plan would be delivered in practice. For instance, will there be a steering group led by the District Council set up to oversee the delivery of the action plan with representation from key stakeholders? Will there be an annual report to report on progress? Will there be a short term (year 1) action plan to identify priority actions for the first period of the strategy? What will be the review process for the action plan?</p> <p>It is requested that a section is added to the end of the action plan on delivery and monitoring to explain the proposals for this.</p>		<p><u>As each project is further developed, each will have a monitoring framework to ensure that each meets its intended outcomes.</u></p> <p><u>The GI Strategy, as an SPD will be monitored through the Maldon District Council’s authority monitoring report.</u></p>
Appendix 2 Appraising natural/semi-natural greenspace sites				
MDC Planning and Licensing Committee A-St Joseph	Appendix 2, 3.76 page 79	Delete bullet 3.76 and renumber following paragraphs.	Agreed	The formatting and numbering will be reviewed once the amendments have been made to the document
Essex County Council	Appendix 2 – Appraising Natural and Semi-natural Greenspace Sites: Guidance Note	The robust criteria for the appraisal of natural and semi-natural greenspace is welcomed. Although nature conservation designations have been excluded from the natural and semi-natural green space criteria, reference should still be made to ‘proximal green space’. In these areas cultural services such as aesthetic	This appraisal process is to enable areas of local significance to be identified, which is why designated sites have been excluded from the process. Land adjacent to designated sites may have a value in acting as a buffer	None

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		experience and spiritual/cultural enrichment may still be achieved due to the proximity to nature conservation areas.	around the designated area, however, as the criteria are focused on habitat types, it may not be appropriate to identify land solely due to its proximity to other sites.	
Appendix 3 Stakeholder Input				
MDC Planning and Licensing Committee A-St Joseph	Page 80 -	First bullet point needs amending to make its meaning clear.	This is the direct quote on the Post-It note where workshop attendees were asked to write their vision for green infrastructure in the Maldon District.	None
MDC Planning and Licensing Committee A-St Joseph	Page 81 –	Disagree with bullet 14 – there should not be permissive rights to cycle on the sea walls. Unless there is more money spent on maintaining sea walls, they are unsuitable for cycle use.	This section of the report relays comments made at the stakeholder workshops. As such it would be inappropriate to edit the comment. However, the suitability of any potential access projects for cycling/riding will need to be considered as each project is developed in more detail.	None
MDC Planning and Licensing Committee A-St Joseph		Page 84 – 1st bullet point in weaknesses section – ‘public transport legibility’ – has this been transcribed correctly from the workshop comments?	The bullet point has been transcribed correctly. A suggested interpretation has been added to the bullet point.	Revised bullet point: Access to coast; public transport legibility <u>[suggested interpretation: the public transport network can be difficult to navigate in terms of accessing timetables and linking routes throughout the District]</u>

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
Appendix 4 Policy Review				
Essex County Council	Appendix 4 – Policy Review Green Essex Strategy (GES) Para 3.82	<p>Paragraph 3.82 refers to the Essex Green Infrastructure Strategy as focussing primarily on social and economic benefits, which is not the case, as the ecological and environmental benefits of any GI Strategy are equally important. The emerging GES takes into consideration priorities coming out of the 25 Year Environment Plan and other local and national policies and Green Infrastructure Strategies. The GES proposed Action Plan is outlined in Appendix 1.</p> <p>The GES is planned to be published for consultation in Spring 2019. A working version of the Strategy can be viewed within the Essex Green Infrastructure Strategy Partnership via the Knowledge Hub - https://khub.net/group/essex-green-infrastructure-strategy-partnership . Green Essex Strategy Action Plan (work in progress) – provided with the ECC comments.</p>	The section will be updated.	<p>3.82 Overall the vision and <u>objectives</u> principles of the emerging <u>Green</u> Essex Strategy aligns with that of <u>the Maldon GI Strategy</u>. this document's. <u>The emerging GES takes into consideration priorities coming out of the 25 Year Environment Plan, and other local and national policies and Green Infrastructure Strategies. The GES is planned to be published for consultation in Spring 2019. However, the county wide document focuses primary on the social and economic benefits of green infrastructure and none of the emerging key principles mention the ecological importance of green infrastructure. Neglecting the protection and enhancement of the physical environment would result in social and economic benefits failing to be delivered. The policy for the Maldon GI Strategy needs to include protection and enhancement of the District's environmental assets, particularly as residents and visitors to Maldon District are attracted by its landscape, biodiversity, rivers and sea.</u></p>
Essex County Council	Appendix 4 – Policy Review	Appendix 4 refers to and reviews the emerging Essex Green Infrastructure		<u>Essex Green Infrastructure Strategy</u> <u>Green Essex Strategy</u>

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
	<p>Green Essex Strategy (GES)</p>	<p>Strategy, and in particular the initial draft scoping version of that Strategy. However, work has been progressing on the Strategy and is now termed the 'Green Essex Strategy'.</p> <p>In addition, the Vision, as outlined in paragraph 3.80 has been replaced with the following:</p> <p><i>'We will protect and grow a high quality connected Green Infrastructure network which extends from our City and town centres to the countryside and coast which is designed for people and wildlife whilst being self-sustaining'.</i></p> <p>The key principles, as outlined in paragraph 3.81 have been replaced with the following objectives:</p> <p>Place Protect existing green infrastructure, especially the most valuable Place Improve existing green infrastructure so it is better functioning Place Create more high-quality green infrastructure, especially in areas of deficiency Place Connectivity improvements connecting green infrastructure, people and wildlife.</p>		<p>3.80 The Vision of the emerging <u>Green Essex Green Infrastructure Strategy</u> is: <i>"A holistic approach to our green infrastructure (existing and new) to provide social, environmental and economical benefits to Essex."</i> <i>'We will protect and grow a high quality connected Green Infrastructure network which extends from our City and town centres to the countryside and coast which is designed for people and wildlife whilst being self-sustaining.'</i></p> <p>3.81 The emerging <u>key principles objectives</u> are:</p> <ul style="list-style-type: none"> • <u>Place: Protect existing green infrastructure, especially the most valuable</u> • <u>Place: Improve existing green infrastructure so it is better functioning</u> • <u>Place: Create more high-quality green infrastructure, especially in areas of deficiency</u> • <u>Place: Connectivity improvements connecting green infrastructure, people and wildlife.</u>

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		<p>People Increase use and inclusivity of green infrastructure across all social groups and abilities</p> <p>People Provide green infrastructure facilities to promote health and wellbeing</p> <p>Economy Secure funding for new and existing green infrastructure to ensure their sustainability.</p>		<ul style="list-style-type: none"> • <u>People: Increase use and inclusivity of green infrastructure across all social groups and abilities</u> • <u>People: Provide green infrastructure facilities to promote health and wellbeing</u> • <u>Economy: Secure funding for new and existing green infrastructure to ensure their sustainability.</u> <p>• “High quality green spaces are within easy reach of all parts of the county.</p> <p>• Visually beautiful places of Essex should be protected.</p> <p>• Green space can directly improve health and wellbeing outcomes.</p> <p>• Holistic approach to Essex green space and infrastructure.</p> <p>• Green infrastructure is integral to developing the Essex Economy.</p> <p>• Exploiting all opportunities for making green spaces self-sustaining.</p> <p>• Public and partner engagement is key to the creation of a green infrastructure strategy.”</p>
Essex County Council	General	ECC recommend reference is made to the revised Essex Design Guide (2018), which has been widened in scope to cover topics including Highways Technical Manual; Sustainable Urban Drainage Systems (SuDS);	A short section on the Essex Design Guide will be added to Appendix 4 Policy Review.	New para after 3.82 <u>Essex Design Guide</u> The revised Essex Design Guide (2018), has been widened in scope to cover topics including Highways Technical

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		<p>Garden Communities; Local Authority Profiles; and new themes regarding ageing populations, digital and smart technology, active design and health and wellbeing. www.essexdesignguide.co.uk/about/new-and-updated-content/</p>		<p><u>Manual; Sustainable Drainage Systems (SuDS); Garden Communities; Local Authority Profiles; and new themes regarding ageing populations, digital and smart technology, active design and health and wellbeing. The revised Essex Design Guide (2018) is not endorsed by MDC. However, reference should be made to the EDG where Essex CC is the lead authority including Flood Risk, SuDs and Highways. Reference should be made to the EDG Home Page ‘Essex Local Authorities’ that lists all relevant policy documents and sets out key policy requirement for each Local Authority Area. The EDG should be referenced in relation to locally adopted design guidance, key policy and supporting documents. The EDG is available at: www.essexdesignguide.co.uk</u></p>
Chelmsford City Council		<p>Table A4.2 in Maldon’s GI Strategy contains an analysis of how green infrastructure is addressed in Chelmsford’s Local Plan. It states that Chelmsford’s GI Strategic Plan (SP) places emphasis on the Local Plan, yet the Pre-Submission Local Plan does not mention this document other than listing it as an evidence base. This is incorrect as Chelmsford’s GI SP is referred to in the</p>	<p>This section will be amended</p>	<p>Table A4.2 Green infrastructure features within the specific growth site allocation policies, in two of the nine Strategic Priorities (<u>Strategic Priority 7 - Protecting and enhancing the Natural and Historic Environment, the Green Belt and valued landscapes & Strategic Priority 8 - Creating Well</u></p>

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		<p>Reasoned Justification (RJ) to Strategic Policy S6 and S13. In the RJ to Policy NE1 there are references to the Green Infrastructure Strategy rather than the Strategic Plan. This could be amended for clarity. In addition, there are various general references throughout the plan to green infrastructure.</p>		<p><u>Designed and Attractive Places, and Promoting Healthy Communities</u>), three <u>and five</u> strategic policies, in addition to <u>the Natural Environment policies</u>.</p> <p>...</p> <p>Add the following policies: <u>Strategic Policy S1 – Spatial Principles - Protects and enhances the character of valued landscapes, heritage and Biodiversity.</u></p> <p><u>Strategic Policy S13 – The Role of The Countryside-</u> <u>recognises the role the countryside plays as part of the green infrastructure network, and providing connectivity between the countryside and the urban area</u></p> <p>...</p> <p>Final para: The Chelmsford Green Infrastructure Strategic Plan places emphasis on the Local Plan. <u>Green Infrastructure features throughout the Local Plan. For example, Green Wedges and Green Corridors have a prominent position in the Local Plan, and Green Infrastructure is a key element within the strategic growth areas.</u> The Green Infrastructure SP is</p>

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				referred to in a few places in the Local Plan. yet the Pre-Submission Local Plan does not mention this document other than listing it as an evidence base.


Projects

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
Essex County Council	Green Infrastructure Projects	The proposed GI projects identified in Table 3.1 are generally supported, but should consider ECC's comments on the individual projects.	Noted	
Individual	GI projects	<p>The proposals put forward in the consultation document seem to fall into three categories:</p> <p>a) those that are desk-based 'nice ideas', which have little chance of being carried forward, such as greening of Maldon High Street, involving pedestrianisation, establishing new woodlands or a new country park;</p> <p>b) those that would depend largely on voluntary input to be realised, such as identifying and mapping ancient hedgerows, quiet lanes, veteran trees and missing links in the footpath network;</p> <p>c) Those that depend on consultation with and participation of outside partners, such as establishing the viability of ferry links across the Crouch and schemes for wildlife-friendly farming.</p> <p>In whichever group a project falls it should be made clear who would have a lead role and what other input would be required.</p>	This level of detail will be drawn up as each project is developed.	None

APPENDIX C

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
Promenade Park				
Essex County Council	Promenade Park	Promenade Park is a historic designed landscape and any GI project should reflect its heritage significance within its historic setting	The Promenade Park's historic designed landscape is recognised in the project outline.	None
Town Centre Greening				
Essex County Council	Town centre Greening	Mitigation measures will be required to ensure that there are no significant impacts on the historic environment (whether built or below-ground).	This point will be added to the challenges section	Potential challenges: <u>Need to ensure there are no significant impacts on the historic environment.</u>
Essex County Council	Town Centre Greening	Town Centre Greening – Potential Partners – reference should also be made to the Highways Authority – Essex County Council	Agreed	Potential partners: <u>Essex County Council – Highways Authority</u>
Maldon's Hidden Landscapes				
Essex County Council	Maldon's Hidden Landscape	Recommend the mapping of heritage hedgerows and veteran trees is undertaken, along with green lanes. Reference should be made to the Historic Environment Characterisation project, which identifies the significance of the historic field boundaries to the identity of the Dengie	The Historic Environment Characterisation project has been referenced in the main body of the GI Strategy. The mapping of historic hedgerows and veteran trees are already included in the list of potential sub-projects.	Maldon's Hidden Landscapes sub projects: Mapping of historic hedgerows in the <u>District Dengie</u> , to promote wildlife, landscape and heritage benefits.
Essex County Council	Maldon's hidden landscapes	ECC recommend reference should refer to all historic hedgerows or 'important' hedgerows in the district, rather than just the Dengie. Parish councils and the Tree Council/Tree Warden network should be included as potential partners. Whilst the	Amendments have been made for clarity	<u>Sub projects:</u> <u>Digitisation of the mapping of all the preserved trees in the District</u> Potential partners: <u>Parish councils</u>

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		mapping of preserved trees is a good idea in general terms, further clarification should be given to why this is necessary.		<u>Tree Council/Tree Warden network</u>
Chelmer and Blackwater Access Project				
Langford & Ulting Parish Council	Chelmer and Blackwater Access Project (page 69)	The Parish Council is concerned about the impact that improving access to the Chelmer and Blackwater will have at Hoe Mill, Ulting. As can be seen from the photograph below (taken on Sunday 2 nd September 2018), there is no car park. It should be noted that eight cars are parked on the bridge which has a 3 T maximum weight limit and this does not include any cars driving over the bridge at the same time. In addition, there is limited visibility for drivers and cyclists when cars are parked on both sides of the road, plus the hump backed bridge over the canal which causes highway safety issues. Increasing the number of visitors would affect the tranquillity of the canal and its surroundings and have an adverse effect on the wildlife present.	This is an important point and could apply to the Railway Multi-Access Trail and the Greenways projects, too. Issues of car parking has been added to the 'potential challenges' section of the project proforma.	Potential Challenges: <u>Increasing parking provision along the route at key access points.</u>

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
				
Essex County Council	GI project – Chelmer and Blackwater Access Project	There are opportunities for further enhancement and interpretation of the heritage structures associated with the Navigation, whilst mitigation measures will be required to ensure that there are no	This will be added as a potential challenge.	Potential challenges: <u>Protection of the historic environment, archaeological and heritage assets</u>

APPENDIX C

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		inadvertent impacts on the historic environment (whether built or below-ground) whilst improving access.		
Essex County Council	Chelmer and Blackwater Access Project	In paragraph 1 amend 'for' to 'form'. Ramblers and the Parish Council should be referred to as a partner.	Agreed	..and water meadows for <u>form</u> a central Potential partners: <u>Parish Councils</u> <u>Walking, cycling, and riding special interest groups</u>
Environment Agency	Chelmer and Blackwater Access Project	The project mentions enhancing wildlife but doesn't have the 'Protecting and enhancing wildlife' icon highlighted. This should be highlighted as the project could provide numerous benefits to wildlife given the continuous length and existing 'green' nature of the Navigation. Enhancing habitats for wildlife and public enjoyment will be important to counter the predicted extra disturbance from visitors. This can be worked alongside the willow tree planting which forms part of the character of the canal.	Agreed	The project will have the ' <u>Protecting and enhancing wildlife</u> ' icon highlighted – on page 69 of the strategy and page 7 of the projects document.
Woodham Walter Parish Council	Chelmer and Blackwater Access project.	Concern is expressed over the proposed Chelmer and Blackwater Access project. The Chelmer and Blackwater Navigation is essentially a rural canalised river and a conservation area. Enhancing and upgrading the towpath would change the rural characteristic of the route involved to the detriment of many of the areas through	The risk to wildlife is identified as a challenge. The protection of the rural character of the Navigation will be added as a potential challenge.	Potential challenge <u>Protecting the rural character of the Navigation</u>

APPENDIX C

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		<p>which it passes and to the existing wildlife. Examples of the damage that can be caused by such changes can be witnessed from large lengths of the UK canal network.</p>		
Chelmsford City Council	Chelmer and Blackwater Navigation Project	<p>Chelmsford City Council particularly welcomes the Chelmer and Blackwater Navigation Project.</p> <p>Addressing River Valley Access Enhancement including along towpaths and to the Blackwater Navigation is identified as an initiative at Table 6.4 in Chelmsford’s Green Infrastructure Strategic Plan (Chelmsford’s GI SP) so complements the Chelmer and Blackwater Access Project. We note that Chelmsford City Council has been identified as a potential partner and welcome the opportunity to work with Maldon DC to deliver this project.</p>	Noted	
Essex Bridleways Association & British Horse Society	Chelmer and Blackwater Access Project	<p>Chelmer and Blackwater Access Project: As mentioned above, any such improvements to the towpath to enable cyclists to use them should also include access for equestrians. It seems unbelievable that an historic pathway originally constructed solely for horses to use now prohibits their use. Whilst we accept that there are certain ‘honeypot’ areas where there are cafés etc and space is limited, there are</p>	<p>Walking, cycling and riding groups have been added as potential partners. The length of existing bridleway along the Navigation is limited. This project could offer the opportunity to extend this provision.</p>	<p>Recreational opportunities could include <u>improving walking, cycling riding provision along the towpath</u>, facilitating water-based....</p> <p>Potential partners: <u>Walking, cycling, and riding special interest groups</u></p>

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		several miles of remote towpath where ALL users would be able to co-exist without problem (as they do already on many thousands of miles of bridleways in the country) and this project should include access for equestrians.		
Railway Multi-Access Trail				
Essex County Council	Railway Multi-Access Trail	This will be required to include the implementation of a Conservation Management Plan for the repair and ongoing maintenance of the Scheduled Trestle Timber Viaduct at Wickham Bishops.	This has been added as a potential challenge.	Potential challenges: <u>Need for a Conservation Management Plan and ongoing maintenance for the Scheduled Trestle Timber Viaduct at Wickham Bishops.</u>
Maldon Wick Ltd	Railway Multi-Access Trail	The proposed GI Project ‘Railway Multi-Access Trail’ appears to seek to designate new routes above the adopted development plan. Approving such a proposal in an SPD could risk conflict with approved GI to be provided as part of approved planning permissions and could also impede upon the adopted policies in the LDP which have been recently and independently assessed to provide the most sustainable option for the future development of Maldon District.	The diagram on page 8 is indicative. It shows how the trail could link into existing public rights of way running through Maldon town, the surrounding countryside, and the planned pedestrian / cycle routes through the new Garden Suburbs.	None
Maldon Wick Ltd	Railway Multi Access Trail	The GI project proposes to re-instate the old railway line as a multi-access route (walking, cycling and horse riding). Maldon Wick Ltd. objects to the part of the trail	The diagram on page 8 is indicative. It shows how the trail could link into existing public rights of way running through Maldon town, the	None

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		<p>(Maldon to Cold Norton) which appears to overlay the Maldon Wick site (see annex 1).</p> <p>As engaged with above, SPDs should not designate new routes above the adopted development plan (NPPF, Annex 2; PPG, paragraph 028) particularly those which could limit the development prospects of a sustainable site. The GI project should follow existing public footpaths, cycle ways and bridleways, to do otherwise would fall into the remit of ‘plan-making’.</p> <p>The SPD would benefit from making that deliverability intention clearer, by using existing public footpath network within Maldon town.</p> <p>At present, the Project Map might imply that the land at Maldon Wick, which is a short section of the former railway line to the north of Limebrook Way, is intended to be included, when this site is suitable for development to contribute to meet the town and District’s housing or other development needs.</p> <p>The Maldon Wick site is surrounded by existing built development on three sides, including industrial development on the former railway line to the north.</p> <p>Limebrook Way and then the allocated ‘Strategic Growth Area’ (SMGS) lie to the</p>	<p>surrounding countryside, and the planned pedestrian / cycle routes through the new Garden Suburbs.</p> <p>The Railway Multi-Access Trail would not include land at Maldon Wick, as it is impractical to do so. There is, however, an existing public right of way running adjacent to land at Maldon Wick which could be used to link the Cold Norton to Maldon section with the footpath network in the town, through to the Maldon to Witham section of the trail.</p>	

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		<p>south. Therefore, although at present, the site is on the urban fringe of the town, this will change with the development of the SMGS which is coming forward in the plan period.</p> <p>Maldon Wick Ltd. therefore object to the proposed multi-access route extending to the north of Limebrook Way, if that is intended to include Maldon Wick, as this is not available or practical. This GI multi-access trail project should not include the Maldon Wick site.</p> <p>The intention of a multi-access trail from Maldon and Cold Norton, through Maldon town, can be secured by using the existing public footpaths and public right of ways within the urban area, linking into the former railway line at the SMGS, south of Limebrook Way, as indicated in the SMGS SMF.</p>		
<p>South Woodham Ferrers Town Council</p>	<p>Pages 42, 44 and 47, para 2.79, Railway Multi Access Trail</p>	<p>We would welcome the provision of a multi-use trail following the course of the disused railway between SWF and Maldon. In addition to providing access for walking, cycling and horse riding it would produce a linear nature reserve linking the existing Essex Wildlife Trust reserves at Stow Maries Halt and The Wick. Such linear Nature Reserves allow free movement of wildlife</p>	<p>Enabling people to join the trail along its route, would be a consideration when developing the project in detail.</p> <p>The issue of car parking facilities will be added to the potential challenges section of the Railway Multi-Access Trail</p>	<p>GI projects document, page 8, Potential Challenges – <u>The provision of car parking facilities at key access points</u></p>

APPENDIX C

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		<p>and would allow such wildlife to return to urban areas.</p> <p>The only concerns that we would have is regarding suitable parking facilities at either end of the trail.</p> <p>Also we should look at providing access points along the trail so that people can join midway.</p>		
Essex Bridleways Association & British Horse Society	Railway Multi-Access Trail	<p>Railway Multi-Access Trail: we are pleased to see that this route also will include equestrians, but it is disappointing that section 3b does not aspire to be true multi-user, mentioning the proposal to add 'permissive cycling rights' to the footpath. This Strategy should include the aspiration for this entire route to be true multi-user – accessible to walkers, cyclists, and equestrians.</p>	<p>Extending use of the footpath to other users is recognised as a challenge, and that more than one option may need to be considered to achieve this.</p>	None
Langford & Ulting Parish Council	Railway Multi-Access Trail (page 69)	<p>The Parish Council would support more use of the Blackwater Rail Trail by walkers/ cyclists but there are again, issues over car parking.</p>	<p>Include issues of car parking in the 'potential challenges' section of the project proforma.</p>	<p>Potential Challenges: <u>Increasing parking provision along the route.</u></p>
Chelmsford City Council	Railway Multi-Access Trail	<p>One of the sections of the Railway Multi-Access Trail runs between Cold Norton and South Woodham Ferrers, a section of which goes across the eastern part of Strategic Growth Site 7 in Chelmsford's Local Plan, Land North of South Woodham Ferrers. The final section of this disused railway line</p>	<p>It is recognised that section 3a crosses local authority boundaries from Maldon District into Chelmsford City and that it may not be possible to follow the route of the former rail line in its</p>	<p>Page 8 Projects document</p> <p>Potential partners: Chelmsford District <u>City</u> Council</p> <p>Context:</p>

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		<p>forms a linear open space but is crossed by Hamberts Road and the B1012. No bridge is proposed across the B1012 at this point. Strategic Growth Site 7 is currently in the early stages of Masterplanning. The Council will consider whether it would be feasible to incorporate a PROW across this site allocation. It is unlikely that the new PROW could connect with the open space within the urban area however.</p> <p>Note, Chelmsford District Council rather than City Council is mentioned as a potential project partner for this project.</p>	<p>entirety due to land ownership and land management changes along the route since the rail line closed.</p> <p>Reference to the City Council will be corrected</p>	<p>Reinstating the old railway line as a multi access route (walking, cycling and horse riding) would connect Witham (Braintree District) with South Maldon and South Woodham Ferrers (Chelmsford City). This could be</p> <p>Potential challenges: <u>The trail route will need to take into account plans for new development and the existing road network (in Maldon & South Woodham Ferrers)</u></p>
Blackwater Greenway				
Essex Bridleways Association & British Horse Society	Blackwater Greenway Page 8, 13, 14	This should also include equestrians; in many areas along the coastal path the sea wall is more than large enough to be able to accommodate all users, many cyclists already using these illegally. Similarly, for the Southminster to Burnham and River Crouch Greenways, these should also include access for equestrians.	There are identified issues with cycle use of the sea walls. There are structural issues to be considered before horses can be permitted to use the sea walls. As such, it would not be appropriate for this document to aim for equestrian access when it may not be feasible to do so. However, there is potential for equestrian access to other sections of the	Context 2 nd sentence: ...the provision of walking, and/or cycling <u>and/or equestrian routes</u> between these areas and ...

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
			Greenway and this will be added to the context section.	
Essex County Council	Blackwater Greenway	There are opportunities associated with this proposal for the enhancement and interpretation of the historic environment.	Noted	None
Connecting Woodlands				
Essex County Council	Connecting Woodlands	Reference should be made to the Historic Environment Characterisation Project (2008) regarding the appropriateness of the planting of woodlands in particular areas. The Wickham Bishops and Great Totham area historically formed part of Tiptree Heath and the restoration of heathland, an equally rare habitat, should also be considered.	The Historic Environment Characterisation project has been referenced in the main body of the GI Strategy. Additional text has been added to the Strategy on ancient woodlands.	None
The Wick				
Essex County Council	The Wick	Recommend the local community are engaged at the earliest opportunity to involve them in management of this LoWS to manage expectations for recreation, particularly dog walking.	The potential conflict between recreation and biodiversity has already been identified for this project, as has the opportunity it offers for environmental education.	None
Maldon Wick Ltd	The Wick project	Aside from the general comments above (regarding scope and implementation of the GI projects), Maldon Wick Ltd. acknowledge the appropriateness of this GI project applying to the area within the South Maldon Garden Suburb (SMGS) - i.e.	The arrow to the north of the site clearly ends south of Limebrook Way. There is an existing public right of way opposite The Wick on the norther side of	None

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		<p>the area south of Limebrook Way. This is consistent with the approved SMGS Strategic Masterplan Framework (adopted 22 March 2018) which identifies the Wick as part of the Green Infrastructure Plan for the Suburb (see Figure 4.3) and also includes proposals for its maintenance and enhancement.</p> <p>However, Maldon Wick Ltd. object to the inference that this GI project might extend to the north of the SMGS, across Limebrook Way. The Maldon Wick site does not include an area of Local Wildlife Interest. This is clearly established in the adopted MLDP Policy Map (2017) which does not designate the land north of Maldon Wick as a LWS.</p> <p>It is therefore requested that the arrow head shown on the project map at page 11 of the GI Projects document is removed so that it is clear this GI project does not extend to land to the north of Limebrook Way.</p>	<p>Limebrook way, adjacent to land at Maldon Wick, which can be used to access the residential areas nearest the site.</p>	
Water Sports Awareness programme				
Essex County Council	Water Sports Awareness Programme	<p>The project is welcomed in relation to managing the existing issues on the Blackwater estuary but also the opportunity to work in partnership with the Essex Coast RAMS project. The latter would</p>	Noted	

APPENDIX C

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		assist in avoiding in-combination impacts on the Dengie SPA/Ramsar.		
Environment Agency	Water sports awareness programme	<p>We agree with the approach of informing boat users / the public of the issues increased recreational pressure can have. The suggestions to help prevent deterioration of the water environment and surrounding habitats are encouraged.</p> <p>An additional potential project involvement is the Wetland Vision. Further details can be found here http://www.wetlandvision.org.uk/dyndisplay.aspx?d=home</p>	Noted	<p>Added text to the last paragraph of the 'context' section of the water awareness programme: <u>Locations for this project could be guided by the Wetland Vision (see www.wetlandvision.org.uk), a project that sets out a 50-year vision for England's freshwater wetlands. The Wetland Vision's 'Future Wetlands' map shows the current extent of wetland in England and it also identifies areas that have the greatest potential to benefit biodiversity for potential future wetland. A number potential future wetland areas have been identified along Maldon's coastline.</u></p>
RSPB	Water Sports Awareness Programme (GI project)	<p>The RSPB is willing to engage with the council and the other stakeholders identified on this proposal in relation to existing activity. Whilst signage is a useful tool and would raise awareness, its usefulness must not be overstated. The impact of signage is very limited and can be even less effective if it is permanent (temporary signage is more likely to be read), particularly if the messages are not reinforced as part of a robust package of</p>	Signage would be one element of a wide package of measures to achieve this project.	None

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		<p>measures with long-term goals that will protect and enhance the special features of the estuary.</p> <p>The Essex Coast Recreational Avoidance and Mitigation Strategy (RAMS) that is currently under development across the county is focussing on employing rangers, who we hope will be trained to:</p> <ul style="list-style-type: none"> • raise awareness of where the sensitive areas are, • promote positive behaviours, • foster a sense of collective responsibility and pride for the estuary • direct potentially damaging activities to more appropriate locations. <p>This will be particularly important among estuary user groups (kayakers, stand-up paddle-boarders, jet-skiers) whose actions, should they remain unchecked, may have an adverse effect on the internationally important waterbird populations on the Blackwater Estuary Special Protection Area (SPA).</p>		
Southminster to Burnham-on-Crouch Greenway				
MDC Planning and Licensing Committee Cllr A St Joseph	Southminster to Burnham-on-Crouch Greenway	This is an important link between two of the larger settlements in the District. This should be a high priority project.	As part of the Essex Cycle Strategy, Essex Highways published the Maldon District Cycling Action Plan in 2018. This includes a new leisure route between	None

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
			Southminster and Burnham-on-Crouch, which is assigned it a medium priority, based on deliverability; directness; extension of existing network; and key attractors. The project has the same priority in both the GI Strategy and the Cycling Action Plan.	
Gladman Developments	Southminster to Burnham-on-Crouch Greenway	Any contributions made to this potential scheme from Section 106 monies would need to be in line with regulation 122 of the Community Infrastructure Regulations 2010.	Reference to the Community Infrastructure Regulations 2010 has been added to chapter 3 of the Strategy.	None
River Crouch Greenway				
Essex County Council	River Crouch Greenway	There are opportunities for enhancement and interpretation of the historic environment. The Essex Coast RAMS project should be recognised as a partner for this project to avoid in combination impacts and maximise partnership working. It should be noted that the England Coast Path is a project not a partner.	This will be added to the context/partners section.	Context: <u>This project offers the opportunity to enhance the interpretation of the historic environment for visitors.</u> Potential partners: <u>English Coastal Path</u> <u>Natural England (England Coast Path)</u> <u>Essex Coast RAMS project</u>
Environment Agency	River Crouch Greenway project	This project mentions potential for increased access and recreational pressure to international designations. The 'Protecting and enhancing wildlife' icon is	Agreed	The icon for Protecting and Enhancing Wildlife will be highlighted for this project, in the project

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		not highlighted. This should be highlighted as the project can enhance and/or complement the value of the wildlife habitats along the route. If, for example, information boards were put up on the surrounding habitats, this would add to people's understanding, care and appreciation of their local area.		synopsis and in table 3.1 of the Strategy
MDC Planning and Licensing Committee Cllr A-St Joseph	River Crouch Greenway	There will be significant objections to this project. This should be led by the English Coast Path project. Therefore this should be a low priority project. In addition, unless there is more money spent on maintaining sea walls, they are unsuitable as cycle routes.	Cycling is currently not permitted on sea walls unless there is a permissive cycle route in place. The route for this section of the England Coast Path is currently being prepared and is likely to be published in the near future. This project will follow on from the wider national project. As such, the priority for this project does not need to be changed, especially as it is a medium term project (5-10 years).	None
Maldon Society	Coastal path	With regard to the new coastal footpath, access to join parts of the path midway are restricted. There are many miles which are inaccessible without a significant walk of many miles before hand. Land is claimed to be privately owned so can't be crossed, despite roads that lead to the coast. In the	Identifying a safe simple route has been identified as a challenge. The route of the Greenway will be led by the route of the England Coastal path.	None

APPENDIX C

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		past landowners will of reclaimed salt marsh and built sea walls, thus the end of the old road is no longer meeting the new sea wall. Access for POWR'S should be extended from an old road to the relatively new sea wall.		
Northey Island/Battle of Maldon				
Essex County Council	Northey Island/Battle of Maldon	This area is of national heritage significance and any development will need to both contribute to enhancing the understanding and management of the site and to mitigate against any impacts on its significance. Reference should be made to the Essex Coast RAMS project as a partner for this project to avoid in combination impacts and maximise partnership working.	These points will be added	Potential partners: <u>Essex Coast RAMS project</u> Challenges: <u>Protection of heritage assets</u>
MDC	Northey Island/Battle of Maldon	Timescale: It has been pointed out that short term is the same as medium term.	Amend the time-period.	Amend timescale to read: Short term (1-5 years)
Country Parks				
Essex Bridleways Association & British Horse Society	Country Parks Page 17	As previously mentioned, equestrian access should be an aspiration within this Strategy as far as possible to Maldon's country parks, especially Elms Farm Park, and any new park constructed should also be accessible to equestrians.	Where possible, access for all users will be incorporated into this project.	None
Essex County Council	Country Parks	The potential location of the Country Park has considerable historic environment significance and any designation/provision	Agreed the text will be amended.	This may therefore contribute towards <u>the aims</u> of the <u>Essex Coast Recreational disturbance Avoidance</u>

APPENDIX C

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		<p>will require consultation with the Historic Environment advisors to Maldon District Council.</p> <p>It should be recognised that the provision of greenspace is not a commitment of the Essex Coast RAMS as the latter is only focussed on dealing with the in-combination impacts and the current text should be amended to reflect this.</p>		<p>and Mitigation Strategy. commitments.</p> <p>Challenges: <u>Protection of heritage assets</u></p>
Woodham Walter Parish Council	Country Park	<p>Concern is also expressed at the creation of a country park at Beeleigh Falls. The proposed enlargement of this existing community facility to a more mercantile one is likely to detract from the historic asset of Beeleigh Mill and the canal dock as well as potentially destroying the tranquillity of the wildlife haven. Essex County Council already include this as part of a Navigation Walk and there is a Beeleigh Falls car park opposite Langford Village Hall. The project would therefore appear superfluous.</p>	Noted	None
Environment Agency	'Country Parks' proposed project	<p>Beeleigh is a good site for both terrestrial and aquatic wildlife. The site being at the tidal limit and therefore containing both freshwater and saltwater habitats. The site is already frequented by the public but any increase in visitors would need to be managed sensitively so as to not cause deterioration of the existing biodiversity.</p>	This will be noted as a potential challenge	<p>Potential challenges: <u>Potential conflict between increased visitor numbers and the existing biodiversity value of the area.</u></p>

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		Improvements could be made as identified in the project synopsis.		
MDC Planning and Licensing Committee Cllr A-St Joseph	Country Park	I strongly support this project.	Noted	
MDC (internal)	Country Park	The project title should be Country Park, singular. The map illustrating the project needs to be changed for a different illustration, for example of people using a country park. The illustrative map is misleading, as it suggests there is only one possible area of search for a new country park. The area of search is wider than just one site, and, in addition, there are commercial interests in part of the site shown that may make it unsuitable for a country park.	Agreed. The title and illustration will be changed.	Change title to Country <u>Park</u> (amend throughout document) Change illustration.
Get Active Maldon map/app				
Essex County Council	Get Active Maldon	The development of any cultural layer for the proposed map/app will need to take into account the information summarised in the Historic Environment Characterisation Project (2008) and held on the Historic Environment Record.	This will be added to the text	Other attributes could show cultural and <u>heritage</u> features and ...
Quiet Lanes				
Essex County Council	Quiet Lanes	The assessment of the protected lanes for Maldon District was undertaken by Essex County Council (Place Services) and they	ECC will be added as a potential partner	Potential partners <u>Essex County Council</u>

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		should be consulted with regard to any proposed expansion to the network.		
Woodham Walter Parish Council	Quiet Lanes project	The Parish Council is concerned at the quiet lanes and protected lanes that are unsuitable for designation as cycle routes. It is clear from those routes already selected within this Parish that looking at an OS map on a desktop and deciding which shall be designated for cycling results in unsuitable and potentially dangerous routes being selected. This Parish Council is concerned at the cavalier attitude of some cyclists who consider that they have exclusivity on these routes resulting in enhanced highway danger to other users, especially in twisting narrow lanes. Whilst this and the education of cyclists is not directly a consideration of the GI Strategy, the selection of cycle ways is and therefore this Council considers that more thought should be given to this part of the Green Infrastructure Strategy.	Safety issues are already identified in the synopsis.	None
Wildlife Friendly Farming				
Essex County Council	Wildlife friendly farming	The Farming Wildlife Advisory Group (FWAG) should be identified as a potential partner.	Agreed	Add <u>The Farming Wildlife Advisory Group (FWAG)</u> as a potential partner.
MDC Planning and Licensing	Wildlife Friendly Farming	This should be a high priority project, as it achieves so much and it is cheap. Need to	Agreed, this project merits a higher priority.	Change the priority to <u>High</u>

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
Committee Chair A-St Joseph		show that MDC is supportive of the conservation role provided by farmers.		
Environment Agency	Wildlife friendly Farming project	Catchment Sensitive Farming Officers may be able to provide further assistance with projects. Officer contact details can be found at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/766900/csf-contacts.pdf	Noted	None
RSPB	Wildlife Friendly Farming (GI Project)	<p>We welcome that this project has been proposed and that TDFZs are referenced, but we recommend that this is re-worded and framed more specifically.</p> <p>For context, turtle doves are vulnerable to global extinction (IUCN Red List of Endangered Species). They have suffered a 91% UK population decline since 1995 which is now halving every six years. Their range is increasingly concentrated into an ever shrinking patch of East Anglia and the south-east of England. At this current rate of change if we don't help this species scientists calculate that complete UK extinction as a breeding species will be a real possibility. A coalition of organisations have formed Operation Turtle Dove2 as part of the urgent mission to reverse the fortunes of this enigmatic and culturally significant bird.</p>	<p>TDFZ have been identified as an approach to wildlife friendly farming, and one that could be replicated for other species. The level of detail suggested is not suitable for the short project synopsis.</p> <p>The suggestion to re-direct this project to focus on Turtle Doves is not appropriate. TDFZ are a great representation of a very specific wildlife farming scheme, however, we would not wish to focus on this one approach to the detriment of other potential approaches and funding opportunities.</p>	Change priority to <u>high</u> .

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		<p>Part of the RSPB’s response has been to identify a number of TDFZs in their remaining strongholds. These are defined as areas of four or more adjacent tetrads where each tetrad contains 2+ breeding pairs in the 2007-2011 Bird Atlas³ or through other credible data.</p> <p>² See www.operationturtledove.org</p> <p>³ Balmer, D.E., Gillings, S., Caffrey, B.J., Swann, R.L., Downie, I.S., Fuller, R.J., 2013. Bird Atlas 2007-11: the breeding and wintering birds of Britain and Ireland. BTO Books, Thetford.</p> <p>Therefore, given the urgency of this situation and that these areas have already been scientifically selected, we propose that the project is re-named and focussed to within the TFDZs. With finite resources across all sectors, a GI project in these areas will have greater impact. Given the alarming rate of decline in turtle doves, we also recommend that it is reprioritised to “high” rather than its current status of “low”. The RSPB’s Turtle Dove Conservation Adviser in Essex is already active working with farmers and other key stakeholders. Embedding and enhancing this work as part of the GI strategy will provide an exemplar</p>	<p>This project merits a higher priority.</p>	

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		<p>of partnership working and ecological coherence as per the fundamental principles that the GI strategy proposes.</p> <p>We do wish to emphasise that although delivery of this project will have an overt focus on Turtle Doves, it has to be recognised that the provisions required for them:</p> <ul style="list-style-type: none"> • seed for feeding (supplementary feed or floristically-rich areas) • nesting habitat (scrub) • a source of accessible water (ponds) <p>will also provide multiple benefits for a range of other species including pollinating insects, pond-life, breeding birds such as nightingales, notwithstanding wider ecosystem service benefits.</p>		
Connections to Wallasea Island				
RSPB	Connections to Wallasea Island	We support the inclusion of this project and look forward to working with the council and other key stakeholders.	Noted	
St Peters and Bradwell Circular Walk				

APPENDIX C

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
Essex County Council	St Peters and Bradwell Circular Walk	This area is of national heritage significance and any development will need to both contribute to enhancing the understanding and management of the site and to mitigate against any impacts on its significance. Reference should be made to the Essex Coast RAMS project as a partner for this project to avoid in-combination impacts and maximise partnership working	In the context of a potential new nuclear power station in the vicinity, the provision of a circular walk will have limited impact on the heritage significance of the locale. Protection of heritage assets will be added as a challenge.	Potential partners: <u>Essex Coast RAMS project</u> Potential challenge: <u>Protection of heritage and archaeological assets.</u>
Environment Agency	St Peters and Bradwell circular walk	This project mentions (and is suitable for) including biodiversity enhancements. The 'Protecting and enhancing wildlife' icon should be highlighted.	Agreed, as this project offers education opportunities to raise awareness of the importance of this area for biodiversity.	The icon for Protecting and Enhancing Wildlife will be highlighted for this project, in the project synopsis and in table 3.1 of the Strategy
Project suggestions				
Environment Agency	Other GI opportunities	Given expected resource constraints by involved parties, smaller green infrastructure measures can also be implemented. Physical and functional connectivity between sites, allowing greater species dispersal and migration, can be achieved by a variety of means. Stepping stones and corridors in between the larger green spaces are highly valuable, examples include: private gardens, trees, hedgerows, ponds, ditches, playing fields, allotments, rough grassland, village greens, hedgerows, orchards, old railway lines, bat and bird	Principle 2 identifies the opportunity for Biodiversity Net Gain through development, as does the LDP and the NPPF. This could provide a mechanism for delivering the types of habitat enhancements suggested here. Additional text has been added to para 3.9 (Biodiversity in new developments)	Principle 2 - Para 3.9 Add similar text to 1.11. Protection and Enhancement of Biodiversity in New Developments 3.9 New developments will be designed to mitigate adverse impacts on biodiversity whilst providing demonstrable/measurable net gain for biodiversity where possible. <u>In the context of the recreational disturbance pressures currently being faced by the Essex Coast</u>

APPENDIX C

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		<p>boxes, and log piles. These may be transitional but provide valuable supplementary habitats and also act as buffers to larger key habitats from adverse impacts of developed areas.</p> <p>Restoring degraded sites and habitats may be less resource intensive than creating Green Infrastructure from new. This method could also potentially provide greater benefits to biodiversity if sites were successful prior to neglect. Key habitat areas such as rivers and those mentioned above are key to being protected, restored, enhanced and expanded alongside the known designated sites. Formal and informal open space (pages 38-39) are great opportunities to add biodiversity enhancements such as native wildflower strips. This benefits both people and wildlife.</p>		<p><u>designated sites, and the requirement for net gain for biodiversity, the Green Infrastructure network and new provision will be of growing importance. In terms of green infrastructure, new provision could range from on-site green infrastructure, habitat creation and enhancement, through to improved management of recreation activities along the coast.</u></p>
RSPB	Inclusion of additional project	<p>Project Proposal for the Blackwater Conservation Strategy (BCS)</p> <p>Paragraph 174 of the NPPF states that: “to protect and enhance biodiversity plans should...promote the conservation, restoration and enhancement of priority habitats, ecological networks and the</p>	<p>Reference will be included in the GI Strategy to the Blackwater Conservation Strategy. As it is a strategy it would not be appropriate to include it as a project in the GI Strategy. In addition, the BCS project area extends beyond the district</p>	<p>Text has been added to page 14 of the GI Strategy on the Blackwater Conservation Strategy.</p>

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		<p>protection and recovery of priority species.”</p> <p>The BCS is actively working on little terns and breeding waders (lapwings and redshank), but there is a need to map other priority species to inform how we, as a partnership, can effectively undertake the restoration of the ecological network. Establishing a network of suitably, skilled and empowered volunteers to systematically monitor and record these species will provide invaluable detail for BCS partners to deliver more effective conservation measures.</p> <p>We welcome discussing this idea with the council.</p> <p>Map of the BCS area provided</p>	<p>boundary. Areas outside the district are beyond the remit of this strategy.</p>	