

Marian Spain
Natural England
County Hall
Spetchley Road
Worcester
WR5 2NP

29th July 2024

Dear Marian

Re. Urgent SSSI Designation of Middlewick Ranges

We are writing as a coalition of local groups, wildlife experts, and NGOs with an urgent request to consider the designation of the Middlewick Ranges as a Site of Special Scientific Interest (SSSI). In the middle of a biodiversity crisis, a comprehensive protected area network is needed more than ever. This requires the protection of nationally important wildlife sites and coherent ecological networks around them to provide refugia for rare and declining species and to act as a source for recolonisation into the wider landscape¹.

Middlewick Ranges is one such vital site. It is the largest area of unimproved acid grassland in Essex and at the heart of the local community in Colchester. A unique remnant of old Thames Terrace Grassland, it has provided essential long-term ecological continuity in a landscape that has suffered from continued loss and fragmentation of grassland habitats. Its long standing habitat mosaic has allowed a nationally important invertebrate assemblage to develop with a significant proportion of species of conservation concern and unique coastal character. We also now know that the site plays a key role in supporting the UK's second largest population of Red Listed Nightingale (*Luscinia megarhynchos*) and that it appears to be part of a network of sites supporting the Vulnerable Barbastelle Bat (*Barbastella barbastellus*).

The accompanying "*Middlewick Ranges: the case for Site of Special Scientific Interest designation*" clearly outlines the ecological value of the site in its own right, and the immense value the site holds within a network of high-quality wildlife habitats. Its importance for wildlife has been known for decades by local naturalists, hence its inclusion as a Local Wildlife Site. However, ongoing surveys have strengthened the case that Middlewick Ranges and the adjacent Birch Brook is not just of local importance but is a nationally important asset deserving of SSSI status. We also attach a compiled species list, based on the records collected and/or compiled by local naturalists and experts.

The designation of Middlewick Ranges would be an important strategic step for nature conservation in Essex, not just securing the future of an important site, but enhancing the ecological coherence of the SSSI network in the area. Sitting just 300m from the nearby Roman River SSSI and its mosaic of grassland and woodlands², which also support a large Nightingale population, the Middlewick Ranges and Birch Brook complex is a notable omission from the statutory protected site network.

The need for designation is also becoming increasingly urgent due to the imminent threat of sale hanging over the Middlewick Ranges for up to 1,000 houses- an outcome that is shockingly supported by the developing Colchester Local Plan³. As a result of the site's inclusion in the Local

¹ https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf

² <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002950.pdf>

³ <https://www.colchester.gov.uk/local-plan/>

Plan we believe that SSSI designation is an appropriate and necessary step. Development on any part of the site would jeopardise the integrity and importance of the site and its wider connections in the landscape. The SSSI selection process is one that should be based purely on rigorous assessment of its biological value and be free from economic considerations. It is also notable that the original intention of the SSSI series is to protect sites at risk of development, as addressed in our accompanying *“Middlewick Ranges: the case for Site of Special Scientific Interest designation”* document.

We believe a strong case has been made for the SSSI designation of the Middlewick Ranges and we urge Natural England to direct its relevant species group specialists to review the evidence presented and consider taking steps to urgently consider its designation. We trust that Natural England will be resolute in its impartial consideration of this site and recognise that its protection is in the national interest and in line with its purpose of helping to *“conserve, enhance and manage the natural environment for the benefit of present and future generations”*⁴.

Bold action to protect the Middlewick Ranges would be a crucial step to securing the site’s future and make a clear statement of intent to meet the Government’s clearly stated 30 x 30 commitments⁵.

We look forward to your response. We would be happy to discuss our report with you and to assist with any further information that you may require.

Yours sincerely

Craig Macadam, Conservation Director, Buglife
Rich Yates, Chief Executive Officer, Essex Wildlife Trust
Alan Johnson, Area Manager- Kent and Essex, RSPB
Sharon Hearle, Conservation Manager (East of England), Butterfly Conservation
Rob Smith, County Recorder for Butterflies, Butterfly Conservation Cambridgeshire & Essex Branch
Dougal Urquhart, Chair, Colchester Natural History Society
Prof Ted Benton, President, Colchester Natural History Society
Martin Pugh, Deputy Chair, Friends of Middlewick Ranges
Peter Harvey, Vice President, Essex Field Club
David Knight, Chairman, CPRE Essex
Nicola Hutchinson, Director of Conservation, Plantlife
Nida Al-Fulaij, Chief Executive Officer, People’s Trust for Endangered Species
Dr Tony Gent, Chief Executive Officer, Amphibian & Reptile Conservation
Prof Ed Turner, President, Amateur Entomologists’ Society
Gerald Johnson, Chair, Essex Birdwatching Society
Dr Mark Welch, Conservation Officer, Dipterists’ Forum
Zoë Simmons, President, British Entomological and Natural History Society
Dr David Horsfield, Secretary, The Malloch Society

⁴ <https://www.gov.uk/government/organisations/natural-england/about#who-we-are>

⁵ https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering_30by30_on_land_in_England.pdf