



The Rt Hon John Healey MP

Secretary of State for Defence

2nd October 2024

RE: Save the wildlife of Middlewick Ranges in Colchester

Dear Secretary of State

As a collection of nature conservation organisations and groups, we are writing to express our deep concern about the continued threat to the Middlewick Ranges, a firing range site in Colchester, Essex. The nationally important 76ha Middlewick Ranges is one of Essex's largest Local Wildlife Sites (LoWS), supporting over 10% of its special acid grassland habitats and is a much-loved green space for the local community.

Despite many years of controversy about the site's future, and its importance to the local community, the Ministry of Defence (MOD) and Defence Infrastructure Organisation (DIO) are still contemplating the sale of this special wildlife site. As currently proposed, the sale of the land is linked to the building of 1,000 homes across this LoWS, leading to the loss of extensive areas of wildlife-rich habitat. We believe this would be catastrophic for Colchester's wildlife and the local community, as well as going against the MOD's own policy commitments, setting a dangerous precedent for Government departments facilitating building on such biodiverse sites.

The current position of the MoD and DIO contradicts the principles of nature recovery on which the Environment Act 2021 is founded. LoWS are essential building blocks for Local Nature Recovery Strategies (LNRS), as set out clearly in Defra's LNRS Statutory Guidance¹. We are disappointed to see a UK Government agency enabling destruction of one of Essex's largest LoWS and, thereby, actively undermining the forthcoming Essex Local Nature Recovery Strategy, as the biodiversity crisis deepens².

We raised these concerns in a letter to key DIO decision makers, Mike Green (Chief Executive), Major General Andy Sturrock (Director of Strategy and Planning) and Lucy Bogue (Security Services and Estates Director), dated 29th May 2024, but have not received a response.

The nature conservation value of Middlewick Ranges

The site's outstanding natural history prompted 20 leading conservationists to write to the Natural England Chief Executive, Marian Spain, in July 2024, calling for it to be designated as a Site of Special Scientific Interest (SSSI)³. The letter was accompanied by the '*Middlewick Ranges: the case for Site of Special Scientific Interest designation*' report which is included alongside this letter which highlighted⁴:

¹ [Local nature recovery strategy: what to include](https://www.gov.uk/government/publications/local-nature-recovery-strategy-what-to-include) - GOV.UK (www.gov.uk)

² <https://stateofnature.org.uk/>

³ <https://cdn.buglife.org.uk/2024/08/Middlewick-Ranges-SSSI-NE-letter-FINAL-UPDATED.pdf>

⁴ <https://cdn.buglife.org.uk/2024/07/Middlewick-Ranges-case-for-designation.pdf>

- It is the largest remaining intact acid grassland habitat in Essex, a Priority Habitat under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006⁵.
- The Middlewick Ranges is home to a thriving population of *Red Listed* Nightingales and Skylarks, part of an assemblage of 10 *Red Listed* and over 10 *Amber Listed* Birds of Conservation Concern⁶⁷. It supports Vulnerable Barbastelle Bats and nearly 1,500 species of invertebrate, including 167 species of conservation concern.
- It is a crucial wildlife-rich green space that is readily accessible to the residents of Colchester in a city that is becoming increasingly congested, making it vital for people's wellbeing⁸.
- The habitats on site are widely considered irreplaceable and cannot be recreated through ill-thought planning schemes and experimental methods. When it is gone, it is gone.

MOD policy commitments

The MOD has a responsibility to meet its own environmental and biodiversity commitments, including “*a duty to minimise adverse effects on the environment*” and that “*it is essential that sustainable management of the natural environment be achieved*”.⁹

Of greater relevance, is the statement that, “*Biodiversity is an integral part of the government's sustainable development (SD) strategy. The MOD's sustainable development commitments have been outlined in the Secretary of State for Defence's Policy statement for safety, health and environment protection*¹⁰ which states “*Ensure that MOD plays its part in leading by example to deliver sustainable development in line with securing the future*””.

The proposed sale of Middlewick Ranges would enable wide-scale losses and degradation of irreplaceable semi-natural habitat to allow the building of up to 1,000 houses. This is clearly against the MOD's specific biodiversity commitments and the wider sustainable development ambitions of the Government to which the MOD is statutorily committed.

A community resource

Middlewick Ranges is a vital ‘green lung’ in the south of Colchester, used by thousands of local residents. It is a place for peaceful reflection, healthy exercise and for people to escape the congested centre of Colchester and re-connect with wildlife.

The community response to the proposed development of Middlewick Ranges has mobilised thousands of local residents to respond to local consultations and to write letters. It has inspired the 3,200+ strong [Save the Middlewick Ranges group](#) which has supported and organised demonstrations, litter picking events, wildlife walks, community events and media stories. This has led to Middlewick Ranges getting not just local media coverage¹¹¹² but having a national spotlight

⁵ <https://www.legislation.gov.uk/ukpga/2006/16/contents>

⁶ https://drive.google.com/file/d/15ymYW_Q2zkY8nLzxFOeihF1BqprelGZA/view?usp=sharing

⁷ https://drive.google.com/file/d/1gujMmdXu1OigtP_jeG5-euByAzyXrtHV/view?usp=drive_link (Section 15)

⁸ <https://publications.naturalengland.org.uk/publication/5939107801595904>

⁹ <https://www.gov.uk/guidance/defence-infrastructure-organisation-estate-and-sustainable-development#:~:text=MOD%20policy%20is%20to%20ensure,statement%20for%20the%20MOD%20estate.>

¹⁰ <https://www.gov.uk/government/publications/secretary-of-states-policy-statement-on-safety-health-environmental-protection-and-sustainable-development>

¹¹ <https://www.bbc.co.uk/news/uk-england-essex-67962131>

¹² <https://www.gazette-news.co.uk/news/24050876.experts-write-colchester-council-middlewick-ranges/>

shone on it in the Guardian¹³ and by Channel 4 News¹⁴. A petition launched in August this year has already been supported by over 14,300 signatures¹⁵.

Summary

Middlewick Ranges has been a wildlife hotspot and important community green space for many years, but plans for housing would see it destroyed. The MOD, however, is in a unique position to not just prevent the catastrophic destruction of the site, but to preserve it for future generations. Places like Middlewick Ranges must be protected and enhanced in the face of ongoing global biodiversity declines. Such protection, with Middlewick's value properly recognised¹⁶ can help the Government meet its clearly stated 30 by 30 commitments¹⁷.

As a coalition of nature organisations and groups, we urge you to use your powers as Secretary of State for Defence to ensure the MOD fulfils its own biodiversity commitments and the sustainable development goals of the Government by withdrawing its proposals to sell Middlewick Ranges.

We understand the pressure for Government departments to provide value for money to taxpayers, but this site is too important to be developed. Instead, we are asking you to work with us to explore other opportunities to forge an alternative future, one that safeguards this special wildlife site for future generations to enjoy.

We look forward to discussing this with you further.

Yours sincerely

Craig Macadam, Conservation Director, Buglife

Richard Yates, Chief Executive, Essex Wildlife Trust

Alan Johnson, Area Manager Essex & Kent, RSPB

Sharon Hearle, Conservation Manager (East of England), Butterfly Conservation

Rob Smith, Essex County Recorder, Butterfly Conservation Cambridgeshire & Essex Branch

Martin Pugh, Deputy Chair, Friends of Middlewick Ranges

Dougal Urquhart, President, Colchester Natural History Society

Peter Harvey, Vice-President, Essex Field Club

David Knight, Chair, CPRE Essex

¹³ <https://tinyurl.com/4xa35373>

¹⁴ <https://www.channel4.com/news/rules-to-protect-wildlife-tilted-in-favour-of-developers-say-campaigners?fbclid=IwAR1inTPbhum2p5bH-LayKMTe6U8GADIWGEitFiKW8-LqIGyT4HV6i6ymoZE>

¹⁵ <https://you.38degrees.org.uk/petitions/defend-the-wildlife-of-middlewick-ranges>

¹⁶ <https://tinyurl.com/pcws53pf>

¹⁷ https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering_30by30_on_land_in_England.pdf