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	Gladman Developments
		Commissioner	
Langford and Ulting Parish Council	Historic England	Essex Bridleways Association &	Maldon Wick Ltd
		British Horse Society	
Maldon District Council (MDC)	Natural England	Maldon Society	
Planning and Licensing Committee			
(response received from Chairman and			
Vice-Chairman of the Committee)			
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 comme	ents			,
MDC Planning and Licensing Committee via the Chairman and Vice- Chairman	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	Natural England is supportive of the ambition and scope of the document and we welcome the partnership working that has informed the strategy. 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.	Noted	
Historic England	General	No specific comments 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	Advice will be sought from the Council's Conservation and Heritage specialist as projects are developed.	

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		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.		
Chelmsford City Council	General	Chelmsford City Council welcomes and supports Maldon's GI Strategy, its policy principles and projects.	Noted	
Maldon Society	General	The need to update the previous study is wholly endorsed.	Noted.	
		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.		
		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.]		
		Without that assertiveness the effectiveness of these policies will on certain issues become meaningless.		
Individual	General	Does it really matter if we have any concerns?? You approve it in the end any way.	Consultation on the GI Strategy gives the opportunity for anyone to make their views known on the Strategy. All	None

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

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		been informed by the desk based study, stakeholder engagement and policy analysis in Appendix 4."		
		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).		
		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 'planmaking'.		
		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.		
Woodham	General	The Parish Council supports the Green	Noted	

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Walter Parish Council		Infrastructure initiative in principle but there are a number of issues that in the opinion of this Parish Council need correcting, clarifying or incorporating.		
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	I			
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 with significant hedging and trees has been	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 standards. The masterplans	None

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		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.	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	Maldon District Council commissioned LUC to develop a Green Infrastructure (GI) Strategy Supplementary Planning Document (SPD) (footnote: 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.) 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') follows the Maldon District Green Infrastructure Study that was published in 2011 which informed the emerging future growth and infrastructure

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				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.	National Planning Policy Framework (NPPF) in 2012 and its replacement in 2018 which incurred minor revisions during 2019
				Para 1.10Published in 2018, with minor amendments made in 2019, the revised NPPF (footnote updated; Ministry of Housing, Communities and Local Government (20189) National Planning Policy Framework) guides on the plan
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.	3.18Deficiencies have been identified within the District which should be addressed. 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
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). This seems to be an omission, given that MDC's 'Statement of Representation	Paragraph 1.7 will be revised to include policies N2 and N3.	 1.7 new bullet points: 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. Policy N3 Open Space, Sport and Leisure aims to protect PROW,

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	on	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"		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	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"	An additional reference to the SMGS SMF will be added to para 1.8.	1.8 First bullet pointSPD assigns 40% of the allocation as strategic green infrastructure, <u>as shown</u> on Figure 4.3 of the South Maldon Garden Suburb SPD. The document
		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.		
		However, Dartmouth Park Estates request that greater clarity should be provided by way of reference to Figure 4.3 'Green		

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		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		
Sport England	Page 4	each development parcel). 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.	Noted	
Maldon Society	1.8	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. 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 considered paramount. Clearly MDC policy was insufficiently robust	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 led approach where built form is softened by green infrastructure and provides a	None

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			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 August 2018 (reference 244199) and the enclosed recommendations regarding on- site provisions for large scale developments.	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. 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. In terms of green infrastructure, the mitigation is expected to be varied and could include on-site green infrastructure, 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. The Essex Coast RAMS provides an opportunity for on-site green infrastructure provisions to be incorporated into large scale

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		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.		developments. 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 the late summer of 2019.
Natural England	1.11	Biodiversity enhancement 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.	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.	None
		Landscape enhancement 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 example through green infrastructure provision and access to and contact with nature. Landscape characterisation and		

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		townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. Other design considerations The NPPF (para 180) includes a number of design principles which could be considered, including the impacts of lighting on		
South Woodham Ferrers Town Council	1.11	landscape and biodiversity. 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 plan or project; in this instance we note that a number of the projects enclosed within the SPD are within close proximity to the	Para 1.13 will be expanded to make it clear that individual GI projects may need assessment under the HRA process.	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.

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

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and Licensing Committee via the Chairman and Vice- Chairman		Estuary NNR is incorrect. The second RSPB reserve is Old Hall Marshes.	reserves will be corrected	Estuary National Nature Reserve Old Hall Marshes and
	2.8 page 13	It would be helpful for those using the strategy to separate out these important SPA Feature species in to 'breeding' and 'wintering': Breeding: Pochard, Ringed Plover and Little Tern Wintering: Hen Harrier, Dark-bellied Brent Goose, Dunlin, Black-tailed Godwit, Grey Plover 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 will show a disturbance effect at a greater distance than over-wintering birds. This	Para 2,8 has been expanded to cover the points raised.	These are designated on the basis of the coastal and estuarine habitats and species assemblages they support, and in particular populations of wintering (Hen Harrier, Dark-bellied Brent Goose, Dunlin, Black-tailed Godwit, Grey Plover) and breeding birds (Pochard, Ringed Plover and Little Tern) including dark bellied geese, hen harrier, red knot, grey plover, common pochard, dunlin, ringed plover, black tailed godwit, little tern). 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 spring, they are less habituated to the regular human activities that long-

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		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.		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.
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 via the Chairman and Vice- Chairman	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	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). 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.	Para 2.11 will be updated as suggested	Wallasea Island is open to the public, and can be accessed by boat from Burnham-on-Crouch. The island is currently undergoing transformation, the largest conservation and engineering project of its kind in Europe Crossrail scheme in London. The construction work has been completed and the site is naturally reseeding/ colonising.
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
Forestry	General	In comparison to other districts in East	Add a section to 'Protecting &	Additional text after para 2.12

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Commission		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. 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.	Enhancing Wildlife' (after para 2.12) on the importance of ancient woodlands based on the Forestry Commission response.	Ancient Woodland 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). 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.
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 Strategy fails to show this SSSI or how it	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 whole of the District and the Woodham Walter SSSI complex.	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. Change MDC boundary style to match

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		connects with the rest of Danbury Ridges.		the other maps.
RSPB	Strengths and Opportunitie s (page 14)	1. We recommend a re-wording of the last bullet point to: 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 oystershells (provided by local oystermen) to raise the beach-crest which provides safer nesting habitat, the number of successfully breeding birds is increasing. 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.	The desk based study findings (page 14) will be amended as suggested.	 Delete the last bullet point on page 14 and replace with: The Essex Little Tern Group (ELTG) is a group of public, private and nongovernmental 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 oystershells (provided by local oystermen) to raise the beach-crest which provides safer nesting habitat, the number of successfully breeding birds is increasing. Add an additional bullet point (page 14): 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 species and habitats by working

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		A map showing the boundary of this area is attached as a separate pdf.		more closely together to share ideas, management methods, our experiences and knowledge.
		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.		experiences und knowledge.
Woodham Walter Parish Council	Protecting and Enhancing Wildlife	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 material consideration when dealing with local issues.	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. 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.	Fig 2.1 to be reformatted, to show the whole of the District and the Woodham Walter Common SSSI. Additional paragraph after 2.11: 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.

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Individual	Protecting & Enhancing Wildlife	 I wish to emphasise the importance of: 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. 	The Prom Park (including Millennium Wood) and The Wick have their own projects in the GI Strategy reflecting their importance to the local community. The hedgerow mapping sub project will be expanded in Maldon's Hidden Landscapes project. However, the Council has limited powers relating to hedgerow protection.	Maldon's Hidden Landscapes sub projects: Mapping of historic hedgerows in the District Dengie, to promote wildlife, landscape and heritage benefits.
Essex County Council	Figure 2.0: Green Infrastructure Baseline: All Green Infrastructure	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	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 infrastructure initiatives promoted through the Strategy would not have a significant	The detailed officer response is provided in the SEA Screening section of this report (page 98). In response to the NE comments, additional wording	2.13 There are international nature designations along Maldon District's coastline and estuaries, with a number of local nature designations inland as well as along the coast. Both the desk based study and stakeholder findings

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
	on	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. 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. 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	has been added to para 2.13 and 2.16	identified existing initiatives, such as the Essex Coast RAMS 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. 2.16 The key priorities for Protecting and Enhancing Wildlife in Maldon are: • Protecting international, national and local 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 international, national and local wildlife sites, providing places for Maldon District's residents and visitors to enjoy the District's natural environment and
		increased recreational pressure and disturbance.		experience the benefits provided by access to nature, whilst managing

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		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). Our advice is that the Strategy and SEA screening report be amended accordingly.		potential impacts <u>through</u> <u>mitigation projects and</u> <u>partnerships.</u>
Creating Resilie	ent Water Enviro	nments		
Environment Agency	Creating Resilient Water Environ- ments	Shoreline Management Plan 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 contributions towards maintaining or improving the levels of protection from	Additional bullet point on the SMP will be added to the Weaknesses and Threats box on page 22	New bullet point (Weaknesses and Threats page 22) 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 the levels of protection from flooding.

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		flooding.		
Environment	Creating	Natural Flood Management	Text on natural flood	New paragraph after 2.25:
Agency	Resilient	The recent change in emphasis in the NPPF	management will be added	<u>Natural Flood Management</u>
	Water	for the consideration of natural flood	after 2.25	The NPPF encourages the use of natural
	Environment	management techniques to reduce the		flood management techniques to
	S	causes and impacts of flooding should be		reduce the causes and impacts of
		considered. There are potential benefits in		flooding. Natural flood management is
		encouraging the implementation of natural		when natural processes are used to
		flood management techniques on and		reduce the risk of flooding and coastal
		around small watercourses in catchment		erosion. Examples include: restoring
		headwaters. At a development site level,		bends in rivers, changing the way land is
		small scale natural flood management		managed so soil can absorb more water
		measures can potentially be incorporated		and creating saltmarshes on the coast to
		within the site boundary and there is some		absorb wave energy There are potential
		potential to overlap these with Sustainable		benefits in encouraging the
		Drainage Systems (SuDS) measures, but		implementation of natural flood
		these are only likely to yield small benefits in		management techniques on and around
		flood risk management on individual sites.		small watercourses in catchment
		Greater gains from natural flood		headwaters. At a development site
		management are likely to only be achieved		level, small scale natural flood
		over a wider catchment scale and would		management measures can be
		benefit from strategic coordination and		incorporated within the site boundary
		acknowledgment within the Green		and there is some potential to overlap
		Infrastructure Strategy.		these with SuDS measures, resulting in
				benefits in flood risk management for
				the individual site. However, greater
				gains from natural flood management
				could be achieved when applied over a
				wider catchment scale.
Environment	2.17	It would be useful to add to this paragraph	Para 2.17 will be amended as	2.17 additional sentence:

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Agency		that "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".	suggested	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
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 where 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 where 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 "Holloway Road ditch, Heybridge" and "Heybridge Hall ditch" 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 Environment s	Watercourses and Flood Risk We support the principle of maintaining natural features such as ditches and watercourses, particularly in relation to the Garden Suburbs. 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	This point will be added to the text.	New para after 2.22 page 12: 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 there is less risk of householder modification of these features. If these areas remain as public open space, the

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		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.		risk to habitat through culverting or increased local flood risk etc. can be reduced.
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 (approximately 30% of the land area in the District is within Flood Zones 2 and 3. See fig2.2), and are subject to
Essex County Council	Stakeholder comments pg 22	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	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	New para on SuDS after 2.25 SuDs in Public Open Space (POS) All development must contribute towards improving the provision, quality

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		conflict between the provision of SuDS and	is required to meet the needs of	and/or accessibility of local and strategic
		open/recreation space. It is unclear within	all residents it should not be	open space, sports, community and
		the Strategy if this has been addressed.	dominated by SuDs features as	leisure facilities, biodiversity and
			a detention basin is not	habitat. Direct provision of POS should
		As Lead Local Flood Authority (LLFA) the	practical for POS whether wet	form part of a green infrastructure
		County Council considers that whenever	or dry. POS is diverse in its use;	network. POS should be accessible,
		possible SuDS features should be	to have an informal 'kick about',	functional and practical for all users.
		incorporated with Public Open Space (POS).	to have a picnic or to ride a	POS is diverse in its use, to have an
		This approach maximises deliverability,	cycle. It must be accessible to	informal 'kick about' or for other ball
		minimises land take and provides access to	all users including families with	games' to have a picnic or to ride a
		SuDS to help educate people about their use	pushchairs, wheelchair users,	cycle. POS must not be dominated by
		as well as providing blue green amenity	motor scooter users and	Sustainable Drainage Systems (SuDs)
		benefits. It is preferable to design features	walkers. Whilst SuDs features	features whether wet or dry and should
		in a way that allows their use for as much of	are considered an element of	not encumber use of the POS for
		the time as possible. If a dry feature, such as	POS within the Garden Suburb	informal recreation and play or impact
		a detention basin, is used it is likely that it	Masterplans and Strategic	upon direct routes to facilities and
		will only be used during heavy periods of	Design Codes, SuDs features	services for pedestrians, cyclists, motor
		rain, when there is reduced usage of the	should not dominate the POS.	scooters, wheelchairs and those with
		area for POS. Furthermore, a well-designed	Other options should be	pushchairs and buggies. SuDs features
		feature that is properly drained could allow	considered as alternatives to	should be incorporated into existing site
		for that part of the site to drain more quickly	SuDs detention basins including	features including watercourses and
		than a stand-alone area, which would allow	Rain Gardens, Tree planting or	ditches. Where SuDs features overly
		increased potential usage.	underground SuDs features to	dominate the POS provision,
			ensure there is sufficient POS	alternatives or complementary SuDs
			and that is functional and	should be considered including 'Rain
			practical to the development.	Gardens' tree planting or an
				underground drainage network.
			Reference should be made to	
			C21 MDDG SPD 'Future	Footnote:
			Proofing'	Maldon District Design Guide SPD and

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		Wester Quality We welcome and average	A footbooks will be added to make	supporting Landscape and GI Technical Document are available at: https://www.maldon.gov.uk/info/20048 /planning policy/9226/urban design/2 Designing Rain Gardens: A Practical Guide, Urban Design London is available at: https://www.urbandesignlondon.com/r esources/designing-rain-gardens- practical-guide/
Environment Agency	Para 2.29 and 3.5	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. 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	A footnote will be added to para 3.5	Footnote to para 3.5 page 62 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

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Essex Bridleways Association & British Horse Society	Para 2.29, pg 22	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.	The bullet point does not need changing as it is already inclusive: 'Increases access to the coastline, rivers and canals, whilst managing associated impacts'	None
Individual	Figure 2.2	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. Since then EA have produced a much more detailed map, whilst not suitable for planning, it allows people to make a 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,	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)	Add footnote to para 2.22 The Environment Agency's interactive flood risk map is available at: https://flood-warning- information.service.gov.uk/long-term- flood- risk/map?easting=587569.15&northing= 203622.58&address=100091258901&m ap=SurfaceWater

Name /	Section being	Summary of Comments	Officer Response	Proposed modifications – paragraph
Organisation	commented			numbers refer to the consultation draft
	on			
		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?easting=587569.15&northing=203		
		622.58&address=100091258901↦=Surf		
		<u>aceWater</u>		
Supporting Loc	al Landscape Cha	aracter page 25		
Woodham	Supporting	This Council believes that there should be a	Landscape protection is already	None
Walter Parish	Local	much greater emphasis on local landscape	covered by a number of policy	
Council	Landscape	character types. In this respect we do not	documents, and this Strategy	
	Character	consider that the document goes far enough	should be read in conjunction	
		in its coverage to avert the degeneration of	with these other policies, and	
		green areas from inappropriate and	not in isolation.	
		indiscriminate development, whether	GI Strategy policy Principle 3	
		purporting to be tourism focussed or	(page 63) focuses on conserving	
		otherwise, that do not respect the local	and strengthening links with our	
		character or views.	landscape. LDP Policy D1 design	
			quality & built environment	
			protects landscape settings, the	
			natural environment and	
			encourages development to	
			contribute to and enhance local	
			distinctiveness. Paragraph 3.5	
			expands on this policy. The	
			Maldon District Design Guide at	

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			B03 and B04 covers landscape	
			character in some detail, as	
			does the accompanying	
			technical document Landscape	
			and Green Infrastructure.	
			Where appropriate, a landscape	
			and Visual Impact Assessment	
			(LVIA) or an assessment of	
			impact on local landscape	
			character can be required for	
			development proposals.	
Individual	Supporting	I wish to emphasise the importance of:	Hedgerow mapping is included	Maldon's Hidden Landscapes sub
	Local	 preserving the major hedgerows along 	within Maldon's Hidden	projects:
	Landscape	the main roads of Maldon, for wildlife,	Landscapes project, to clearly	Mapping of historic hedgerows in the
	Character	visual screening and as noise barriers;	identify historic hedgerows and	<u>District</u> Dengie , to promote wildlife,
			raise awareness of their value.	landscape and heritage benefits.
			However, the Council has	
			limited powers relating to	
			hedgerow protection.	
Celebrating Cul	tural Heritage			
G Courtney	Cultural	I am concerned to see no references to the	The section on Supporting	None
A Maldon	heritage	marine industry heritage in this policy	Economic progress and Tourism	
Harbour		document.	at paras 2.95 and 2.96 (page 56)	
Commissioner			refer to the strong maritime	
			economy and culture of the	
			district. In the Celebrating	
			Cultural Heritage section, the	
			district's maritime heritage is an	
			identified strength (page 32)	

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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.	New paragraphs after 2.43: Non-Designated Heritage Assets 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. Within the wider landscape, there are other non-designated heritage assets of historical and archaeological interest, such as the remnants of the late Iron 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. Footnote: The Historic Environment

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Essex County Council	Celebrating Cultural Heritage	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/presubmission/2%20Design%20and%20Climate %20Change/EB018%20Maldon%20District%20Historic%20Environment%20Characterisa	This will be included as a footnote to the new Non-Designated Heritage Assets text.	Characterisation Project (2008) provides an overview of the district and the Historic Environment Record. Available at: www.maldon.gov.uk/publications/LDP/pre-submission/2%20Design%20and%20Climate%20Change/EB018%20Maldon%20District%20Historic%20Environment%20Characterisation%20Project.pdf See above.
Dromoting U.S.	lthy Living page	tion%20Project.pdf		
South	Ithy Living page 2.47	We support the proposed Coastal Footpath	The challenge of identifying a	None
Woodham	2.47	connecting South Woodham Ferrers with	safe, simple route is identified	INOTIC
Ferrers Town		Burnham on Crouch, although looking at	in the River Crouch Greenway	
Council		Ordnance Survey maps, there would seem	project.	
		to be difficulties in proposing a direct route.	This project will need to rely	
		Details of which can be found	upon Natural England's England	

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		www.gov.uk/government/publications/engl	Coast Path (ECP) for its route.	
		and-coast-path-in-essex	The proposal for the Wallasea	
			to Burnham-on-Crouch stretch	
			of the ECP is due to be	
			published later in 2019.	
Essex County Council (ECC)	Promoting Healthy Living	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.	Noted	None
		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.		
ECC	Promoting Healthy Living	ECC recommend health inequality and green infrastructure requires further consideration in particular. Public Health England and UCL	Add a footnote to the end of para 2.64 page 41, for this report, as this paragraph refers	Footnote to 2.64: Further information on improving access to green space for all social groups, to
		Health equity evidence work published in 2014 considered improving access to green space, and included information and	to health inequalities.	reduce social equality, is available at: https://assets.publishing.service.gov.uk/ government/uploads/system/uploads/a

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		evidence on access for all social groups. It		ttachment data/file/357411/Review8
		can be viewed by the following link.		Green spaces health inequalities.pdf
		https://assets.publishing.service.gov.uk/gov		
		ernment/uploads/system/uploads/attachm		
		ent data/file/357411/Review8 Green spac		
		es health inequalities.pdf		
Essex County	Promoting	Recommend that the Fields in Trust (FiT)	Add text to the end of para 2.61	The Fields in Trust guidance for outdoor
Council	Healthy	guidance for outdoor sport and play is	·	sport and play is a useful tool for
	Living	referred to. These guidelines are a useful		designing outdoor recreational space.
	New	tool for designing outdoor recreational		Footnote: Fields in Trust Guidance for
	development	space and may help form the expected		Outdoor Sport and Play, available at:
	and	standards for new developments.		http://www.fieldsintrust.org/guidance
	Recreational			
	spaces			
MDC Planning	Healthy	Public Rights of WayA partnership	The ECC Rights of way	Add new para after 2.48
and Licensing	Living	(between MDC, ECC, landowners etc) is	improvement Plan is due for	
Committee via	section:	needed to solve the Public Rights of Way	review in 2019. MDC will ensure	The Essex Cycling Strategy sets out the
the Chairman		(PRoW) issues in the countryside (eg missing	that the aspirations of the GI	key elements of a long term plan that
and Vice-		bridges, impassable tracks, footpaths being	Strategy and the GI projects will	will lead to a significant and sustained
Chairman		used by cyclists/horse riders/vehicles) and	be embedded in MDC's	increase in cycling in Essex. Two key
		to make the PRoW network as usable as	response to this.	commitments of the Essex Cycling
		possible. There is huge potential to raise	As part of the Essex Cycle	Strategy are to:
		awareness of PRoW in the District, and to	Strategy, Essex Highways	 Establish a coherent,
		make sure that the individual elements of	published the Maldon District	comprehensive and advantageous cycle
		the PRoW network are better connected	Cycling Action Plan in 2018.	network in every major urban area,
		together. This could be a potential scheme	The purpose of the Essex	utilising a combination of on-
		for RAMS (Recreational disturbance and	Cycling Strategy is to set out the	carriageway and off-carriageway cycle
		Avoidance Mitigation Strategy) funding, to	key elements of a long term	facilities; and
		draw people away from the coast.	plan that will lead to a	• Ensure each District has an up to
			significant and sustained	date Cycling Action Plan (renewed every

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		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. Unless there is more money spent on maintaining sea walls, they are unsuitable for cycle routes (PRoW or permissive routes).	increase in cycling in Essex. Two key commitments of the Essex Cycling Strategy are to: • Establish a coherent, comprehensive and advantageous cycle network in every major urban area, utilising a combination of oncarriageway and offcarriageway cycle facilities; and • Ensure each District has an up to date Cycling Action Plan (renewed every 5 years).	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. Footnote: Maldon District Cycling Action Plan (2018) is available at: https://www.essexhighways.org/upload s/files/Getting%20Around/Cycling/Mald on-District-Cycling-Action-Plan.pdf
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 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.	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

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
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 disabled, especially those in mobility scooters.	Additional text on bridleways will be added after para 2.64	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.
Sport England	Pages 38-39, para 2.50- 2.55	The summary of formal recreation space provision is welcomed as this forms an important part of Green Infrastructure.	A review of pitches, NEAPs and LEAPs etc for all parishes in the District will be carried out as part of the Playing Pitch	See changes for paragraphs 3.20-3.21

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
	011	However, there is a concern that the GI	Strategy review (target date	
		Strategy's evidence base for formal	2021). Principle 6 has been	
		recreation space provision needs and issues	amended to reflect this.	
		is reliant on the 2011 GI Study. While this	amenaea to remede tino.	
		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		
		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		
i		up-to-date understanding of formal open		

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		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.		
		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.		
MDC Planning and Licensing Committee via the Chairman and Vice- Chairman	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
MDC Planning and Licensing Committee via the Chairman and Vice- Chairman	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	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	Add asterix to 'To apply a higher level of policy protection to Local Wildlife Sites'** At foot of table add: ** This relates to policy NE2 MDLDP.

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		made clear	sites.	
Sport England	Page 41, para 2.61	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. 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. 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 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.	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). Text added to the 'Essex Design Guide' section in Appendix 4.	Text added to the 'Essex Design Guide' section in Appendix 4: 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 the physical and mental health needs of future residents of all ages and abilities and does it contribute to a multifunctional biodiversity network. A4.7 The revised Essex Design Guide (2018), has been widened in scope to

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				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
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	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, horse riders and vehicles Footnote 58: Maldon District Council (2017) Pre Submission Local Development Plan 2014-2019. Available at:

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		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 Presubmission document rather than the adopted version which may of course be the reason, but it seems strange that the Presubmission 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.		
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. 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.	The viability of any ferry/ boat proposals is a key concern. Any such proposals would need detailed consideration to 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	None

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
			are viability issues for these.	
Essex County Council	Para 2.63	ECC recommend paragraph 2.63 is amended to read: 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 alone and meet the requirements of the Habitats Regulations.	The paragraph will be amended as suggested. Reference to SANGS included.	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 impacts from each development alone and meet the requirements of the Habitats Regulations.
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,	This reports comments made at the stakeholder workshop. The Chelmer and Blackwater Access project could deliver an upgraded towpath between	None

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		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.	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.	
Nurturing Com	munities page 4	5		
Individual	Nurturing communities	 I wish to emphasise the importance of: 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
MDC Planning and Licensing Committee via the Chairman and Vice- Chairman	2.71	Obesity and Mental Health are major issues in the District. This section needs expanding.	Agreed. Para 2.71 will be replaced.	Generally, the health of residents in Maldon District is better than the England Average. There are however 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

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				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
				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 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. Mental health is another health priority of the Council. The proportion of estimated mental health disorders in

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Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				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
				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

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				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.
				Footnotes: 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/he alth-profiles/area-search- results/E12000006?search_type=list- child-areas&place_name=East 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:
				https://fingertips.phe.org.uk/profile/he alth-profiles/area-search- results/E12000006?search_type=list- child-areas&place_name=East3 Public Health England (2018) Local Authority Health Profile 2018: Maldon District. Percentage of adults walking for travel at least three times per week (2016/17). Available at:

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Name /	Section being	Summary of Comments	Officer Response	Proposed modifications – paragraph
Organisation	commented			numbers refer to the consultation draft
	on			
				https://fingertips.phe.org.uk/profile/he
				alth-profiles/area-search-
				results/E12000006?search_type=list-
				<pre>child-areas&place_name=East</pre>
				4 Public Health England (2018) Local
				Authority Health Profile 2018: Maldon
				<u>District. Reception: Prevalence of</u>
				overweight (including obese)(2016/17);
				Year 6: Prevalence of overweight
				(including obese) (2016/17). Available
				at:
				https://fingertips.phe.org.uk/profile/he
				alth-profiles/area-search-
				results/E12000006?search_type=list-
				child-areas&place_name=East
				5 White MP, Alcock I, Wheeler BW,
				Depledge MH. (2013) Would you be
				happier living in a greener urban area? A
				fixed-effects analysis of panel data.
				Psychological science. 24(6):920-8.
				6 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.
				<u>(7):1-97.</u>
				7 Public Health England (2018) Local
				Authority Health Profile 2018: Maldon
				<u>District. Estimated prevalence of mental</u>
				health disorders in children and young

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Name / Organisation	Section being commented	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
Organisation	on			indiffuers refer to the consultation draft
	0			people: % population aged 5-16 (2015).
				Available at:
				https://fingertips.phe.org.uk/profile/he
				alth-profiles/area-search-
				results/E12000006?search type=list-
				child-areas&place name=East
				8 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/he
				alth-profiles/area-search-
				results/E12000006?search_type=list-
				child-areas&place_name=East
				9 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
				Wellbeing than Physical Activity
				Indoors? A Systematic Review.
				Environmental Science & Technology.
				<u>45(5):1761-72</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/he
				alth-profiles/area-search-

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				results/E12000006?search_type=list- child-areas&place_name=East
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	Additional text added after the stakeholder comments on page 47: Analysis 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. 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 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.

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				The key priorities for Promoting Healthy
				Living are:
				 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;.
				 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.
				 Ensuring potential conflicts,
				such as increased access and recreation
				activities occurring within close
				proximity to wildlife sites, are
				acknowledged and addressed.
	luctive landscap		T	1
MDC Planning	Page 52	There appears to be too much emphasis on	The paragraphs have been re-	Move para 2.86 on the Agricultural Land
and Licensing		salt production (one company) at the	ordered and additional	Classification to above 2.84, so it is the
Committee via		expense of the importance of farming and	information has been added.	first paragraph in this section.
the Chairman		food production in the District. For example,		
and Vice-		one farm in the District produces enough		At the end of 2.84 (agricultural
Chairman		wheat to supply the whole of Essex with		employment) add: The following
		bread for two months. Further information		examples of businesses give a flavour of
		on farming in the District would rebalance		the productive landscape in the District.
		the emphasis of the Sustaining Productive		

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		Landscapes section.		New paras after employment (formerly
				paragraph 2.84)
				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.
				North Maldon Growers Ltd, wholesale
				producers of UK grown handpicked
				fresh vegetables since 1964, is a co-
				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,

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				courgettes, and purple sprouting
				broccoli and kale.
				Dort of the Wilkin & Cons (Tintroe ioms)
				<u>Part of the Wilkin & Sons (Tiptree jams)</u> <u>'Tiptree' farm estate is in the District,</u>
				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
				assurance system recognising
				sustainably farmed products.
				Format Danis a laws attablished formily
				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

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				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.
MDC Planning and Licensing Committee via the Chairman and Vice- Chairman	Page 53 para 2.90	Second sentence needs revising to make its meaning clear.	Agreed – the sentence has been re-written.	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 the District and the District has responded through diversifying.
MDC Planning and Licensing Committee via the Chairman and Vice- Chairman	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	Additional text has been added to para 2.89	New text at the end of para 2.89 (ALC para) 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

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		carry on doing this. How do we recognise		water quality. As a result, these areas
		their contribution to GI? How do we raise		contribute significantly to the Green
		awareness amongst the public? How can		Infrastructure of the district.
		MDC support this?		
Supporting Eco	onomic Progress	and Tourism page 55		
Maldon	Page 55-59	Section on supporting economic progress	It is recognised that the	None
Society	2.92-2.100	and tourism.	proposed new power station at	
		It is unfortunate that these two aims have	Bradwell will have both positive	
		been bracketed together as they can, as the	and negative impacts. However,	
		strengths and weaknesses comment implies,	it is beyond the remit of the GI	
		be mutually exclusive.	Strategy to deal with Bradwell	
		Nowhere is this more exemplified in the fact	in any detail. Large	
		that apart from a small blob on one of the	infrastructure projects can	
		maps, the proposal for a new nuclear station	become tourist attractions in	
		at Bradwell appears not to be mentioned?	their own right, for example	
		Yet this would clearly have a direct and	when the Channel Tunnel was	
		adverse effect on at least of the three	being constructed it had it own	
		commendable projects which are detailed	visitor centre and viewing	
		separately. These are The proposal for a	platform.	
		Bradwell/Tollesbury ferry - it is clearly		
		assumed by default that tourists would want	As with all the GI projects, these	
		to approach a mega building site?	projects will need to be	
		The same could be said of the proposed	developed further.	
		Bradwell and St Peters circular walk project.		
		The construction and emissions could also	The St Peter's Circular Walk is a	
		have a direct effect on the safety and quality	long-term project, which is	
		of watersports activity, another project	likely to come forward after the	
		objective.	power station is constructed.	
		All three of these projects deserve support		
		and are to be commended. In this case the	The Water Sports Awareness	

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		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. 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.	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. The appropriate safety assessments, and flood risk assessments and mitigation measures will be undertaken as part of the Development Consent Order process.	
Essex Bridleways Association & British Horse Society	P56 Para 2.97	Para 2.97 again mentions improving access for pedestrians and cyclists but no mention 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.	The majority of the Causeway Area is not a suitable location for encouraging horse riding. Where appropriate, horse riding access will be considered for routes linking to the Navigation.	None
Action Plan pag	ge 61 Fig 3.1 (Map)	I'm not sure how realistic the ferry	As with all the GI projects, this	None
and Licensing Committee via the Chairman and Vice-	.5 (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	project will need to be developed further to ensure that it is practical and viable.	

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
Chairman		Island to Thistly Rd, Tollesbury, or Bradwell to north east of Tollesbury Wick Marshes) that could provide an all-tide service.		
MDC Planning and Licensing Committee via the Chairman and Vice-Chairman	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 stakeholders. As a result, paragraphs 3.1 and 3.2 have been amended to take into account this change. 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	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. 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

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
			infrastructure through the Environmental and Countryside Stewardship Schemes. In addition, the Wildlife Friendly Farming project has been given a higher priority.	character, but also identifies that the GI network needs to be promoted and enhanced to maximise the delivery of benefits for local communities. Move word cloud to appendix 3 with the following text from para 3.1: 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.
Essex County Council	Vision	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. The Maldon GI Strategy will deliver a connected multi-functional 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	These amendments are in line with the NPPF and are acceptable.	The Maldon GI Strategy will deliver a connected multi-functional 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, promote healthy living, whilst providing mitigation for development and population growth.

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		will deliver a range of benefits for local communities, promote healthy living, whilst providing mitigation for development and population growth.		
		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.		
Essex Bridleways Association & British Horse Society	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 many user groups as possible and should be embedded within the Vision.	The proposed changes to the vision suggested by ECC, on creating a connected, multifunctional landscape and promoting healthy living cover this point.	See the above changes
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	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	A footnote will be added to para 3.5	Footnote to para 3.5 page 62 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:

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		bodies including the Environment Agency to		https://www.gov.uk/guidance/rules-for-
		help improve water quality in the district.		<u>farmers-and-land-managers-to-prevent-</u> water-pollution
		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		
200	2.6	improve river habitat quality.		
RSPB	3.6	This should be written as Sustainable	Agreed, this will be corrected.	new developments will incorporate
		Drainage Systems (SuDS). The lower case 'u'	The other references will be	Sustainable Drainage Systems (SuDS) sustainable urban drainage systems
		does not mean 'urban'. Leaving this uncorrected could falsely imply that issues	corrected as necessary.	(where necessary)
		of water management/flood risk and		(where necessary)
		alleviation are solely an issue in urban		All other references to SuDs will be
		environments.		checked and corrected
Individual	3.7	Flood defence enhancement should be	It is highly unlikely that flood	None
		refused unless a need is proven. When is	defence enhancement works	
		that need. For example has the predicted	would be undertaken if there	
		sea rise occurred. Is it threat now or in	was not an identified need.	
		epoch 3 which is 100 years away. Has the	Although these are valid points,	
		sea wall deteriorated etc, are there better	the engineering and	
		alternatives such as managed retreat?	construction methods aspects	
			of such proposals are beyond	
		In some cases when land has been	the remit of the GI Strategy.	

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
	on	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. 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.		
		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. The EA of such significant works on the greater population must be considered against the smaller short term financial		
South Woodham Ferrers Town Council	3.7	interests of those proposing the schemes, 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	No change

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
			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.	
RSPB	Principle 2: Protecting and Enhancing Biodiversity (paragraph 3.8, page 62)	We recommend that the order of the three themes in this section is changed to better reflect their magnitude. They should read: Development of a coherent ecological network Partnership Working Protection and Enhancement of Biodiversity in New Developments 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.	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.
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	

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
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	With regards increasing Water Based Activity Levels the following amendment is recommended to paragraph 3.26. However, particularly in coastal locations, such measures will fully consider ecological sensitivities, with a partnership approach taken to ensure impacts are avoided and mitigated in accordance with Recreational Disturbance and Avoidance Measures (RAMS).	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
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	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. 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). Therefore, opportunities to provide Local Equipped Areas for Play (LEAP) and Neighbourhood Equipped Areas for Play (NEAP) shall be assessed within the following areas:

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
			review of NEAPs and LEAPs will	◆ Asheldham
			be carried out as part of the	• Dengie
			playing pitch strategy review	Great Braxted
			(target date 2021).	Great Totham
			This section has been revised	Hazeleigh
			accordingly.	• Little Braxted
			, , , , , , , , , , , , , , , , , , ,	• Langford
				• North Fambridge
				• Stow Maries
				• Ulting
				• Wickham Bishops
				Woodham Mortimer
				3.21 New developments within these
				areas shall assess the local provision of
				NEAPs and LEAPs and will
				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	3.21	It is accepted that development should	Principle 5, refers back to table	3.21 add footnote:
Developments		contribute towards both LEAPs and NEAPs	2.1 (page 40) the greenspace	Any developer contributions will need to
		to provide play space for new and existing	standards set out in the GI	meet the requirements of the
		communities in the area.	Study 2011, which are the same	Community Infrastructure Regulations
			standards used in the Maldon	2010 (or any successor regulations).
		However, this should be in line with the	District Design Guide Landscape	
		Greenspace Standards set out in the Maldon	and Green Infrastructure	

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
Sport England	Page 64, para	Landscape and Green Infrastructure Technical Document and should have regard to Regulation 122 of the Community Infrastructure Regulations 2010. While the actions in the action plan relating	Technical Document. A footnote will be added to the end of para 3.21 for the Community Infrastructure Regulations 2010. The Maldon District Design	Add text to para 3.18, after the 2 nd
	3.23	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.	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 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.'	sentence:natural environment. New development, where ever possible, should be designed to promote physical activity, following the guidance in the Maldon District Design Guide. Deficiencies have been Additional text added to the end of the paragraph: 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.
RSPB	Paragraph 3.26 (page 64) – Increasing	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	Your concern is understandable. The paragraph already explicitly refers to the coast's ecological sensitivities and the RAMS. The	3.26 - Opportunities to facilitate enjoyment of the water environment within and surrounding the district will be identified. This could will include
	Water Based Activity Levels	appropriate to overtly promote an increase in activity on the Blackwater Estuary SPA. Given the year-round importance of the	paragraph will be amended.	promoting access to water, taking steps to improve water quality and improving e health and

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		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.		safety at access points.
		The emphasis, as underpinned by the CIEEM-endorsed mitigation hierarchy and the first principle of biodiversity net gain (https://www.cieem.net/data/files/Publicati ons/Biodiversity_Net_Gain_Principles.pdf) is to "Do everything possible to first avoid and then minimise impacts on biodiversity".		
Gladman Developments	3.32	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. It may be that no need exists in a particular area because of an overprovision of exiting allotments or that a better use of \$106 monies would be to improve the facilities at an existing allotment, rather than provide new ones. Any requirement for allotments should therefore be flexible enough to allow a more	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

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		bespoke approach towards provision.		
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 form the basis of future funding bids and applications. Text on delivery and monitoring has been added.	New para after 3.52 page 75 Delivery and Monitoring 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
Maldon Wick Ltd	Funding	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''. 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	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. Text on delivery and monitoring has been added.	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. As individual projects are further developed, there will be opportunities for stakeholder input and, where appropriate, further opportunities for public engagement. A regime of monitoring and review

Name / Organisation	Section being commented	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
· •	_	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. 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 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?	Text on delivery and monitoring has been added.	
		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.		

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
Appendix 2 App	raising natural/	semi-natural greenspace sites	,	
MDC Planning and Licensing Committee via the Chairman and Vice- Chairman	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 experience and spiritual/cultural enrichment may still be achieved due to the proximity to nature conservation areas.	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 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.	None
Appendix 3 Sta	keholder Input			
MDC Planning and Licensing Committee via the Chairman and Vice- Chairman	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	Page 81 –	Disagree with bullet 14 – there should not be permissive rights to cycle on the sea	This section of the report relays comments made at the	None

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
Committee via		walls. Unless there is more money spent on	stakeholder workshops. As	
the Chairman		maintaining sea walls, they are unsuitable	such it would be inappropriate	
and Vice-		for cycle use.	to edit the comment.	
Chairman			However, the suitability of any	
			potential access projects for	
			cycling/riding will need to be	
			considered as each project is	
			developed in more detail.	
MDC Planning		Page 84 – Ist bullet point in weaknesses	The bullet point has been	Revised bullet point: Access to coast;
and Licensing		section – 'public transport legibility' – has	transcribed correctly. A	public transport legibility [suggested
Committee via		this been transcribed correctly from the	suggested interpretation has	interpretation: the public transport
the Chairman		workshop comments?	been added to the bullet point.	network can be difficult to navigate in
and Vice-				terms of accessing timetables and
Chairman				linking routes throughout the District
Appendix 4 Poli	cy Review			
Essex County	Appendix 4 –	Paragraph 3.82 refers to the Essex Green	The section will be updated.	3.82 Overall the vision and <u>objectives</u>
Council	Policy Review	Infrastructure Strategy as focussing		principles of the emerging <u>Green</u> Essex
		primarily on social and economic benefits,		Strategy aligns with that of the Maldon
	Green Essex	which is not the case, as the ecological and		GI Strategy. this document's. The
	Strategy	environmental benefits of any GI Strategy		emerging GES takes into consideration
	(GES)	are equally important. The emerging GES		priorities coming out of the 25 Year
		takes into consideration priorities coming		Environment Plan, and other local and
	Para 3.82	out of the 25 Year Environment Plan and		national policies and Green
		other local and national policies and Green		Infrastructure Strategies. The GES is
		Infrastructure Strategies. The GES proposed		planned to be published for consultation
		Action Plan is outlined in Appendix 1.		in Spring 2019. However, the county
				wide document focuses primary on the
		The GES is planned to be published for		social and economic benefits of green
		consultation in Spring 2019. A working		infrastructure and none of the emerging

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		version of the Strategy can be viewed within		key principles mention the ecological
		the Essex Green Infrastructure Strategy		importance of green infrastructure.
		Partnership via the Knowledge Hub -		Neglecting the protection and
		https://khub.net/group/essex-green-		enhancement of the physical
		infrastructure-strategy-partnership.		environment would result in social and
		Green Essex Strategy Action Plan (work in		economic benefits failing to be
		progress) – provided with the ECC		delivered. The policy for the Maldon GI
		comments.		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.
Essex County	Appendix 4 –	Appendix 4 refers to and reviews the		Essex Green Infrastructure Strategy
Council	Policy Review	emerging Essex Green Infrastructure		Green Essex Strategy
		Strategy, and in particular the initial draft		
	Green Essex	scoping version of that Strategy. However,		3.80 The Vision of the emerging Green
	Strategy	work has been progressing on the Strategy		Essex Green Infrastructure Strategy is:
	(GES)	and is now termed the 'Green Essex		"A holistic approach to our green
		Strategy'.		infrastructure (existing and new) to
		In addition, the Vision, as outlined in		provide social, environmental and
		paragraph 3.80 has been replaced with the		economical benefits to Essex."
		following:		'We will protect and grow a high quality
				connected Green Infrastructure network
		'We will protect and grow a high quality		which extends from our City and town
		connected Green Infrastructure network		centres to the countryside and coast
		which extends from our City and town		which is designed for people and wildlife
		centres to the countryside and coast which		whilst being self-sustaining.'
		is designed for people and wildlife whilst		
		being self-sustaining'.		3.81 The emerging key principles

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
		The key principles, as outlined in paragraph 3.81 have been replaced with the following objectives: 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. People Increase use and inclusivity of green infrastructure across all social groups and abilities People Provide green infrastructure facilities to promote health and wellbeing Economy Secure funding for new and existing green infrastructure to ensure their sustainability.		 objectives are: 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. People: Increase use and inclusivity of green infrastructure across all social groups and abilities People: Provide green infrastructure facilities to promote health and wellbeing Economy: Secure funding for new and existing green infrastructure to ensure their sustainability. "High quality green spaces are within easy reach of all parts of the county. Visually beautiful places of Essex
				 should be protected. Green space can directly improve health and wellbeing outcomes. Holistic approach to Essex green space

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
Essex County Council		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); 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/	A short section on the Essex Design Guide will be added to Appendix 4 Policy Review.	and infrastructure. • Green infrastructure is integral to developing the Essex Economy. • Exploiting all opportunities for making green spaces self-sustaining. • Public and partner engagement is key to the creation of a green infrastructure strategy." New para after 3.82 Essex Design Guide 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 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

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				design guidance, key policy and supporting documents. The EDG is available at: www.essexdesignguide.co.uk
Chelmsford City Council		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 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.	This section will be amended	Table A4.2 Green infrastructure features within the specific growth site allocation policies, in two of the nine-Strategic Priorities (Strategic Priority 7 - Protecting and enhancing the Natural and Historic Environment, the Green Belt and valued landscapes & Strategic Priority 8 - Creating Well Designed and Attractive Places, and Promoting Healthy Communities), three and five strategic policies, in addition to the Natural Environment policies Add the following policies: Strategic Policy S1 - Spatial Principles - Protects and enhances the character of valued landscapes, heritage and Biodiversity.
				Strategic Policy S13 – The Role of The Countryside- recognises the role the countryside plays as part of the green infrastructure network, and providing connectivity between the countryside and the urban area

APPENDIX C

Name / Organisation	Section being commented on	Summary of Comments	Officer Response	Proposed modifications – paragraph numbers refer to the consultation draft
				Final para:
				The Chelmsford Green
				Infrastructure Strategic Plan
				places emphasis on the Local
				Plan. 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. The Green Infrastructure SP is
				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	The proposals put forward in the consultation document seem to fall into three categories: 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; 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; 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. In whichever group a project falls it should be made clear who would have a lead role and what other input would be required.	This level of detail will be drawn up as each project is developed.	None

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	g			
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: Need to ensure there are no significant impacts on the historic environment.
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</u> <u>Authority</u>
Maldon's Hidden Land	dscapes			
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 District Dengie, 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	Sub projects: Digitisation of the mapping of all the preserved trees in the District Potential partners: Parish councils

Name/Organisation	Project being commented	Comments	Officer Response	Proposed Modifications
	on			
		mapping of preserved trees is a good idea		Tree Council/Tree Warden network
		in general terms, further clarification		
		should be given to why this is necessary.		
Chelmer and Blackwa	ter Access Projec	t		
Langford & Ulting	Chelmer and	The Parish Council is concerned about the	This is an important point	Potential Challenges:
Parish Council	Blackwater	impact that improving access to the	and could apply to the	Increasing parking provision along
	Access Project	Chelmer and Blackwater will have at Hoe	Railway Multi-Access Trail	the route at key access points.
	(page 69)	Mill, Ulting. As can be seen from the	and the Greenways projects,	
		photograph below (taken on Sunday 2 nd	too.	
		September 2018), there is no car park. It		
		should be noted that eight cars are parked	Issues of car parking has	
		on the bridge which has a 3 T maximum	been added to the 'potential	
		weight limit and this does not include any	challenges' section of the	
		cars driving over the bridge at the same	project proforma.	
		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.		

APPENDIX C

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: Protection of the historic environment, archaeological and heritage assets

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		inadvertent impacts on the historic environment (whether built or belowground) 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 form a central Potential partners: Parish Councils Walking, cycling, and riding special interest groups
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 'Protecting and enhancing wildlife' 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 Protecting the rural character of the Navigation

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		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.		
Chelmsford City Council	Chelmer and Blackwater Navigation Project	Chelmsford City Council particularly welcomes the Chelmer and Blackwater Navigation Project. 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.	Noted	
Essex Bridleways Association & British Horse Society	Chelmer and Blackwater Access Project	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	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.	Recreational opportunities could include improving walking, cycling riding provision along the towpath, facilitating water-based Potential partners: Walking, cycling, and riding special interest groups

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

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		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. 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. 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		
South Woodham Ferrers Town Council	Pages 42, 44 and 47,para 2.79, Railway Multi Access Trail	SMF. 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 and would allow such wildlife to return to urban areas.	Enabling people to join the trail along its route, would be a consideration when developing the project in detail. The issue of car parking facilities will be added to the potential challenges section of the Railway Multi-Access Trail	GI projects document, page 8, Potential Challenges – The provision of car parking facilities at key access points

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		The only concerns that we would have is regarding suitable parking facilities at either end of the trail. Also we should look at providing access points along the trial so that people can join midway.		
Essex Bridleways Association & British Horse Society	Railway Multi- Access Trail	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.	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.	None
Langford & Ulting Parish Council	Railway Multi- Access Trail (page 69)	The Parish Council would support more use of the Blackwater Rail Trail by walkers/cyclists but there are again, issues over car parking.	Include issues of car parking in the 'potential challenges' section of the project proforma.	Potential Challenges: Increasing parking provision along the route.
Chelmsford City Council	Railway Multi- Access Trail	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 forms a linear open space but is crossed by Hamberts Road and the B1012. No bridge is	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 entirety due to land ownership and land	Page 8 Projects document Potential partners: Chelmsford District City Council Context: Reinstating the old railway line as a multi access route (walking, cycling and horse riding) would connect

Name/Organisation	Project being commented	Comments	Officer Response	Proposed Modifications
	on			
		proposed across the B1012 at this point.	management changes along	Witham (Braintree District) with
		Strategic Growth Site 7 is currently in the	the route since the rail line	South Maldon and South Woodham
		early stages of Masterplanning. The Council	closed.	Ferrers (Chelmsford City). This could
		will consider whether it would be feasible		be
		to incorporate a PROW across this site	Reference to the City Council	
		allocation. It is unlikely that the new PROW	will be corrected	Potential challenges:
		could connect with the open space within		The trail route will need to take into
		the urban area however.		account plans for new development
				and the existing road network (in
		Note, Chelmsford District Council rather		Maldon & South Woodham Ferrers)
		than City Council is mentioned as a		
		potential project partner for this project.		
Blackwater Greenway	<u> </u> 			<u> </u>
Essex Bridleways	Blackwater	This should also include equestrians; in	There are identified issues	Context 2 nd sentence:
Association & British	Greenway	many areas along the coastal path the sea	with cycle use of the sea	the provision of walking, and/or
Horse Society	Page 8, 13, 14	wall is more than large enough to be able	walls. There are structural	cycling and/or equestrian routes
		to accommodate all users, many cyclists	issues to be considered	between these areas and
		already using these illegally. Similarly, for	before horses can be	
		the Southminster to Burnham and River	permitted to use the sea	
		Crouch Greenways, these should also	walls. As such, it would not	
		include access for equestrians.	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	
			Greenway and this will be	
			added to the context	

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
			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 Woodland	ls		,	,
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	l	1	,	,
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 area south of Limebrook Way. This is consistent with the approved SMGS	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 Limebrook way, adjacent to land at Maldon Wick, which	None

22 N as p the inclu	March 2018) which identifies the Wick part of the Green Infrastructure Plan for e Suburb (see Figure 4.3) and also	can be used to access the residential areas nearest the site.	
How infe to tl Way inclu	cludes proposals for its maintenance and hancement. bwever, Maldon Wick Ltd. object to the ference that this GI project might extend the north of the SMGS, across Limebrook ay. The Maldon Wick site does not clude an area of Local Wildlife Interest.		
MLI desi a LV It is hea of tl that exte Way			
programme			
pareness mar ogramme Blac opp Esse	anaging the existing issues on the ackwater estuary but also the portunity to work in partnership with the sex Coast RAMS project. The latter would	Noted	
ite are	gramme r Sports The eness machine Black op Ess ass	extend to land to the north of Limebrook Way. gramme r Sports The project is welcomed in relation to managing the existing issues on the	extend to land to the north of Limebrook Way. gramme r Sports eness eness Blackwater estuary but also the opportunity to work in partnership with the Essex Coast RAMS project. The latter would assist in avoiding in-combination impacts

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
Environment Agency	Water sports awareness programme	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. An additional potential project involvement is the Wetland Vision. Further details can be found here http://www.wetlandvision.org.uk/dyndisplay.aspx?d=home	Noted	Added text to the last paragraph of the 'context' section of the water awareness programme: 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 areas have been identified along Maldon's coastline.
RSPB	Water Sports Awareness Programme (GI project)	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 measures with long-term goals that will protect and enhance the special features of	Signage would be one element of a wide package of measures to achieve this project.	None

Name/Organisation	Project being	Comments	Officer Response	Proposed Modifications
	commented			
	on			
		the estuary.		
		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:		
		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.		
		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).		
Southminster to Burn	1			
MDC Planning and	Southminster	This is an important link between two of	As part of the Essex Cycle	None
Licensing Committee	to Burnham-	the larger settlements in the District. This	Strategy, Essex Highways	
via the Chairman	on-Crouch	should be a high priority project.	published the Maldon	
and Vice-Chairman	Greenway		District Cycling Action Plan in	
			2018. This includes a new	
			leisure route between	
			Southminster and Burnham-	
			on-Crouch, which is assigned	

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
			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 Greenwa	ay			
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	This will be added to the context/partners section.	Context: This project offers the opportunity to enhance the interpretation of the historic environment for visitors.
		avoid in combination impacts and maximise partnership working. It should be noted that the England Coast Path is a project not a partner.		Potential partners: English Coastal Path Natural England (England Coast Path) Essex Coast RAMS project
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 not highlighted. This should be highlighted as the project can enhance and/or	Agreed	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

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		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.		
MDC Planning and Licensing Committee via the Chairman and Vice-Chairman	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 past landowners will of reclaimed salt marsh and built sea walls, thus the end of	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

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		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	This area is of national heritage significance	These points will be added	Potential partners:
	Island/Battle	and any development will need to both		Essex Coast RAMS project
	of Maldon	contribute to enhancing the understanding		
		and management of the site and to		Challenges:
		mitigate against any impacts on its		Protection of heritage assets
		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.		
MDC	Northey	Timescale: It has been pointed out that	Amend the time-period.	Amend timescale to read:
	Island/Battle	short term is the same as medium term.		Short term (1-5 years)
	of Maldon			
Country Parks	T			
Essex Bridleways	Country Parks	As previously mentioned, equestrian access	Where possible, access for	None
Association & British	Page 17	should be an aspiration within this Strategy	all users will be incorporated	
Horse Society		as far as possible to Maldon's country	into this project.	
		parks, especially Elms Farm Park, and any		
		new park constructed should also be		
		accessible to equestrians.		
Essex County Council	Country Parks	The potential location of the Country Park	Agreed the text will be	This may therefore contribute
		has considerable historic environment	amended.	towards the aims of the Essex Coast
		significance and any designation/provision		Recreational disturbance Avoidance
		will require consultation with the Historic		and Mitigation Strategy.
		Environment advisors to Maldon District		commitments.

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
		Council. 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 incombination impacts and the current text should be amended to reflect this.		Challenges: Protection of heritage assets
Woodham Walter Parish Council	Country Park	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.	Noted	None
Environment Agency	'Country Parks' proposed project	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. Improvements could be made as identified in the project synopsis.	This will be noted as a potential challenge	Potential challenges: <u>Potential conflict between increased</u> <u>visitor numbers and the existing</u> <u>biodiversity value of the area.</u>

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
MDC Planning and Licensing Committee via the Chairman and Vice-Chairman	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 Park (amend throughout document) Change illustration.
Get Active Maldon ma	ар/арр			
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 heritage 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 should be consulted with regard to any proposed expansion to the network.	ECC will be added as a potential partner	Potential partners <u>Essex County Council</u>
Woodham Walter	Quiet Lanes	The Parish Council is concerned at the quiet	Safety issues are already	None

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
Parish Council	project	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.	identified in the synopsis.	
Wildlife Friendly Farm	ning			
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</u> <u>Group (FWAG)</u> as a potential partner.
MDC Planning and Licensing Committee via the Chairman and Vice-Chairman	Wildlife Friendly Farming Wildlife	This should be a high priority project, as it achieves so much and it is cheap. Need to show that MDC is supportive of the conservation role provided by farmers.	Agreed, this project merits a higher priority.	Change the priority to <u>High</u> None
Environment Agency	friendly	Catchment Sensitive Farming Officers may be able to provide further assistance with	Noted	None

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	Farming	projects. Officer contact details can be		
	project	found at		
		https://assets.publishing.service.gov.uk/go		
		vernment/uploads/system/uploads/attach		
		ment data/file/766900/csf-contacts.pdf		
RSPB	Wildlife	We welcome that this project has been	TDFZ have been identified as	Change priority to high.
	Friendly	proposed and that TDFZs are referenced,	an approach to wildlife	, <u> </u>
	Farming (GI	but we recommend that this is re-worded	friendly farming, and one	
	Project)	and framed more specifically.	that could be replicated for	
		For context, turtle doves are vulnerable to	other species. The level of	
		global extinction (IUCN Red List of	detail suggested is not	
		Endangered Species). They have suffered a	suitable for the short project	
		91% UK population decline since 1995	synopsis.	
		which is now halving every six years. Their		
		range is increasingly concentrated into an	The suggestion to re-direct	
		ever shrinking patch of East Anglia and the	this project to focus on	
		south-east of England. At this current rate	Turtle Doves is not	
		of change if we don't help this species	appropriate. TDFZ are a	
		scientists calculate that complete UK	great representation of a	
		extinction as a breeding species will be a	very specific wildlife farming	
		real possibility. A coalition of organisations	scheme, however, we would	
		have formed Operation Turtle Dove2 as	not wish to focus on this one	
		part of the urgent mission to reverse the	approach to the detriment of	
		fortunes of this enigmatic and culturally	other potential approaches	
		significant bird.	and funding opportunities.	
		Part of the RSPB's response has been to		
		identify a number of TDFZs in their	This project merits a higher	
		remaining strongholds. These are defined	priority.	
		as areas of four or more adjacent tetrads		
		where each tetrad contains 2+ breeding		

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	011	pairs in the 2007-2011 Bird Atlas3 or		
		through other credible data.		
		through other credible data.		
		2 See www.operationturtledove.org		
		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.		
		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		
		of partnership working and ecological		
		coherence as per the fundamental		
		principles that the GI strategy proposes.		
		principles that the distrategy proposes.		
		We do wish to emphasise that although		

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		delivery of this project will have an overt focus on Turtle Doves, it has to be recognised that the provisions required for them: • seed for feeding (supplementary feed or floristically-rich areas) • nesting habitat (scrub) • a source of accessible water (ponds) will also provide multiple benefits for a range of other species including pollinating insects, pond-life, breeding birds such as nightingales, notwithstanding wider		
Connections to Wallas	l sea Island	ecosystem service benefits.		<u> </u>
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 Bradwe	ll Circular Walk	,		
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: Essex Coast RAMS project Potential challenge: Protection of heritage and archaeological assets.
Environment Agency	St Peters and	This project mentions (and is suitable for)	Agreed, as this project offers	The icon for Protecting and

Name/Organisation	Project being commented on	Comments	Officer Response	Proposed Modifications
	Bradwell	including biodiversity enhancements. The	educations opportunities to	Enhancing Wildlife will be highlighted
	circular walk	'Protecting and enhancing wildlife' icon should be highlighted.	raise awareness of the importance of this area for biodiversity.	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	Principle 2 identifies the opportunity for Biodiversity Net Gain through development, as does the	Principle 2 - Para 3.9 Add similar text to 1.11. Protection and Enhancement of
		connectivity between sites, allowing	LDP and the NPPF. This could	Biodiversity in New Developments
		greater species dispersal and migration, can be achieved by a variety of means. Stepping stones and corridors in between the larger	provide a mechanism for delivering the types of habitat enhancements	3.9 New developments will be designed to mitigate adverse impacts on biodiversity whilst providing
		green spaces are highly valuable, examples include: private gardens, trees, hedgerows,	suggested here. Additional text has been added to para	demonstrable/measurable net gain for biodiversity where possible. In
		ponds, ditches, playing fields, allotments, rough grassland, village greens, hedgerows,	3.9 (Biodiversity in new developments)	the context of the recreational disturbance pressures currently
		orchards, old railway lines, bat and bird boxes, and log piles. These may be transitional but provide valuable		being faced by the Essex Coast designated sites, and the requirement for net gain for
		supplementary habitats and also act as buffers to larger key habitats from adverse		biodiversity, the Green Infrastructure network and new provision will be of
		impacts of developed areas.		growing importance. In terms of green infrastructure, new provision
		Restoring degraded sites and habitats may		could range from on-site green
		be less resource intensive that creating		infrastructure, habitat creation and
		Green Infrastructure from new. This		enhancement, through to improved
		method could also potentially provide greater benefits to biodiversity if sites were successful prior to neglect. Key habitat		management of recreation activities along the coast.

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	OII	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.		
RSPB	Inclusion of	Project Proposal for the Blackwater	Reference will be included in	Text has been added to page 14 of
	additional	Conservation Strategy (BCS)	the GI Strategy to the	the GI Strategy on the Blackwater
	project		Blackwater Conservation	Conservation Strategy.
		Paragraph 174 of the NPPF states that:	Strategy. As it is a strategy it	
		"to protect and enhance biodiversity plans	would not be appropriate to	
		shouldpromote the conservation,	include it as a project in the	
		restoration and enhancement of priority	GI Strategy. In addition, the	
		habitats, ecological networks and the	BCS project area extends	
		protection and recovery of priority	beyond the district	
		species."	boundary. Areas outside the	
		The BCS is actively working on little terns	district are beyond the remit	
		and breeding waders (lapwings and	of this strategy.	
		redshank), but there is a need to map other	<u>.</u>	
		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		

APPENDIX C

Name/Organisation	Project being commented	Comments	Officer Response	Proposed Modifications
	on			
		conservation measures.		
		We welcome discussing this idea with the		
		council.		
		Map of the BCS area provided		