

# Chelmsford Policy Board Agenda

**16 July 2020 at 7pm**

**Remote Meeting**

**Membership**

Councillor G H J Pooley (Chair)

**and Councillors**

H Ayres, N Chambers, W Daden, I Fuller, J Galley, M Goldman,  
S Goldman, N Gulliver, G B R Knight, R Moore, R J Poulter,  
I C Roberts, A Sosin, N Walsh, R T Whitehead  
and T N Willis

Local people are welcome to attend this meeting remotely, where your elected Councillors take decisions affecting YOU and your City. There is also an opportunity to ask your Councillors questions or make a statement. These have to be submitted in advance and details are on the agenda page. If you would like to find out more, please telephone Brian Mayfield in the Democracy Team on Chelmsford (01245) 606923 email [brian.mayfield@chelmsford.gov.uk](mailto:brian.mayfield@chelmsford.gov.uk)

# CHELMSFORD POLICY BOARD

16 JULY 2020

## AGENDA

### PART 1

Items to be considered when members of the public are likely to be present

#### 1. ATTENDANCE AND APOLOGIES FOR ABSENCE

#### 2. DECLARATIONS OF INTEREST

All Members are reminded that they must disclose any interests they know they have in items of business on the meeting's agenda and that they must do so at this point on the agenda or as soon as they become aware of the interest. If the interest is a Disclosable Pecuniary Interest they are also obliged to notify the Monitoring Officer within 28 days of the meeting.

#### 3. MINUTES

Minutes of meeting on 4 June 2020

#### 4. PUBLIC QUESTIONS

Any member of the public may ask a question or make a statement at this point in the meeting, provided that they have been invited to participate in this meeting and have submitted their question or statement in writing and in advance. Each person has two minutes and a maximum of 15 minutes is allotted to public questions/statements, which must be about matters for which the Board is responsible. The Chair may disallow a question if it is offensive, substantially the same as another question or requires disclosure of exempt or confidential information. If the question cannot be answered at the meeting a written response will be provided after the meeting.

Any member of the public who wishes to submit a question or statement to this meeting should email it to [committees@chelmsford.gov.uk](mailto:committees@chelmsford.gov.uk) 24 hours before the start time of the meeting. All valid questions and statements will be published with the agenda on the website at least six hours before the start time and will be responded to at the meeting.

Those who have submitted a valid question or statement will be entitled to put it in person at the meeting, provided they have indicated that they wish to do so and have submitted an email address to which an invitation to join the meeting and participate in it can be sent.

5. CHELMSFORD LOCAL PLAN STRATEGIC SITE ALLOCATION 2 - MASTERPLAN FOR WEST CHELMSFORD (WARREN FARM)
6. CHELMSFORD LOCAL PLAN STRATEGIC SITE ALLOCATION 8 - MASTERPLAN FOR LAND NORTH OF BROOMFIELD
7. ESSEX COAST RECREATIONAL AVOIDANCE DISTURBANCE MANAGEMENT STRATEGY (RAMS) – ADOPTION OF SUPPLEMENTARY PLANNING DOCUMENT
8. REVIEW OF COUNCIL’S STATEMENT OF COMMUNITY INVOLVEMENT (SCI)
9. NEIGHBOURHOOD PLAN UPDATE
10. CHELMSFORD POLICY BOARD WORK PROGRAMME
11. URGENT BUSINESS

To consider any other matter which, in the opinion of the Chairman, should be considered by reason of special circumstances (to be specified) as a matter of urgency.

## PART II (EXEMPT ITEMS)

NIL

**MINUTES**  
of the  
**CHELMSFORD POLICY BOARD**  
held on 4 June 2020 at 7pm

Present:

Councillor G H J Pooley (Chair)

Councillors H Ayres, N Chambers, P Clark, I Fuller, M Goldman,  
S Goldman, N Gulliver, G B R Knight, R Moore, R J Poulter, I Roberts, A Sosin,  
N Walsh, M Watson, R T Whitehead and T N Willis

Also present:

Councillors N Dudley, J Lager, M J Mackrory and C Tron

### 1. Attendance and Apologies for Absence

The attendance of those present was confirmed. Apologies for absence had been received from Councillors W Daden and J Galley, who had appointed Councillors P Clark and M Watson respectively as their substitutes.

### 2. Minutes

The minutes of the meeting on 5 March 2020 were confirmed as a correct record.

### 3. Declarations of Interest

All Members were reminded to disclose any interests in items of business on the meeting's agenda and that they should do so at this point on the agenda or as soon as they became aware of the interest. They were also obliged to notify the Monitoring Officer of the interest within 28 days of the meeting, if they had not previously notified her about it. Councillor G H J Pooley declared a non-pecuniary interest in Item 6 as the member of the public asking a question on that item was known to him.

#### 4. Public Questions

A statement and questions on the Strategic Housing and Employment Land Availability Assessment had been received from a member of the public, details of which are given in minute number 6 below.

#### 5. Appointment of Vice Chair

RESOLVED that Councillor I Fuller be appointed as Vice Chair of the Policy Board.

#### 6. Strategic Housing and Employment Land Availability Assessment

The Chair having declared an interest, the Vice Chair took the chair for this item.

The Board considered the latest Strategic Housing and Employment Land Availability Assessment (SHELAA.), which replaced the Council's previously published Strategic Land Availability Assessments (SLAAs).

The submitted assessment was an important source of evidence to identify development sites that are available and achievable for housing and economic development uses. It will provide a 'long list' of consistently assessed sites to inform the review of the Local Plan and helps inform the sites contained on Part 1 of the Brownfield Register. This desktop-based study assesses sites against a range of suitability, availability and achievability criteria to determine their deliverability and developability, with concise summary outputs produced for each site.

The Board had a presentation on the SHELAA before receiving a question from a member of the public on the effect on the scoring of sites of their locality to development, discrepancies in such scoring, and whether the relative scoring of brownfield and greenfield sites was consistent with government policy on the development of such sites.

In response to those points, officers said that the SHELAA was a technical document which was kept under regular review and did not represent policy. Officers did not believe that there were any discrepancies in the scoring of sites to assess their suitability for development. The Council had recently adopted its Local Plan and new spatial strategy and some sites might now be contrary to policy, which had affected their scores. With regard to sites in the Brownfield register, the outputs of the SHELAA was just one of the criteria used in assessing whether to include a site in that register. On the technical points raised on the scoring of other sites, the officers would check the coding in parts of the SHELAA and inform the questioner in writing of their findings.

During the discussion of the report, a number of questions were raised:

- How likely it was that some sites in Great Baddow within the Green Belt and not in the Local Plan would be included in the Plan in future. Officers replied that the Local Plan currently makes provision to maintain a rolling supply of development sites to

exceed five years. The main purpose of the SHELAA was to provide an evidence base for the review of the Local Plan and it was at that stage that the scoring of sites not yet included in the Plan would be considered if further sites were required.

- Whether the grading of the categories in the Criteria Note (Appendix 1 to the report) needed to be refined and weighted according to importance, to give a more realistic score in determining which category a site should come within. The officers replied that the SHELAA was a starting point in the process for determining whether a site was acceptable for inclusion in the Local Plan and more detailed criteria were applied as part of the subsequent sustainability appraisal of a site. The current criteria were considered to be adequate.
- Whether sites with multiple dwellings needed to be included in the SHELAA before they could be considered in a future review of the Local Plan. In response, officers said that that was not necessarily the case and representations in support of the inclusion in a future review of the Plan of sites not listed in the SHELAA would mean that they would still be considered.

RESOLVED that

1. The changes to the Criteria Note in the updated Strategic Housing and Employment Land Availability Assessment set out in the Appendix 1 be noted.
2. The outputs of the updated Strategic Housing and Employment Land Availability Assessment 2020 set out in Appendices 1 – 6 be noted.

(7.08pm to 7.32pm)

## 7. Bradwell B Consultation – Proposed Response

The report to the meeting sets out the Council's suggested response to the stage 1 pre-application consultation on the Bradwell B nuclear power station proposal. The report summarised the matters on which views were being sought, the key proposals in so far as they impacted on Chelmsford City Council's administrative area and provided a summary of the proposed consultation response, which was set out in detail in Appendix 1 to the report.

The Board received a presentation on Bradwell Power Generating Company's (BRB's) proposals and the officers' suggested comments on them. The ensuing discussion among members centred on the following concerns:

- The effect on local road networks and the environment of the additional traffic from HGV movements and the transportation of workers for Bradwell to and from the temporary park and ride facilities, in particularly the effect on roads around South Woodham Ferrers, through parts of Chelmsford and at already busy or inadequate key junctions. This traffic would be in addition to that generated by other proposed developments in Chelmsford and elsewhere in Essex, including other major infrastructure schemes such as the Lower Thames Crossing. The preference would be for most materials associated with the construction to be moved by rail or sea.

- The effect on local employers of the demand for additional workers to support the construction of Bradwell B and the impact they could have on the availability and cost of housing in the Chelmsford area.
- The apparent lack of regard the developers had had to the Chelmsford Local Plan and those of other Essex districts.

In response to the points made, officers said that:

- The suggested response to the consultation stressed the traffic impact of the development, referred to the lack of an adequate assessment of its implications for strategic routes, and requested that the evidence base and modelling be made available to enable the Council to assess in detail its implications of the transport proposals and to consider whether better options or ways to mitigate the effect of the development on local communities could be suggested.
- BRB was being encouraged to look at the modal strategy to maximise the movement of freight by rail and sea rather than road. However, the consultation stated that an extension of the Southminster line to Bradwell may be unviable and the number of barges for the bulk transport of material might be limited to two to four per day to avoid damaging wildlife habitats.
- BRB was being encouraged to work closely with the developer of the strategic housing site in the Local Plan to the north of South Woodham Ferrers, particularly in regard to the impact of both developments on traffic in the area.
- The consultation draft did not refer to the impact of the development on local employers and did not indicate where the workers associated with it would come from.
- The response requested that the developers should take full account of Local Plans, including that recently adopted for Chelmsford, and referred to concerns about the impact of some on the proposals on Green Belt land.
- The Council had asked that it be involved in the Habitat Regulations Assessment the developer was required to produce.

The Board welcomed the proposed response and thanked officers for their work in producing it. It suggested that it could be strengthened by including in the introduction stronger wording about its concerns that BRB had not taken into account the Chelmsford or other Local Plans or considered in detail the impact of the development on Chelmsford. It also agreed that it should be made clear that the Council had concerns about the possibility that HGVs would be travelling through the city centre if the Brook Street goods yard was used for the delivery and storage of material moved by rail.

RESOLVED that the Director of Sustainable Communities, after consultation with the Chair and Vice Chair of the Board and one member from each of the opposition Groups, be authorised to finalise the consultation response set out in Appendix 1 of the report to the meeting to take account of the Board's comments and to submit it to the Bradwell Power Generation Company Limited before the end of the consultation period on 1 July 2020.

(7.36pm to 8.40pm)

## 8. Annual Reports of Working Groups

The Board received a report which summarised the activities of its Working Groups over the past year and their intended work in 2020/21. The Chairs and members of the Working Groups also provided an update on their work.

Members were informed that it was intended to amalgamate the Community Engagement Task Force with the Connectivity and Local Democracy Working Group so that the volunteering workstream could come under the umbrella of one body.

It was pointed out that the reference in paragraph (c) of the introduction to the report should be to the Climate and Ecological Emergency, not just the Climate Emergency.

In response to a question about the use of the rivers and creeks around South Woodham Ferrers, the Board was told that this had been identified as a future workstream of the Working Group.

RESOLVED that the Annual Report on the activities of the Board's Working Groups be noted.

(8.40pm to 9.01pm)

## 9. Housing Working Group – Proposed Terms of Reference

The Board was requested to consider proposed terms of reference for the new Housing Working Group, which would replace the former Working Groups on Homelessness and Rough Sleeping and Affordable Housing. Its membership would be determined in due course.

RESOLVED that

1. The establishment of a Housing Working Group and the disbanding of the Homelessness and Rough Sleeper Strategy Working Group and the Affordable and Social Housing Working Group be approved.
2. The Terms of Reference for the new Working Group set out in Appendix 1 to the report to the meeting be agreed.

(9.01pm to 9.04pm)

## 10. Work Programme of the Policy Board

An updated work programme for the Board over the coming months was submitted for information.

The Board was informed that the master plan for the West Chelmsford/Warren Farm site had been changed, with further details added since the initial consultation, and that a further public consultation on it would begin on 5 June 2020. Minor changes had been made to the master plan for North of Broomfield following stakeholder and public consultation and that would be brought to the next meeting of the Board. Stakeholder consultation on the master plan for the site in South Woodham Ferrers had taken place earlier in the year and the Council with working with the developer on the public consultation expected to begin in late June 2020. Stakeholder consultation has started for the Manor Farm site in Great Baddow with public consultation to follow.

RESOLVED that the work programme of the Board be noted.

(9.04pm to 9.16pm)

## 11. Urgent Business

There was no urgent business for the meeting.

The meeting closed at 9.17pm

Chair



---

## Chelmsford City Council Policy Board

16 July 2020

---

### Strategic Growth Site Policy 2 – West Chelmsford masterplan

---

**Report by:**

Director of Sustainable Communities

---

**Officer Contact:**

Matthew Perry, Senior Planning Officer

---

#### Purpose

This report is seeking the Policy Board to recommend to Cabinet the approval of the masterplan for the West Chelmsford Local Plan Site Allocation.

#### Recommendations

1. The Policy Board recommend to Cabinet that the masterplan attached at Appendix 1 with any changes arising from the recommendations be approved.
  2. That before consideration by Cabinet, the masterplan is subject to independent quality and design review undertaken by the Essex Quality Review Panel.
  3. That the Policy Board delegate the Director of Sustainable Communities in consultation with the Chair, Vice Chair and Cabinet Member for Sustainable Development, to negotiate the further considerations outlined in this report and other subsequent changes to the masterplan ahead of the consideration by Cabinet.
-

## 1. Background

- 1.1. The masterplan presented with this report relates to Strategic Growth Site Policy 2 – West Chelmsford, which is brought forward by Crest Nicholson. The formal determination of masterplans consists of two stages: approval by Chelmsford Policy Board and then approval by Cabinet.
- 1.2. Strategic Policy S7 sets out the Spatial Strategy (i.e. the scale and distribution) for new development over the period of the Local Plan. In allocating sites for strategic growth, this policy confirms that Strategic Growth Sites will be delivered in accordance with masterplans to be approved by the Council. This is to ensure we are creating attractive places to live and to ensure the successful integration of new communities with existing.
- 1.3. Masterplans are to demonstrate how the site will satisfy the requirements of the respective site policies. Masterplans are a tool to help achieve a vision and key development objectives. They consider sites at a broad level and set a framework for the future planning applications to follow (usually Outline and Full applications). The Council's Masterplan Procedure Note, updated in October 2019, sets out what masterplans should contain. The core content of masterplans should cover:
  - A vision for the new place
  - Site and context analysis e.g. surrounding landscape, heritage, contamination, flood risk, important views, etc
  - Movement structure e.g. walking, cycling, public transport, vehicle circulation
  - Infrastructure strategy
  - Sustainable Urban Drainage (SUDS) strategy
  - A framework for landscape, spaces and public realm
  - Land use and developable areas
  - Building heights
  - Layout Principles
  - Delivery and phasing

Following the update to the Masterplan Procedure Note in October 2019, the Council also requires consideration of (i) supporting Livewell initiatives across the development and (ii) incorporating sustainable construction methods, energy efficiency and other sustainable development initiatives set out in the Council's Making Places Supplementary Planning Document.

- 1.4. Each of the masterplans will take a bespoke approach to the site it relates to. The larger of the allocated sites will differ from the smaller sites, the more complex or more constrained sites may differ from less complex and constrained sites, for example. Most masterplans will cover additional content or will look at certain matters in more detail than others, as appropriate, but all will consider similar core content.

- 1.5. The masterplan does not secure detailed site planning.
- 1.6. Developer obligations will be secured by way of a s.106 Agreement as part of the Outline planning application.

## **2. The journey to this stage**

- 2.1 Through the Planning Performance Agreement (PPA) the developer is given a set of masterplanning parameters (written and in plan form). These relate to the Local Plan policy expectations for the site. In addition, the parameters identify key site constraints and the areas where development should be avoided, where it might be preferable to situate the main site access, other key considerations such as heritage setting, flood zones, for example. These are provided at a very broad level, intended only to provide the starting parameters of site construct, and are to be subject to refinement as part of the masterplan production.
- 2.2 Throughout the period of masterplan production there are recurrent discussions between officers and the developer. These generate numerous iterations of the masterplan; each of those refining the masterplan in light of the issues which have been the subject of discussion. Complementing and strengthening that approach the process involves various forms of local engagement which ultimately shape the masterplan into something which is tailored for its locality. The key inputs of that engagement are outlined below.

### Public Consultation

- 2.3 Two public consultation drop-in events were held in July 2018, one in Writtle Village and a second on the Chignall Estate.
- 2.4 Crest Nicholson has also undertaken engagement with Writtle Parish Council, the Writtle Neighbourhood Plan Group, and local Councillors. This has included meetings and site visits to discuss potential highways and traffic mitigation measures for the village that could be delivered alongside the development.
- 2.5 Crest have also attended meetings with Chignall Estate Residents Association (CERA) and with local Councillors, primarily to debate the bus link.
- 2.6 A further public consultation event was held at Writtle College on 13 November 2018 to give local residents the opportunity to view the Masterplan.
- 2.7 The masterplan submission in November 2018 was subject to a public consultation by the local planning authority, similar to a planning application. The revised masterplan submitted in April 2020 was subject to a further round of consultation (four weeks as opposed to three, and a Council leaflet drop).

### Community and Technical Stakeholder Workshops

- 2.8 Prior to producing a draft masterplan, a round of community and technical stakeholder workshops is run. This collates local expectations for the future development and draws key concerns and suggestions to the surface so that the developer can seek to include or resolve those as part of the first draft masterplan.
- 2.9 Two stakeholder workshop events were held in September 2018; one with statutory consultees (the technical workshop) including Essex County Council, the NHS, Anglian Water as well as officers from CCC; the other (community workshop) with City and County councillors, Writtle and Chignal Parish Councils, local school, and community and residents groups.

#### Neighbourhood Plan

- 2.10 The existence of a draft Neighbourhood Plan in Writtle will help shape the masterplan and content of the planning application going forward.

#### Member Presentation

- 2.11 Prior to the Chelmsford Policy Board meeting, all Members were invited to a presentation setting out the content of the final draft masterplan and have had the opportunity to ask questions about content.

### **3. Overview of Masterplan Content**

#### **Vision**

- 3.1. The vision set out within Strategic Growth Site Policy 2 is one for *'a high-quality comprehensively-planned new sustainable neighbourhood that maximises opportunities for sustainable travel.'*
- 3.2. Crest Nicholson's vision echoes the site policy and expands upon it. No objection is raised at this stage to their current vision.

#### **Site and context analysis**

- 3.3. The masterplan provides a site and context analysis, which supplements analysis work undertaken by the Council in the first stage of the masterplan process. It represents a suitable starting point for a masterplan.

#### **Layout Principles**

- 3.4. The requirement of the site policy is to provide a coherent network of public open space, formal and informal sport, recreation and community space within the site. Whilst different bodies and groups may share aspirations for alternative layouts, the masterplan should demonstrate a coherent layout underpinned by the site and context analysis.

- 3.5. The Local Plan site allocation dictates that the western segment of the site (roughly about ¼ of the site area of the allocation) should be allocated for future recreation use and/or SUDS. The context analysis has informed the location of the SUDS attenuation basins on the lower parts of the site towards the brook. Given the proposed location of SUDS features (along the eastern boundary), recreation use is the obvious remaining choice for the western segment – this is reflected in the masterplan denoting an ecology park, parkland, green space, orchard, park and recreation ground, within this space.
- 3.6. The two major residential parcels are roughly split into two by a central green space in the form of an arc, which sweeps from the south east to the west. The green arc encompasses the drainage features along the eastern boundary before arcing roughly centrally westwards, out towards the ecology park. It is a striking concept which places a green space through the centre of the site, enabling green connections with Chignall to the east and allowing new residents a green connection to the newly formed recreation area to the west.
- 3.7. Public representations from Writtle residents have requested a larger ‘green buffer’ to Roxwell Road. The masterplan shows a 30m buffer already – any extension to this buffer has to be balanced with the aspirations to secure a speed reduction along Roxwell Road and the loss of other green space within the allocation to compensate the size of development areas which would be further squeezed from an enlarged buffer. The presence of a buffer along this route is presented within the masterplan and this is a sound principle. Officers view the buffer’s primary role is to green the route into Chelmsford rather an aspiration to separate the site from Writtle village. Writtle Parish Council do not object to the depth as a matter of principle but are keen to influence greater depth in places – rear of car wash, entrances to residential parcels and along footpaths. Such changes can be facilitated as part of ongoing dialogue with stakeholders and do not undermine the ability to recommend approval for this masterplan.
- 3.8. The neighbourhood centre (NC) and school are positioned roughly centrally within the southern development parcel – a balance between accessibility from Roxwell Road, within the site itself and Chignall to the east. They are close enough to Roxwell Road to allow the primary road to ‘loop’ over the NC and school and re-join Roxwell Road further east at a newly created roundabout.
- 3.9. The principles adopted within the masterplan are coherent, albeit that public comments raise concerns with various aspects.

### **Movement and access**

- 3.10. Main vehicular access to the site will be from Roxwell Road (A1060), via two roundabouts.
- 3.11. Pedestrian and cycle connections are provided through use of the bus link to the east and the crossing of Roxwell Road. However, the number of connections can be

expanded to allow greater permeability into the Chignall Estate and Writtle to the south.

- 3.12. The internal road layout allows for a loop around the school and neighbourhood centre to be served by buses using the bus link. The primary road from Roxwell Road will be capable of accommodating buses travelling along Roxwell Road. The provision of the bus link allows for bus priority measures to be in place and maximises opportunities for public transport and provides flexibility for future bus routing in the network. The bus link would be dedicated to bus, cycle and pedestrians. It would link into the existing Urban Area via Avon Road. The provision of the bus link would satisfy the policy requirements; however, there is concern from the residents within the Chignall Estate to its specific location. In order to address, these concerns, the masterplan has sought to detail the access arrangements and impact upon Avon Road beyond what would normally be expected within a masterplan. This matter remains contentious for the Chignall Estate Residents Association and its residents. However, the detail submitted to date demonstrates that the route is workable from a highways and safety perspective.
- 3.13. The site will also be served by the existing bus route running along Rowell Road and has the potential for buses to be diverted into the site, if bus operators choose to do so.
- 3.14. The secondary road, identified in the northern half of the site, is relatively long and straight. This will be less attractive to pedestrians (due to limited interest and lack of terminating vista) and will encourage higher vehicle speeds. The form of the road should be revised.
- 3.15. Within the northern half of the site, the central pedestrian and cycle route (east-west) does not respond to the location of the PROW to the east or the Pavilion/Community centre to the west, a likely destination – it appears to be based on dissecting the parcels of development rather than meaningfully linking destinations. The reworking of the east-west connections would mean that it makes sense to split the development parcels into six, as opposed to four blocks.

Further consideration:

- The secondary access road to be realigned to give a greater curvature in a northern direction
- East-west pedestrian and cycle connections to be reworked
- The developer should address each of the issues identified in the ECC Highways consultation response dated July 2020

### **Infrastructure strategy**

- 3.16. The site infrastructure requirements are listed within the site policy.
- 3.17. Land is shown to be designated for a co-located primary school and early years and childcare nursery. The stand-alone nursery can be accommodated within the

neighbourhood centre. The presence of these also addresses the three key bullets of on-site developments listed in the site policy.

- 3.18. Improvements to the local and strategic road network will be detailed in the planning application and secured through legal agreement or planning conditions. Crest Nicholson's transport consultants have been engaged with ECC Highways for a number of years now as part of this process. Policy Board can therefore have a degree of confidence that improvements will be secured, as well as securing measures to promote and enhance sustainable modes of transport.
- 3.19. A multi-user crossing of Roxwell Road is necessary for both pedestrians and cyclists. The masterplan shows one at the new roundabout along Roxwell Road. ECC Highways recommendations include a requirement for another crossing near to the new roundabout at Lordship Road (see Appendix 2), amongst a list of other recommendations. One of the key criticisms is the reduction of connections from the site into Avon Road compared to the original masterplan in November 2018.
- 3.20. The illustrative masterplan shows provision for new leisure and recreation facilities.
- 3.21. Financial contributions to secondary education can be secured through legal agreement at planning application stage, as required by the Local Education Authority.
- 3.22. Contributions will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) at planning application stage.
- 3.23. The masterplan demonstrates a commitment to conform with the site infrastructure requirements.

Further consideration:

- The developer should address each of the issues identified in the ECC Highways consultation response dated July 2020

#### **Land use and developable areas**

- 3.24. The masterplan successfully shows the integration of around 800 new homes to this locality. The approach taken is landscape-led and there are good opportunities for public open space as well as natural landscaping throughout the development. Neighbourhood facilities, including a new primary school, early years and childcare nursery, are focussed towards the centre of the site where they are most accessible to all areas of the new community. The central location offers opportunity for access to Chignall Estate residents via Avon Road.
- 3.25. There is sufficient open space to facilitate local recreation. These spaces are all located in accessible areas of the site for the benefit of new and existing residents. The relationship between development and public open spaces is such that safety and

security are factored in from the outset through natural surveillance from the new homes.

- 3.26. Public responses have raised concerns related to the location of the travelling showpersons' site (TSP) within the allocated recreation area, and furthermore its access being taken from Roxwell Road. Firstly, the location of urban form within the recreation zone is not ideal as a matter of principle. However, the TSP site represents a use that will favour a peripheral urban location due to the nature of its industrial/residential content. This coupled with the desire for safe and direct access to the road network has created a challenge in balancing integration within the development parcels and a location which could be highly visible from the south. The compromise was locating it in an area of the site which could be well screened from the south (masterplan shows bunding and additional planting) and secure access to the main road. Furthermore, the loss of recreation space is compensated for within the central green space. The position of the access is not stipulated within the site policy and its proposed location will need to satisfy ECC Highways in terms of highway safety – current feedback is that it is a workable solution.

### **Building heights and density**

- 3.27. Building heights are shown to be predominantly up to 2.5 storey, up to 3 storeys, along parts of the primary road and along the eastern edge next to open space, up to 4 storeys within the neighbourhood centre zone.
- 3.28. Given the lack of direct neighbouring properties, and the distance of separation from the nearest properties, the proposed building heights in principle are acceptable. However, it is apparent from the building heights plan there is a deep block of 'up to 3 storeys' to the north of the curve to the central open space 'arc'. The eastern edge of this block does not benefit from a large area of new open space and it is considered that this scale should be reshaped.
- 3.29. Up to 4 storeys is considered to be appropriate within the neighbourhood centre zone as mixed use development (shops with flats above) would be expected.
- 3.30. Densities are denoted as low (25-33dph), medium (30-37dph) and medium high (35-43dph). Low density is shown to north, west and the central part of the south edges, which is logical. Medium density is shown further within the site and fronting open space. Medium high density roughly follows the primary and secondary which is also logical given the separation of buildings by roads, however a similarly to building heights the density is shown as medium high extending eastwards on the north side of the curve to the open space. The result would be a large parcel of greatest scale and density positioned closest to One Bridge Brook – this rationale is questionable and should be reconsidered.

Further consideration:

- The northernmost block denoting 'up to 3 storeys' be reconsidered to be reshaped to more closely align with the edge of the newly created open space

- The northernmost block denoting 'medium high density' be reconsidered to focus this density more centrally to the secondary access road

### **Sustainable Urban Drainage (SUDS) Strategy**

- 3.31. Drainage approach has used existing topography to promote a natural SUDS solution, through the inclusion of several attenuation basins along the eastern edge of the site. Given the topography and position of those basins within an area of amenity space, it is considered an appropriate design solution at this stage.

### **Delivery and phasing**

- 3.32. Phasing is shown to be in two parts. Given that each phase could accommodate roughly 400 dwellings, such a phasing approach is considered to be unrealistic. The phasing plan also fails to take into account the timing of key infrastructure. Representations have been critical of the phasing of matters such as bus link, schools, sports pitches, highway works.
- 3.33. There will be other requirements, such as affordable and specialist housing, self/custom build housing, local healthcare, local highway improvements, etc. which do not have a bearing over masterplanning, but which will form part of the development and will be considered further as part of the outline planning application. These references to potential planning obligations are not to be taken as exhaustive.

Further consideration:

- Further detail is required on phasing of residential parcels as well key infrastructure such as roads, bus link, schools, neighbourhood centre, sports pitches and travelling showperson site.

### **Livewell**

- 3.34. The Livewell campaign is designed to engage communities, families and individuals with the aim of providing information about all that is on offer in Essex to improve health and wellbeing. Crest Nicholson are committed to embed the vision of the Livewell initiative within their development. The masterplan dedicates a section to discuss measures to reflect the aspirations of Livewell.

### **Sustainable development initiatives**

- 3.35. The masterplan focuses on Livewell as a means to drive sustainability. The application will be required to adhere to the Local Plan policies for sustainability. The masterplan does not include details for option for alternative means to power properties, however the absence of such facilities in this masterplan does not rule out the inclusion of community systems or other sustainable living/sustainable power generation measures on this site to meet the Council's objective of reaching a net carbon zero position by 2030.

#### 4. Consultation Responses – Main Issues

- Principle of allocation and details within it
- Traffic impact – through Writtle, Roxwell Road, during construction, during occupation
- Travelling showperson site – principle, location, access
- Bus link – principle, highway safety, environmental impact, impact on residential amenity
- Bus routes – query extent, improvements
- Landscape buffers – position, extent
- Density and building heights – concerns, key views
- Delivery and phasing – general acceptability, detail lacking
- Open/green spaces – content, layout
- Residential parcels – detail lacking
- Neighbourhood centre – content queried
- Pedestrian/cycle connections – location, detail
- Loss of agricultural land
- Loss of ecological habitats – trees, wildlife
- Flood risk – flooding within site, pumping station
- Archaeology – extent of consideration
- Consultation arrangements – criticisms of
- Masterplan revisions – criticisms of content compared to first

#### 5. Additional Considerations

- 5.1. An Independent Design Review shall be undertaken by Essex Quality Review Panel in the intervening period between Chelmsford Policy Board and Cabinet meetings. This verification of the masterplan allows for an independent sense-check and the outcome of the review will be considered by the Director of Sustainable Communities as part of the process outlined in the recommendations of the report.

#### 6. Conclusion

- 6.1. The masterplan demonstrates how the requirements of the Local Plan will be delivered on this site. The vision is sufficiently ambitious to achieve a high-quality development which is well related to its context. The masterplan layout and other content provides a sound framework to guide successful placemaking and will support the planning application process in an appropriate way.
- 6.2. The report highlights that changes are expected to the masterplan document in order to align it with the Council's aspirations for this site.

- 6.3. The masterplan is presented to Chelmsford Policy Board with recommendations that it be referred to Cabinet for approval subject to the inclusion of any further necessary changes with acknowledgement of those Further Considerations as listed in the body of the report.

List of appendices:

1. Masterplan document – dated April 2020
  2. ECC Highways consultation response – 2 July 2020
- 

Corporate Implications

Legal/Constitutional:

None

Financial:

None

Potential impact on climate change and the environment:

New housing delivery can have a negative impact on climate and environmental change issues. Planning Policies, Building Regulations and Environmental Legislation ensure that new housing meets increasingly higher sustainability and environmental standards which will help mitigate this impact.

Contribution toward achieving a net zero carbon position by 2030:

The new Local Plan and emerging Making Places SPD will provide guidance to assist in reducing carbon emissions through development. This development will follow the published guidance.

Personnel:

None

Risk Management:

None

Equality and Diversity:

None. An Equalities and Diversity Impact Assessment has been undertaken for the Local Plan.

Health and Safety:

None

Digital:

None

Other:  
None

---

**Relevant Policies and Strategies:**

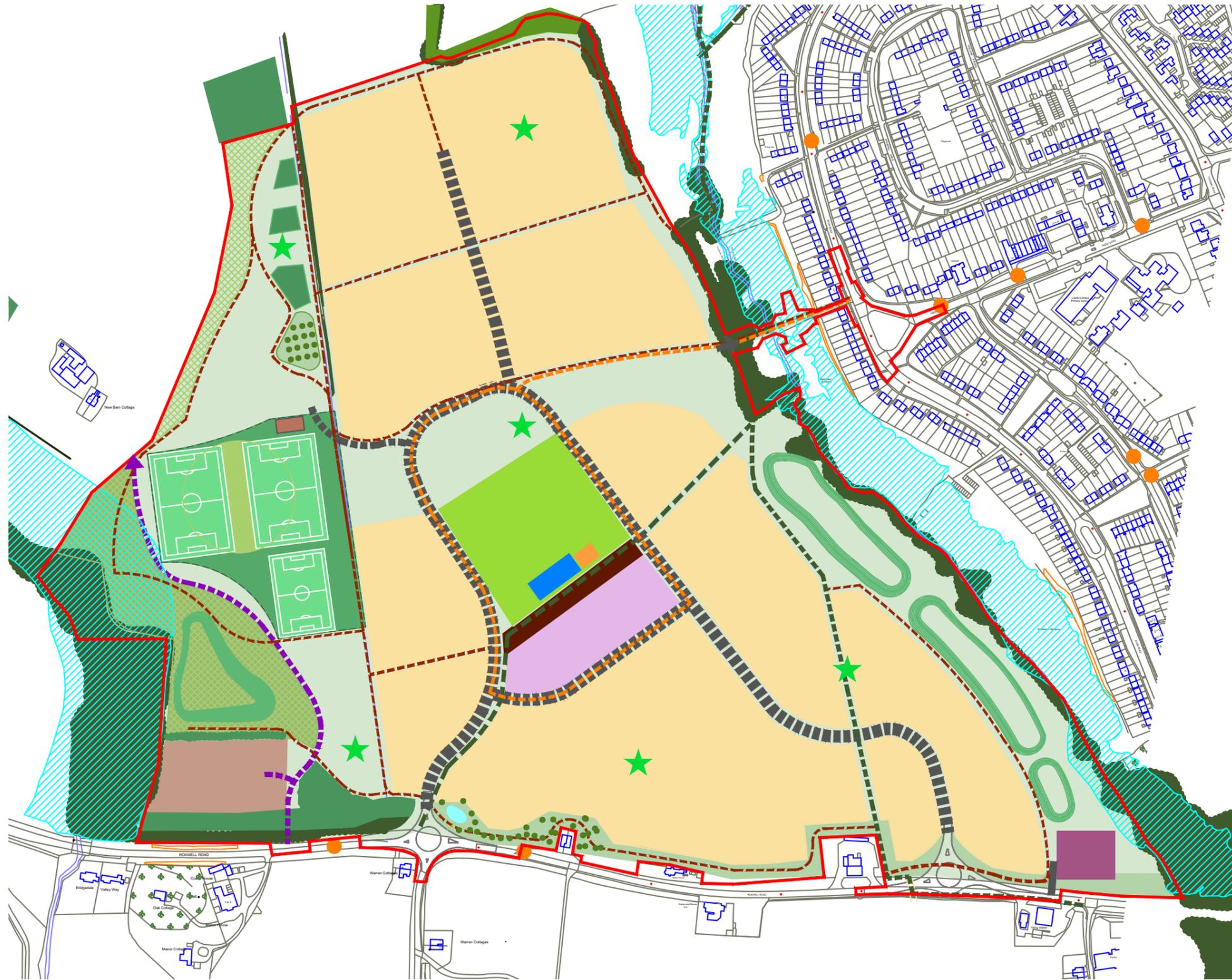
This report takes into account the following policies and strategies of the City Council:

Local Plan 2013-2036

Our Chelmsford, Our Plan, January 2020

Chelmsford Climate and Ecological Emergency Action Plan

---



Chelmsford Draft Local Plan  
Strategic Growth Site 2 -  
West Chelmsford  
Warren Farm

Masterplan Document  
April 2020

## Project Details

Client: Crest Nicholson  
Project Name: Warren Farm  
Reference Number: 15029  
Date: April 2020

This document was prepared by:



Town Mill, Mill Lane, Stebbing, Dunmow, Essex, CM6 3SN

Telephone: +44 (0)1371 855855

Fax: +44 (0)1371 856201

Email: [info@am-plan.com](mailto:info@am-plan.com)

URL: [www.am-plan.com](http://www.am-plan.com)

© Copyright 2020 Andrew Martin Planning All Rights Reserved.

1. Executive Summary	4	<b>Figures</b>			
2. Introduction	5	Figure 1: Site Location Plan	4	Figure 23: Ecology Park and Sports	31
• The Developer – Crest Nicholson – Track record	5	Figure 2: Chelmsford Draft Local Plan Modifications to Policies Map - PM14 - Chelmsford Urban Area	7	Figure 24: Illustrative Southern Boundary	32
• The Vision for Warren Farm	6	Figure 3: Wider Context	8	Figure 25: Sequence of Development and Phasing	34
• Local Plan Policy Context	7	Figure 4: Aerial view of the site	8		
3. Site Location	8	Figure 5: The site in relation to the City of Chelmsford	8		
4. Site Assets	9	Figure 6: Existing Facilities and Links	9		
• Existing facilities and links	9	Figure 7: Existing Links to Chelmsford City Centre	10		
• Existing access and connectivity	10	Figure 8: Photos from the workshop events and website consultation page	12		
• Topography	11	Figure 9: Chelmsford Health and Well-being Plan 2016 - 2019 Chelmsford City Council	15		
• Landscape	11	Figure 10: Site Constraints	16		
• Views into and out of the site	11	Figure 11: Development Opportunities and Connectivity	17		
5. Involvement	12	Figure 12: CCC Concept Masterplan	19		
• Community Engagement and Local Involvement	12	Figure 13: Crest Masterplan Concept Sketches	20		
• Sustainability and Livewell	15	Figure 14: Illustrative Masterplan	21		
6. Summary of Site Constraints	16	Figure 15: Indicative Parameters - Land Use and Access and Movement	23		
7. Evaluation - Development Opportunities and Connectivity	17	Figure 16: Illustrative Bus Link Signal Controlled	24		
8. Design Objectives and Evolution	18	Figure 17: A fourth arm will be added to the existing Lordship Road/Roxwell Road roundabout so that site access can be achieved.	25		
• Design Objectives	18	Figure 18: A new roundabout will feature a pedestrian crossing allowing pedestrians and cyclists to cross Roxwell Road.	26		
• Place Making Principles	18	Figure 19: The Travelling Showpeople access (including access to the existing farm) and site section sketch	27		
• Chelmsford Draft Local Plan Strategic Growth Site 2 - West Chelmsford master plan principles document May 2018	20	Figure 20: Indicative Parameters - Building Heights	28		
9. Illustrative Masterplan	22	Figure 21: Indicative Parameters - Density	29		
• Key Features of the Illustrative Masterplan	23	Figure 22: Indicative Parameters - Landscape, Sports and Green Infrastructure	30		
10. Parameter Plans	24				
• Land Use and Access and Movement	24				
• Building Heights	25				
• Density	26				
• Landscape, Sports and Green Infrastructure	27				
11. The Neighbourhood Centre	30				
12. Phasing and Delivery	34				

## 1. Executive Summary

- Strategic Growth Site 2 - West Chelmsford is a proposed allocation in the Chelmsford Draft Local Plan. It sits within the Plan's Growth Area 1 - Central and Urban Chelmsford and is subject to Policy SGS2. The Local Plan proposes that the allocation should be for a high quality, comprehensively - planned new sustainable neighbourhood that maximises the opportunity for sustainable travel. Development proposals are required to accord with a masterplan to be approved by the Council to provide around 800 homes, a site for Travelling Showpeople, a Neighbourhood Centre, a primary school with co-located early years and childcare nursery and a network of green infrastructure.
- The proposals will include a wide mix of house types and tenures, including affordable, to be compliant with Council policy.
- This high level Masterplan document has been prepared on behalf of Crest Nicholson to set out their approach to development for this Strategic Site, which will be referred to as 'Warren Farm' throughout this document.
- The proposals presented within have evolved through an extensive process of collaboration between Crest Nicholson, Chelmsford City Council (CCC), Essex County Council, the local community and other key stakeholders.
- This Masterplan has been prepared to satisfy the above Policy and is submitted for the approval in accordance with the Council's masterplan procedure.
- Once approved, the Masterplan will sit alongside the Local Plan, once it is adopted, and will form part of the planning framework for the Strategic Growth Site.
- The approved Masterplan will also establish the principles to guide the preparation, submission and determination of future planning applications for the site and will be a key reference document.

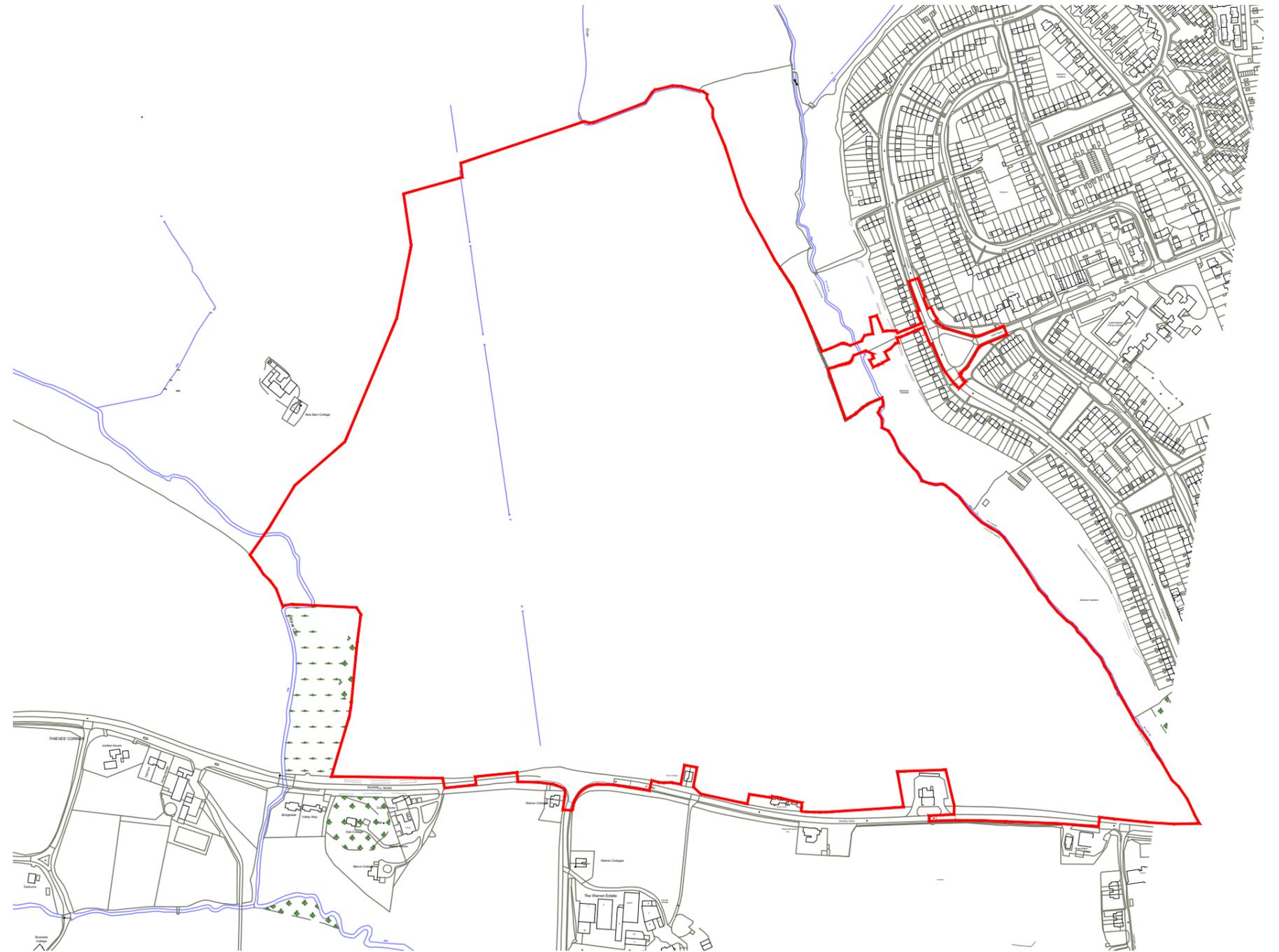


Figure 1: Site Location Plan

## The Developer – Crest Nicholson

Crest Nicholson has been building new homes for over 50 years and is firmly established as a leading developer with a passion for not just building homes, but creating vibrant, sustainable communities. Crest Nicholson aims to improve the quality of life for individuals and communities, both now and in the future, by providing high quality homes with inviting landscaped public realms, extensive green infrastructure and appropriate community facilities.

Crest Nicholson’s contribution to the built environment has been recognised with a string of awards, including The Queen’s Award for Enterprise in Sustainable Development. This award is testament to Crest’s continued emphasis on producing high quality developments that champion the very best principles in sustainability. More recent awards include winning Sustainable Housebuilder of the Year at the Housebuilder Awards 2016, and Large Housebuilder of the Year in 2015, as well as coming 2nd in the NextGeneration benchmark, which ranks the largest 25 UK housebuilders sustainability performance.

As well as awards praising sustainability at Crest Nicholson, the company has achieved awards in design, planning, community interest, landscaping and placemaking. Notably, Crest Nicholson’s Bath Riverside development located in the centre of Bath was presented with a gold award in the Best Development category at the Whathouse? Awards 2017. Judges were particularly impressed with the inherent elegance of design achieved and appropriate material use. In the same year, Crest’s Finberry development in Kent celebrated success winning the ‘Outstanding landscaping for housing’ category and named a finalist in ‘Development of the year’ award at the 2017 Sunday Times British Homes Awards. Further acknowledgment was received at the 2018 Planning Awards for Monksmoor Park, Crest’s development in Daventry, which was highly commended for its positive impact on its surrounding environment and social well-being in the category of ‘Best Housing Scheme’.



## The Vision for Warren Farm

To deliver a high-quality, comprehensively-planned new neighbourhood that has sustainable travel at its heart.

- A new development that is landscape-led and underpinned by a package of sustainable travel improvements.
- A high quality, multi-purpose green edge to Chelmsford, and an attractive and well-planned gateway into the City.
- A physical environment that promotes a balanced lifestyle, a place that supports healthy and sustainable travel choices, and provides opportunities for the community to improve their health and well-being.
- The creation of high quality, functional ecological networks to benefit biodiversity, and a variety of safe open green spaces for recreation and leisure.



Bishops Brook, Wells



Finberry



Kilnwood Vale, West Sussex

This Masterplan Document has been prepared and subsequently evolved in the context of the policy relating to Strategic Growth Site 2 - West Chelmsford and the proposed allocation shown on the Policies Map for the Chelmsford Urban Area contained in the submitted draft Local Plan and as proposed to be changed in the Main Modifications and Proposed Policies Map Changes. The report on the Examination of the Chelmsford Draft Local Plan was published on 25th February 2020. The Inspector concludes that the Plan with the main modifications is legally compliant, meets the test of soundness and is therefore capable of adoption. Chelmsford City Council are expected to adopt the Plan to become the statutory development plan in Spring 2020. The site allocation policy for the site as modified is as follows:

### STRATEGIC GROWTH SITE 2 – WEST CHELMSFORD

Land to the west of Chelmsford and north of Roxwell Road, as shown on the Policies Map, is allocated for a high-quality comprehensively-planned new sustainable neighbourhood that maximises opportunities for sustainable travel. Development proposals will accord with a masterplan approved by the Council to provide:

#### Amount and type of development:

- Around 800 new homes of mixed size and type to include affordable housing
- Travelling Showpeople site for 5 serviced plots.

#### Supporting on-site development:

- Neighbourhood Centre
- Provision of a new primary school with co-located early years and childcare nursery
- Provision of new stand-alone early years and childcare nursery.

#### Site masterplanning principles:

##### Movement and Access

- Main vehicular access to the site will be from Roxwell Road (A1060)
- Provide pedestrian and cycle connections
- Provide a well-connected internal road layout which allows for bus priority measures
- Provide a new dedicated bus, cycle and pedestrian link into the existing Urban Area.

##### Historic and Natural Environment

- Mitigate the visual impact of the development
- Create a network of green infrastructure
- Provide suitable SuDs and flood risk management
- Ensure appropriate habitat mitigation and creation is provided
- Undertake an Archaeological Assessment.

##### Design and Layout

- Provide a coherent network of public open space, formal and informal sport, recreation and community space within the site.

##### Site infrastructure requirements:

- Land (circa 2.1 hectares) for a co-located primary school and early years and childcare nursery (Use Class D1) and the total cost of physical scheme provision with delivery through the Local Education Authority.
- Land (circa 0.13 hectares) for a stand-alone early years and childcare nursery (Use Class D1) or contributions towards the cost of physical scheme provision with delivery through the Local Education Authority.
- Appropriate improvements to the local and strategic road network as required by the Local Highways Authority.
- Appropriate measures to promote and enhance sustainable modes of transport.
- New and enhanced cycle routes, footpaths, Public Rights of Way and, where appropriate, bridleways.
- Provide, or make financial contributions to, new or enhanced sport, leisure and recreation facilities.
- Financial contributions to secondary education as required by the Local Education Authority and other community facilities such as healthcare provision as required by the NHS/CCG
- Multi-user crossing of Roxwell Road.

In addition to the Chelmsford Local Plan, Writtle Parish Council is preparing a Neighbourhood Plan that will also, once made, become part of the statutory development plan. The Neighbourhood Plan, however, will have to be prepared to be in general conformity with the strategic policies in the adopted Chelmsford Local Plan.

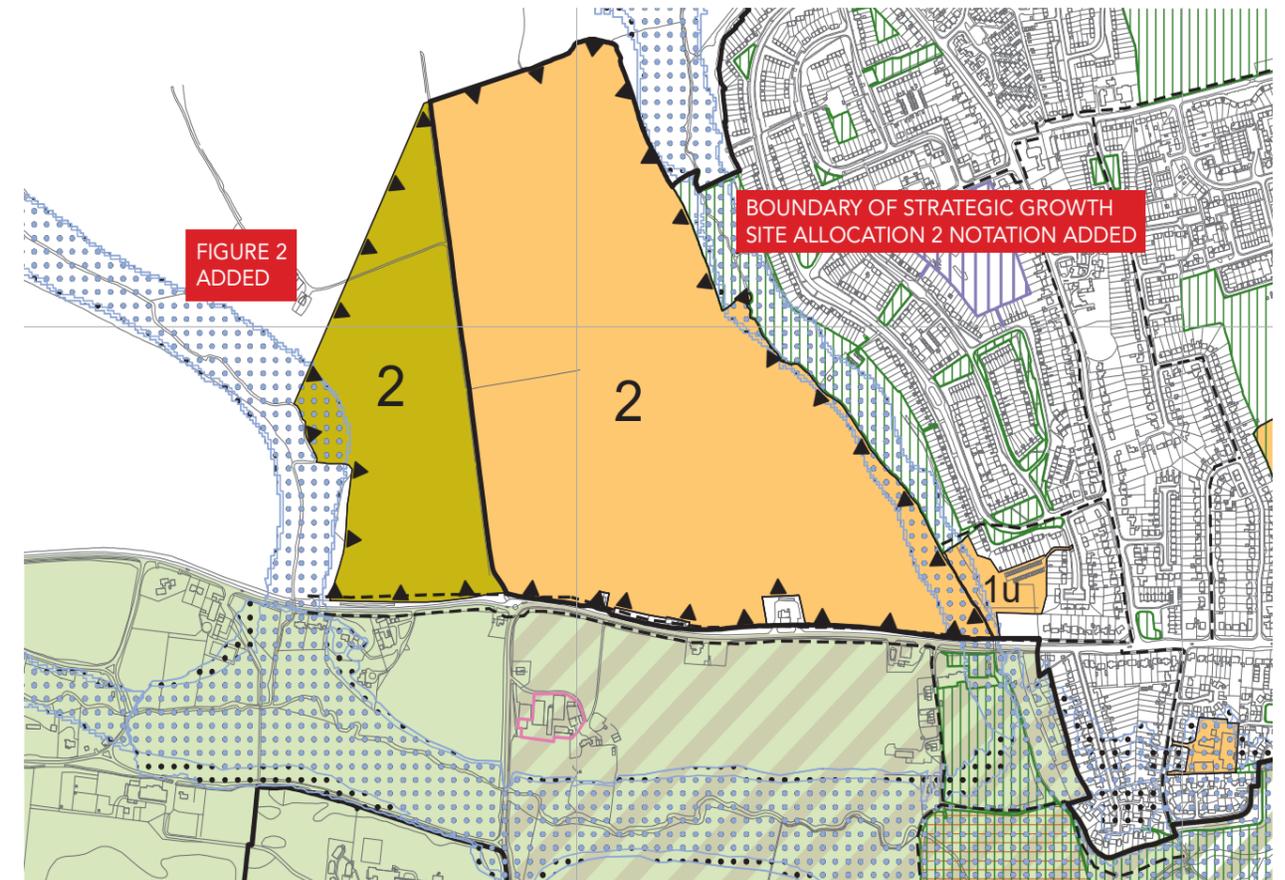
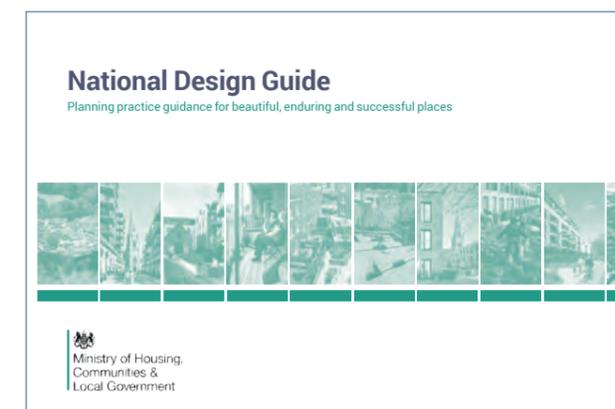


Figure 2: Chelmsford Draft Local Plan Modifications to Policies Map - PM14 - Chelmsford Urban Area



#### Other Relevant Policies

On 1st October 2019, the Ministry of Housing, Communities & Local Government published the National Design Guide. This *'sets out the characteristics of well-designed places and demonstrates what good design means in practice'*. The National Design Guide is based on national planning policy, practice guidance and objectives for good design as set out in the NPPF.

The masterplan proposals for Warren Farm embody the essential characteristics of a well designed place in accordance with the aspirations of The National Design Guide and the NPPF.

### 3. Site Location

Warren Farm is located within the Parish of Writtle and abuts the urban area of west Chelmsford known as Chignall. Roxwell Road (A1060) runs along the southern edge of the site and the land to the south of this road is Green Belt. Writtle Village is 1.3 km to the south. Immediately to the west of the site is the River Can and to the east is One Bridge Brook, a tributary of the River Can. To the north is agricultural land.

Key features within the site and its immediate surroundings include the existing footpath network including the Centenary Circle public right of way (PROW), the river valleys to the east and the west of the site boundary, key local facilities and important local open spaces.



Figure 4: Aerial view of the site

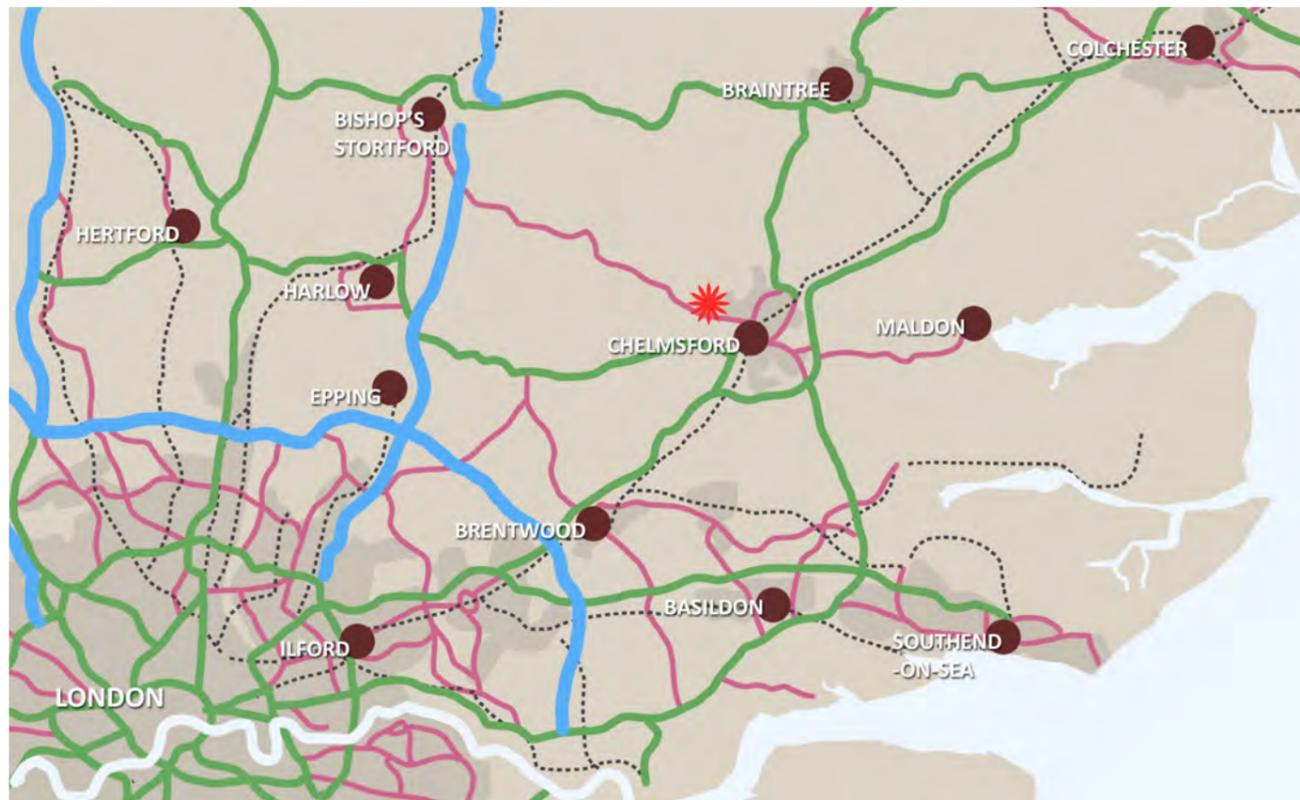


Figure 3: Wider Context

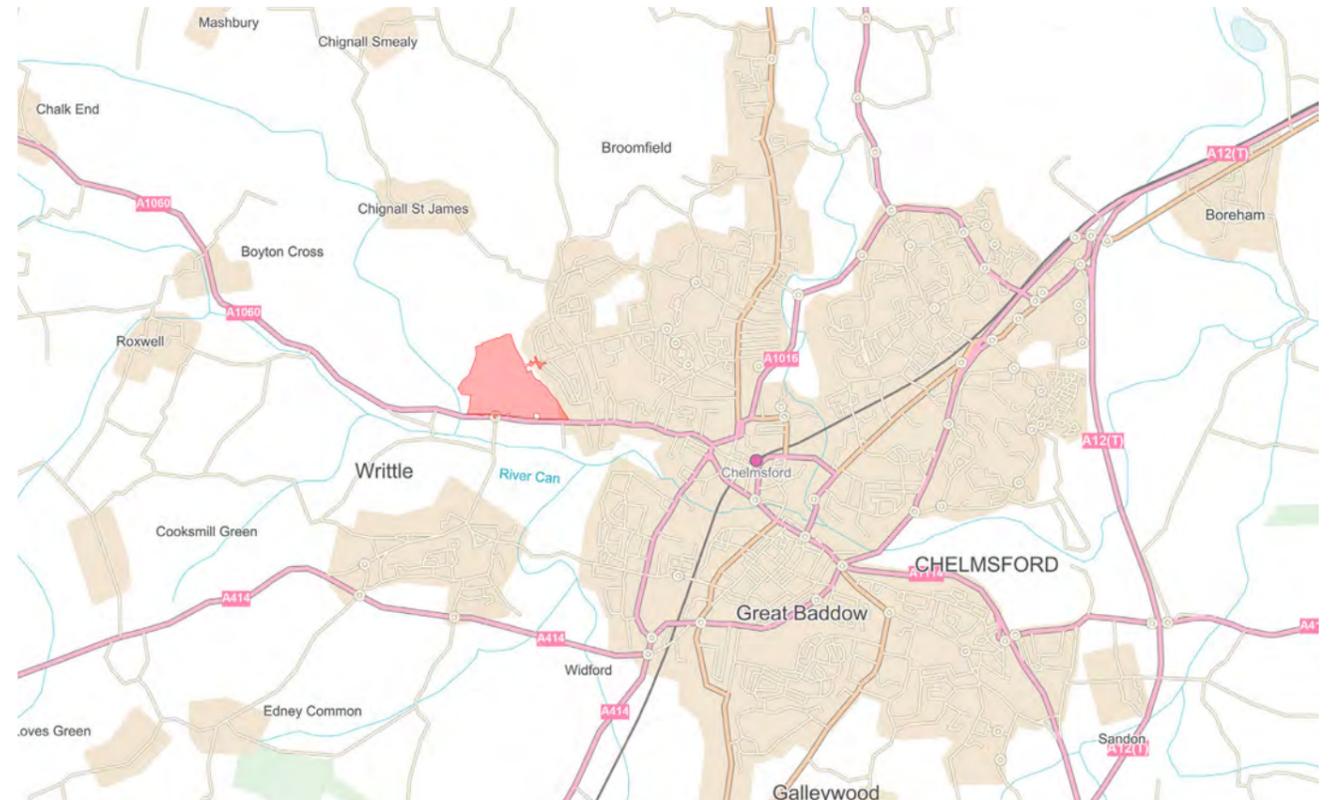


Figure 5: The site in relation to the City of Chelmsford

## 4. Site Assets - Existing Facilities and Links

Figure 6 illustrates the existing links and facilities within the surrounding area of Warren Farm and beyond, including the network of sport and recreation spaces and the cycle and footpath connections to the City Centre.

The site is accessible to a wide range of facilities, all within a reasonable walking distance. The plan demonstrates that there is opportunity to connect the site to existing links and provide opportunity for sustainable travel choices.

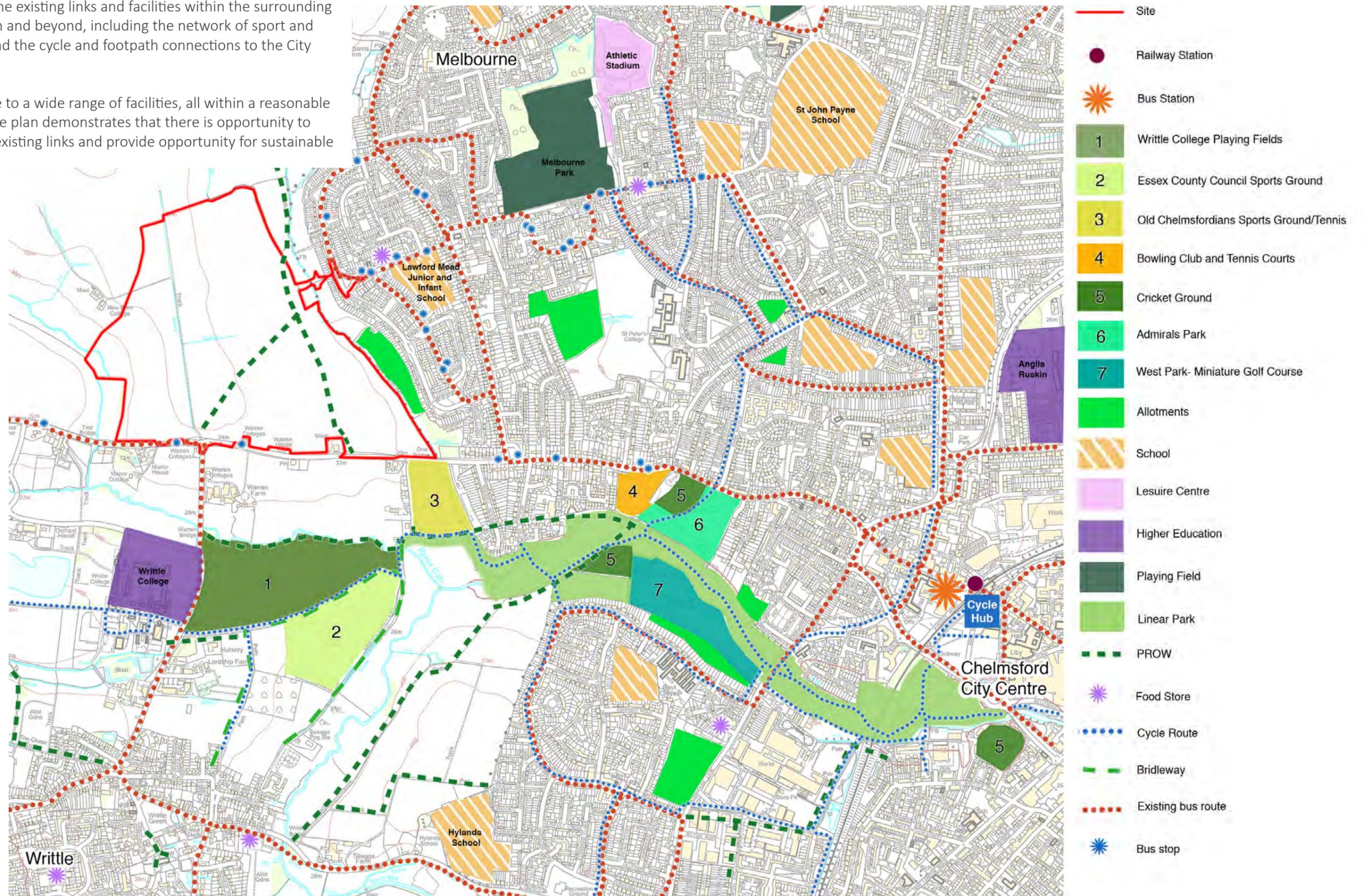


Figure 6: Existing Facilities and Links

## 4. Site Assets - Existing Access and Connectivity

Warren Farm is in a strategic location and is close to the City Centre, railway station and bus station. As a consequence, it has significant potential for trips to be made by active modes such as walking and cycling. Warren Farm is fortunate in being close to a number of good quality walking / cycling routes. (Figure 7)

### Existing movement network

Warren Farm benefits from the provision of existing local schools, shops, service and amenities, within walking and cycling distance. There are existing bus stops along Roxwell Road, which provide frequent services into Chelmsford City Centre and throughout Essex.

Warren Farm is located only 2.4km from Chelmsford Train Station, which provides direct trains to Central London. In addition, there is an extensive PROW network surrounding Warren Farm including NCR 1 which provides a pleasant, practical cycling route from Warren Farm to Chelmsford City Centre and train station. The route is off-road and would allow journeys from Chelmsford Train Station towards London and other destinations to be undertaken as a multi-modal cycle/train journey.

### Proposed movement network

The accessibility of Warren Farm will increase through the implementation of the proposed development, which will increase permeability through the creation of walking and cycling routes. These new routes will provide for shorter walking and cycling distances to local services and facilities.

Development at Warren Farm seeks to increase the potential for site accessibility to public transport. The proposed development potentially could provide the infrastructure necessary to permit buses to enter and exit Warren Farm via a bus loop. With the addition of two new services between the development and Chelmsford City Centre, this will provide a sustainable alternative for commuters to Chelmsford City Centre and Chelmsford Train Station.

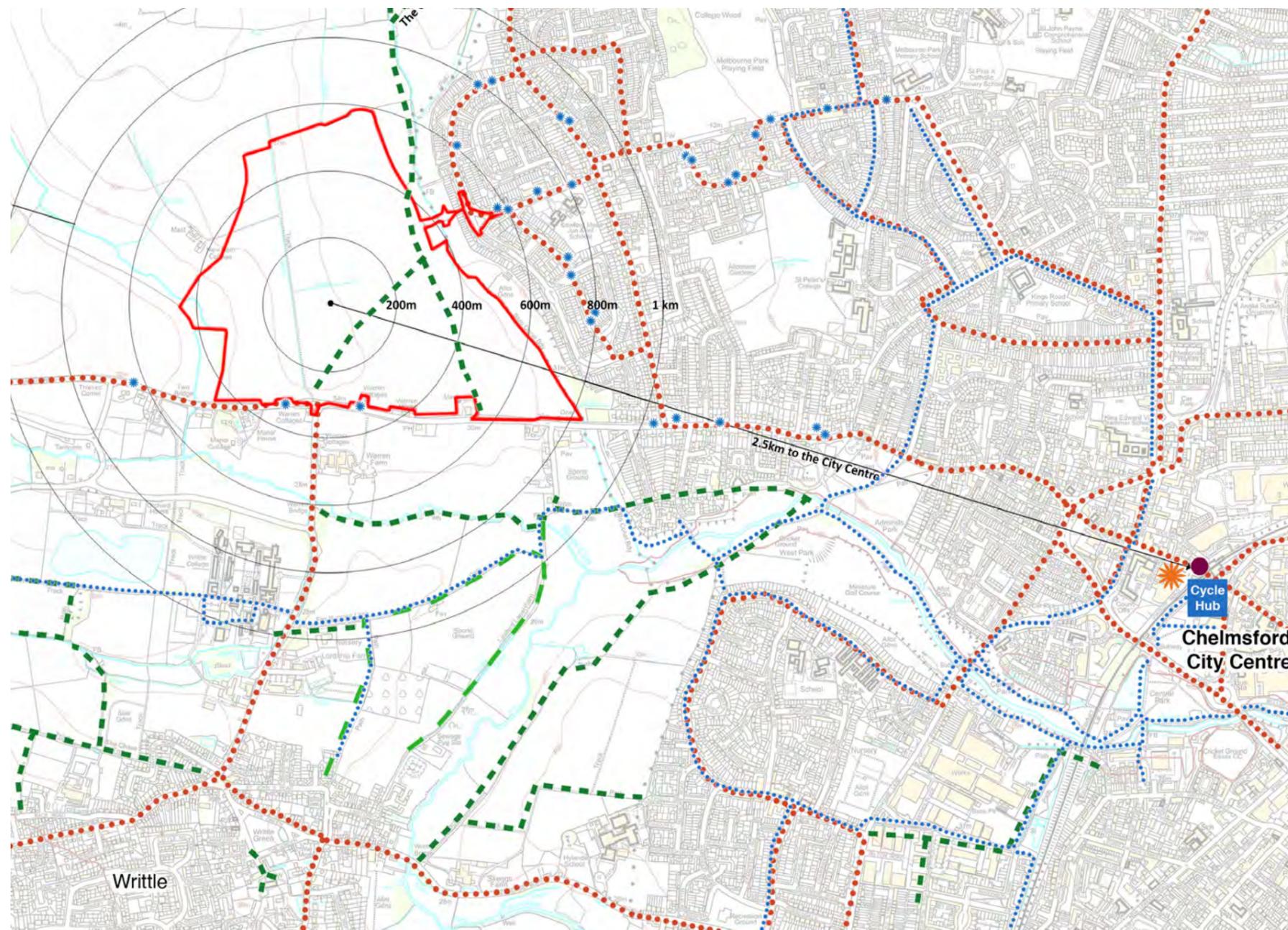


Figure 7: Existing Links to Chelmsford City Centre



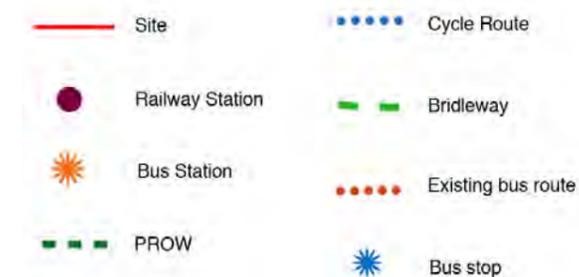
Chelmsford Bus Station



Chelmsford Railway Station



Chelmsford Cycle Hub



## Topography

Warren Farm is in essentially one large field with limited internal division provided by broken remnant hedgerows and occasional trees. The site is open and has a gentle rolling shape with a central ridge.

The majority of Warren Farm lies to the north of Roxwell Road, bounded by the River Can to the west and a tributary of the River Can to the east. Private residential land associated with New Barns lies to the west of the site. Warren Farm is mostly surrounded by agricultural land dominated by arable crops with residential development associated with Chelmsford lying to the east.

## Landscape

Warren Farm lies adjacent to the built edge of Chelmsford and is not subject to any landscape designations, unlike many other areas on the edge of Chelmsford.

Green Belt and the 'River Can and River Wid West Green Wedge' abut Roxwell Road to the south of the site. To the north, east and west of Warren Farm, the landscape is gently rolling and land use is primarily agricultural with limited tree cover.

## Views into and out of the site

There is a strong field boundary / hedgerow network surrounding Warren Farm's perimeter often reinforced by trees. This creates a higher level of screening within the landscape than the amount of woodland cover would suggest.

The approach to the site from the west is largely screened by existing vegetation. If the site is built out there would be views of the site from the north from the higher ground around Brickbarns Farm. Views into the site are also available from Roxwell Road to the south, albeit restricted by the hedgerow along much of the southern boundary.

The effects of the proposals for Warren Farm would be localised to an area no more than 1km from the site boundary, principally to the west and north.

There are distant views of the spire at St Mary's Church in Widford from the ridge in the centre of the site.



Looking east towards Chelmsford from the existing track



Looking south towards Writtle from the existing track



Looking west towards New Barn Cottage and the River Can from the existing track

## 5. Community Engagement and Local Involvement

### Public Consultation

There has been a lengthy period of public consultation, giving local residents and stakeholders the opportunity to have their say on the development of the Masterplan for Warren Farm.

The public consultation has followed the Masterplan development procedure for Strategic Growth Sites as designated in March by CCC's Development Policy Committee.

Crest Nicholson has worked closely with CCC to ensure that the consultation has been extensive and members of the public have had considerable opportunity to have their say on the Masterplan and to make amendments to the proposals

This included two public consultation events in July 2018, one held in Writtle Village and a second on the Chignall Estate. These events were well attended by over 200 local residents and more than 100 feedback forms were submitted.

Two stakeholder workshop events were also held in September 2018; one with statutory consultees including Essex County Council, the NHS, Anglian Water as well as officers from CCC; the second with City and County councillors, Writtle and Chignall Parish Councils, local school, and community and residents groups, which focused on providing more detailed input into the Masterplan.

Throughout the consultation period, Crest Nicholson had a dedicated website for the scheme - [www.warrenfarmsite.co.uk](http://www.warrenfarmsite.co.uk) – which provides information and the ability for residents to provide feedback. Feedback has been provided online, by email, in writing, and over the phone.

Crest Nicholson has also undertaken regular engagement with Writtle Parish Council, the Village's Neighbourhood Plan Group, and other local representatives and community groups. This has included meetings and site visits to discuss potential highways and traffic mitigation measures for the village that could be delivered alongside the development.

**Public consultation so far**

**Writtle University College, 9<sup>th</sup> July**  
 Attendees: 135  
 Feedback forms submitted: 70

**Chelmsford Community Church, Trent Rd, 11<sup>th</sup> July**  
 Attendees: 94  
 Feedback forms submitted: 34

**Residents are also able to submit feedback through the dedicated website**  
 Feedback forms submitted so far: 8

The graphic includes a screenshot of the 'WARREN FARM Chelmsford CONSULTATION ON FUTURE OF WARREN FARM' website, showing a progress bar for the consultation feedback form with steps: 1. Community facilities, 2. Open spaces and parkland, 3. Highway improvements, 4. Traffic improvements for the area, 5. Additional comments, and 6. Contact details.



**WARREN FARM**  
Chelmsford

**CONSULTATION ON FUTURE OF WARREN FARM**

Chelmsford City Council is developing a new Local Plan and has identified the Warren Farm site in the northern part of Writtle Parish as an appropriate area for new homes to meet local housing need.

The site presents the opportunity for a garden village development of new homes and community facilities. The site also has the potential to feature areas of green space and a new nature reserve for all residents to enjoy.

We want to hear the views of local residents to find out what you would like to be included in our initial proposals for Warren Farm.

To help us do this, we are holding two exhibition events, in Writtle and West Chelmsford. At each exhibition you will be able to view our current proposals and provide feedback.

Crest Nicholson are developing proposals for Warren Farm with the potential to include new homes, a primary school and nursery, sports facilities and public amenities.

[Click to view the proposal boards](#)

[Click for the feedback form](#)

Figure 8: Photos from the workshop events and website consultation page

A further public consultation event was held at Writtle College on the 13th November 2018 to give local residents the opportunity to view the Masterplan. Members of the public had the opportunity to speak to the Crest Nicholson team and Council officers, ask questions and give their feedback. Feedback from the event was provided directly to the Council as part of the Masterplan consultation process.



Exhibition board - The Submitted Masterplan

The total number of representations made was 73 and 1 petition of 1031 signatories.

**Summary of public comments on submitted masterplan:**

1. Overall principle of development allocation/detrimental effect on Writtle
2. Wider landscape strip to North of Roxwell Road
3. Low density development to built front
4. Travelling Showpeople Site : oppose, or should move further North
5. Connections to Chignall Estate | conflict with Allotments  
Connections to Chignall Estate | conflict with Play Area  
Connections to Chignall Estate | Bus route issues  
Connections to Chignall Estate | Should be for all vehicles
6. Bus route along Roxwell Road
7. On-site health facilities
8. General increase in traffic issues
9. Access to TSP
10. Flood Risk
11. Loss of Agricultural land
12. Park & Ride facility required
13. Consultation Arrangements Flawed

**Summary of Consultee comments on submitted masterplan**

Consultee	Comments
Writtle Parish Council:	Confirmed opposition to development of site: will create urban sprawl; traffic issues; object to sports pitches; implications on CIL payments if planning permission granted before approval of Neighbourhood Plan; require 4 actions from CCC including confirmation of no more than 800 homes, sports facilities and TSP site; timing.
Writtle PC P&D Committee:	Confirmed opposition due to expansion and urbanisation of Chelmsford and erosion of buffer between City and Writtle; inconsistency between housing numbers in MP document and EIA Scoping Report; adverse traffic and transport issues; insufficient detail on pedestrian links; erosion of rural/urban boundary, landscape character; coalescence; loss of agricultural land; flood risk; archaeological constraints; local infrastructure provision; sports pitches; TSP site; need for tree-planting; access to Hylands School and impact of school traffic on Writtle.
Chignall Parish Council	Need to retain open farmland buffer between Chelmsford and Parish/Chelmsford; unwelcome intrusion into neighbouring Writtle Parish that will need to be mitigated by extensive landscaping; light pollution; should retain landscaped corridor to Century Circle PROW; extension of site to west justified as a landscaped ecological park, but object to 3 sports pitches, car parking, fencing, floodlights etc; various transport issues.
EA:	Site within Flood Zone 3A - will need FRA; general and detailed advice for preparation and content of application/EIA.
Natural England:	Information and likely requirements as site within Zone of Influence for one or more of the Essex Coast European designated sites which fall within emerging RAMS; general and detailed advice for preparation and content of planning application/EIA.
Essex County Fire & Rescue Service:	Comments on details for consideration in preparation of planning applications.
Essex County Council (SUDS):	Comments on details for consideration in preparation of planning applications.
Public Health & Protection Services:	Residential development should provide EV charging point infrastructure to encourage use of ultra-low emission vehicles at a rate of 1 charging point per unit and/or 1 point per 10 spaces where off-road parking is unallocated.

## 5. Community Engagement and Local Involvement

### Amendments to the Masterplan following public consultation

Responding to the feedback received from community groups and local residents, Crest Nicholson committed to considering a series of potential changes to the Masterplan. These included:

- Further clarity on the bus link: Following consultation with residents, Crest has provided further detail on the bus link to West Chelmsford and its impact on residents in the direct vicinity of the junction between Avon Road and Trent Road in order to give residents further clarity about how the link will be constructed and its operation. Residents have been reassured that access to their homes will not be restricted by the proposals.
- Green buffer along Roxwell Road: Following resident comments, Crest committed to explore how the buffer can be further widened along Roxwell Road, in particular at the junction with Lordship Lane to create a green gateway to Chelmsford.
- Allotment access: Crest committed to remove the indicative footpaths running from the site through the allotments. Crest will also explore what improvements to the existing allotments it could fund as part of the development and provide additional footpath links with the Chignal area.
- Centenary Circle Walk: Crest committed to ensuring that at detailed planning stages the Centenary Circle Walk is integrated into the site and layout, and improved further with planting and landscaping.
- Screening of Travelling Showpersons Plots: Crest committed to exploring the position, ground modelling, landscaping and appearance of the TSP site. There is existing dense vegetation between the road and the proposed location of the TSP site and further measures could include introducing more planting along the road, acoustic fencing and a landscaped bund. Crest are exploring these options for the detailed layout.
- NHS Provision: Potential NHS provision in local centre providing for flexible uses should NHS require the space.



A selection of photos from the exhibitions held in Writtle Village and in Chignal in July 2018 and at Writtle College in November 2018.



**Livewell and Sustainability**

The proposed development will be designed to embed key sustainability measures, reflective of National and Local Planning Policy. These include:

**Location and connectivity** – Warren Farm is on the edge of Chelmsford and, as such, offers easy access to existing employment opportunities and social infrastructure, and therefore reduces the need to travel. It will provide a new vehicular connection for a bus service to use to connect the neighbourhood centre and new primary school to parts of the city;

**Energy, climate change and resource use** – an Energy Strategy will be prepared that identifies measures to be built into the future buildings to ensure that carbon emissions targets in the Building Regulations are exceeded. A wider assessment of how carbon emissions can be reduced throughout construction and operation is being undertaken, as is consideration of how Warren Farm can adapt to predicted changes in climate over its lifespan;

**Wildlife and biodiversity** – The site provides an opportunity to greatly improve the biodiversity value of the local area, through provision of drainage ponds and an ecology park as well as linking green corridors. It also connects broadly with the existing green infrastructure stretching to the south east towards Chelmsford City centre.

**Enhancing health and well-being** - of new and existing residents is also a priority for the development. A Health Impact Assessment will be carried out in accordance with local requirements to support the planning application, and discussions have been had with the City and County Councils with respect to their Livewell Campaign (<https://www.livewellcampaign.co.uk/>). Some important and effective health and well-being measures will be built into the scheme, such as:

**Provision of excellent quality housing** - that will be designed to meet the needs of occupants of all ages;

**Encouragement of active travel** – Warren Farm will introduce new walking and cycling connections to the wider area, which will be signposted to encourage people to use them. The provision of a bus service will also help reduce dependency on private car use and the emissions associated with this;

**Access to open space, sports and wildlife** – the provision of sports pitches will encourage more people to do strenuous exercise, whilst access to open space and wildlife will encourage people to spend time outside and reduce stress and depression;

**Designing for the community** – Warren Farm offers a mixture of uses, spaces and connections that encourage new and existing local residents to come together and interact. The focal point of the scheme will be the new neighbourhood centre, school, and the sports pitches and pavilion, which will benefit the whole community and foster social interactions.



Figure 9: Chelmsford Health and Well-being Plan 2016 - 2019 - CCC

## 6. Summary of Site Constraints

Figure 10 identifies the key site considerations and constraints. These include significant vegetation, flood zones, adjacent properties, existing public rights of way, topography and views.

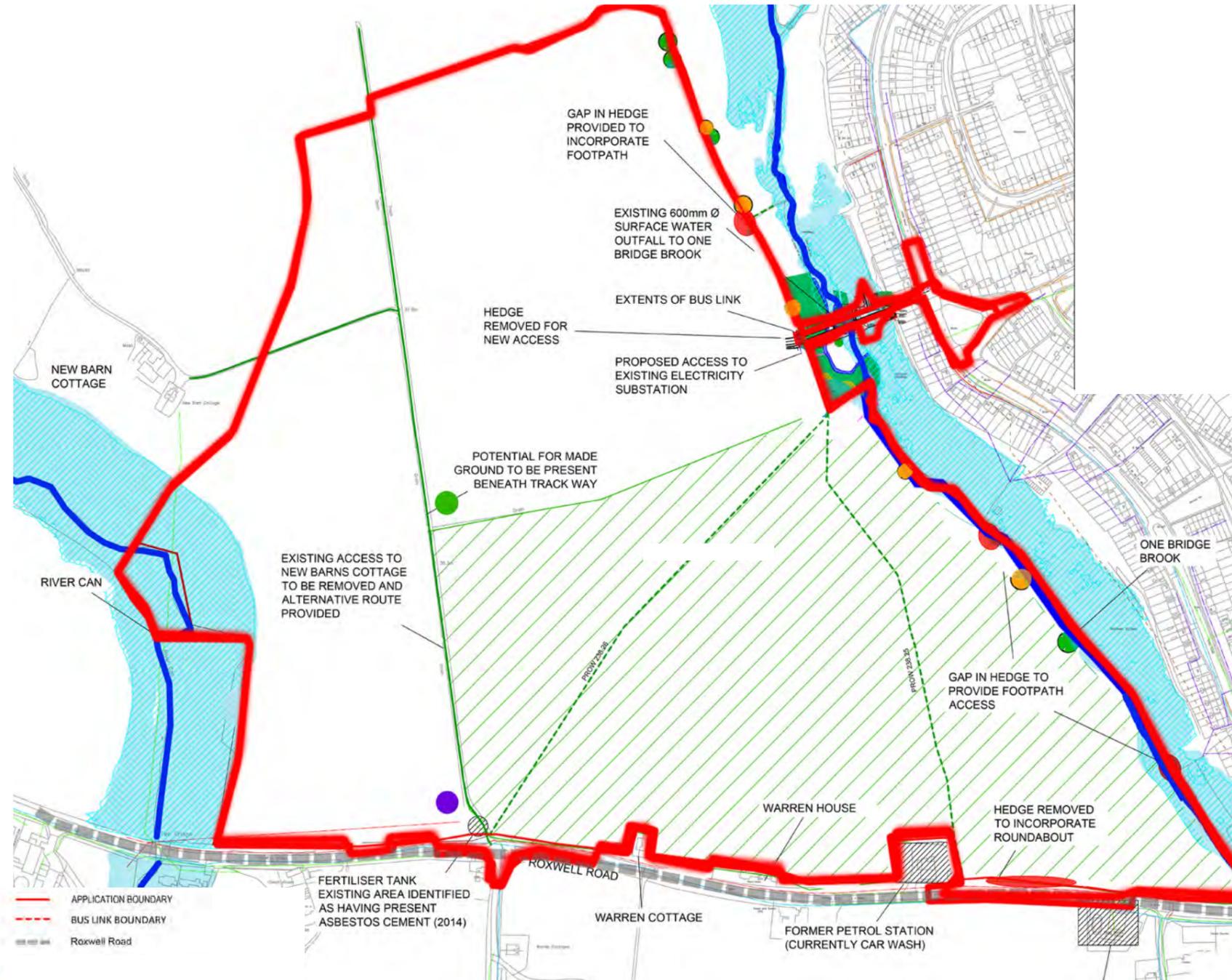


Figure 10: Site Constraints

### Site Considerations

#### Landscape

- Existing hedges and trees around the boundary of the site should be retained unless required to form new points of access.
- Existing boundary reinforcement where necessary.
- Retain and enhance public rights of way through the site, connecting to the surrounding footpath network.
- Utilise existing topography to create a natural drainage strategy.
- Enhance the existing boundary planting to the south including additional earth mounding, water features and reinforced hedgerow and tree planting.

#### Ecology

- Enhance biodiversity by planting new trees and vegetation within and around the edges of the site, including green corridors.
- Deliver biodiversity net gain by retaining and enhancing existing trees and hedgerows, with additional landscape planting as part of extensive provision of public open space.

#### Archaeology and Built Heritage

- Where archaeology is affected, it will be investigated in advance and recorded.
- Site proposals should respect the setting of the listed buildings to the north east of the site (Brickbarns Farmhouse and Crows Farmhouse) and the setting of the non-designated heritage asset to the west of the site (New Barn Farm).

#### Flood risk

- The parts of the site in the flood zone could remain as green open space for both biodiversity and recreation uses.
- Utilising the flood plain and adjacent areas to provide an appropriate level of green open space will provide a valuable contribution to the overall landscape and biodiversity strategies for the site.

#### Utilities

- Consideration to be given to the natural attributes of the site when installing drainage and utilities.
- The site is well positioned to connect into existing utilities

# 7. Evaluation - Development Opportunities and Connectivity

## Key Opportunities

### Sustainable Travel

To ensure that all homes are within a 5-10 minute walk of local facilities, providing the opportunity for sustainable travel choices. Providing new shared walking and cycling connections through the site and to the wider area.

### Community Facilities

The potential to offer a mixture of uses, spaces and connections within the site that benefit the whole community and foster social interactions. New community facilities could include a new neighbourhood centre, primary school and sports pitches and pavilion.

### New Homes

Opportunity to provide around 800 new, market-led homes designed to meet the needs of occupants of all ages. A new residential development that offers variety and choice; a mix of uses and tenures; a vibrant place to live with opportunity for a convenient modern lifestyle.

### Biodiversity

Opportunity to greatly improve the biodiversity value of the local area through the provision of drainage ponds, an ecology park as well as linking green corridors.

### Public Open Space

Opportunity to provide high quality recreation and open spaces within the development to encourage people to spend more time outside and pursue an active lifestyle.

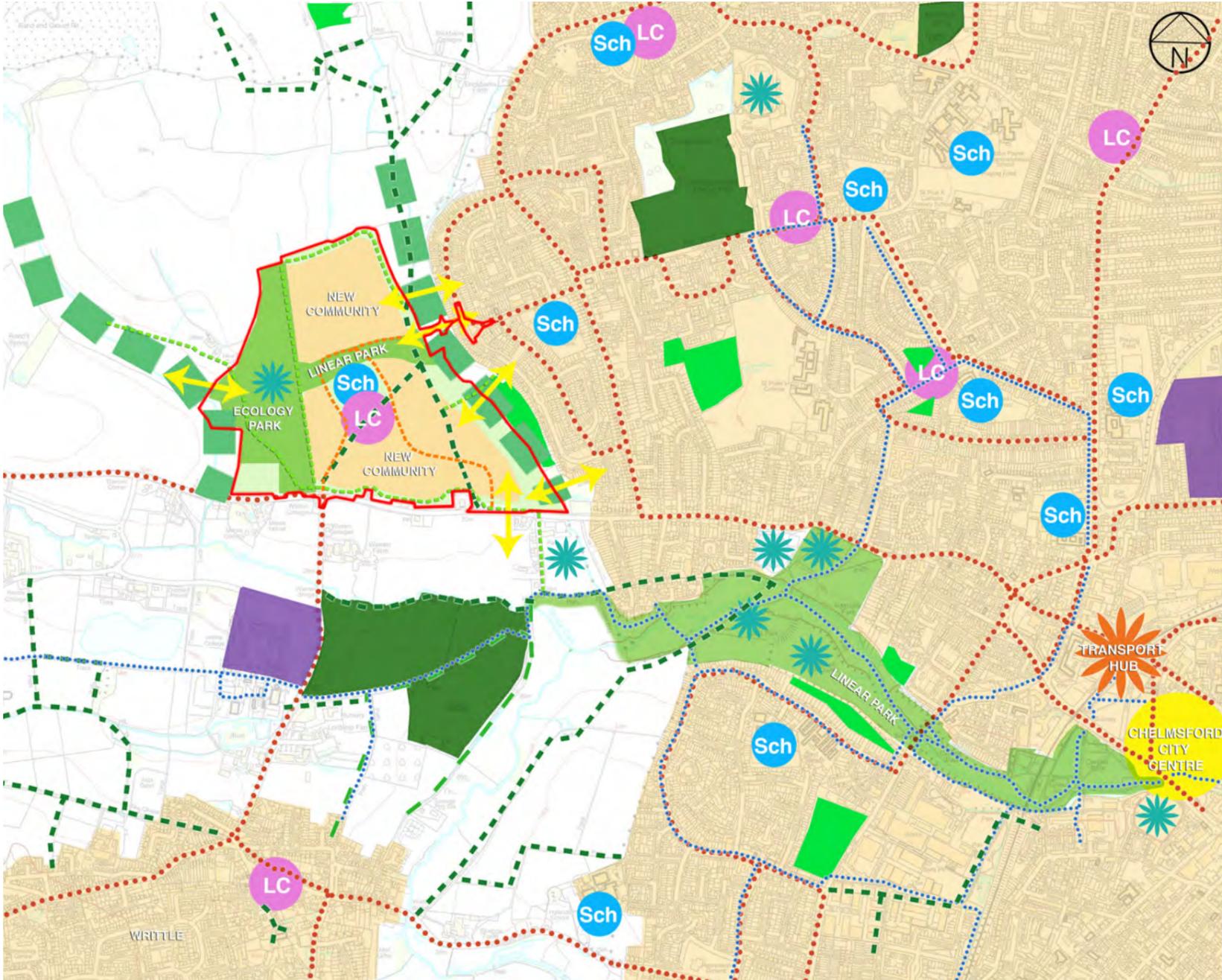
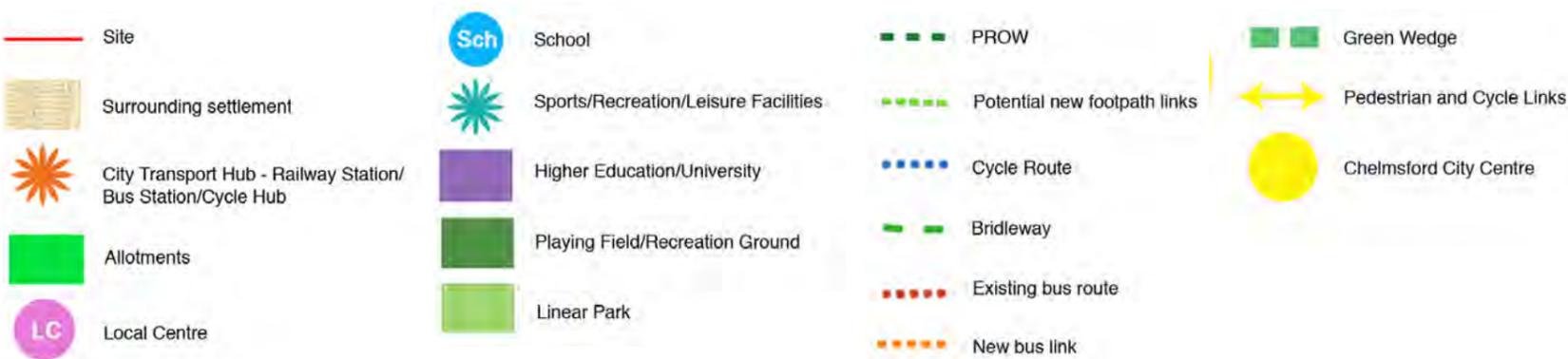


Figure 11: Development Opportunities and Connectivity



## 8. Design Objectives and Evolution

### Design Objectives for Warren Farm

- Create a high-quality, comprehensively-planned, new sustainable neighbourhood that maximises opportunities for sustainable travel.
- Provide main vehicular access to the site from Roxwell Road (A1060).
- Provide safe and pleasant pedestrian and cycle connections.
- Provide a well-connected internal road layout that allows for bus priority measures.
- Provide a new dedicated bus, cycle and pedestrian links into the existing urban area to the east and throughout the development.
- Provide a mix of market-led homes to attract a diverse population.
- Create a physical environment that promotes a balanced lifestyle, a place that supports healthy and sustainable travel choices, and provides opportunities for the community to improve their health and well-being.
- Provide new community facilities for people of all ages so that they feel supported and valued.
- Create a well connected community where people have access to good employment and work opportunities
- Create a resilient place that is adaptable to changing requirements and climate.
- Create a variety of safe open green spaces to provide opportunities for recreation, education and relaxation.

### Place Making Principles

It is envisaged that the new development at Warren Farm will embody a strong sense of place and community. The design respects the individual character of the location and the history, topography, transportation links and natural landscape are considered through design.

The following place making principles are key:

#### Permeability and connectivity

Design that provides ease of access and movement through a permeable built environment, along shared footways and cycle routes. A design that promotes sustainable travel.

#### Hierarchy

A clear and legible hierarchy throughout the development to assist with way finding and easy navigation.

#### Scale

A varied built form of mixed density and building heights within a landscaped setting.

#### Enclosure

Design that establishes clear distinctions between public and private space, thus encouraging appropriate activities within each. Encouraging safe environments and appropriate use of available space and boundary treatment.

#### Community Engagement

Early involvement of the local community in order to create places that meet people's needs and aspirations, and engender civic pride.

#### Mixed use

A mix of uses to create a new residential community with access to education, retail and community facilities.

#### Public realm

A quality public realm formed through extensive landscaping including the 'Livewell Garden' and nature park.

#### Integrate health and well-being

The development will promote the physical and mental wellbeing of residents through the introduction of initiatives in the Livewell campaign.



Notley Grange, Braintree



Finberry



Kilwood Vale

Chelmsford Draft Local Plan Strategic Growth Site 2 - West Chelmsford master plan principles document May 2018.

Following the introduction of the Council's new masterplan procedure in March 2018, officers prepared a Masterplan Principles Document and a series of plans in order to inform and guide the detailed masterplanning process. The plans included: site context, proposed land use, movement, open space and a concept masterplan.

Based on a high level study and desk top evidence, the concept masterplan opposite (Figure 12) sets out CCC's initial key principles for Growth Site 2 and assisted in informing subsequent iterations of the masterplan

Through a process of gathering detailed technical and environmental evidence, negotiation and collaboration between CCC, Crest and other stakeholders, the concept masterplan has evolved by testing various alternatives and has informed the final Warren Farm Illustrative Masterplan set out in this document.

2

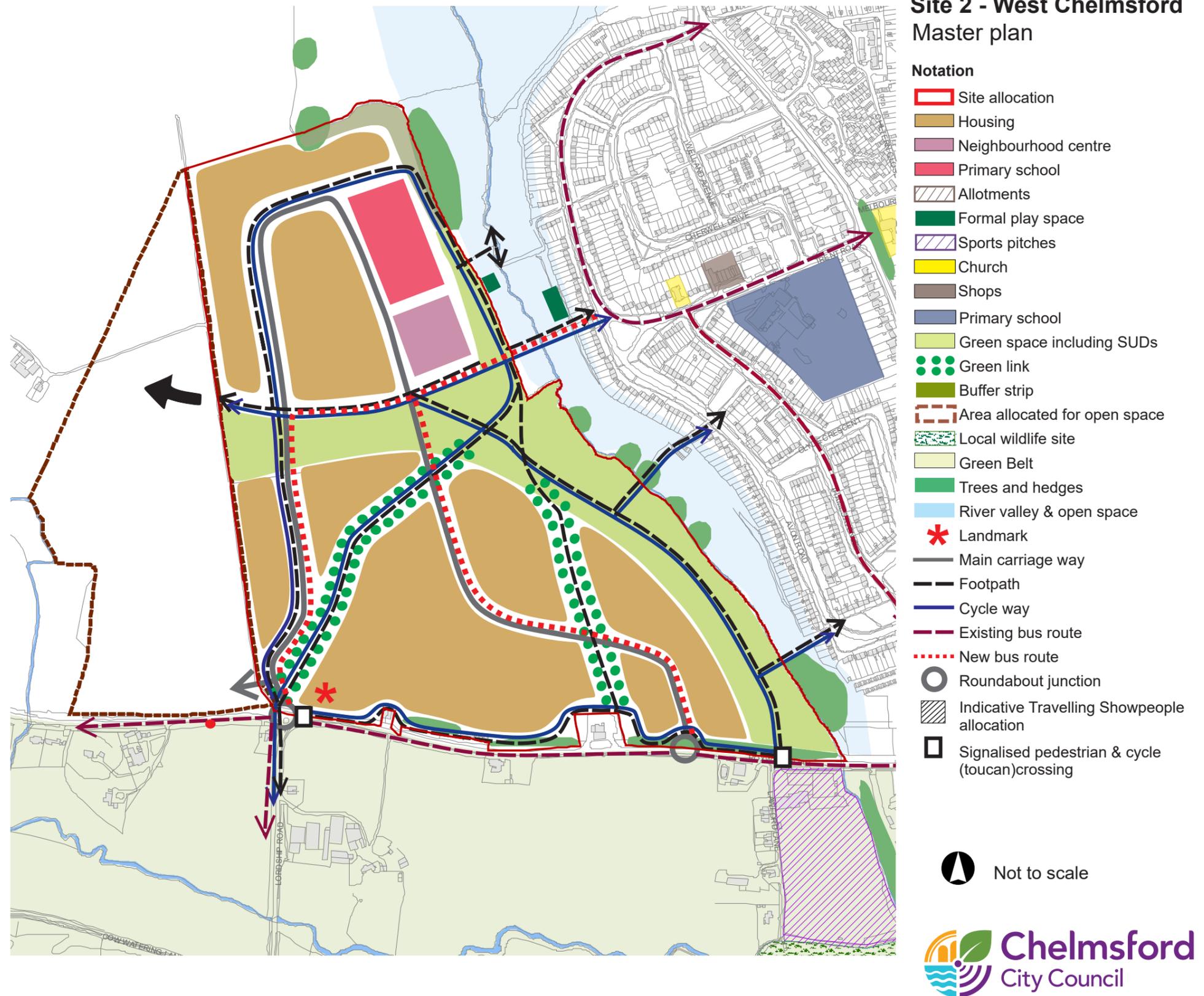


Figure 12: CCC Concept Masterplan

## 8. Design Objectives and Evolution

### Design Evolution

The four masterplan options at Figure 13 were tabled at two public consultation events in July 2018; one held in Writtle village and a second on the Chignall Estate.

The purpose was to open up a dialogue between stakeholders to consider the most appropriate layout configuration in respect of the neighbourhood centre and the Primary School.

Analysis and evaluation of the evidence base, constraints and site assets as summarised in this document resulted in a number of 'fixes' to future masterplanning:

For example:

- the River Can and One Bridge Brook and their associated flood plains and ecological interests.
- the agreed position for the two main access points into the site from Roxwell Road.
- existing Public Rights of Way
- the need to devise a circular bus route that connected into the site from Trent Road.
- the desire to provide convenient connectivity for pedestrians and cyclists between Chignall Estate and the new development to encourage community integration and sharing of facilities.
- the desire to protect long distance views towards St Mary's Church, Widford; skyline trees on Chignall Road and views towards the River Can Valley.
- the need to retain and enhance the existing vegetation on the periphery of the site.
- the need to provide safe and attractive access for pedestrians and cyclists into the River Can Green Wedge.
- to meet the specific requirements of Policy SGS2 regarding the provision of a primary school, neighbourhood Centre and site for Travelling Showpeople.

Following consideration of the feedback on the various concept alternatives, the principles shown on masterplan concept 3 was regarded as the most preferred.



Figure 13: Crest Masterplan Concept Sketches

# 9. The Illustrative Masterplan

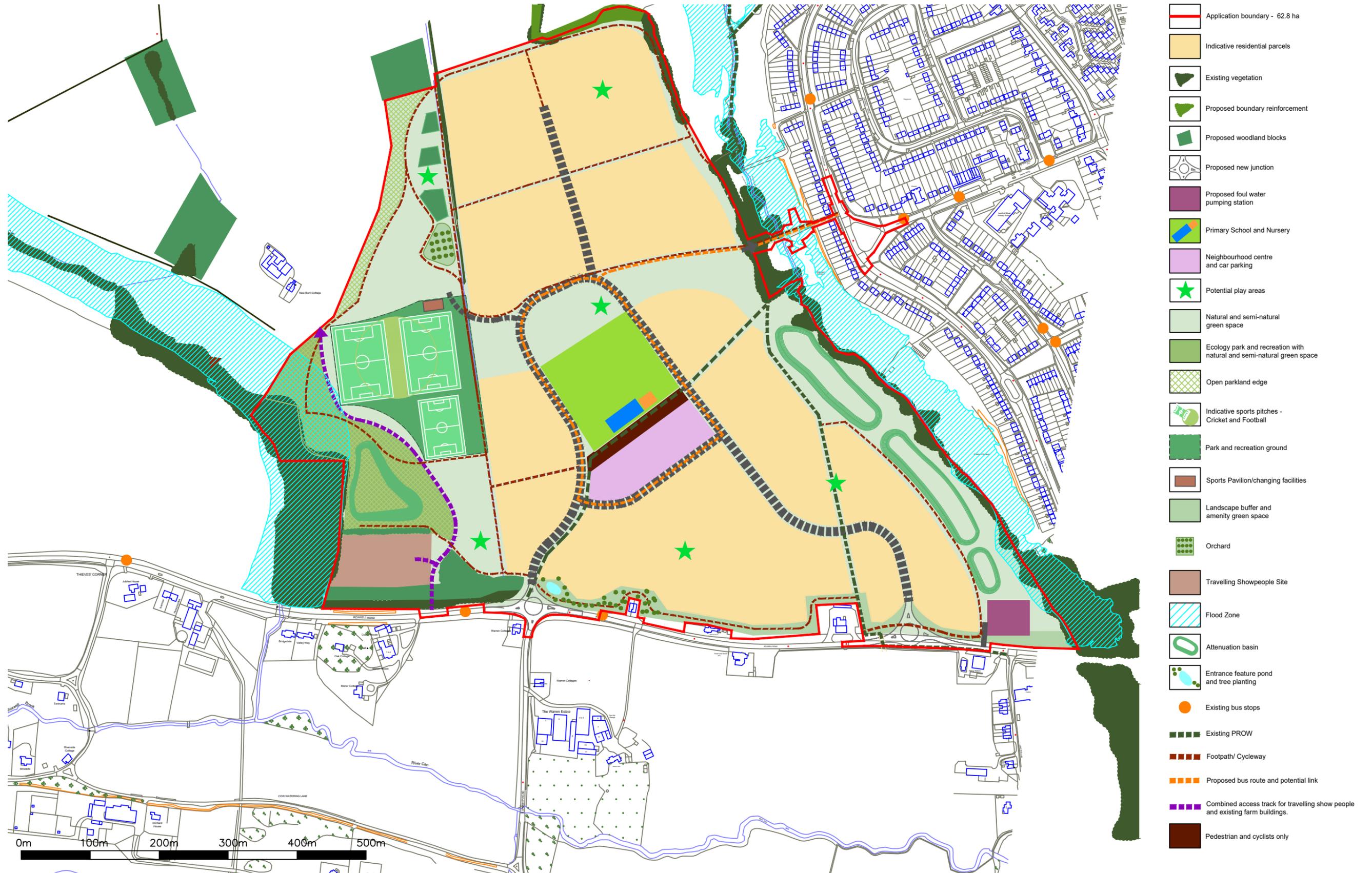


Figure 14: Illustrative Masterplan

## 9. The Illustrative Masterplan

As referred to earlier in this document, the Masterplan has been shaped by Crest Nicholson through a continuous and formal process led CCC, and with input from consultation with the major stakeholders, public and community representatives.

### Key features of the Illustrative Masterplan:

- residential development of around 800 new homes, comprising a wide mix of house types and tenures, including affordable, to be compliant with Council policy;
- a mixed use neighbourhood centre with a high quality public realm and landmark features. A central pedestrian and cycle only street between the Neighbourhood Centre and the Primary School. On site facilities include a foodstore, retail units, community centre, potential healthcare and associated parking;
- a new primary school and stand-alone nursery located within the centre of the development to ensure that all homes are within a 5-10 minute walk, providing the opportunity for sustainable travel choices;
- new bus link to connect the new development to the adjacent Chignall community and beyond;
- retaining existing public rights of way and creation of a new footpath network/trim trail and cycle routes within the development and links to the surrounding areas;
- western and eastern parkland corridors linked together by a wide green link through the development;
- two new access points into the development off Roxwell Road;
- a Sustainable Urban Drainage strategy that will provide a series of attenuation ponds within the natural and semi-natural green amenity space, to allow for surface water run off and opportunity for biodiversity enhancements;
- a landscaped buffer to the south of the development to provide an attractive footpath and cycle route set back from the Roxwell Road with a series of glimpse views through to the new development, providing an appropriate urban edge on the approach to the City centre;
- the provision of 5 Travelling Showpeople pitches with a separate access road from Roxwell Road, in the south west corner of the site;

- a nature park within the western parkland area designed with a range of features to benefit wildlife, as well as providing a pleasant place for quiet recreation and educational opportunities;
- a 3.6 ha recreation ground with sports pitches in the form of two senior football pitches, a cricket pitch with an all weather wicket, and a junior football pitch; and,
- a pavilion with changing facilities, parking and play facilities.

The key landscape elements proposed for Warren Farm include a western and eastern parkland corridor, a central spine and southern boundary.

The existing hedges and trees around the boundary of Warren Farm would be retained unless required to form new points of access.

Areas of planting reinforcement are proposed around the boundaries and within the site to replicate old field boundaries and introduce new areas of woodland. In combination, these would help to mitigate the views from the west and reintroduce a network of biodiversity corridors across the site.

Increased boundary planting along the western and eastern boundaries associated with the adjacent watercourses and water management features would provide the opportunity for biodiversity enhancements.

Within the development, the use of generous open spaces and wide tree lined streets and main avenues with hedges in front gardens would help to create the setting for a new garden village.

### Parameter Plans

Following selection of the Preferred Illustrative Masterplan, a number of detailed technical and design studies were undertaken to test the efficiency, optimisation and quality of potential housing parcels and neighbourhood centre layouts, particularly in terms of the potential to create quality placemaking, housing layouts and public realm. These studies resulted in further refinements and detailed consideration of the Parameter Plans to provide a framework for subsequent detailed design of reserved matters.



Examples of types of landscape treatments that could be applied to the site.

### Vehicular Access

There are four site accesses. Vehicular access to the site can be achieved via two roundabouts on Roxwell Road, a priority junction on Roxwell Road, and a priority junction on Avon Road. Residential access will be via the two roundabouts on Roxwell Road. The easternmost access will be a new roundabout and will feature a pedestrian crossing, which will allow pedestrians and cyclists to cross Roxwell Road safely and continue onto the off-street footway/cycleway that leads to the city centre. A fourth arm will be added to the existing Lordship Road/Roxwell Road roundabout so that site access can be achieved.

A priority access is situated to the west of the Lordship Road/Roxwell Road/Site Access roundabout. This will only be for access to the Travelling Showpeople site and to the existing farm to the north. The Travelling Showpeople access has been designed to include over-runable strips so that it can accommodate large vehicles, yet high speeds are discouraged for regular traffic that will be accessing/egressing the site.

### Bus Link/Bus Route

Further to the above, a bus link between the site and Avon Road is proposed to be provided on the eastern side of the site. The bus route would provide a loop around the local centre in the centre of the site, before heading back towards Avon Road. The main route will feature a 30mph speed limit and will not feature vertical traffic calming. The bus link would be reduced to a 20mph speed limit and would be signalised, and use by cyclists and pedestrians will also be allowed. Regular traffic will not be permitted to use the bus link, which will be controlled by number plate recognition cameras. Further bus services will be available from existing bus stops along Roxwell Road to the south of the site, and within the Chignal Road Estate to the east of the site.

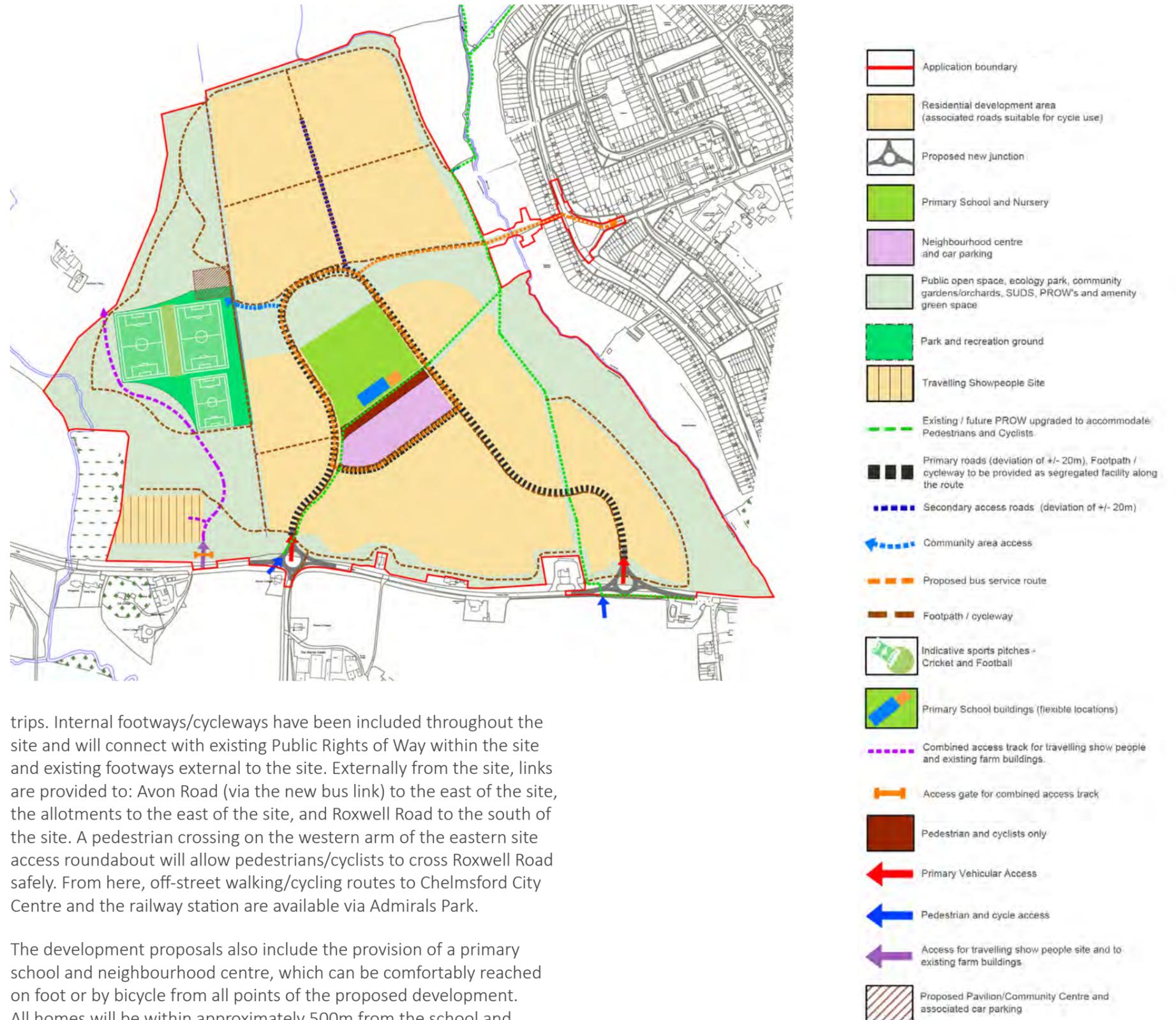
Illustrative drawings showing the access proposals can be found on the following pages.

### Internal Road Layout

The internal road network will largely be made up of 20mph roads. The primary distributor road that provides a loop between the two roundabout accesses will be the only 30mph road within the site. All roads within the site will be designed in accordance with the Essex Design Guide.

### Walking & Cycling

The development has been designed to encourage walking and cycling

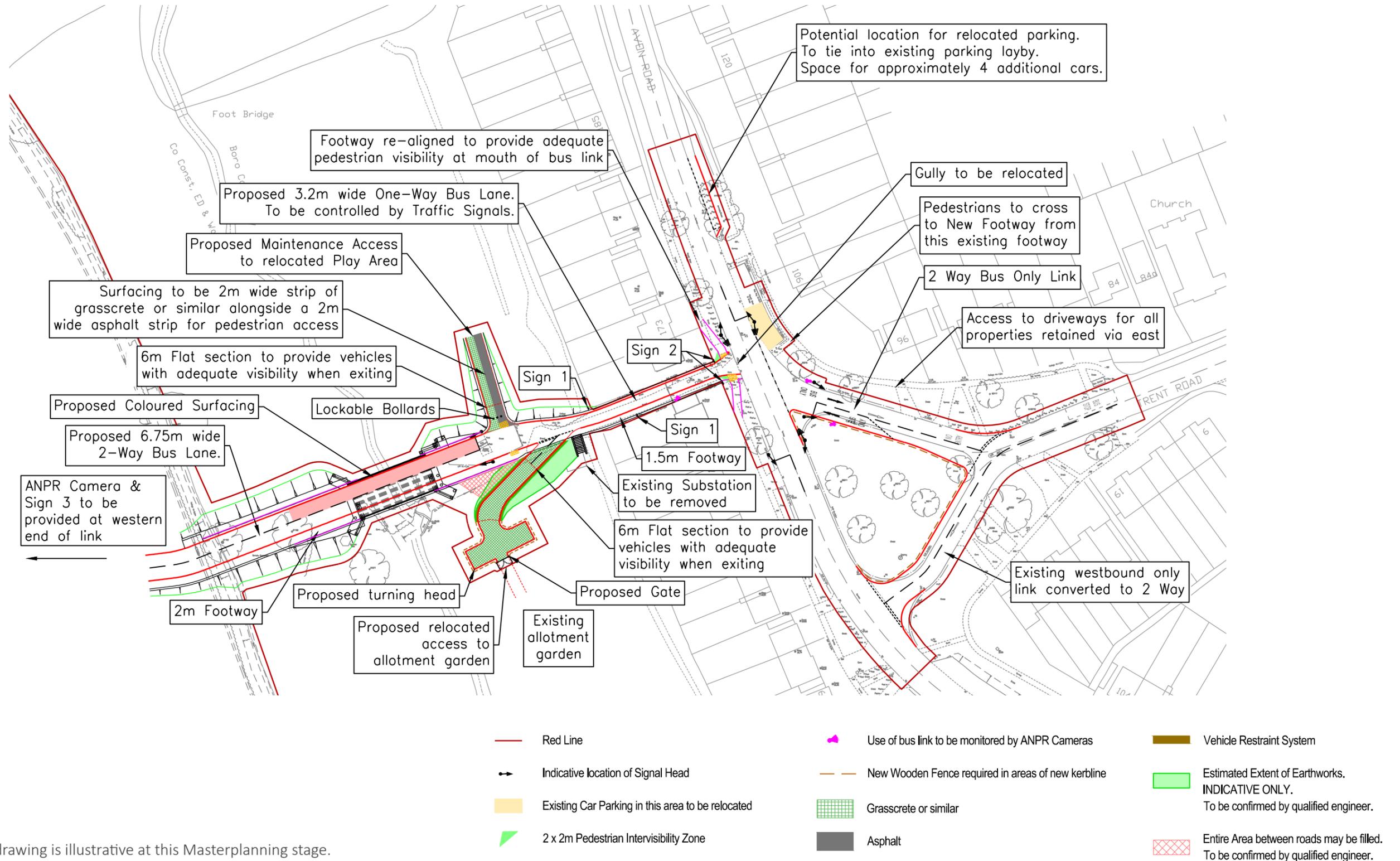


trips. Internal footways/cycleways have been included throughout the site and will connect with existing Public Rights of Way within the site and existing footways external to the site. Externally from the site, links are provided to: Avon Road (via the new bus link) to the east of the site, the allotments to the east of the site, and Roxwell Road to the south of the site. A pedestrian crossing on the western arm of the eastern site access roundabout will allow pedestrians/cyclists to cross Roxwell Road safely. From here, off-street walking/cycling routes to Chelmsford City Centre and the railway station are available via Admirals Park.

The development proposals also include the provision of a primary school and neighbourhood centre, which can be comfortably reached on foot or by bicycle from all points of the proposed development. All homes will be within approximately 500m from the school and neighbourhood centre. Given that it will not be necessary for residents to visit the primary school and neighbourhood centre via private vehicle, this will further encourage trips by active travel modes.

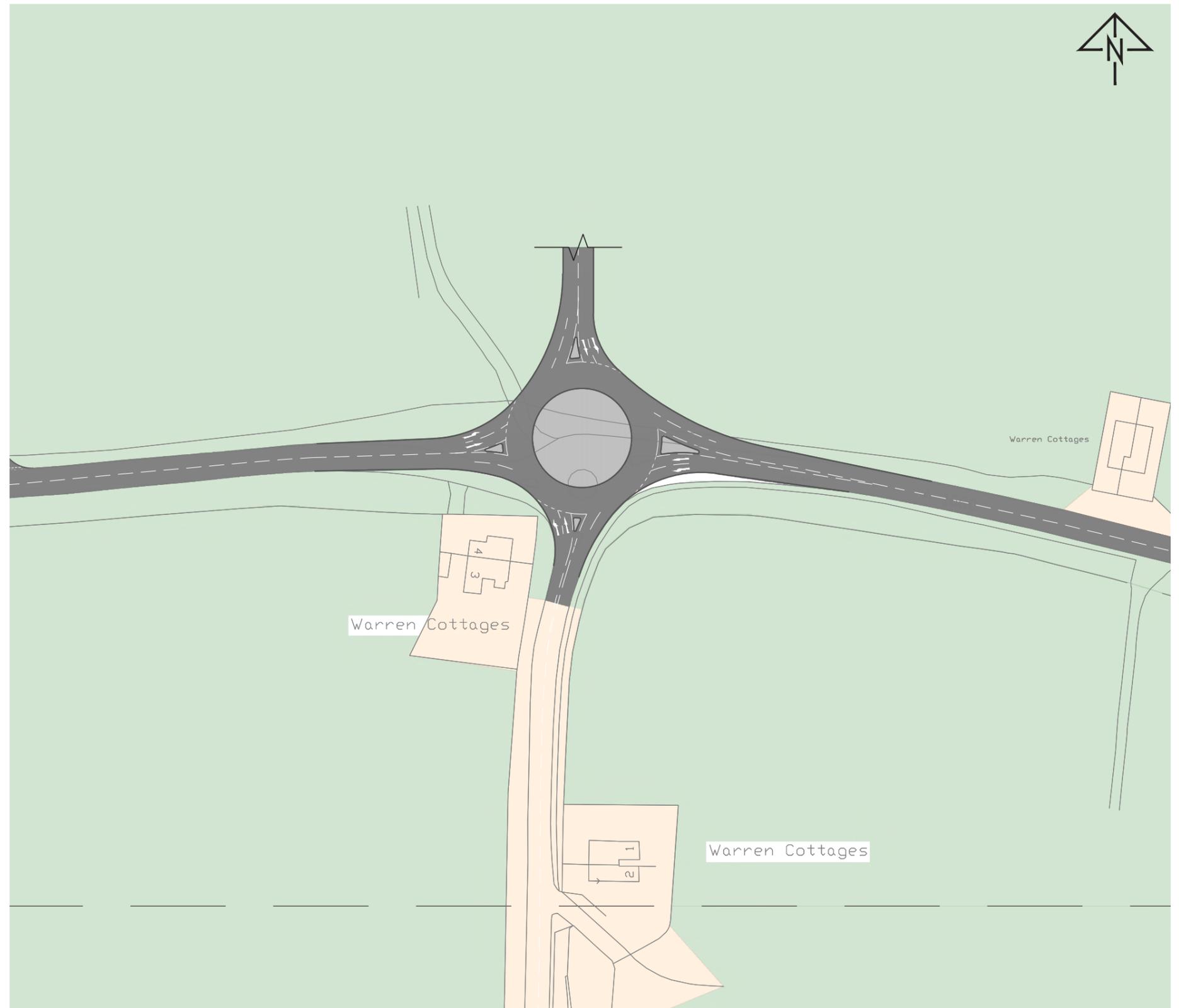
Figure 15: Indicative Parameters - Land Use and Access and Movement

## 10. Parameter Plans - Land Use and Access and Movement



Please note that this drawing is illustrative at this Masterplanning stage. The final design of the junctions will be the subject of detailed technical assessment to be carried out as part of the planning application process and will be subject to agreement with the Highway Authority.

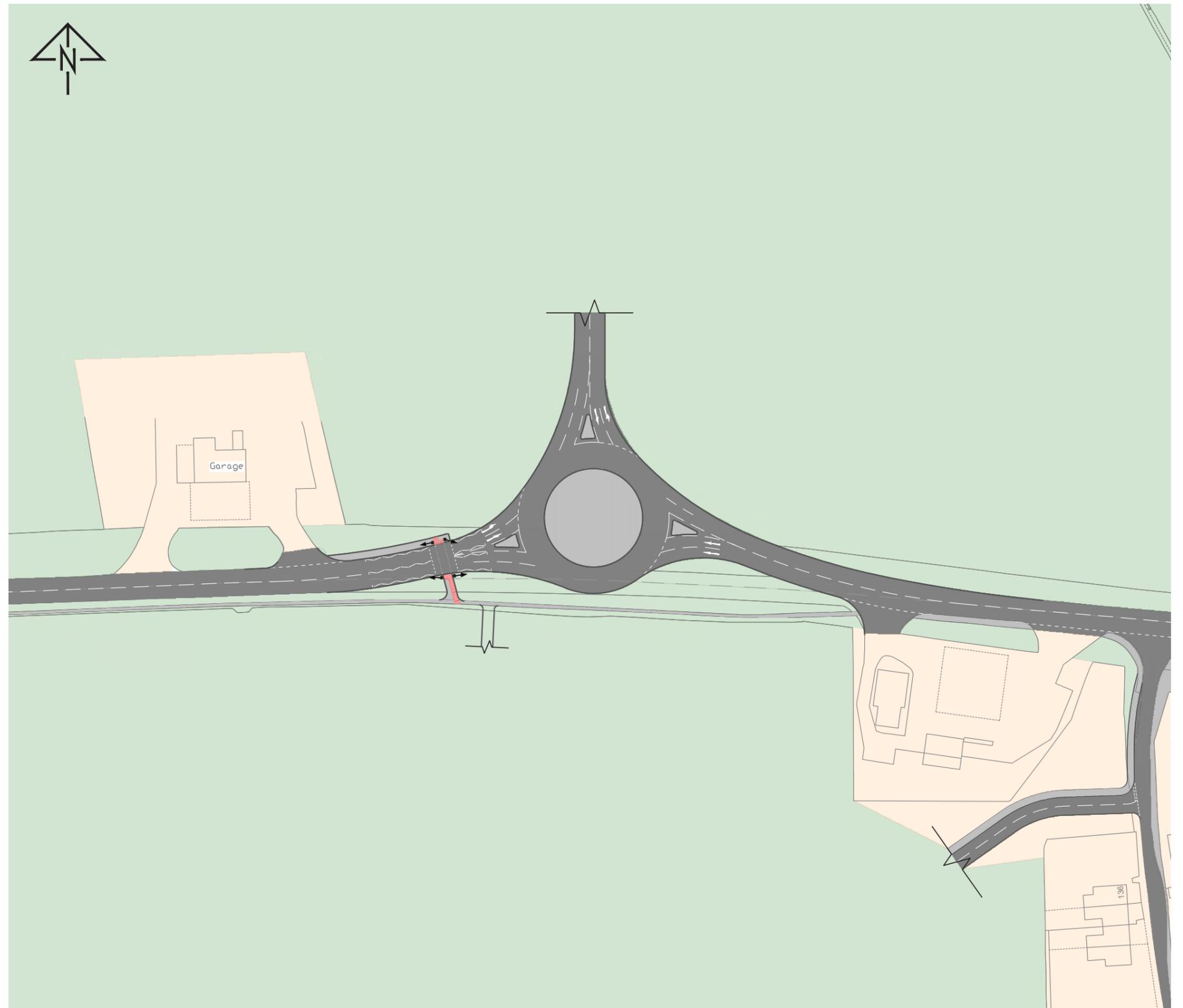
Figure 16: Illustrative Bus Link Signal Controlled



Please note that this drawing is illustrative at this Masterplanning stage. The final design of the junctions will be the subject of detailed technical assessment to be carried out as part of the planning application process and will be subject to agreement with the Highway Authority.

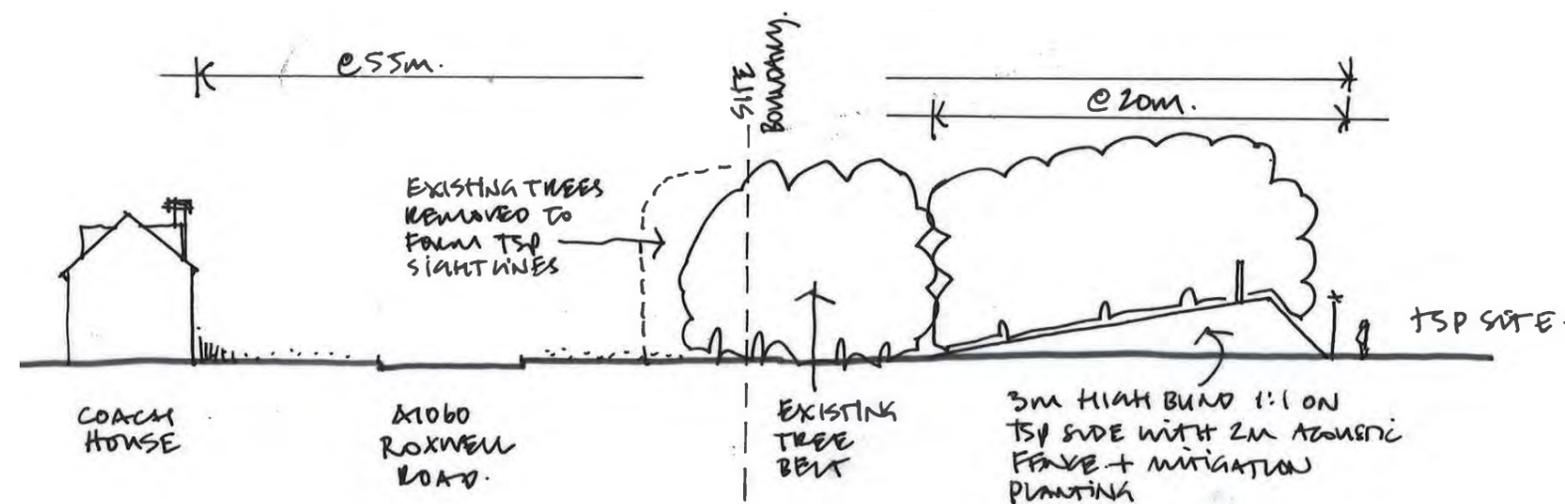
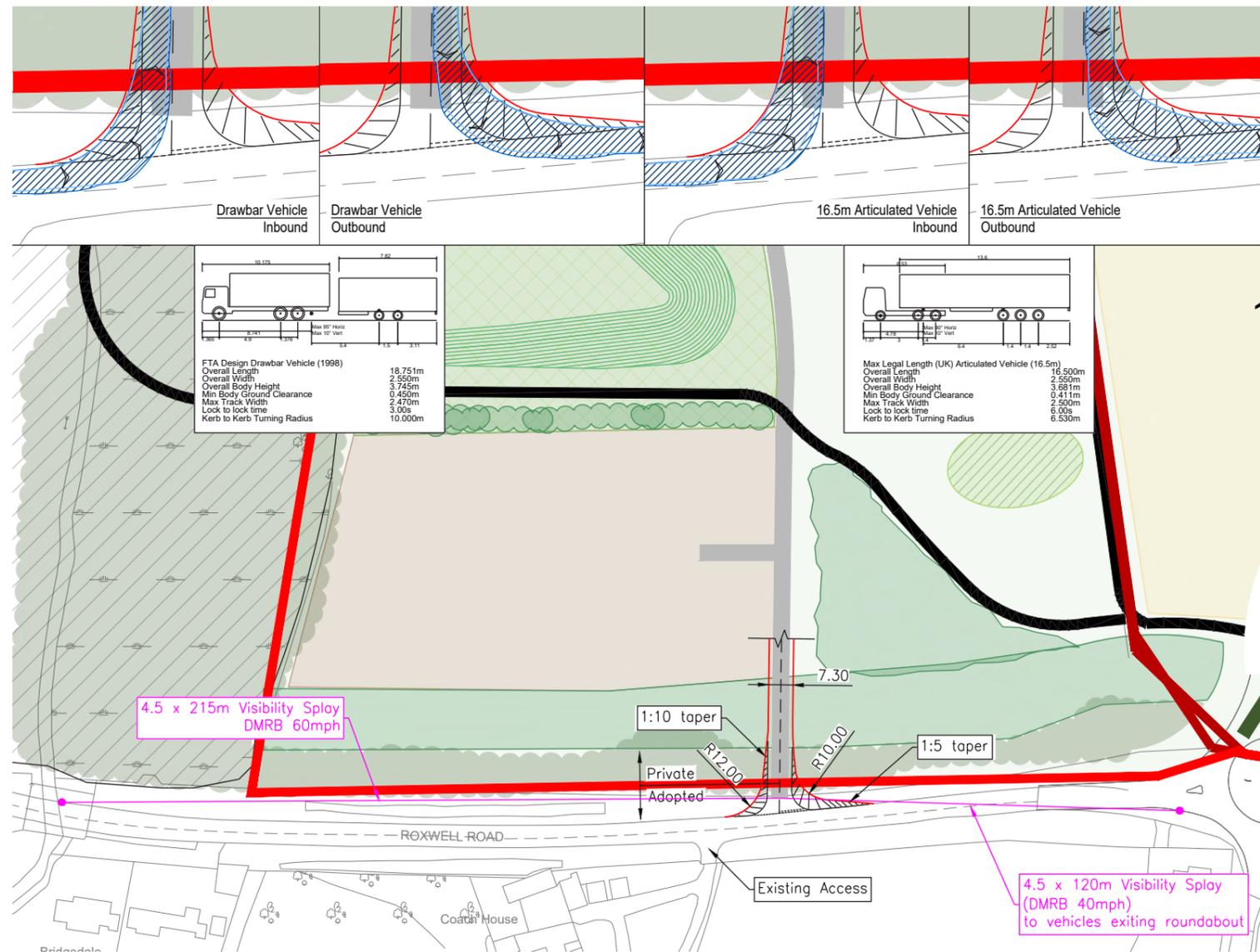
Figure 17: A fourth arm will be added to the existing Lordship Road/Roxwell Road roundabout so that site access can be achieved.

## 10. Parameter Plans - Land Use and Access and Movement



Please note that this drawing is illustrative at this Masterplanning stage. The final design of the junctions will be the subject of detailed technical assessment to be carried out as part of the planning application process and will be subject to agreement with the Highway Authority.

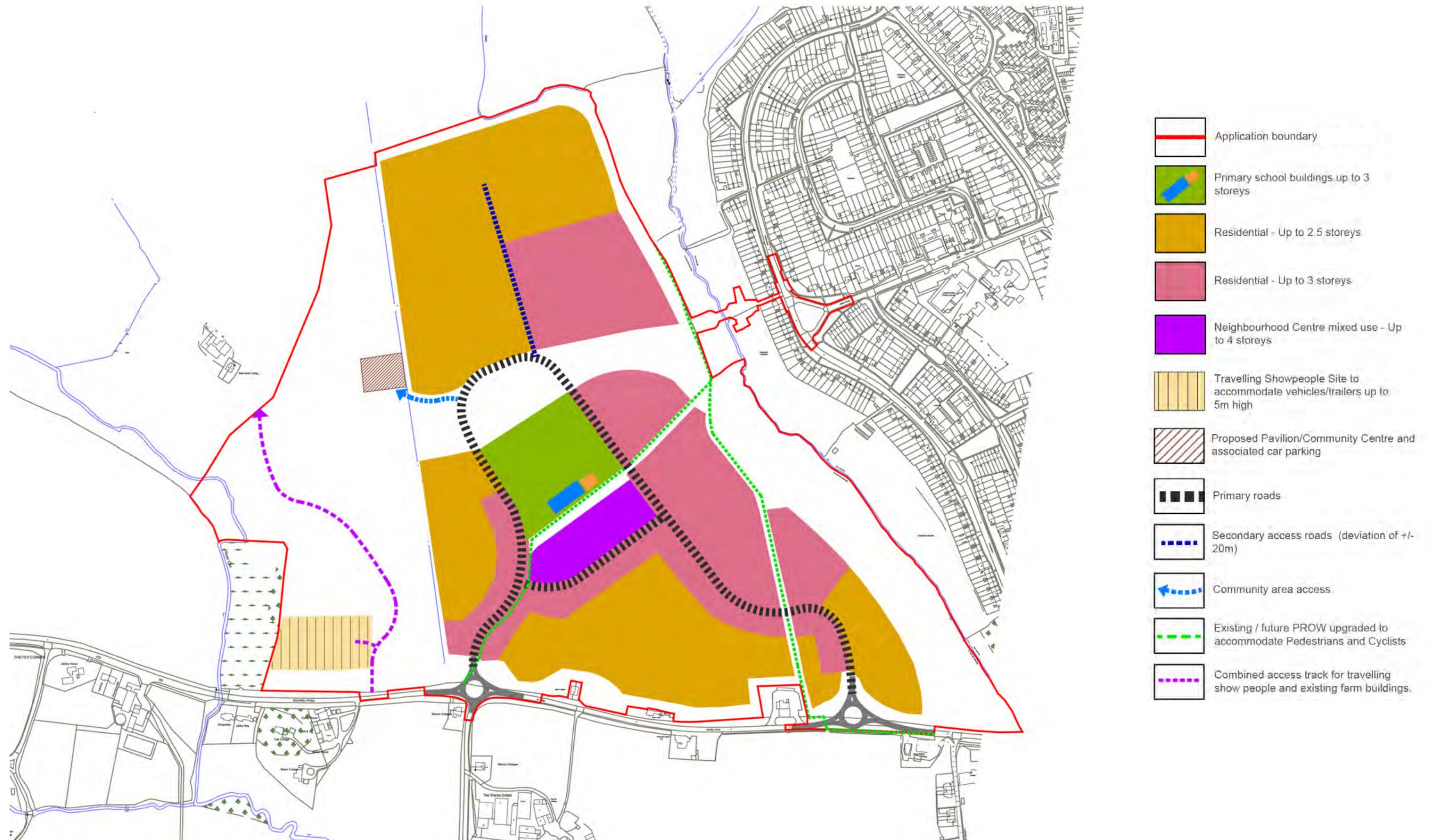
Figure 18: A new roundabout will feature a pedestrian crossing allowing pedestrians and cyclists to cross Roxwell Road.



Please note that these drawings are illustrative at this Masterplanning stage. The final design of the junctions will be the subject of detailed technical assessment to be carried out as part of the planning application process and will be subject to agreement with the Highway Authority.

Figure 19: The Travelling Showpeople access (including access to the existing farm) and site section sketch

# 10. Parameter Plans - Building Heights



-  Application boundary
-  Primary school buildings up to 3 storeys
-  Residential - Up to 2.5 storeys
-  Residential - Up to 3 storeys
-  Neighbourhood Centre mixed use - Up to 4 storeys
-  Travelling Showpeople Site to accommodate vehicles/trailers up to 5m high
-  Proposed Pavilion/Community Centre and associated car parking
-  Primary roads
-  Secondary access roads (deviation of +/- 20m)
-  Community area access
-  Existing / future PROW upgraded to accommodate Pedestrians and Cyclists
-  Combined access track for travelling show people and existing farm buildings.

Figure 20: Indicative Parameters - Building Heights

# 10. Parameter Plans - Density

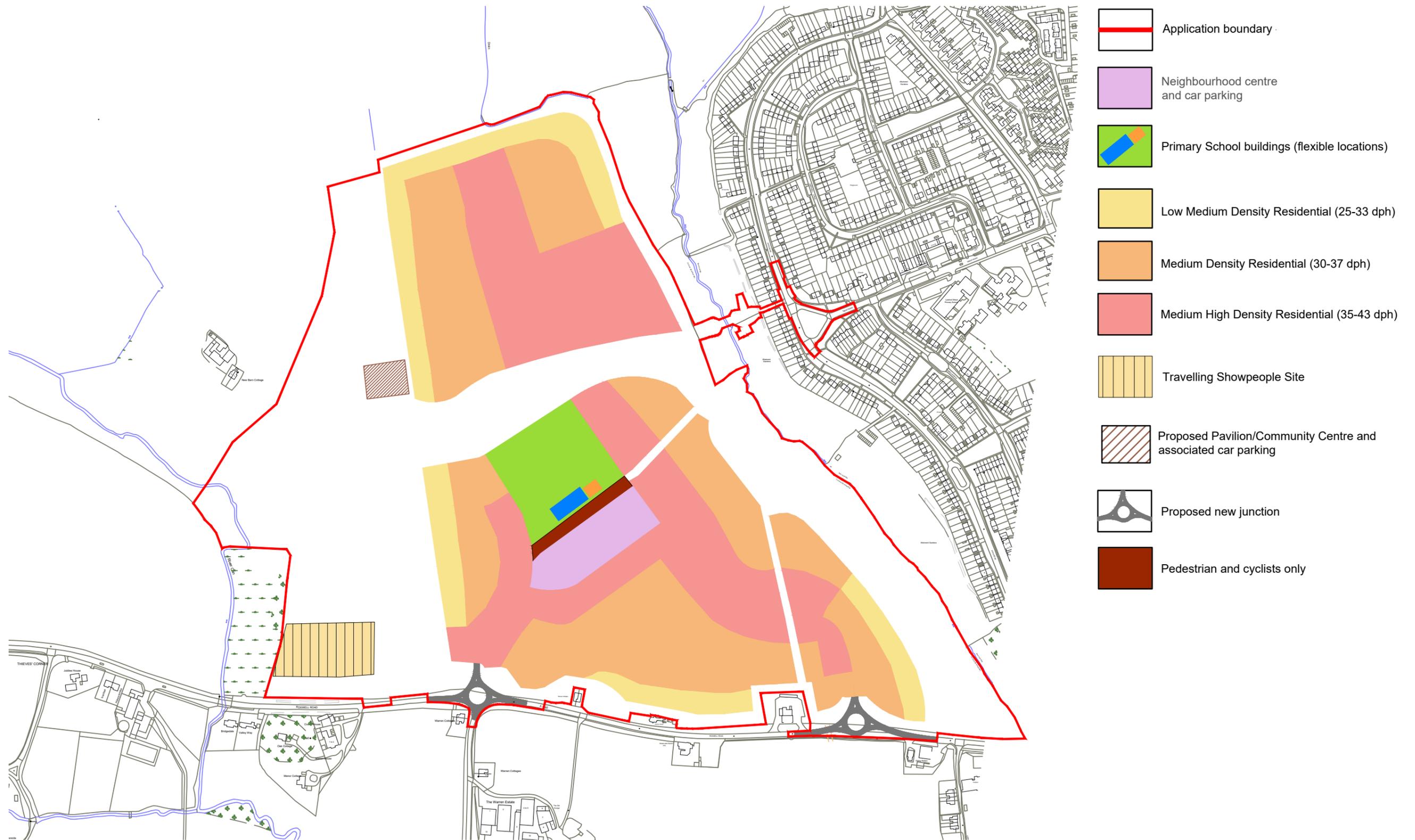


Figure 21: Indicative Parameters - Density

# 10. Parameter Plans - Landscape, Sports and Green Infrastructure



Figure 22: Indicative Parameters - Landscape, Sports and Green Infrastructure

### Ecology and Recreation

The Ecology Park provides a valuable buffering habitat to the River Can and an area of off-site reedbed, which is used by a range of protected species including otter, badger, and several species of bat. The Ecology Park will be designed with a range of features to benefit wildlife, as well as providing a pleasant place for quiet recreation and educational opportunities (such as Forest Schools). The Ecology Park will also be designed to screen any required lighting from the recreation ground to ensure that a dark corridor is maintained along the River Can for nocturnal wildlife. The attenuation basin within the Ecology Park will also be designed in such a way to benefit wildlife, for example, with an area of permanent water and marginal planting. This will benefit a range of species such as foraging bats, reptiles, amphibians, and invertebrates. Other ecological enhancements will be incorporated into the Ecology Park, such as bat boxes on trees, and habitat piles. Once established, the Ecology Park will be managed in the long-term to benefit biodiversity.

### Sport and Recreation

Sports pitches are provided in the form of two senior football pitches, a cricket pitch with all weather wicket, and a junior football pitch. A pavilion with changing facilities, parking and play facilities are also proposed.



Figure 23: Ecology Park and Sports

## 10. Parameter Plans - Landscape, Sports and Green Infrastructure

### The western parkland

This area helps to create a gentle transition from the built edge of the site into the open countryside to the north west. It contains areas of open parkland, with blocks of woodland, small copses and community orchards to break up the appearance of the development edge.

Sports pitches are provided in the form of two senior football pitches, a cricket pitch with all weather wicket, and a junior football pitch. A pavilion with changing facilities, parking and play facilities are also proposed.

The western edge of the parkland along the River Can provides an opportunity to create a nature park. This would be enclosed by the farm access and incorporate the water management basin and areas of rough grass, scrub and tree planting. This could provide the opportunity to encourage a wider range of wildlife including butterflies, dragonflies and reptiles.

There would be a mixture of new water features, enhancing plant life and wildlife around the river area.

### The eastern parkland

The eastern parkland forms the link with the existing edge of Chelmsford to the east around the existing Brook.

This area would consist of informal parkland and water management basins.

### The central spine

The central spine creates a link between the eastern and western parkland areas. It is a more formal space, containing formal play facilities and a robust boundary to the primary school.

### The southern boundary

Development along the southern edge of the site has been set back to provide a structured setting to the site and the creation of a new gateway into the City from the west. This could include additional earth mounding, water features and reinforced hedgerow and tree planting.

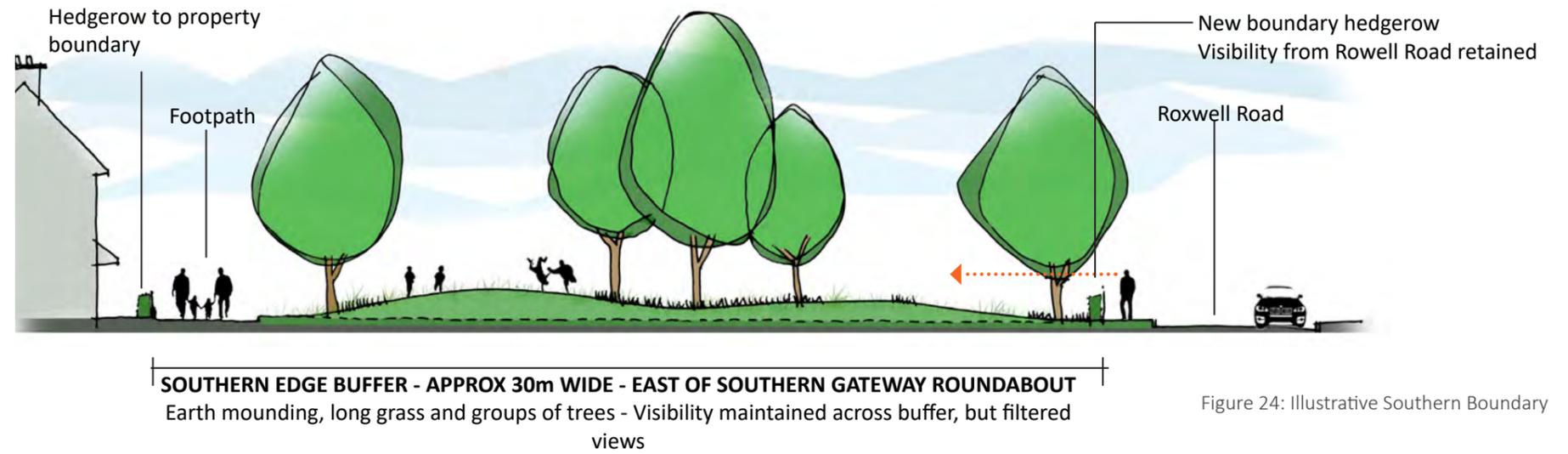


Figure 24: Illustrative Southern Boundary



### Community Hub

A mixed use neighbourhood centre is sited at the centre of the Warren Farm, which is the most sustainable location in respect of access.

All new homes will be within 5-10 minutes walk of the neighbourhood centre and a number of new green links will provide pleasant pedestrian and cycle access routes.

A new primary school with co-located early years and childcare nursery will be provided adjacent to the neighbourhood centre, with on-site parking and additional parking for the nursery within the neighbourhood centre.

A range of community facilities are proposed within this central hub, and along with the school this will be the heart of the development.

Potential facilities which could be provided within the neighbourhood centre include:

- an anchor convenience store;
- a coffee shop/ A3 use;
- a pharmacy;
- a medical centre to serve the new and existing community;
- a senior living scheme with landscaped courtyard;
- landscaped parking square
- a mix of one and two bedroom flats will be provided within the neighbourhood centre with associated parking and amenity space; and
- a pedestrian and cycle only street between the primary school and nursery and the neighbourhood centre facilities, creating a pleasant traffic free environment to making the neighbourhood centre a more attractive place to linger. It will also provide safe pedestrian access for children and parents attending the school.

Crest Nicholson will continue to liaise with the Education Authority and City Council in formulating its detailed proposals for the Community Hub. These will be included in the Design and Access Statement that will accompany the subsequent planning application.



Kilnwood Vale, West Sussex



Southborough, Tunbridge Wells



Tadpole Garden Village

## 12. Phasing and Delivery

### Overall Sequence of Development and Phasing

Crest propose to commence development by constructing the western access roundabout junction on Roxwell Road. The eastern access roundabout will follow as part of Phase 1 alongside housing in that area of the site. The detailed design of both access junctions will be considered as part of the application. The main loop spine road, surface water drainage, foul drainage, and utility services will be phased to be delivered in stages as required to service the housing parcels for the Phases. Practically, the bus link and bus route through the site will be delivered when the service is viable and discussions with the Council and bus service operators will determine timescales.

It is anticipated that development would proceed from the Roxwell Road northwards through the site, served from both the eastern and western sections of the internal loop road.

The timing of the provision of land and payment of financial contributions to the County Council to facilitate the delivery of the primary school and co-located early years and childcare nursery will be determined through the application process and will be documented within a S106 agreement. However, the location of the school and nursery is such that land they will be constructed upon can be made available in discussions with the County Council.

The location of the proposed neighbourhood centre within the scheme will mean it can be marketed relatively early on. Its' delivery will depend on interest of occupiers and it is envisaged that due to having sufficient new residents to make the neighbourhood centre uses viable.

The Travelling Showpersons site itself can also be marketed at an early stage, however its delivery, including its access onto Roxwell Road, will depend on marketing and interest of the Travelling Showpersons community.

Landscaping and open space provision will follow in sequence with the development of each housing cluster. Phase 1 will see the ecology area and play area to the west of the site delivered along with the large open space area to the east (which bounds the Brook and the Chignal Estate). The formal play pitches and associated community building together with the community orchard will be delivered alongside one another within Phase 2.

It is intended that affordable housing will be delivered proportionately across the site in accordance with adopted policy.

### The Way Forward

This masterplan document has been prepared to satisfy CCC's masterplan procedure, which is both to assist with informing the Local Plan process and to form an appropriate framework for the preparation, submission, and determination of future planning applications.

The Draft Local Plan has been found sound by the Examination Inspector, subject to the Main Modifications, and Chelmsford City Council are expected to adopt the plan as the Statutory Development Plan in Summer 2020.

Crest have been collating all necessary baseline evidence to inform the masterplan and to prepare a planning application for submission as soon as this masterplan document has been approved. The planning application will be accompanied by an Environmental Statement.

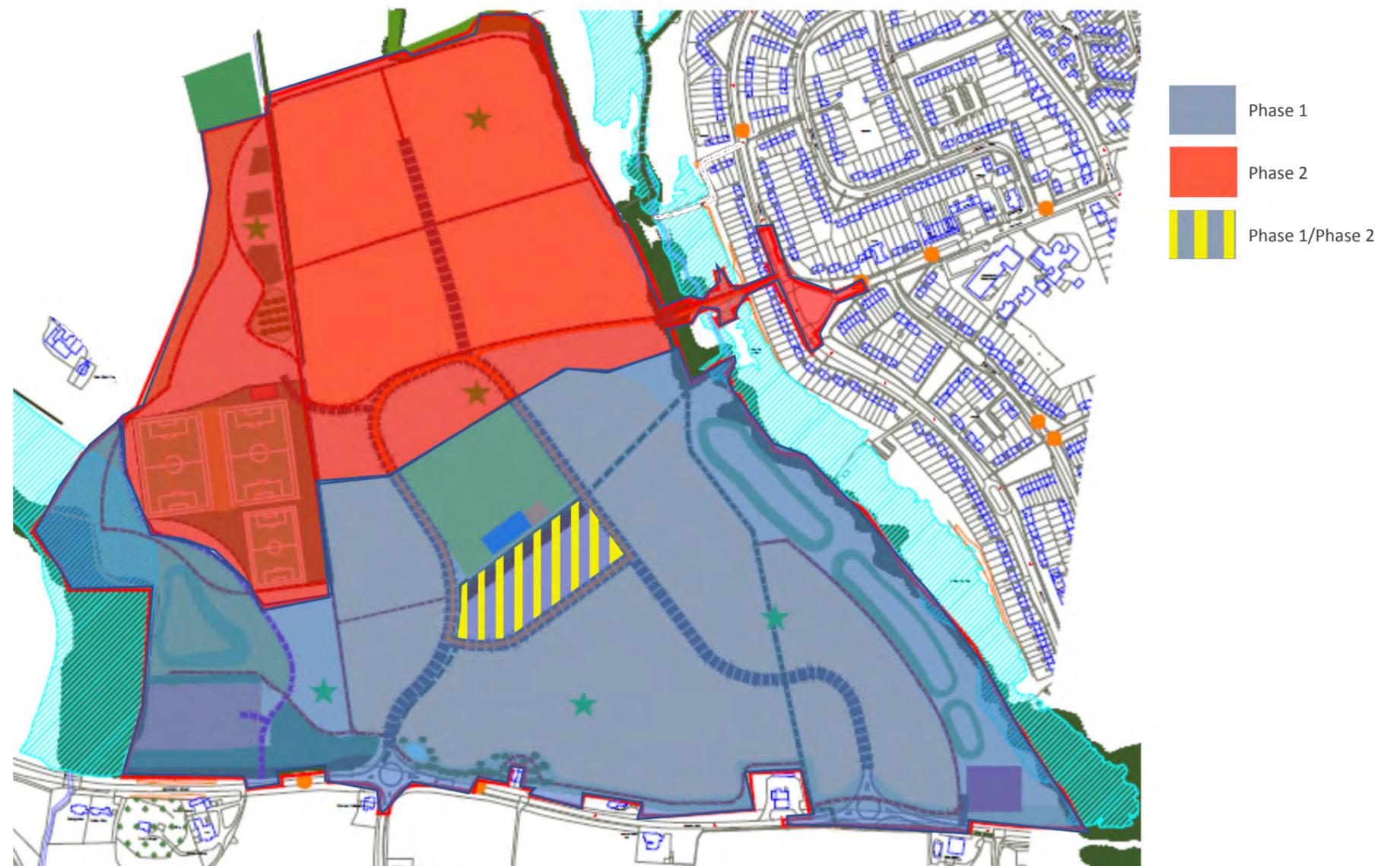
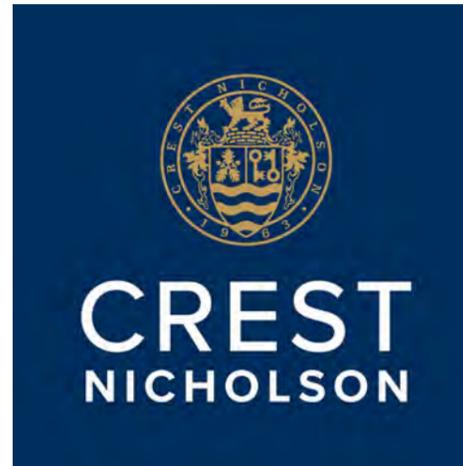


Figure 25: Sequence of Development and Phasing



Your Ref: 18/00001/MAS  
Our Ref: PPH/HT//SD/hg/CHL/18/00001/MAS  
Date: 2<sup>nd</sup> July 2020



CC: Cllr Stephen Robinson  
Essex Highways - SMO2

Andrew Cook  
Director for Highways and Transportation

To: Fao: Matthew Perry  
Planning and Development Management  
Chelmsford City Council

County Hall  
Chelmsford  
Essex  
CM1 1QH

## Recommendation

Application No. CHL/18/00001/MAS

Applicant Crest Nicholson

Site Location Land North of Warren House, Roxwell Road, Chelmsford

Proposal Strategic Growth Site 2 – West Chelmsford

The proposed Masterplan document has been considered in detail, and discussions have taken place with the applicant's highway consultants regarding the highway and transportation elements of the proposals. The revised Masterplan appears to have taken on board some of the Highway Authority's previous comments, however there are a number of issues which need to be addressed as follows:

1. The proposed footway/cycle route, which runs along the site frontage, should run adjacent to Roxwell Road. This, together with views of the development, would create a more built up environment which would be necessary to facilitate a reduction in speed limit to 40mph in the vicinity of the site.
2. The proposal should include the reduction of the speed limit on Roxwell Road to 40mph in the vicinity of the site.
3. A controlled crossing should be provided to the east of the Lordship Road access roundabout, to link the site to Lordship Road.
4. Safe pedestrian links should be provided between the site, including the TSP pitches, and the existing and proposed bus stops on Roxwell Road.
5. Additional bus stops will be required on Roxwell Road to ensure convenient access to the propose bus route along Roxwell Road.
6. Every dwelling should be within 400m walking distance of a bus route.
7. Additional pedestrian and cycle links should be provided between the site and the Chignal Road estate, as shown on the CCC illustrative plan.

8. PROW 25 and 26 Writtle are not accurately represented in the Masterplan. Highway status search plans should be obtained from Essex Highways in order to establish the correct alignment and widths of the routes; which will then need to be incorporated into amended plans.
9. The existing public rights of way PROW, footpaths 25 and 26 Writtle, where they run through the site, should be hard surfaced and improved to accommodate cyclists as well as pedestrians. These should then form part of the adopted network of cycle and pedestrian routes which run through the site. Similarly, all proposed footway and cycle routes throughout the site should be hard surfaces and should not form part of the PROW network.
10. Only the key cycle and footway connections are shown on the Masterplan. A comprehensive network of routes should be provided so that every dwelling is easily accessible by walking and cycling. The details to be agreed at the planning application stage. Pedestrian/cycle routes should be 4.0m in width.
11. A plan of the cycle route network, including route enhancements and connections to key facilities and destinations, should be included in the Masterplan
12. Some of the proposed footway/cycle routes are not direct. For example, a more direct connection should be provided between both the TSP site and the sports pitches, and the community hub.
13. The bus link is shown as being provided in phase 2 of the development. This, together with the part of the road network which provides the bus loop within the site, should be operational prior to the occupation of the 100<sup>th</sup> dwelling so that a bus route through the site can be operational by the 100<sup>th</sup> occupation.

The following highway and transportation measures as shown in the Masterplan and are agreed by the Highway Authority as being necessary to make the proposal acceptable in highway terms:

14. Enlargement of the Lordship Road roundabout and provision of a new roundabout to provide access to the site.
15. Provision of a new access to serve the TSP site and New Barn Cottages/farm buildings, with associated closure of the existing track to New Barn Cottages.
16. The main roads through the site, including the links from the two site access roundabouts to be designed to accommodate buses.
17. A vehicle free route to be provided between the primary school and the community hub. The route to be used by pedestrians and cyclists only.
18. Provision of a bus link between the site and Avon Road, for use by buses, pedestrians, cyclists and CCC maintenance vehicles for the allotments and play area only.

In addition to the above, off-site highway improvements will be required in association with the development, to mitigate its impact. These should be included in a Transport Assessment to accompany any future planning application.

It is noted that the site access plans within the Masterplan do not include details of improvements to pedestrian and cycle facilities or links to bus stops and are indicative only. This will need to be addressed as part of any future planning application, as well as providing details of sustainable travel connections to local facilities and destinations.



.....  
pp. Director for Highways and Transportation



---

## Chelmsford City Council Policy Board

16 June 2020

---

### Strategic Growth Site Policy 8 – North of Broomfield Masterplan

---

**Report by:**

Director of Sustainable Communities

---

**Officer Contact:**

Neil Jordan, Senior Planning Officer – [neil.jordan@chelmsford.gov.uk](mailto:neil.jordan@chelmsford.gov.uk) / tel. 01245 606427

---

#### Purpose

This report is seeking the Policy Board to recommend to Cabinet the approval of the masterplan for the North of Broomfield Local Plan Site Allocation.

#### Recommendation

1. The Policy Board recommend to Cabinet that the masterplan attached at Appendix 1 with any changes arising from the further recommendations be approved.
  2. That before consideration by Cabinet, the masterplan is subject to independent quality and design review undertaken by the Essex Quality Review Panel.
  3. That the Policy Board delegate the Director of Sustainable Communities in consultation with the Chair, Vice Chair and Cabinet Member for Sustainable Development, to negotiate any final changes to the masterplan ahead of the consideration by Cabinet.
- 

#### 1. Background

- 1.1. The masterplan presented in this report relates to Strategic Growth Site Policy 8 – North of Broomfield, which is brought forward by Bloor Homes. The formal

determination of masterplans consists of two stages: consideration by Chelmsford Policy Board and then approval by Cabinet.

- 1.2. Strategic Policy S7 sets out the spatial strategy (i.e. the scale and distribution) for new development over the period of the Local Plan. In allocating sites for strategic growth this policy confirms that Strategic Growth Sites will be delivered in accordance with masterplans to be approved by the Council. This is to ensure we are creating attractive places to live and the successful integration of new communities with existing. Masterplans are to demonstrate how the site will satisfy the requirements of the respective site policies.
- 1.3. Masterplans are a tool to help achieve a vision and key development objectives. They look at sites at a broad level and set a framework for the future detailed planning applications to follow. The Council's Masterplan Procedure Note updated in October 2019 sets out what masterplans should contain. With regard to this site, the core content of masterplan covers:
  - Land uses
  - Movement and connections
  - Green/blue infrastructure
  - Character of place
  - Early understanding of main infrastructure requirements and dependencies
  - Delivery and phasing

The masterplan should also seek to take into account the Livewell Design and Development objectives and make commitments to the principles of improving sustainable construction methods, energy efficiency and other sustainable development initiatives set out in the Council's emerging Making Places Supplementary Planning Document.

- 1.4. Each of the masterplans will take a bespoke approach to the site. The larger of the allocated sites will differ from the smaller sites, the more complex or more constrained sites may differ from less complex and constrained sites, for example. Most masterplans will cover additional content or will look at certain matters in more detail than others, as appropriate, but all will relate to the core content.
- 1.5. The masterplan does not secure detailed site planning or housing typologies.
- 1.6. Developer obligations will be secured by way of a s.106 Agreement as part of the outline planning application.

## 2. The Journey to This Stage

- 2.1 Through the Planning Performance Agreement (PPA) the developer is given a set of site masterplanning parameters (written and in plan form). These relate to the Local Plan policy expectations for that site. In addition, the parameters identify key site constraints and the areas where development should be avoided (e.g. landscape

corridors), where it might be preferable to situate the main site access, other key considerations such as heritage setting, etc. These are provided at a very broad level, intended only to provide the starting parameters, and are to be subject to refinement as part of the masterplan production.

- 2.2 Throughout the period of masterplan production there are recurrent discussions between officers and the developer. These generate numerous iterations of the masterplan; each of those refining the masterplan in response to the issues which have been raised. Complementing and strengthening that approach the process involves various forms of local engagement which ultimately shape the masterplan into something which is tailored for its locality. The key inputs of that engagement are outlined below.

#### Community and Technical Stakeholder Workshops

- 2.3 Prior to producing a draft masterplan, a round of community and technical stakeholder workshops is run. This collates local expectations for the future development and draws out key concerns and suggestions so that the developer can seek to include or resolve those as part of the first draft masterplan. These workshops are shown the PPA site parameters and given the chance to comment on that starting point.
- 2.4 The benefit of holding these sessions in a workshop format is that the input from those stakeholders can be visually represented on plans, helping understanding of spatial site planning.

#### Neighbourhood Plan

- 2.5 The existence of a draft Neighbourhood Plan in Broomfield has provided the means to frequently sense-check the masterplan proposals with local views throughout their production. The evidence base of the emerging neighbourhood Plan has been factored into the masterplanning for this site (alongside Bloor Homes' own evidence and the Local Plan evidence base) and has helped to shape the proposals from an early stage of production. The vast majority of comments made by the Neighbourhood Plan Group at various stages of the process have been incorporated into the refined draft of the masterplan which is now presented to Chelmsford Policy Board.

#### Public Consultation

- 2.6 From January to February this year a 4-week public consultation was held. This included a public exhibition held at Broomfield Village Hall where interested parties had the opportunity to speak with Bloor Homes representatives and Chelmsford City Council Planning Officers. The results of that public consultation have been summarised and the comments have been discussed between Bloor Homes and City and County Council officers culminating in a final draft revised masterplan document.

#### Member Presentation

2.7 Prior to the Chelmsford Policy Board meeting all Members were invited to a presentation setting out the content of the final draft masterplan and have had the opportunity to ask questions about content.

### 3. Overview of Masterplan Content

#### Land Uses

- 3.1. The masterplan successfully shows the integration of around 450 new homes to this locality. The approach taken is demonstrably landscape-led and there are good opportunities for public open space as well as natural landscaping throughout the development. Neighbourhood facilities, including an early years and childcare facility, are focussed towards the centre of the site where they are most accessible to all areas of the new community, whilst being accessible to the existing community as well.
- 3.2. There is sufficient open space to facilitate local recreation. These spaces are all located in accessible areas of the site for the benefit of new and existing residents. The relationship between development and public open spaces is such that safety and security are factored in from the outset through natural surveillance from the new homes. Play equipment suited to a range of age-groups will be located centrally with good levels of natural surveillance.

#### Movement and Connections

- 3.3 A requirement of this development is that it must provide a new vehicular access through the site to serve Broomfield Hospital as well as the development itself. The masterplan shows how this would be achieved in best practical terms. The route alignment has been subject to considerable discussion and refinement with the Mid-Essex Hospital Trust and Essex County Council Highways Officers, as well as with inputs from the developer, City Council Officers and the various stages of local consultation. This route is the only feasible route into the hospital site from the north via the allocation site (see also para 3.8). The masterplan demonstrates how this new route would relate to Woodhouse Lane and avoid intensified use of Woodhouse Lane junction and Hospital Approach.
- 3.4 Whilst the development must be served by roads for practical reasons, the development will promote active and sustainable travel opportunities for residents in preference to private car use. Providing a coherent and accessible network of routes for foot and cycle travel (as well as emerging forms of electric micromobility such as ebikes and e-scooters) is a key part of delivering development which is more geared towards sustainable travel. The masterplan shows how connections with existing foot and cycle routes in the locality would interface with new routes through and around the development and identifies future improvements to off-site routes. The detailed planning stages will consider road typologies and attributes within the development still further to adhere to this strategy.

- 3.5 The masterplan demonstrates how bus service will be directed into and through the site to provide ease of access to public transport for all residents. This would connect with existing bus infrastructure at Broomfield Hospital.

#### Green/blue infrastructure

- 3.6 The starting point for the masterplan has been to safeguard areas which hold most arboricultural or ecological value. This has shaped the development into parcels between those retained features. The result is a strong and coherent network of green corridors and spaces which protects the natural environment whilst meeting the needs of the new community. The masterplan provides several areas of green space for people, part of the 'village greens' approach to site planning in the context of Broomfield, and this supports the developer's commitment to achieve the Livewell accreditation.
- 3.7 Drainage approach has used existing topography and features such as ditches and the agricultural reservoir to promote a natural SUDS solution. This will be used in conjunction with new blue infrastructure in the form of open swales, etc. introduced as part of the new estate setting.
- 3.8 Although outside of the masterplan, the route through Puddings Wood required as part of the delivery of a new access road into Broomfield Hospital has been selected on the basis of ecological and arboricultural considerations. The selected route is consciously aligned over a natural clearing in the wood to greatly reduce impact on woodland character, individual trees and wildlife. With few exceptions, the trees along the selected route are lower category specimens and are of limited ecological value, which is in contrast to trees located outside of the selected route within the remainder of the woodland. The developer has accepted that both mitigation and compensation as part of the development will be required as a result of this new road access, which has meant the strengthening and widening of the landscape corridor to the west of the site, which provides a connection between Puddings Wood and Sparrowhawk Wood, to support more of the woodland characteristics that will provide/extend wildlife habitat and movement corridor.

#### Character of place

- 3.9 Through the masterplan the developer has conducted a study of local character and has used that contextual understanding to reinforce both the vision for the development and the layout approach. The vision informs the design approach that will be taken at detailed planning stage without representing overly prescriptive design coding, which is the appropriate protocol for this scale of development.
- 3.10 Within the site surroundings are various designated and non-designated heritage assets which the masterplan has remained sensitive to. The parcel in the south-east corner is being retained as open space to maintain an open setting to heritage assets and to acknowledge the former estate setting of Wood House (in addition to its ecological contribution).

Early understanding of main infrastructure requirements and dependencies

- 3.11 As allocated, the site is well served through its connection with the existing neighbourhoods of Broomfield, Little Waltham and Great Waltham. These settlements provide a range of services which can help to support the development, such as primary and secondary schools, a local library, places of worship, public houses, etc.
- 3.12 As referenced earlier within this report, delivery of the access from Blasford Hill into Broomfield Hospital (including bus provision and the means to prevent local rat running), pedestrian and cycle connections both within the site and to surrounding local settlements, provision of neighbourhood centre with co-located early years and childcare facility, and on-site open space are all shown within the masterplan. These infrastructure undertakings are mainly acknowledged at this stage because they have a bearing over masterplanning.
- 3.13 There will be other requirements, such as affordable and specialist housing, self/custom build housing, local healthcare, local highway improvements, etc. which do not have a bearing over masterplanning, but which will form part of the development and will be considered further as part of the outline planning application. These references to potential planning obligations are not to be taken as exhaustive.
- 3.14 During the course of consultation, the NHS has engaged with officers and the developer on provision of additional local healthcare capacity either in the local area or on-site. The delivery of local healthcare services is managed by the NHS and their decision on where services should be placed is being considered by them in light of their emerging strategy, but their remains sufficient flexibility in the masterplan to accommodate healthcare provision on site if the NHS decides that is the best approach. The neighbourhood centre is to be a community-focused area of the development which can be adapted at a later stage of the planning process. The discussions with the NHS are ongoing.
- 3.15 Sustainable design and construction objectives will be adhered to. This is achieved through a fabric first approach but does not rule out the use of community heat and power systems, for example, for which space within the development will need to be provided. Whilst this information could be incorporated at masterplanning stage, the absence of such facilities in this masterplan does not rule out the inclusion of community systems or other sustainable living/sustainable power generation measures on this site to meet the Council's objective of reaching a net carbon zero position by 2030.

4. Public Consultation – Main Issues (masterplanning)

Issue	Response
<p>How is the hospital access road delivered?  <i>Various queries about how it connects with the hospital internal road network, who provides it, at what stage of the process is this provided, etc.</i></p>	<p>The masterplan now more clearly shows the continuation of the route via Puddings Wood to connect into the hospital internal road network. Clearer language is used to demonstrate it is Bloor Homes' obligation to provide the new hospital access road from Blasford Hill to connection with hospital internal road network. Definitive timing of works will be for agreement under the terms of a s.106 Agreement, but the masterplan demonstrates intent to deliver this new access road early in the construction programme.</p>
<p>Woodhouse Lane closure  <i>Unclear what is being proposed as three options have been presented, comments on the attributes of the road closure which vary depending on where respondent lives along Woodhouse Lane</i></p>	<p>It is a necessary part of delivering the new hospital access road that closure is introduced to Woodhouse Lane and routes redirected over the new development access infrastructure. Everyone supports closure of Woodhouse Lane junction with Blasford Hill in some form and all want to avoid rat running via the narrow country lanes. The masterplan has removed the options drawings and now presents a workable proposal which facilitates the new hospital access and prevents rat running.</p>
<p>Local land ownership matters  <i>Some areas of masterplan remain in separate ownership and need consideration as such</i></p>	<p>Any use-specific designations have been removed from these areas, but masterplanning principles remain to guide development on those parcels.</p>
<p>Woodland buffer to the west  <i>Wider zone and more densely tree planted</i></p>	<p>The masterplan has not been amended in light of these comments. The width of landscape belt balances the need for arboricultural/ecological mitigation and compensation with the site's ability to deliver 450 new homes. Detailed planting specification will be agreed at detailed planning stage (e.g. reserved matters).</p>
<p>Impact on Puddings Wood</p>	<p>Rationale for hospital access road alignment is explained earlier in this report.</p>
<p>Loss of natural habitat</p>	<p>A clearer commitment to achieving net biodiversity gain is stated in the masterplan. Ecological assessment has informed masterplanning from the outset.</p>

<p>Long range views to the development <i>Views out of the valley, views from the farmland plateau, site topography</i></p>	<p>The masterplan has not been amended in light of these comments. The scale range of the development is 2-3 storeys and taken with the extensive boundary planting as proposed, local built context and variation in local topography the need to further masterplan for longer range views is not necessary.</p>
<p>Local healthcare provision</p>	<p>Discussions with the NHS are ongoing. Should they conclude that on-site healthcare provision is required, this would involve the adaptation of the neighbourhood centre area which has limited masterplanning implications.</p>

## 5. Delivery and Phasing

- 5.1. The masterplan sets out an indicative phasing strategy. This will be subject to future evolution, but it provides a basis of understanding at masterplanning stage of how the development can come forward
- 5.2. The masterplan describes housing delivery over three phases with a duration of around 5 years to complete the build. An intention to deliver the access road across the site and into the hospital at an early stage in the development is stated.

## 6. Further Considerations

- 6.1. An Independent Design Review shall be undertaken by Essex Quality Review Panel in the intervening period between Chelmsford Policy Board and Cabinet meetings. This verification of the masterplan allows for an independent sense-check and the outcome of the review will be considered by the Director of Sustainable Communities as part of the process outlined in the recommendations of the report.
- 6.2. As stated at the recent Member Presentation, Bloor Homes will more extensively explore what sustainable construction methods, energy efficiency and other sustainable development initiatives can be incorporated into this development in accordance with the emerging Making Places Supplementary Planning Document. This will begin now but will continue into the next stages of planning.

## 7. Conclusion

- 7.1. The masterplan demonstrates how the requirements of the Local Plan will be delivered on this site.

- 7.2. The vision is sufficiently ambitious to achieve a high-quality development which is well related to its context. The masterplan layout and other content provides a sound framework to guide successful placemaking and will support the planning application process as it should.
- 7.3. The masterplan is presented to Chelmsford Policy Board with recommendations that it be referred to Cabinet for approval subject to the inclusion of any further necessary changes with acknowledgement of those Further Considerations as listed.
- 

**List of appendices:**

Appendix 1 – Masterplan

**Background papers:**

None

**Corporate Implications**

**Legal/Constitutional:**

None

**Financial:**

None

**Potential impact on climate change and the environment:**

New housing delivery can have a negative impact on climate and environmental change issues. Planning Policies, Building Regulations and Environmental Legislation ensure that new housing meets increasingly higher sustainability and environmental standards which will help mitigate this impact.

**Contribution toward achieving a net zero carbon position by 2030:**

The new Local Plan and emerging Making Places SPD will provide guidance to assist in reducing carbon emissions through development. This development will follow the published guidance.

**Personnel:**

None

**Risk Management:**

None

**Equality and Diversity:**

None. An Equalities and Diversity Impact Assessment has been undertaken for the Local Plan.

**Health and Safety:**

None

Digital:  
None

Other:  
None

---

**Consultees:**

CCC – Spatial Planning

**Relevant Policies and Strategies:**

This report takes into account the following policies and strategies of the City Council:

Local Plan 2013-2036

Our Chelmsford, Our Plan, January 2020

Chelmsford Climate and Ecological Emergency Action Plan



BLASFORD HILL  
**BROOMFIELD**

**MASTERPLAN FRAMEWORK**

APRIL 2020

All plans are reproduced from the Ordnance Survey Map with the permission of the Controller of HMSO. Crown copyright Reserved. Licence No. AR152684.

Barton Willmore  
The Blade  
Abbey Square  
Reading  
Berkshire  
RG1 3BE

T: 0118 943 0000  
E: info@bartonwillmore.co.uk

Desk Top Publishing and Graphic Design by Barton Willmore Graphic Communication.

This artwork was printed on paper using fibre sourced from sustainable plantation wood from suppliers who practice sustainable management of forests in line with strict international standards. Pulp used in its manufacture is also Elemental Chlorine Free (ECF).

© Barton Willmore

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore.

\\bartonwillmore\cfs\Reading\Files\25000 - 25999\25700 - 25799\25746 - Broomfield\A5 - Reports & Graphics\Graphic Design\Documents\06 Masterplan Document

Document Status	FINAL
Revision	J
Author	SW
Checked by	AF
Authorised by	AF
Issue Date	April 2020

# CONTENTS

## 1. INTRODUCTION

- A VISION FOR BLASFORD HILL
- THE DEVELOPER - BLOOR HOMES

## 2. CONTEXT & SITE ANALYSIS

- SITE LOCATION
- SITE DESCRIPTION
- SITE CONTEXT & ANALYSIS
- PLANNING POLICY
- LOCAL COMMUNITY FACILITIES & SERVICES
- ACCESS & MOVEMENT
- LANDSCAPE & VISUAL
- LOCAL CHARACTER
- ARBORICULTURE & ECOLOGY
- ARCHAEOLOGY AND BUILT HERITAGE
- GEOLOGY
- FLOOD RISK
- UTILITIES
- NOISE
- EDUCATION
- SITE CONSIDERATIONS

## 3. SITE OPPORTUNITIES AND DESIGN PRINCIPLES

- DESIGN RATIONALE

## 4. COMMUNITY ENGAGEMENT & LOCAL INVOLVEMENT

- COMMUNITY ENGAGEMENT & LOCAL INVOLVEMENT CONSULTATION

## 5. MASTERPLAN FRAMEWORK

- MASTERPLAN FRAMEWORK PLAN

### INDICATIVE MASTERPLAN

- LANDUSE STRUCTURE
- MASTERPLAN

### INDICATIVE LANDSCAPE / GREEN INFRASTRUCTURE FRAMEWORK

- GREEN & BLUE INFRASTRUCTURE
- LANDSCAPE FRAMEWORK PLAN

### INDICATIVE MOVEMENT FRAMEWORK

- MOVEMENT FRAMEWORK PLAN
- PUBLIC TRANSPORT
- PEDESTRIAN AND CYCLE
- ACCESS
- WOODHOUSE LANE HIGHWAY IMPROVEMENT OPTIONS

### INDICATIVE CHARACTER & FOCUS AREAS

- CHARACTER AREAS
- NEIGHBOURHOOD CENTRE
- INDICATIVE STREET SECTIONS
- SPINE STREET
- COUNTRYSIDE EDGE
- LANDSCAPE

## 6. DELIVERY & PHASING

- INDICATIVE PHASING PLAN

# 1. INTRODUCTION

## THE VISION FOR BLASFORD HILL

Blasford Hill, created for the 21st Century responding to people's desires not only for quality new homes but for a whole new way of life, one that's sustainable, healthy, convenient and community focused. Blasford Hill will give people a chance to own a home in their local community, by delivering a variety of homes to meet local needs.

The development will deliver new areas of high-quality open space as part of a comprehensive green and blue infrastructure network that connects with the existing landscape setting helping to enhance existing wildlife habitats and improve biodiversity. Blasford Hill aims to create a community that integrates with the existing residents of Broomfield and Little Waltham.

Blasford Hill will be an exemplar development of the highest standards – a place where people genuinely want to live and work and play. Designed to minimise the use of the car and maximise walking, cycling and local public transport, to help encourage healthy living and community interaction ensuring that Broomfield remains a great place to live.

# THE DEVELOPER - BLOOR HOMES

**PLACEMAKING IS AT THE VERY HEART OF EVERYTHING WE DO – DELIVERING HOMES PEOPLE WANT TO LIVE IN.**

Bloor Homes has 50 years continuous experience in promoting and developing major housing schemes across the UK. Today, it is one of the largest privately-owned house building companies in the UK, building 4,000 new homes each year ranging from one-bedroom apartments to traditional family homes.

Our long term family ownership and simple structure provides certainty which is not susceptible to change or disruption.

We deliver high quality homes and infrastructure which are designed to complement the local area. Recognising the importance of working collaboratively with those who live and work in the area, creating good places that promote health happiness and wellbeing.



## ROWHEDGE, COLCHESTER BOROUGH COUNCIL

This application in Rowhedge delivered 170 plots in a sensitively designed new mixed-use residential neighbourhood within the settlement boundary of the area formally known as Rowhedge Wharf. It transformed the 4.9 hectares of degraded Site through comprehensive regeneration and provided new homes, which included 2 to 5 bedroom homes. Full planning permission was granted in August 2015 by Colchester Borough Council. In addition, provisions were made to improve ecological habitats.

## SIBLE HEDINGHAM, BRAINTREE DISTRICT COUNCIL

This application saw 193 plots created on a Brownfield Site which consisted of the redevelopment of the former redundant Premdor Factory into beautiful 2 to 5 bedroom homes. It ensured ecological enhancement to the existing woodland surrounding the area, alongside the creation of a new river walk and cycle link.

We worked very closely with the local authority, and the construction of the work hub building was gifted to Braintree District Council as was land secured for future healthcare.



## SEVERALLS, COLCHESTER BOROUGH COUNCIL

The re-development of the former Severalls Hospital saw the creation of a high-quality residential development with reserved matters approved in April 2016 by Colchester Borough Council. The Site was allocated through the adopted Local Plan and consisted of 750 plots of 2 to 5-bedroom homes.

The Site's historical use, character, design and landscape was an important element to capture within the proposed design which saw the re-development of listed buildings as well as ensuring ecological enhancement, in-particular for bats.



## 2. CONTEXT & SITE ANALYSIS

### SITE LOCATION

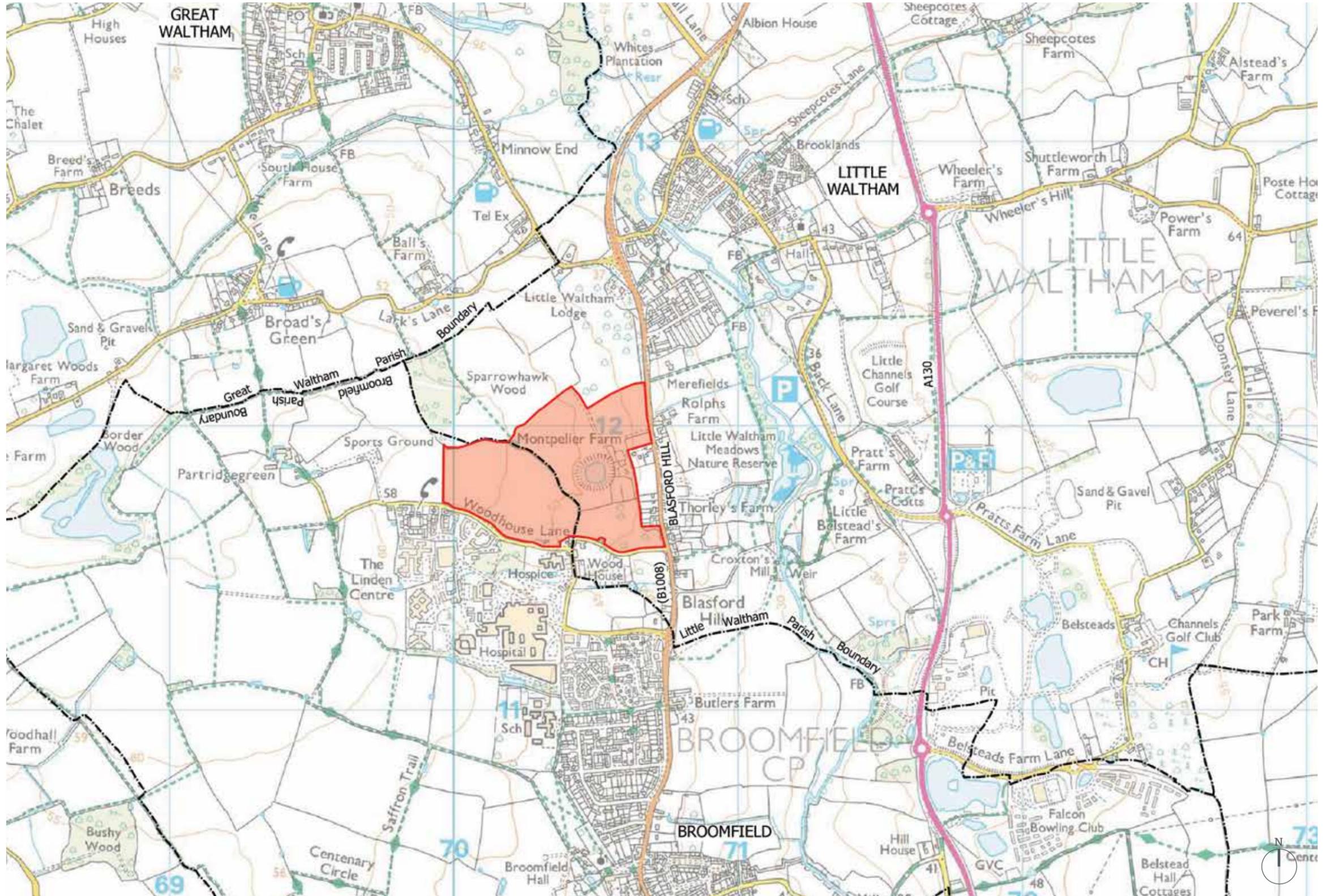
The Site lies around 4 miles (6.43km) north of Chelmsford city centre, between the villages of Broomfield and Little Waltham. The Site falls jointly into the Parishes of Broomfield and Little Waltham as illustrated on the map opposite. To the north west lies the hamlet of Broad's Green whilst to the east is Little Waltham Meadows Nature Reserve. Broomfield Hospital and Farleigh Hospice are located immediately to the south of the Site which occupies a significant area.

Broomfield has a population of approximately 4,000 people and offers a good range of services and facilities. The village extends out along the B1008 main road from Chelmsford city centre although most of the built up area is on the western side with the Chelmer River Valley to the east.

Little Waltham village and parish has a population of around 1,200 people. It has a pub, GP surgery, church, school, and two halls. The village has an attractive centre and a number of historic buildings.

The Site is located within the borough of Chelmsford City and the Council is the local planning authority.

The following pages explore the Site, its context, planning policy, character and technical considerations in more detail.



Local Context Plan

**SITE DESCRIPTION**

The Site comprises approximately 28 hectares (ha) and lies on the northern edge of Broomfield, to the west of Blasford Hill (B1008) and to the north of Woodhouse Lane.

The Site is predominantly in agricultural use, bisected by trees and hedgerow on the alignment of a ditch and public right of way. The public footpath connects Sparrowhawk Wood to the north with Woodhouse Lane and North Court Road to the south.

The hard standing area to the west of the scaffold yard has also been included within the masterplan boundary. Although this area is not included within the Local Plan Allocation it helps to show how the area could be comprehensively masterplanned.

The Site contains an agricultural reservoir which is well established, created around 1976. To the east of this feature lies a group of commercial buildings. Trees and hedges define the northern and southern boundaries of the Site. The banks around the reservoir comprise grassland, scrub and immature trees.

The land to the north comprises fields currently in agricultural use whilst located to the west of the Site are the King Edwards Grammar School (KEGS) sports pitches. The southern boundary is defined by Woodhouse Lane beyond which are Broomfield Hospital, Farleigh Hospice and a small area of woodland known as Puddings Wood located between them.

Located in the south east corner at the lowest point of the Site lies a field which is currently semi-improved neutral grassland and contains a few tree preservation orders within it. Adjacent to the eastern boundary is Blasford Hill, Montpelier Farm, commercial buildings (Scaffold Yard), the rear gardens of the adjoining housing, and allotments.

A planning application for residential development had been submitted on land to the south east corner of the Masterplan boundary (land north of Woodhouse Lane and west of Blasford Hill), and which forms part of the Site Allocation. Planning permission had been granted in 2018 for 11 dwellings on this land.

 Masterplan Site Area



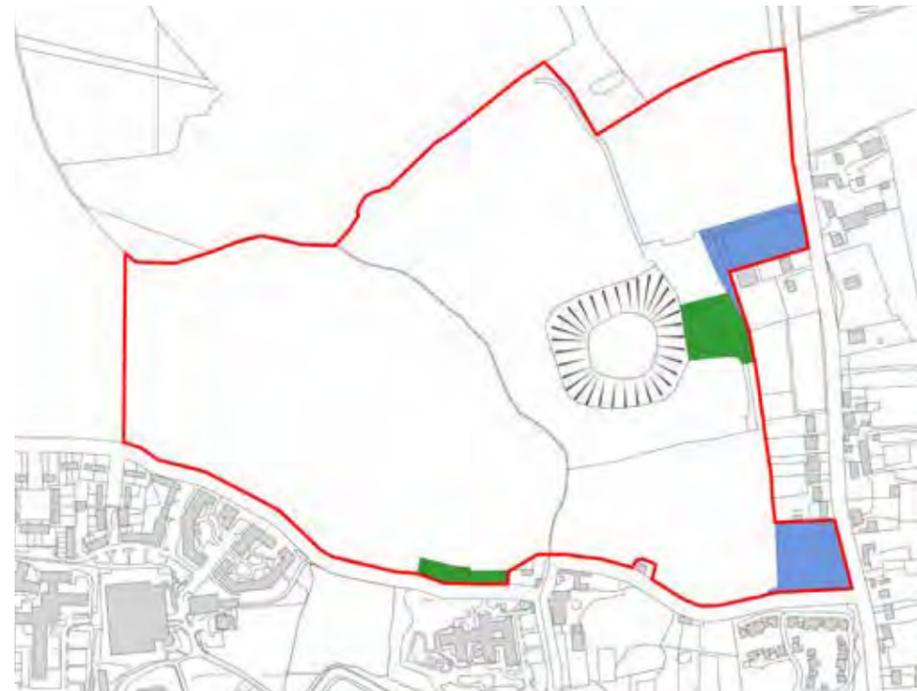
Aerial photo of the Site

# SITE CONTEXT

## SITE AND CONTEXT ANALYSIS

The Site is currently open countryside, characterised by an undulating agricultural landscape and includes an agricultural reservoir. Given the Site topography and surrounding tree belts, long distance views are limited to the east and the valley of the River Chelmer. Short views are afforded to open countryside to the north west, Puddings Wood and Broomfield Hospital to the south. Immediately along the western edge is the King Edwards Grammar School playing fields with Sparrowhawk Wood to the north west. To the north are open fields, and on the eastern boundary there are a few residential properties (of which some are listed), Montpellier Farm, allotments, Scaffold yard and commercial buildings. The southern boundary is defined by Woodhouse Lane, a cluster of residential properties, hedges and small woods. Broomfield Hospital, Farleigh Hospice and the village of Broomfield are beyond. It is expected that the masterplan will respond positively to these Site characteristics.

- Important local views are afforded from the existing public footpath that crosses the Site, running alongside a farm ditch.
- Topography determines that surface water flow routes and natural ponding occurs within the centre of the Site, the reservoir and in the south eastern corner.
- The south eastern element is the historic context for a rural hamlet of listed properties along Blasford Hill and was once the parkland grounds for Wood House located to the south of Woodhouse Lane.
- Trees and hedges sit along the southern boundary and within the south eastern field.
- There are sensitive uses on the south and eastern edges.

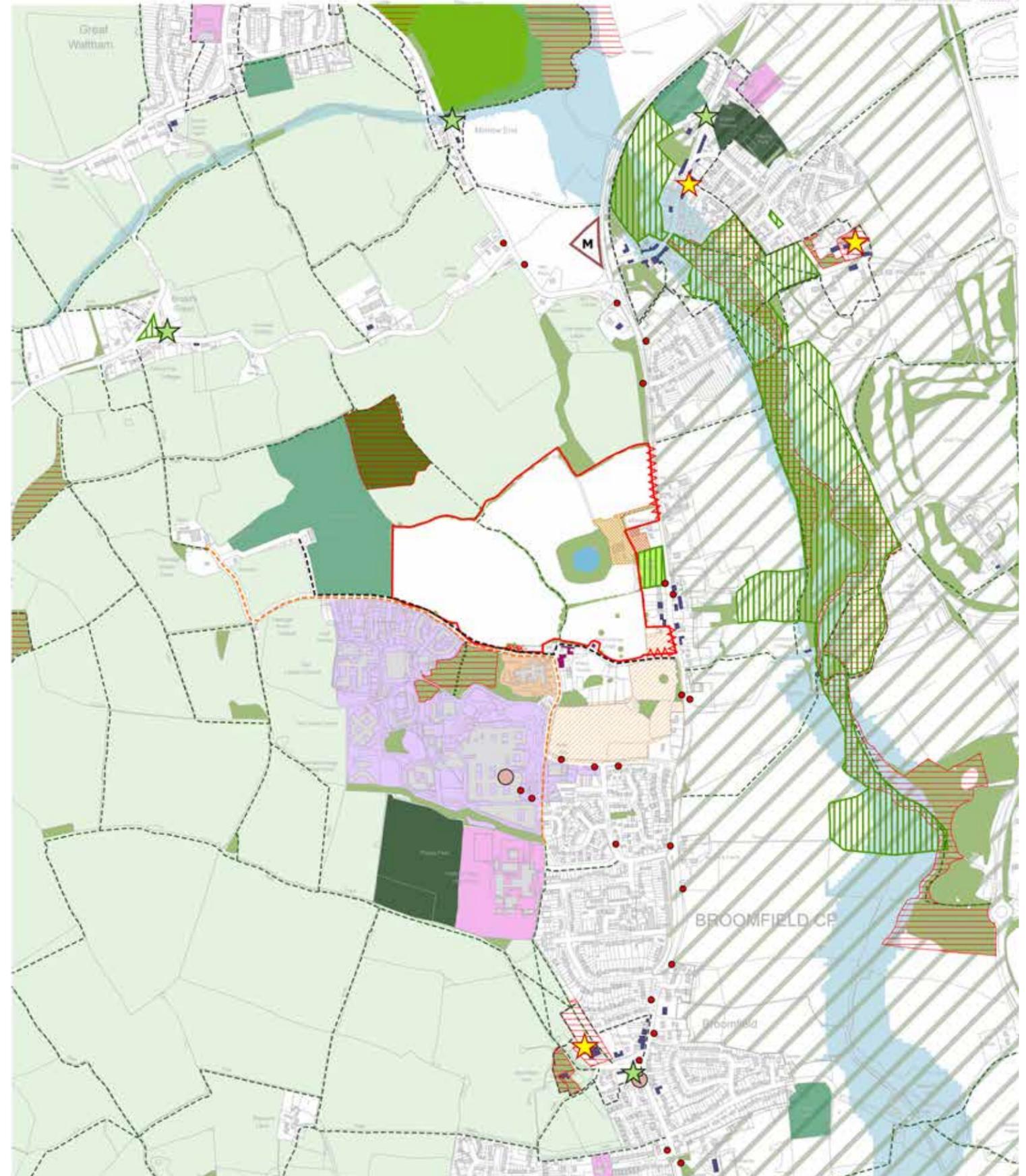


- Masterplan Site Area
- Land in addition to allocation under the control of Bloor Homes
- Land in the allocation that is not under the control of Bloor Homes

- Masterplan Site Area
- Listed Buildings
- Non Designated Heritage Assets
- Scheduled Monument
- Conservation Area
- Local Wildlife Site
- Ancient Woodland
- Trees / Woodland
- Playing Fields
- Green Wedge
- Open Space
- Countryside
- Allotments
- School Playing Fields
- Registered Parks and Gardens
- PRoW
- Footpath Through Puddings Wood
- Cycle Route
- Consented Development
- Flood Zone 2 & 3
- Japanese Knotweed
- Scaffold Yard
- Land Used for Scaffold Business
- Broomfield Hospital (Up to 4 Storeys)
- Farleigh Hospice
- Education
- Noise Source
- Country Lane with Prominent Tree/Hedge
- Shops
- Public House
- Place of Worship
- Library
- Bus Stops



Site Context Plan





View looking south along Blasford Hill towards Broomfield (Site on right hand side)



PRoW leading onto Woodhouse Lane



View looking east along Woodhouse Lane with Coach House on the right



View looking east along Woodhouse Lane to Northcourt Road



Agricultural Reservoir



Agricultural Reservoir setting located within the Site



View looking north east across the Site from Woodhouse Lane with Broomfield Hospital on the right

# PLANNING POLICY

## NATIONAL PLANNING POLICY

This masterplan document and supporting plans have been prepared with reference to local and national planning policy guidance. This section provides a summary of those relating to design.

### National Planning Policy Framework (NPPF, 2019)

The Council's Pre-submission Draft Local Plan (dated January 2018) was examined by the Secretary of State in November and December 2018, and was therefore subject to the policies contained within the previous Framework (2012), as part of the transitional arrangements stipulated within paragraph 214 of the update NPPF (2018).

The revised National Planning Policy Framework (NPPF) was introduced in February 2019, and sets out the government's planning policies and how these are expected to be applied. The NPPF still maintains the 'Presumption in Favour of Sustainable Development' for both planmaking and decision-taking. Paragraph 11 of the NPPF makes clear how the presumption in favour of sustainable development should be applied. This paragraph is at the heart of the plan making and decision-taking processes.

Masterplans are not explicitly referenced within the NPPF, though are a design tool to aid developers in achieving high design standards as part of their development proposals. Accordingly, Paragraphs 124 of the NPPF makes clear that 'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.' This a thread that runs through the Masterplan document.

In support of the NPPF, there are particular references within the Planning Practice Guidance (PPG) that assist the masterplan document.

Paragraph 032 Reference ID: 26-032-20140306, of the PPG states:

'Masterplans can set out the strategy for a new development including its general layout and scale and other aspects that may need consideration. The process of developing masterplans will include testing out options and considering the most

important parameters for an area such as the mix of uses, requirement for open space or transport infrastructure, the amount and scale of buildings, and the quality of buildings.

Masterplans can show these issues in an indicative layout and massing plan where the shape and position of buildings, streets and parks is set out. Masterplans can sometimes be submitted for outline planning permission or they can be adopted as local policy requirements.

Care should be taken to ensure that masterplans are viable and well understood by all involved. In particular graphical impressions of what the development will look like should not mislead the public by showing details not yet decided upon as certainties.

Masterplans, briefs and site policies can stay in place for a long time. They need to be flexible enough to adapt to changing circumstances.'

### National Design Guide

On 1st October 2019, the Ministry of Housing, Communities & Local Government published the National Design Guide. This addresses the question of how we recognise well-designed places, by outlining and illustrating the Government's priorities for well-designed places in the form of ten characteristics.

The National Design Guide is based on national planning policy, practice guidance and objectives for good design as set out in the NPPF.



## LOCAL PLANNING POLICY

### Local Plan

The timeline for the Chelmsford Draft Local Plan is as follows:

- Regulation 18 – Preferred Options consultation: March 2017.
- Regulation 19 – Pre-submission Draft Local Plan consultation: February 2018.
- Examination in Public of the Draft Local Plan: November/December 2018.
- Main Modifications consultation: August 2019, and
- Adoption of the Local Plan: anticipated early 2020.

Devising this masterplan has resulted from a requirement stipulated within the draft Local Plan. Strategic Priority 8 (Creating Well Designed and Attractive Places, and Promoting Healthy Communities) of the Local Plan, makes clear that the 'plan' will encourage the use of masterplans and design codes where appropriate for strategic scale developments. This in turn feeds into the overarching spatial strategy (Strategic Policy S9), which requires that 'Strategic Growth Sites will be delivered in accordance with masterplans to be approved by the Council.'

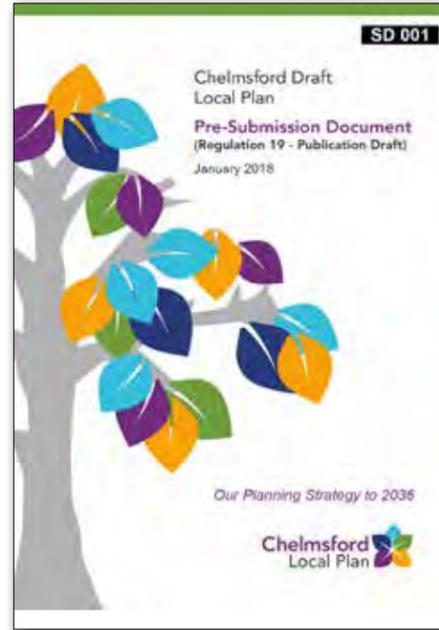
Following on from Strategic Policy S9, the Strategic Growth Site subject to this masterplan document is Location/Site 6 (North of Broomfield). This Site is supported by its own 'Strategic' policy (Strategic Growth Site 6). This policy seeks to deliver a 'high-quality landscape-led development that maximises opportunities for sustainable travel.' The policy requires the following to be provided, and also includes additional text made by the Main Modifications:

### Amount and type of development:

- Around 450 new homes of mixed size and type to include affordable housing.

### Supporting on-site development:

- Neighbourhood Centre.
- Provision of a new stand-alone early years and childcare nursery located in the southern portion of the Site.



### Site masterplanning principles:

#### Movement and Access

- Main vehicular access to the Site will be from Blasford Hill (B1008).
- Provide a new vehicular access road to serve the development and provide access to Broomfield Hospital and Farleigh Hospice.
- Provide pedestrian and cycle connections.
- Provide a well-connected internal road layout which allows for bus priority measures.

#### Historic and Natural Environment

- Conserve and where appropriate enhance the setting of the listed buildings on Blasford Hill and the non-designated heritage assets Wood House, the Coach House and Wood House Lodge adjoining the Site.
- Protect and where appropriate enhance the setting of the nearby Scheduled Monument to the north of the Site.
- Mitigate the visual impact of the development.
- Enhance the historic environment.
- Create a network of green infrastructure.

- Provide suitable SuDs and flood risk management.
- Ensure appropriate habitat mitigation and creation is provided.
- Undertake a Minerals Resource Assessment.
- Undertake an Archaeological Assessment.

### Design and Layout

- Provide a coherent network of public open space, formal and informal sport, recreation and community space within the Site.

### Site infrastructure requirements:

- Land (circa 0.13 hectares) for a stand-alone early years and childcare nursery (Use Class D1) and the total cost of physical scheme provision with delivery through the Local Education Authority.
- Appropriate improvements to the local and strategic road network as required by the Local Highways Authority.
- Appropriate measures to promote and enhance sustainable modes of transport
- New and enhanced cycle routes, footpaths, Public Rights of Way and bridleways where appropriate.
- Provide, or make financial contributions to, new or enhanced sport, leisure and recreation facilities.
- Financial contributions to delivery of the Chelmsford North East Bypass, primary and secondary education, and community facilities such as healthcare provision as required by the NHS/CCG.

There are several key policies that are pertinent to the masterplan in design terms, which are as follows:

Strategic Policy S1 'Spatial Principles' lists the guiding Spatial Principles which include; locating development at well connected sustainable locations, protecting and enhancing the character of valued landscape, heritage and biodiversity, respect the pattern and hierarchy of existing settlements, and, ensure new development is served by necessary infrastructure.

Strategic Policy S5 'Conserving and Enhancing the Historic Environment' states that the Council will protect and enhance the Historic Environment, which includes, amongst other designated and non-designated heritage assets, Scheduled Ancient Monuments and Listed Buildings.

The need to protect and enhance the natural environment and plan positively for biodiversity networks is outlined in Strategic Policy S6 'Conserving and Enhancing the Natural Environment'.

Policy HO1 'Size and Type of Housing' details the key building design parameters that major residential developments will need to adhere to, specifically:

A) Within all developments of 10 or more dwellings the Council will require:

i. The provision of an appropriate mix of dwelling types and sizes that contribute to current and future housing needs and create mixed communities; and

ii. 50% of new dwellings to be constructed to meet requirement M4(2) of the Building Regulations 2015 (accessible or adaptable dwellings), or subsequent government standard.

B) Within all developments of 30 or more dwellings the Council will require A)i and A)ii above, and:

i. 5% of new affordable dwellings should be built to meet requirement M4(3) of the Building Regulations 2015 (wheelchair user dwellings), or subsequent government standard.

C) Within all developments of more than 100 dwellings the Council will require A)i, A)ii and B) i above, and:

i. 5% self-build homes which can include custom housebuilding. At the time an application is submitted, the Council will review this percentage against the latest local housing need requirement for selfbuild/custom build homes; and

ii. Provision of Specialist Residential Accommodation (including Independent Living) taking account of local housing needs.

Policy NE3 'Flooding/ SUDS' aims to ensure that development sites are safe from all type of flooding and that future development does not give rise to adverse flood risk or surface water drainage. All major development will be required to incorporate water management measures to reduce surface water run-off and ensure that it does not increase flood risk elsewhere.

The policies which relate to ensuring that development is of a high quality design and that it responds successfully to its context are explained within planning policies MP1 'High Quality Design' and MP2 'Design and Place Shaping Principles in Major Development'. The policies provide broad principles that new development should follow to ensure that it is of a high standard of design.

Appendix A 'Development Standards' provides greater clarity on the criteria that will be used to determine the design quality of schemes and includes standards such as privacy and proximity standards, private amenity space standards and recycling and waste specifications.

The Strategic Growth Site 6 (Policy SGS6) only requires a 56 place early years facility. This is in reflection of the scale of development proposed.

Other policies which are of relevance and considered as part of the Masterplan document are as follows:

- HE1 – Designated Heritage Assets.
- HE2 – Non-Designated Heritage Assets.
- HE3 – Archaeology.
- NE1 – Ecology and Biodiversity.
- CF1 – Delivering Community Facilities.

Further to the above, Policy S11 (Infrastructure Requirements) is a strategic policy that sets out the infrastructure required to facilitate the development identified within the Local Plan. This policy is of particular relevance to Strategic Growth Site 6 as there are infrastructure requirements listed within the site specific policy over and above items listed within Policy S11.

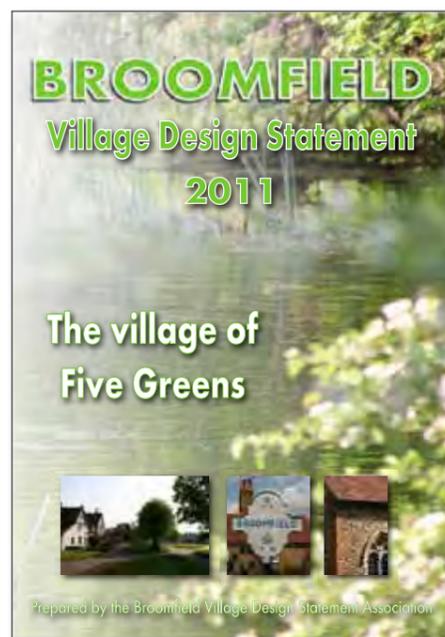
## NEIGHBOURHOOD PLAN

The Site crosses the boundary of two Parish Councils: Broomfield Parish Council and Little Waltham Parish Council.

Broomfield Parish Council are in the process of drafting their Neighbourhood Plan, and have formally designated their Neighbourhood Area. Little Waltham Parish Council have not yet commenced with either formally designated their area, or the drafting of a Neighbourhood Plan. Both Parish Councils have been engaged with in respect of the Masterplan process.

## BROOMFIELD VILLAGE DESIGN STATEMENT

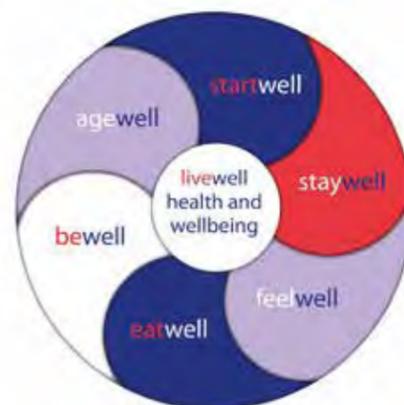
The Broomfield Village Design Statement (VDS) was published in 2011, and was produced to aid and direct future development to integrate within the existing village. Given the age of the VDS it does not consider the proposed development subject to this application in any detail, or does it comply with any current national or local planning policies. The VDS does, however, provide some helpful context in understanding the local vernacular and wider settlement of Broomfield.



## LIVE WELL

An important element of any development coming forward is incorporating and delivering health and wellbeing. Health and wellbeing are intrinsically linked to both individuals and their environment. Health inequalities are heavily influenced by a wide range of socio-economic factors including housing, education, jobs and worklessness.

It is considered that acknowledging developments would be of greater benefit for planners and developers as well as the public who can be given some assurance that these environments have the potential to support their health and wellbeing. Development proposals that may come forward for this Site will have the opportunity to sign up to the 'Livewell Developer Charter', which commits developers to support the health and wellbeing principles within an accreditation scheme.



## SECURED BY DESIGN

Secured By Design (SBD) is a police initiative that improves the security of buildings and their immediate surroundings to provide safe places to live, work, shop and visit. As a police organisation working alongside the Police Service in the UK, this seeks to achieve sustainable reductions in crime through design and other approaches.

SBD has produced a series of helpful Design Guides to assist the building, design and construction industry to incorporate security into developments to comply with the Building Regulations and meet the requirements of SBD.

## CHELMSFORD OPEN SPACE STUDY

The Open Space Study was carried out in 2016 by consultants on behalf of Chelmsford City Council. The overall Chelmsford Open Space, Sports and Recreational Facilities Study comprises six reports.

The Open Space Study is presented in two parts. The main report comprises an overview of the whole study and includes details on local needs, methodology, open space typologies and analysis of provision. The second report comprises six green space area profiles which provide more localised information.

## CHELMSFORD GREEN INFRASTRUCTURE STRATEGIC PLAN

The Green Infrastructure Strategic Plan draws from a wide range of plans, programmes and strategies developed within the City and by partners. As part of a Research and Evidence Base, these documents have helped to inform the identification of the character and opportunities associated with Green Infrastructure across the City Council area and beyond, reflecting both the wide spatial reach of the Green Infrastructure Strategic Plan and its delivery through partnership working. The Green Infrastructure Strategic Plan is a starting point for identifying and targeting gaps in provision, providing a framework for new development and determining how existing assets can be used to better effect. Habitat Regulations

## HABITAT REGULATIONS

The Planning Policy Guidance (PPG) refers to Habitat Regulations by stating 'A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.'

As referenced within the Masterplan document, an extended phase 1 Habitat Survey has been undertaken. This survey assessed the suitability of the Site to support protected species and protected habitats. In addition to this, under the Habitat Regulations it is likely that an Appropriate Assessment (AA) is required for the development that could be delivered on the Site, though this can be applied at the application stage.

## ESSEX RAMS

Further to the HRA, Essex Councils have produced a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). As part of the RAMS, screening is undertaken to identify the Natura 2000 sites which may be affected by the proposed development. The Site falls within the Recreational Zone of Influence (ZOI) of the following Natura 2000 and Ramsar sites:

- Blackwater Estuary (SPA and Ramsar) – Recreational ZOI - 22km (15.1km from Development Site).

The following Natura 2000 sites were highlighted as having ZOIs which encompassed the Site:

- Blackwater Estuary SPA.
- Blackwater Estuary Ramsar site.
- Essex Estuaries SAC.

As a result of increased recreational pressure, it is predicted that the identified Natura 2000 sites will be subject to a 'Likely Significant Effect' caused by the proposed development subject to the Masterplan. Accordingly, any proposed development within the Site will be subject to the Essex RAMS tariff. The calculated RAMS tariff is £122.30 per dwelling (Essex County Council, 2018), as well as the need to consider on-site recreation facilities to mitigate wider disturbance or ZOI receptor areas.

**Masterplan Considerations**

- The proposals need to accord with the planning policy framework set out unless material considerations dictate otherwise.
- This includes various infrastructure requirements, levels of open space provision and housing mix.
- The development proposals need to demonstrate that they align with best practice design guidance.
- The Chelmsford Local Plan masterplanning principles should be incorporated.
- On-site recreational facilities should be provided to mitigate wider disturbance on ZOI receptors areas.
- Commitment to Live Well principles

# LOCAL COMMUNITY FACILITIES & SERVICES

The Site is well served by the existing facilities and services located in Broomfield and Little Waltham. The opportunity to share and enhance existing services will help integrate the new community with the existing residents and promote community cohesion.

## SHOPS

The nearest supermarkets are the Co-operative and Londis, both located along Main Road in the centre of Broomfield. There is also a small Marks & Spencer located within Broomfield Hospital.

## RECREATION AND OPEN SPACE

There are sports and recreation facilities located in Broomfield and Little Waltham which include football and cricket clubs. There are public footpath routes to these destinations expanding out from the Site in all directions, including into Broomfield centre and Little Waltham. There are a number of cycle routes locally with plans in place for improvements.

## EMPLOYMENT

Broomfield Hospital, adjacent to the Site, is one of the largest employers in the Chelmsford area. In addition to other smaller scale employment opportunities within the village, Chelmsford city centre is approximately 4 miles (6.43km) away and easily accessible by bus.

Chelmsford also provides a direct train service to London Liverpool Street taking approximately 34 minutes.

## HEALTH

The Site is well located in terms of health provision with easy access to Broomfield Hospital and doctor's surgery in Little Waltham.

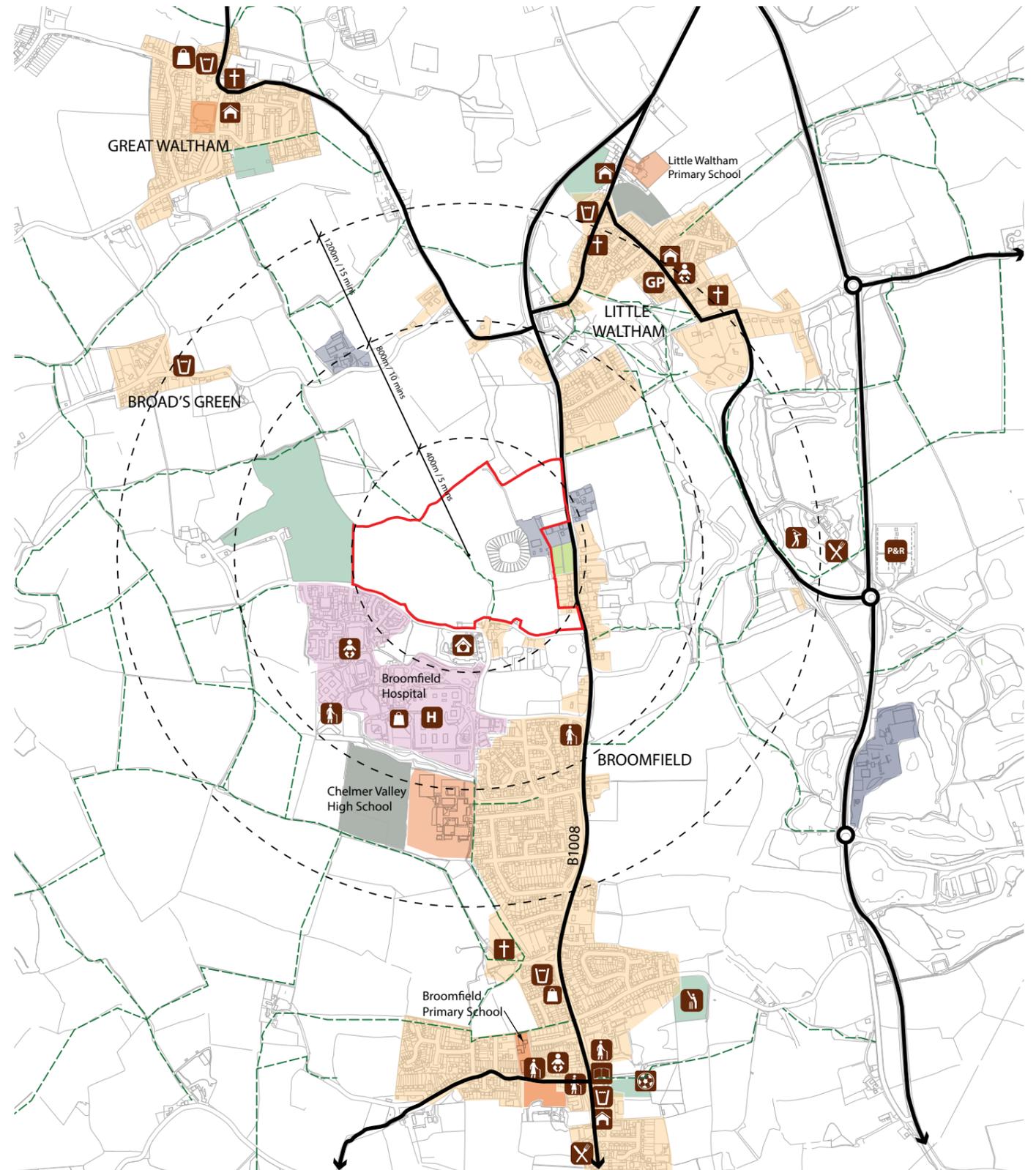
## EDUCATION & EARLY YEARS

Chelmer Valley High School is located within Broomfield, south of the Site and easily accessible by walking or cycling. Broomfield Primary School is also located within the village, approximately 1.64kms to the south and adjacent to Main Road. Little Waltham Primary School is around 1 mile (1.5km) away to the north east.

### Masterplan Considerations

- The Site is well served by existing services and facilities in Broomfield and Little Waltham. Chelmsford city centre is around 4 miles (6.43km) away and easily accessible by bicycle or bus.
- A new community led neighbourhood centre will be located centrally within the site with access from the main spine road and within easy walking distance for all residents. The facilities will be focused on a multi-functional community building and an early years and childcare facility. At this time there are ongoing talks with the NHS about integrating local healthcare provision with this Local Centre or nearby, but this is subject to further discussion with the NHS.
- There is no requirement for a new primary school on the Site. The children are most likely to attend schools in Little Waltham and Broomfield.
- The additional housing will help support and sustain local businesses, such as the nearby shops and pubs.
- Connections to existing facilities by walking and cycling will be a priority.

- Masterplan Site Area
- Predominantly Residential
- Predominantly Health
- Education
- Predominantly Employment
- Main roads nearby
- PRoW
- Allotments
- School Playing Fields
- Playing Fields
- H Broomfield Hospital
- GP GP Surgery
- 🏠 Hospice
- 👤 Nursing Home
- P&R Chelmer Valley Park & Ride
- 🛒 Convenience Store
- 👶 Pre School Nursery
- 📖 Library
- 🍷 Public House
- ⚽ Football Club
- 🍴 Restaurant / Takeaway
- 🏌️ Golf Facility
- ✝️ Place of Worship
- 🏠 Village Hall
- 🏏 Broomfield Cricket Club



Local Community Facilities and Services Plan

# ACCESS & MOVEMENT

## HIGHWAY CONNECTIONS

The Site is well connected to the strategic road network and local bus network. The B1008 on the eastern edge of the Site links to the A130 Braintree Road to the north. This serves Braintree and links to the A120 serving Bishops Stortford to the west and Colchester to the east.

The B1008 extends southwards towards Chelmsford city centre and various strategic routes, including the A1060 to the M11, and east onto the A12.

Reference is made below to the Chelmsford City Growth Package; a £15 million package to be invested in sustainable transport methods designed to help alleviate pressure on Chelmsford's road network. It is understood that these improvements will be made by 2021.

Broomfield hospital is located immediately to the south of the site and is currently served via a separate access on Blasford Hill. The approach to future connections to the Hospital is considered later in the Masterplan.

In relation to Woodhouse Lane it is not considered appropriate to increase the use of this route or its junction with Blasford Hill.

## PUBLIC TRANSPORT

The Site is well connected in terms of public transport. The proposals will provide a bus service into the development, connecting to Chelmsford, Braintree and other key destinations (subject to operator support).

In addition, the Chelmsford City Growth Package proposes improvements to the route between Chelmsford city centre and Broomfield Hospital. These relate mainly to junction redesigns, improved bus stops, and footway improvements.

## WALKING AND CYCLING

The Site will provide for safe accessible and attractive pedestrian and cycle routes within the Site and externally connecting the Site to its context.

The Site is well served by Public Rights of Way (PROW), providing excellent links to the local countryside and long distance leisure routes. PROW Route 225-29 cuts through the Site, linking Great Waltham with Broomfield Hospital.

The Site is also well connected in terms of footpath links into nearby villages. There are pavements along Blasford Hill connecting into the centre of Broomfield and Little Waltham. There are no pavements along Woodhouse Lane.

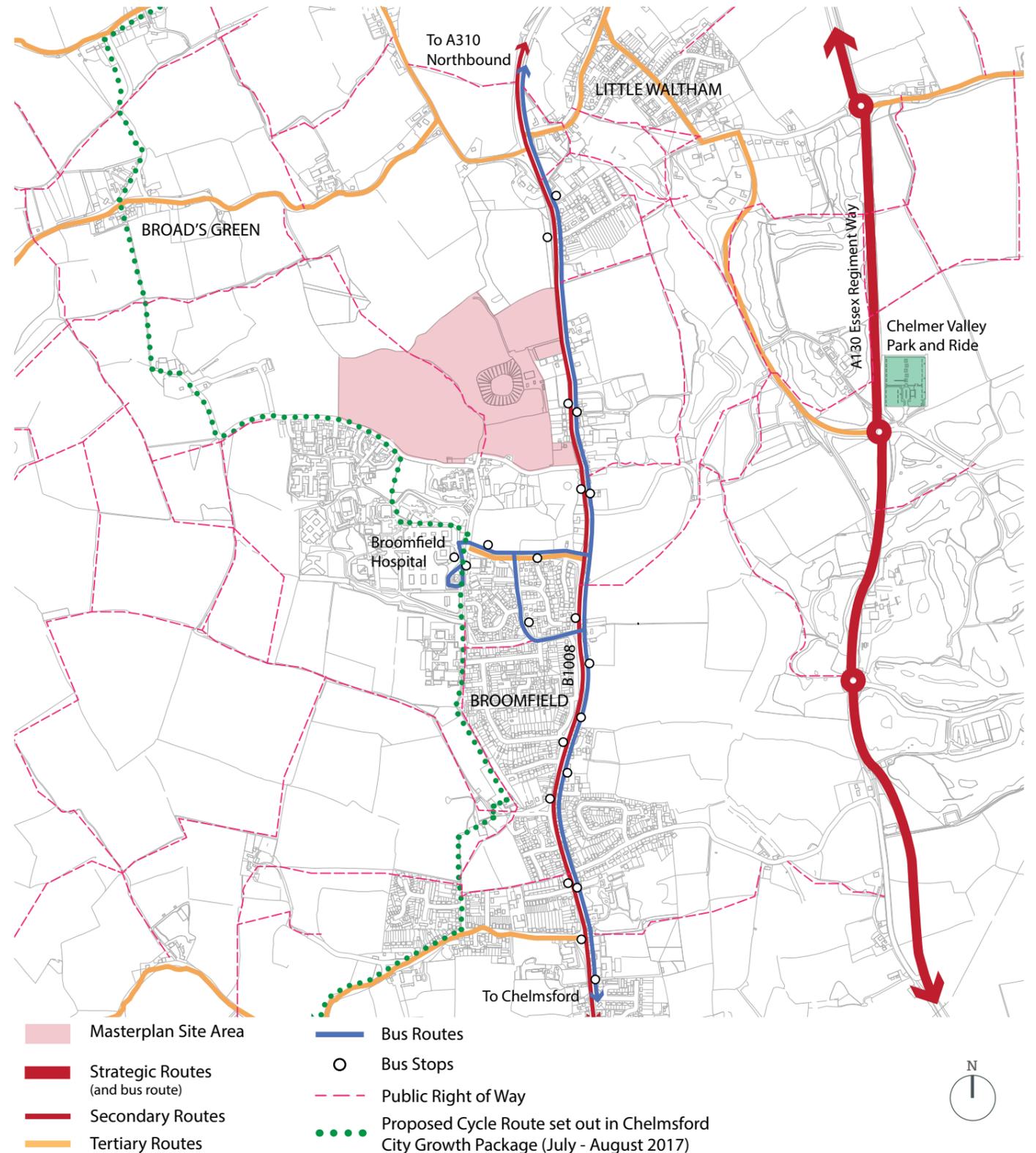
The only cycle route in the immediate area is the on-road route running from the hospital towards Broad's Green. There is however a new strategic route proposed in the Growth Package running from Chelmsford city centre to Great Waltham.

The Great Waltham Cycle Route passes along Woodhouse Lane and the southern boundary of the Site and creates an opportunity to increase cycling opportunities to various destinations including local schools and Broomfield local centre. This also connects with Chelmsford city centre, rail station and bus station (all within 12-15 minutes cycle).

This strategic route will not connect with Little Waltham which identifies a need for better cycle connectivity between the local centre (and the facilities therein) and the Site.

### Masterplan Considerations

- **Vehicular Access:** the Site must be served via a new access off the B1008 Blasford Hill. This should be in the form of a new roundabout, designed to act as a positive and attractive new gateway into Broomfield, including appropriate signage.
- **Public Transport:** early phases of the development can include safe and convenient walking routes to the existing bus stops along Blasford Hill, though later phases could provide an internal bus service. The internal road layout will be designed to accommodate additional bus stops on Site as part of any future proposed bus service.
- **Cycle connection:** cycle route through the Site connecting Little Waltham (subject to feasibility study) with city centre and Great Waltham cycle route to the south via Woodhouse lane.
- **Walking routes:** Connection to walking routes leading to community facilities in Broomfield and Little Waltham. Improvements are needed including a potential crossing facility associated with the new access off Blasford Hill.
- **A new vehicular, pedestrian and cycle access** will be provided to connect with Broomfield Hospital internal perimeter road. The delivery of this access will either be directly by the developer of Blasford Hill (subject to the Hospital Trust making the land freely available) or via a financial contribution by the developer to finance the works to be undertaken by the Hospital Trust under governance of the Local Authority.



Access & Movement Network

# LANDSCAPE & VISUAL

## LANDSCAPE AND VISUAL

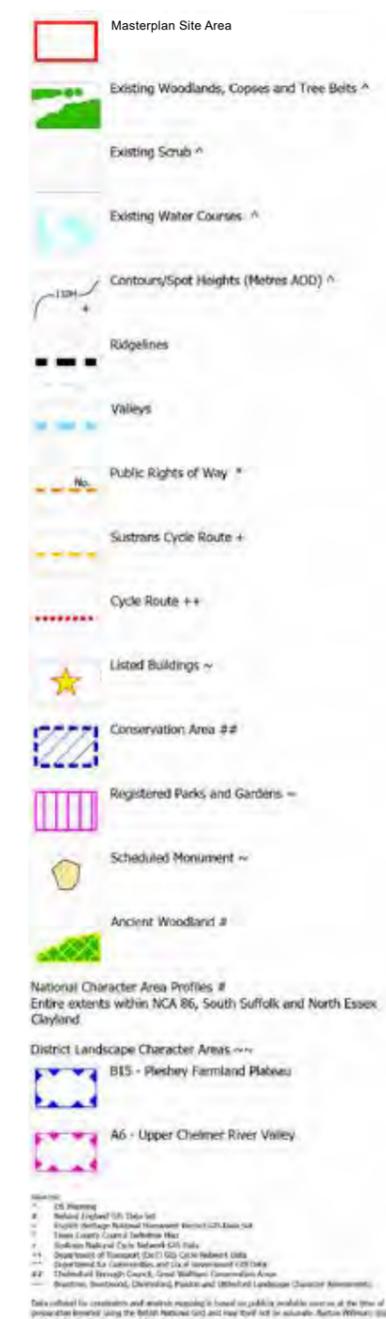
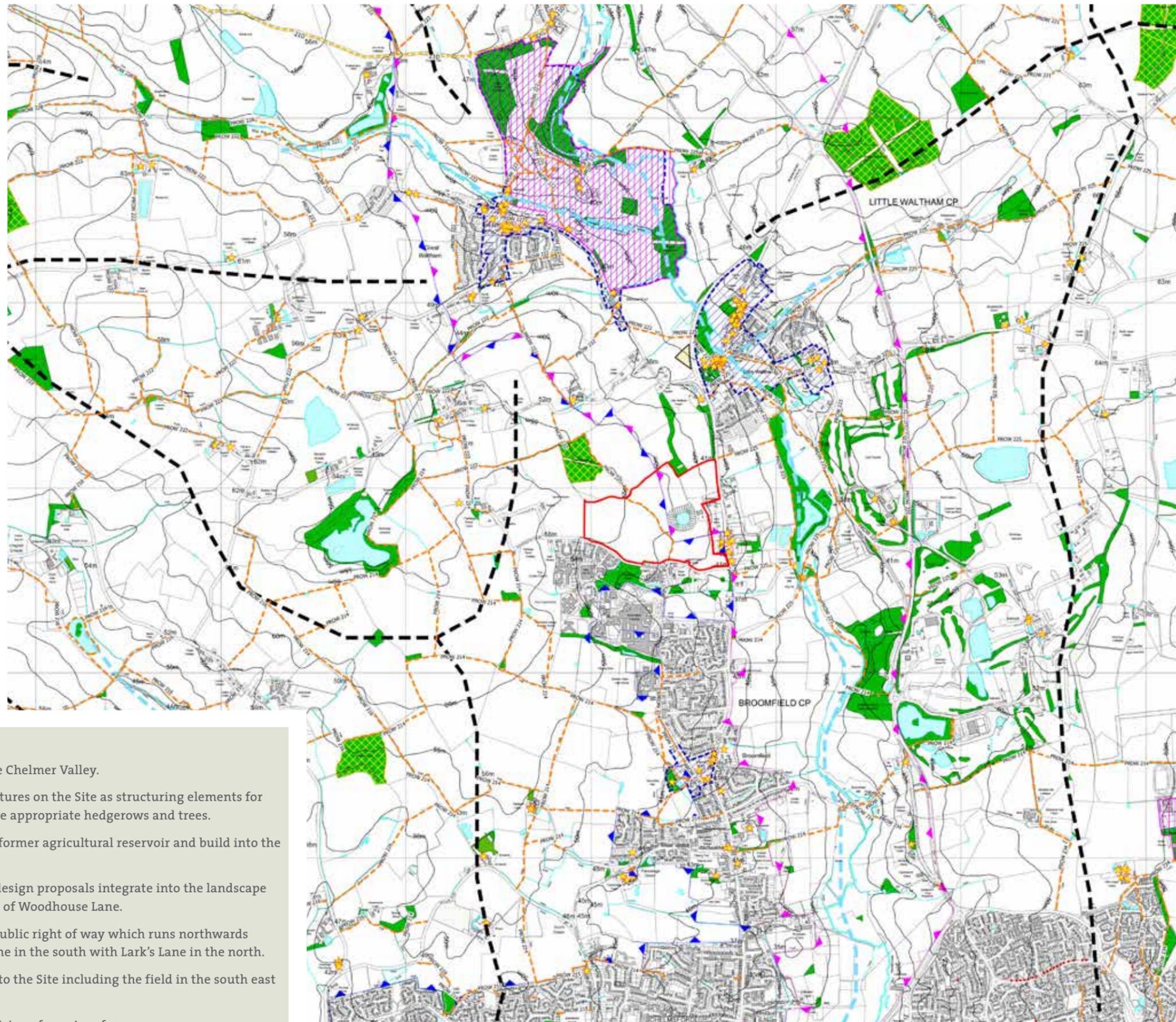
The Site is located on the east facing slopes of the Chelmer Valley and comprises three fields, separated by hedgerows and trees. A public right of way (PRoW 225/29) runs northwards through the Site connecting Woodhouse Lane in the south with Lark's Lane in the north. Sparrowhawk Wood - a parcel of ancient woodland, and the pond in the former agricultural reservoir are dominant landscape features. There is a cluster of listed buildings adjoining the south eastern edge of the Site, accessed via Blasford Hill, and a substantial group of buildings associated with Broomfield Hospital to the south of the Site. The Site is not subject to any landscape related designations, and is not within or adjoining a Conservation Area.

## LANDSCAPE CHARACTER

The Site falls within Natural England's National Character Area 86; South Suffolk and North Essex Clayland. The District Landscape Character Assessment identifies the NE of the Site to be part of the Upper Chelmer River Valley character area (LCA A6) and the south and west to be part of the Pleshey Farmland Plateau (LCA H). Both recognise the importance of the valley sides, woodland blocks, hedgerows and irregular field patterns and suggest they be preserved and enhanced as part of any future green infrastructure. At a local level, the Broomfield Village Design Statement identifies greens as being a key characteristic of the village, and suggests new development should be focused around a series of greens.

### Masterplan Considerations

- Respect eastern views into the Site from the Chelmer Valley.
- Make best use of the existing landscape features on the Site as structuring elements for future development. These to include where appropriate hedgerows and trees.
- Recognise the key landscape feature of the former agricultural reservoir and build into the approach to green infrastructure.
- Enhance existing Site planting to help the design proposals integrate into the landscape surroundings including the wooded setting of Woodhouse Lane.
- Enhance the green corridor context of the public right of way which runs northwards through the site connecting Woodhouse Lane in the south with Lark's Lane in the north.
- Deliver an appropriate landscape response to the Site including the field in the south east corner.
- Reflect local village character through provision of a series of greens.



Site Context and Visual Appraisal

## TOPOGRAPHY

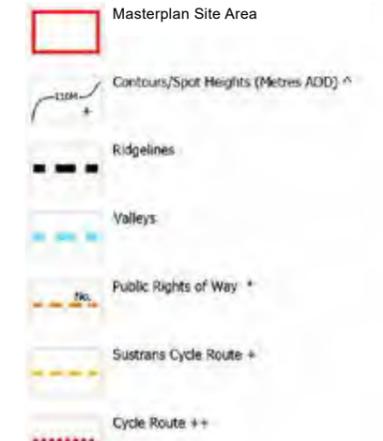
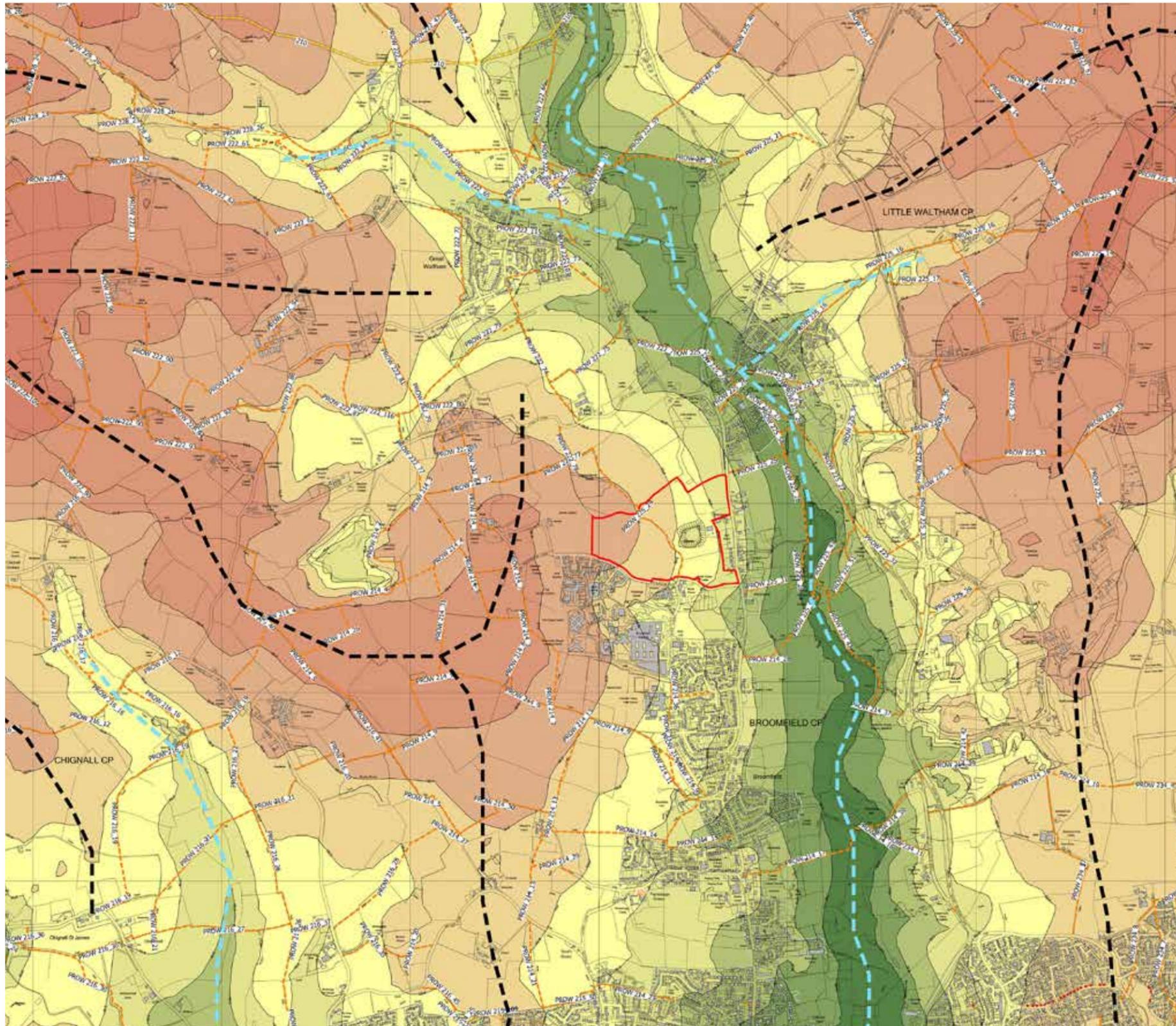
A topographical survey of the Site has been completed which shows elevations ranging from 57.90m AOD at the western Boundary falling to 43.40m AOD at the south eastern boundary. The main topographical feature is an agricultural reservoir, which presents an opportunity for integration into the new scheme.

## VISUAL CONTEXT

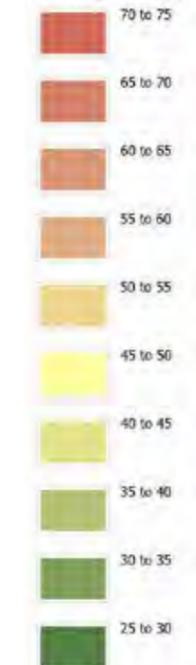
A full visual appraisal has been undertaken. This concluded that views into the Site are obtained from a limited geographic area, including from roads and properties adjoining the Site, such as Woodhouse Lane to the south and a short stretch of Blasford Hill to the north east; from the eastern side of the Chelmer Valley; and from a short stretch of PRoW 225/25 to the east, looking towards the north eastern boundary. The most visually sensitive part of the Site is the area of sloping ground to the east of PRoW 225-29, although any proposed built forms within the Site would be seen in the context of existing large-scale hospital development to the south. As such, sensitive design-led approach would enable new development to be successfully integrated within its landscape setting.

### Masterplan Considerations

- Enhance existing field boundaries to help the development proposals integrate into their landscape surroundings.
- Utilise existing topography to create a natural drainage strategy.



### Elevation ( Metres AOD)



Source:  
 - OS Mapping  
 - Essex County Council Definitive Map  
 - Southern National Cycle Network (SNCN)  
 - Department of Transport (DoT) Cycle Network Data  
 Data collected for this plan was available in 2018. It is based on the most available data at the time of preparation. The British National Grid will not be used for the map. Further information shall not be taken for the accuracy of data obtained from external sources.



Topographical Features Plan

Concrete post and wire fence on western boundary of Site (KEGS playing fields beyond)  
Sparrowhawk Wood

Residential properties at Broomfield Hospital  
Woodhouse Lane



A: View from Woodhouse Lane on the south western boundary of the Site

PRoW 225/29 Tree belt field boundary across centre of the Site Wood House Farleigh Hospice Residential properties at Broomfield Hospital



B: View from PRoW 225/29 in the northern part of the Site looking south towards Broomfield Hospital

PRoW 225/29 Vegetation along northern boundary of Site Industrial shed in the eastern part of the Site PRoW 225/29



C: View from PRoW 225/29 in the centre of the Site looking north east towards Blasford Hill

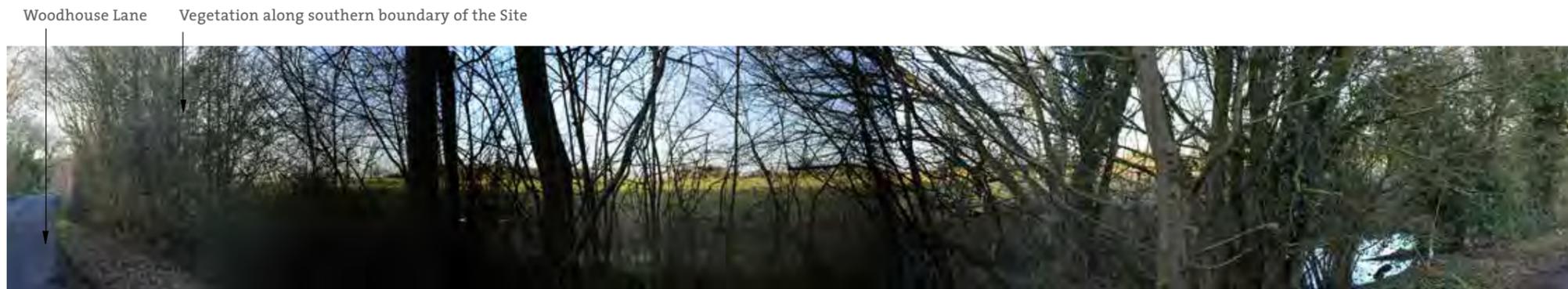
Wood House Farleigh Hospice Residential properties at Broomfield Hospital



D: View from PRoW 225/29 in the centre of the Site looking south west towards Woodhouse Lane



E: View from PRoW 225/29 in the centre of the Site looking north west towards the agricultural reservoir



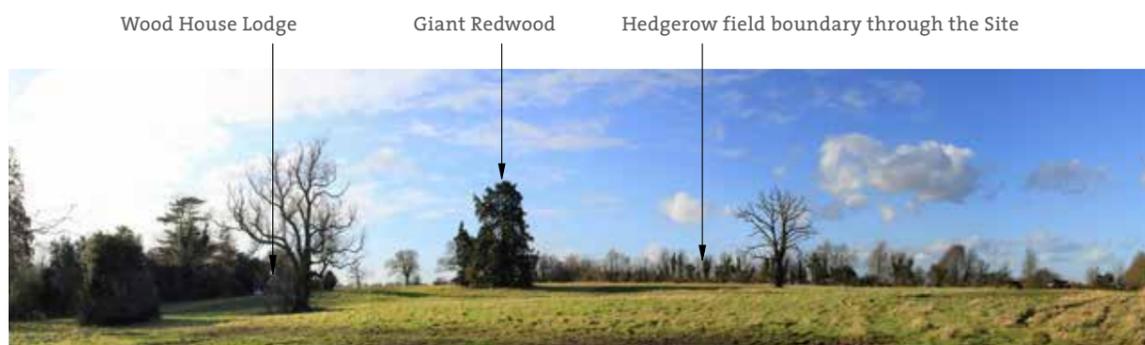
F: View from Woodhouse Lane opposite Farleigh Hospice looking north towards the Site



Photograph location plan



G: View from PRoW 225/29 in the southern part of the Site looking east towards Blasford Hill



H: View from Woodhouse Lane near Blasford Hill looking north west across the Site



i: View west from Blasford Hill

# LOCAL CHARACTER

## INTRODUCTION

Understanding a place is key to delivering integrated and responsive developments. Analysing how the local area has changed over the past 100 years provides useful information about suitable patterns of growth. This is not about copying the past, rather it means understanding and interpreting the context of a particular Site and its surrounding context.

The Site falls within the parishes of Broomfield and Little Waltham. The proposal would expand Broomfield northwards maintaining a clear separation from the village of Little Waltham. Therefore, in order to inform the master plan and design proposals for the Site, the historic development and character of Broomfield has been the focus of this analysis.

## HISTORICAL EVOLUTION

The historical maps show how the villages have changed over the past century. This highlights that the village expansion has moved both north and south along Main Road away from the original focal points of the Broomfield village.

The analysis of the historical evolution of Broomfield illustrates that the Site settlement pattern is consistent with the approach of extending development north and south along Main Road whilst still maintaining separation from the settlement boundary of Little Waltham.

### Masterplan Considerations

- Avoid coalescence of Broomfield and Little Waltham for example visibly breaking the ribbon of development fronting Blasford Hill.
- The interface with the surrounding landscape needs to be considered as this creates a new settlement edge. Housing should be outward facing, but not to create an overly developed urban edge from views from the surrounding countryside.

### ORDNANCE SURVEY MAP 1924

Main Road, forming part of the old Roman Road, provides the ordering structure for the village. Buildings are grouped around the intersection with Church Lane, leading to Broomfield Hall to the west, and the intersection with School Lane, leading to Parsonage Green to the west. Occasional buildings are strung out along the road between these focal points.

The Site comprises farmland located midway between Broomfield and Little Waltham, alongside the hamlet of Blasford Hill. The woodlands of Sparrowhawk and Puddings Wood are evident whilst Wood House which sits within a parkland estate setting, is still there today and lies along Woodhouse Lane to the south. To the east lies two farms, various buildings and allotments.

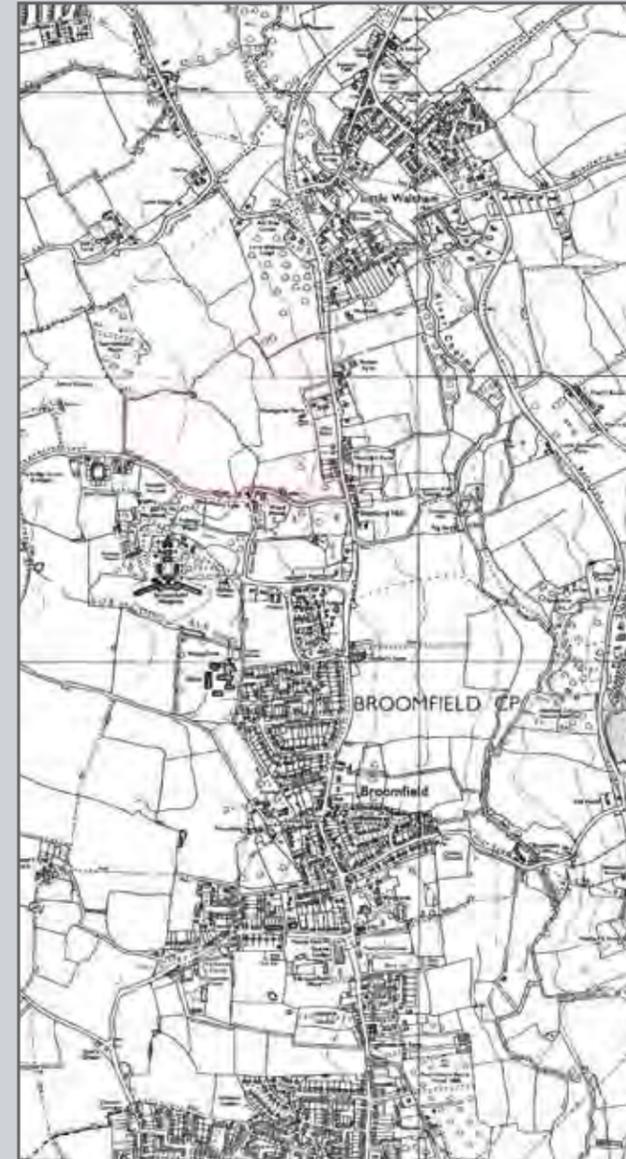


### ORDNANCE SURVEY MAP 1979

By 1979, Broomfield has expanded considerably, with the original building groupings subsumed within post war development north of school Lane, north and south of Mill Lane, with substantial development north of Church Lane.

Although considerable development has occurred within backland areas, the linearity of the settlement is still distinctive by virtue of the continued growth north and south along Main Road.

Other notable changes include the secondary school to the west and Broomfield Hospital within the grounds of Broomfield Court. Like Broomfield, Little Waltham has also expanded markedly to the south, to almost touch the Site boundary.

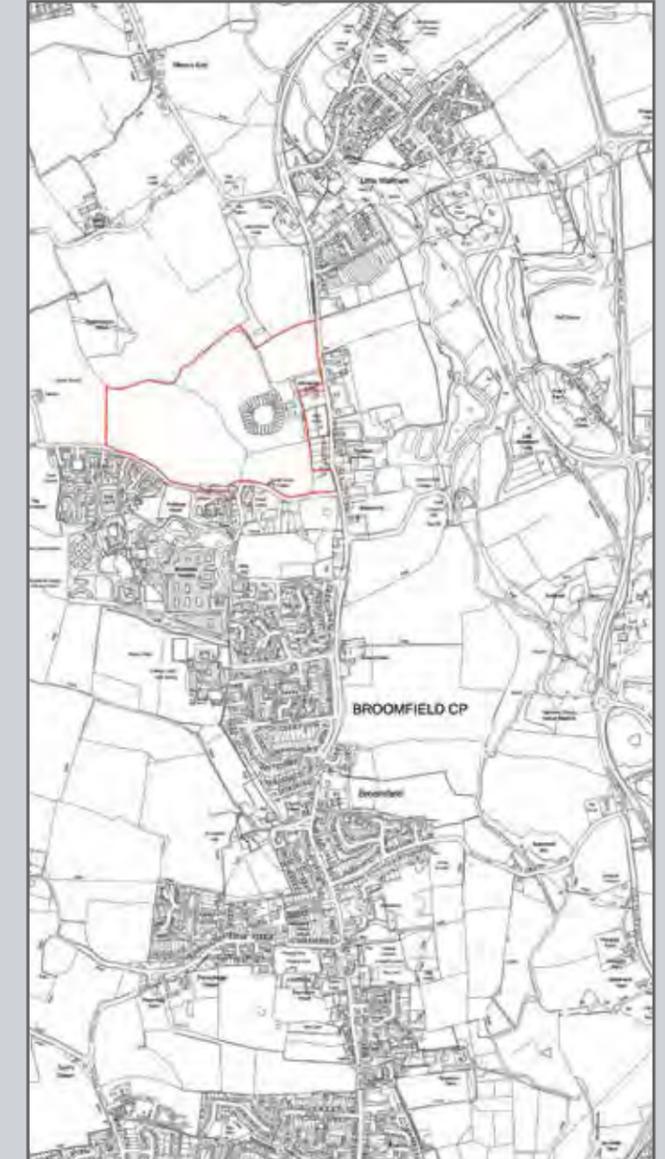


### ORDNANCE SURVEY MAP 2017

The 2017 Ordnance Survey map shows comparatively modest further development in Broomfield around the built up areas associated with Church Lane and School Lane.

This is in contrast to the further significant development in the northern reaches of the village north and north east of the secondary school, including Broomfield Hospital up to Woodhouse Lane.

The southern and eastern boundaries of the Site are now contiguous with the built up area of Broomfield.



## BROOMFIELD

Broomfield is a largely rural Parish, with the built up area of the village stretching from the southern to the northern Parish boundary along Main Road. The images opposite provide examples of the different characters found within the village.

As illustrated on the previous page, Main Road, part of the old Roman Road, provides the ordering structure for the village with historic building groupings around the 'Church Green'; and Angel 'Green'; with occasional individual dwellings strung out along the road between these focal points. Some of the residential buildings within these areas date from the fourteenth to sixteenth centuries and many of the 29 listed buildings in the village are associated with these areas.

More recent development in the latter half of the Twentieth Century substantially increased the size of the village and diluted the character of the original parts of the settlement. Smaller scale infill development in the early part of the Twenty-first Century is evident in Post Office Road, Roselawn Fields and Deverill Close and has marked a return in the most part to a more traditional Essex character and is reminiscent of residential development forms in Broomfield between the Twelfth Century and Georgian period.

### Masterplan Considerations

- Series of village greens with clusters of buildings overlooking the green space, providing positive enclosure and surveillance.
- Curved streets with some vegetation, punctuated by areas of open space, located around the historic areas.
- Buildings set back from the street. Some frontages enclosed with walls and/or hedges, but allowing views to fronts of buildings.
- Traditional form with two storeys, pitched 45° or greater roof pitches and chimneys.
- Walls are predominantly shades of aged gault or orange/red brick whilst some have light coloured render. Timber cladding is also evident, including within newer developments, such as Hanbury Place.
- Roof materials are mostly clay red/orange tiles.
- Doors and windows tend to be white framed, small pane sash/casement. Rain water goods tend to be black. Common details include bay windows, voussoirs, arched doors and window headers.
- There are a number of houses with ornate chimney detailing, decorative brick coursing with tile hanging.



## LITTLE WALTHAM

The village was originally a linear settlement spread out along what is now called 'The Street'. This area contains almost all of the period properties. Its character is derived from the buildings, street pattern and in response to the different topography and River Chelmer, which splits the village.

The village has a wide main street with good enclosure provided by the adjoining buildings along with fences, trees and hedgerows. The buildings more informally front onto the street, either up to the pavement or slightly set back. The building shapes, styles and plot widths vary along the main street although there are certain groups with a similar appearance, such as light coloured render and slate/plain clay tiled roofs.

Village expansion in the latter half of the twentieth century is predominantly to the east. Small scale infill development in the early part of the Twenty-first Century is also evident at Winckford Close, for example which marked a return to a more traditional format than the villages earlier expansion.

### Masterplan Considerations

- The historic core of the village relates to the main street with good enclosure provided by continuous building frontages, proximity to roads along with fences, trees and hedgerows.
- Some of the buildings front onto the street, either up to the pavement or slightly set back.
- The building shapes, styles and plot widths vary along the main street although there are certain groups with a similar form or architectural appearance.
- Trees and hedgerows lie within the majority of front gardens, punctuating the street scene and adding to its character.
- Buildings are nearly all two storeys with a traditional form, along with pitched 45° or greater roofs and chimneys.
- Walls are predominantly shades of light render, plus some aged gault / red brick, and occasional timber. Roofs are mainly slate / plain orange clay tiles.
- Doors and windows tend to be white or black framed, small plane sash or casement.
- Rain water goods tend to be black. Notable features include bay windows.



# ARBORICULTURE & ECOLOGY

## ARBORICULTURE

A Tree Survey has been completed on the Site to identify the quality and location of significant trees adjacent and on the Site within the area specified for inspection. A total of sixty five individual trees, thirty three groups of trees, fifteen areas of trees, eleven hedges and one woodland have been surveyed. These were found to be of mixed condition and age providing a variety of amenity benefits. They include trees and hedgerows around the Site boundaries and along the field margins. There are several Tree Preservation Orders (TPO's) on Site which require careful consideration to include layout and construction methods to ensure long term retention and protection.

Two small woodland blocks were noted beyond the Site boundaries. These included Sparrowhawk Wood to the north and Puddings Wood to the south. A small block of plantation woodland borders the Site to the north, each of these three woodland blocks is protected TPO. KEGS recreational ground, comprising amenity grassland, borders the Site to the west. The key features of the Site in arboricultural terms are shown on the adjacent plan and include:

### Northern boundary

The northern boundary provides a broken linear feature of trees and hedgerow. This boundary is dissected to the centre by an existing Public Right of Way (PRoW) which runs from the south east connecting to Sparrowhawk Wood to the north west. The northern boundary is made up of Field Maple, Hawthorn, English Oak and Ash trees. The existing trees and hedgerows are made up of predominantly Category B and C specimens. There are two English Oak trees which are category A.

### Eastern boundary

The eastern boundary is broken up by the existing built form off Blasford Hill. Most of the landscape features along the eastern boundary are made up of existing Field Maple and Hawthorn hedgerow, which are assessed as Category B. There are a few existing trees located along this boundary, though are considered young specimens. There is an existing field boundary hedgerow located directly adjacent to the eastern boundary and south of the reservoir. This existing hedgerow is made up of Ash, Oak and Hawthorn and considered Category C.

### Southern boundary

There are a number of existing trees alongside Woodhouse Lane, with existing hedgerows in places. The existing trees species are made up of Sliver Birch, Common Holly, Common Ash, Lime, English Oak and Crack Willow. A number of these trees are considered dead or dying, though there are a few notable trees that are covered by TPO's. These particular trees are located within the Site away from the southern boundary. The interspersed hedgerows consist mainly of Field Maple, Hazel and Hawthorn, and are assessed as Category C.

### Western boundary

The western boundary is relatively open, delineated by a post and rail fence along its length. There are examples of Hornbeam, Scarlet Oak, English Oak, Common Ash, Turkey Oak, and Turkey Oak, though are located to the western side of the existing fencing. There are no other known landscape features along this boundary.

### Agricultural reservoir

There is an existing large waterbody formed for use as an irrigation reservoir, and located to the eastern edge of the Site. The waterbody is surrounded by mature landscaping features to the banks of the reservoir. The landscape features include examples of Ash, Field Maple, Oak, Hawthorn and Elm, and are predominantly located to the western areas of the reservoir.

### Hedge line

The Site supports a network of hedgerows that border the arable fields. The hedgerows also support mature and semi-mature trees. The main internal hedgerow is located centrally running from the south east to the north west, which also provides the existing PRoW route. There are a number of trees located along this hedgerow, including several TPOs to the south. There are natural gaps to the hedgerow to the south and north allowing field access for farm vehicles.



- **Masterplan Considerations**
- The layout should mitigate the presence of high-quality trees, particularly the on-site TPO's, meaning where feasible the development proposals are shaped to retain them.
- Retain the main hedgerow running north south through the Site as a key structuring feature, limiting breaks where possible.
- There is an opportunity to provide additional trees and vegetation across the Site, improving its character and enhancing biodiversity.
- There is an opportunity to enhance the boundary planting, for example along the western boundary which is mostly open at present, the northern boundary to limit long range views and the south to buffer the rural lane character.
- The hedgerow to the south of the agricultural reservoir is classified as low quality (Category C) and hence on balance could be removed to facilitate development and compensatory planting will be provided.

**ECOLOGY**

An ecological survey of the Site has been undertaken, with findings set out in an Extended Phase 1 Habitat Survey Report (an extract from the ecology plan is set out opposite).

The findings indicate that the Site is suitably unconstrained for new development with the majority of the Site comprising two large arable fields. Arable land has no intrinsic ecological value as a habitat in its own right, being man-made, common and widespread. The south eastern corner of the Site consists of semi-improved neutral grassland with a slightly higher ecological value. Although the majority of the site is in agricultural use it supports habitat types of limited inherent ecological importance including: bats, birds, harvest mice and Badgers.

**Habitat Regulations Assessment**

The potential impact of new growth within the Chelmsford area could have on coastal Natura 2000 sites has been addressed by Chelmsford City Council, along with the other district and borough councils in Essex, who have prepared a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). The Essex RAMS is considered further at page 9 of the Masterplan.

**Agricultural reservoir**

A mosaic habitat of Unimproved Neutral Grassland and dense scrub around the banks of the reservoir.

**North south corridor**

A tree and dense shrub corridor is located along the existing ditch and PRoW which connects the southern boundary to the northern boundary. It consists of mature and semi-mature trees with agricultural access to the north and south.

**Field boundaries**

Tall ruderal vegetation was noted around the field margins and understorey of hedgerows on Site. Semi-improved grassland was also noted along the road verges as well as the margins of the arable fields.

**South east corner**

A field comprising semi-improved neutral grassland is present in the south east corner of the Site covering an area of around 3 ha.

**Puddings Wood**

To the south of the Site boundary (south of Woodhouse Lane) lies the small woodland block known as Puddings Wood. This woodland block is designated as a County Local Wildlife Site, consisting of mainly Oak and Ash trees.

**Sparrowhawk Wood**

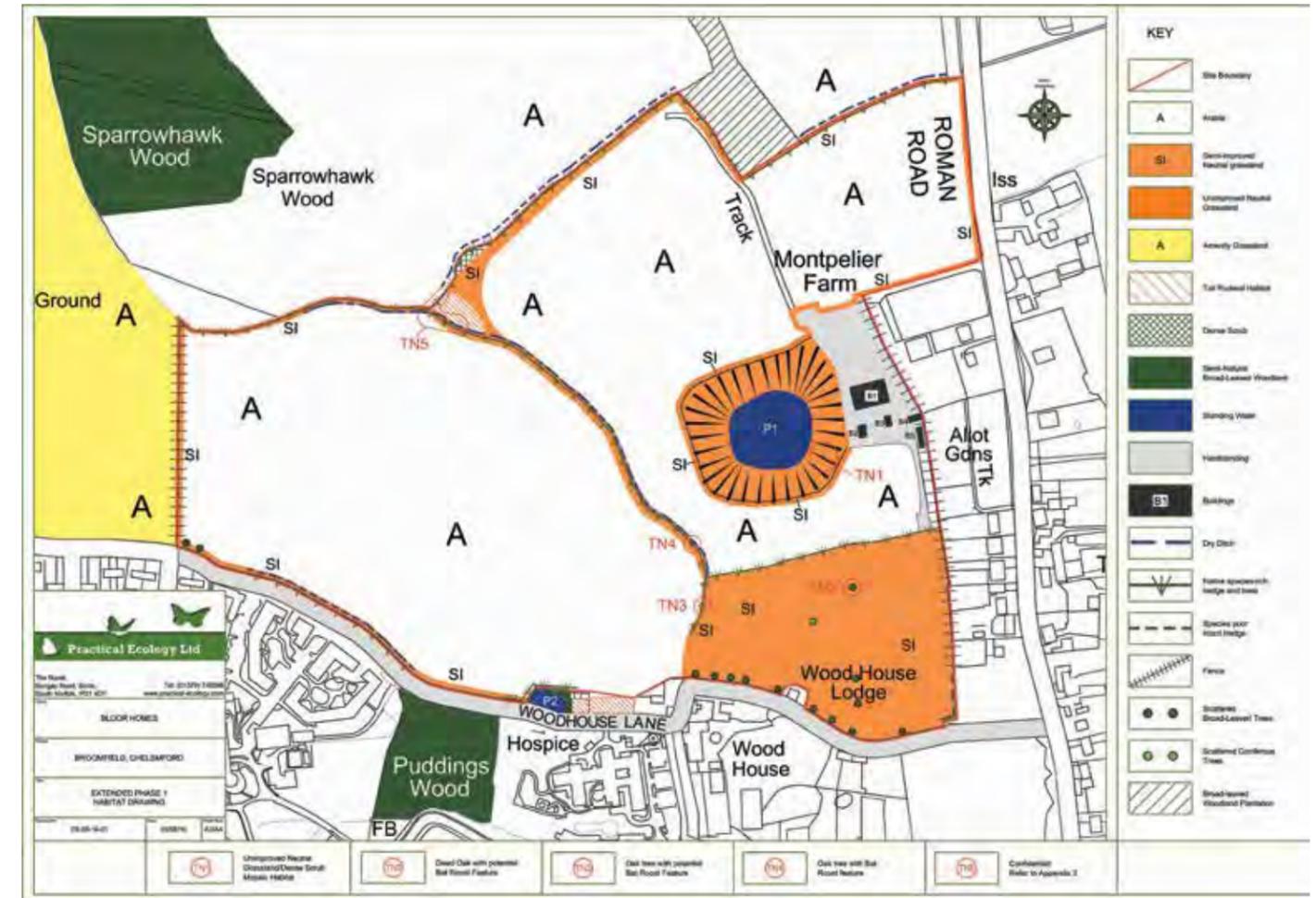
Sparrowhawk Wood is the larger of the two woodland blocks, and located to the north of the Site. This woodland block is also a designated as a County Local Wildlife Site. This ancient woodland consists mainly of Hornbeam, Hazel, Ash and Oak trees. Both of these woodland blocks have the potential to provide for certain mobile species, such as birds and bats.

**Western land**

The KEGS recreational ground borders the Site to the west. This land is predominantly amenity grassland and is well maintained, and therefore provides minimal ecological value.



View looking from the PRoW on Woodhouse Lane across the south eastern part of the Site looking towards the rear of the listed buildings on Blasford Hill



**Masterplan Considerations**

- The approach to incorporating ecological features needs to be incorporated as part of the green infrastructure strategy.
- Opportunity to enhance biodiversity by planting new trees and vegetation within and around the edges of the Site, including green corridors.
- Planting to the western boundary provides the opportunity to create a habitat corridor linking Puddings Wood to the south with Sparrow Hawk Wood to the north.
- Integrate existing network of ditches and reservoir as a natural drainage solution into the proposed drainage strategy.
- Consider the approach to long term management of the grassland area within the south eastern corner and surrounding the agricultural reservoir as part of the landscape strategy.
- Deliver Biodiversity Net Gain by retaining and enhancing where possible existing trees and hedgerows, with additional landscape planting as part of extensive provision of public open space.
- Consider the potential for new buildings to contribute, for example by incorporating bird and bat boxes and other biodiversity enhancements.
- Public green spaces to help mitigate recreational disturbance in the context of mitigation as on-site public space is unlikely to be considered full mitigation of recreational disturbance (RAMS).

# TECHNICAL CONSIDERATIONS

## ARCHAEOLOGY AND BUILT HERITAGE

An archaeological Desk Based Assessment has been undertaken, which identifies that the Site is considered to have a low to nil archaeological potential for palaeoenvironmental evidence from the Palaeolithic and Mesolithic periods.

Approximately 580 metres to the north of the Site (Ash Tree Corner) lies a Scheduled Monument, which dates to the Iron Age/Romano-British period although the Site does not effect its setting.

The north east corner of the Site, and to the east of Main Road, is afforded a moderate to high potential for the presence of archaeological assets belong to the Roman period. While it is possible that archaeological remains may be present within the Site, the balance of probability is that these will be not be of regional or national significance.

There are no known designated or non-designated heritage assets within the Site. There are 8 Listed Buildings located close to the eastern boundary of the study Site which comprise the Grade II designated Tudor Cottage, Maltings at Thorley's Farm, Thorley's Farmhouse, Foxes Maltings, Runnymede, Runnymede Cottage, Glenmore & Thorley's Cottage and Laburnum Cottage.

These Listed Buildings and Non-Designated Heritage Assets formed the historic hamlet of Blasford Hill. This historic hamlet provides an element of ribbon character to the eastern edge of the proposed parkland area.

### Masterplan Considerations

- Archaeology is not a constraint to masterplan layouts.
- Where Archaeology is affected, it will be investigated in advance and recorded.
- Respect the setting of the Listed Buildings to the south east corner of the Site, ensuring new buildings are set back an appropriate distance within an appropriate landscape setting.
- Respect the setting of the Non Designated Heritage Assets.
- Awareness of the Scheduled Ancient Monument located north of the Site.
- Respect the building frontage line on Blasford Hill.
- The grouping of Wood House, Coach House Lodge and the relationship of those to the south east corner of the Site is of note.

## GEOLOGY

Superficial geology comprises deposits of loose sand and gravel across the east of the Site; silty clay is present in the north east corner and slightly sandy, gravelly clay across the remainder of the Site. Solid geology on-site consists of London Clay slightly sandy clay to stiff dark grey clay.

Available British Geological Society (BGS) borehole records indicate groundwater in the area may be present from depths of around 2.0m to 10.4m below ground level which accords with the water level in the agricultural reservoir.

### Geo-environmental

A number of potential sources of contamination have been identified on the Site, including pesticide and herbicides from agricultural working of the Site, PAHs (Polycyclic Aromatic Hydro Carbons) and hydrocarbons associated with a waste burning area in the east, and asbestos, metals and PAHs associated with a waste stockpile in the east of the Site.

Identified Site-wide environmental risks have been classified as very low to low. There is generally a very low or no risk to the Site from geological hazards. Risks from shrink / swell of clays and risk of landslide instability have been classified as very low to low.

### Minerals

The Site lies within a mineral safeguarded area for sand and gravel (from the Lowestoft Formation) and a Minerals Resource Assessment (MRA) has been undertaken in accordance with Policy SGS6. The MRA identifies that there is a mineral resource within the Site. However, it is not considered viable to extract the minerals from the Site. Accordingly, any development on the Site will not require the prior extraction of any mineral resource. Essex County Council as minerals authority have confirmed that they have no objection to development of the Site.

### Masterplan Considerations

- Geology and minerals are not a constraint to masterplan layouts.
- The eastern portion of the Site is considered to be the most suitable for accommodating shallow infiltration drainage via soakaways.

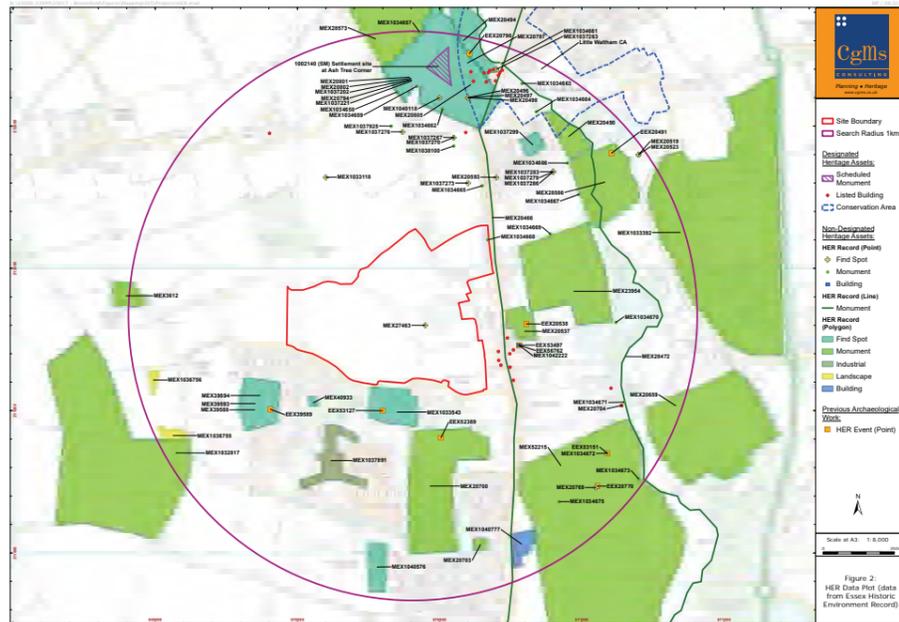
## FLOOD RISK

The Site is classified as Flood Zone 1 which is land designated at low probability of river or sea flooding. According to the Environment Agency's website, small parts of the Site are at risk of flooding from surface water (mainly the ditch) which can be mitigated through appropriate design measures incorporating the use of sustainable drainage systems.

Whilst development will increase the rate and volume of surface water runoff, the use of attenuation systems on Site, such as swales and attenuation basins, can mitigate the effect on development and associated downstream catchments.

### Masterplan Considerations

- Flooding is not a constraint to masterplan layouts.
- Requirement to maintain surface water runoff rates in accordance with national and local policy.
- The existing on-site ditches offer the opportunity to provide a sustainable drainage strategy along with new attenuation features introduced as part of the development.
- The development needs to provide appropriate surface water drainage attenuation, such as using the existing agricultural reservoir.



# TECHNICAL CONSIDERATIONS

## UTILITIES

The area around the Site is well serviced with utilities, including broadband, located along B1008 and Woodhouse Lane corridors. Preliminary design loadings have been considered and further liaison is taking place to determine appropriate technical design.

**Masterplan Considerations**

- To avoid any disruption on Blasford Hill (Distributor road) utilities and services will be directed along Woodhouse Lane and sensitively diverted into the south east corner of the Site to serve the development.
- The layout should take account of existing drainage, including an allowance for maintenance and easements.
- Consideration to be given to the natural attributes of the Site and in particular to the south east corner when installing drainage / utilities.
- The Site is well positioned to connect into existing utilities delivering the latest in communications such as high-speed broadband providing residents a reliable fast internet connection.

## NOISE

There are several existing noise receptors in relation to the Site being residential properties to the south and east and Farleigh Hospice to the south. Traffic along Blasford Hill to the east, and potentially from the general operations at Broomfield hospital to the south west and the Scaffold Yard located to the east of the site, will already contribute to ambient noise.

There is minimal traffic noise arising from the use of Woodhouse Lane to the south. The development would introduce new receptors, but would not introduce excessive noise to the area. Further noise assessment will be prepared as part of the subsequent planning application process

**Masterplan Considerations**

- There are no particular masterplanning constraints identified at this stage in relation to noise impact upon the new residents which could not be mitigated through simple measures such as glazing.
- There are no particular constraints identified in relation to noise impact on existing residents or other sensitive receptors.

## EDUCATION

The Site has schools located nearby in Broomfield and Little Waltham which provide primary education along with a secondary school in Broomfield. Discussions have taken place to agree the position with the Local Education Authority (Essex County Council) which has confirmed that primary or secondary children arising from the development will attend nearby schools. The 2 and 3-mile radii illustrated opposite are the distances prescribed in the Education Act beyond which local authorities are required to provide/fund transport where the nearest available school is further away. Those nearby schools are listed in the table below:

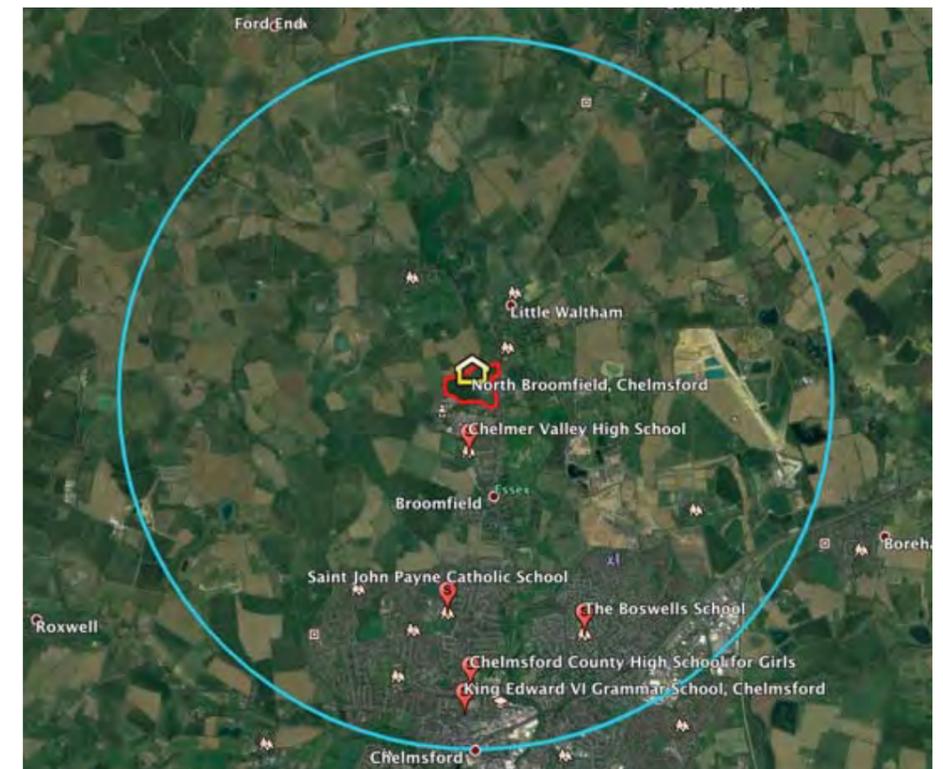
Primary Schools	Distance from Blasford Hill	
Broomfield Primary School	1.2 miles	1.93 km
Little Waltham Primary School	0.9 miles	1.44 km
Great Waltham Primary School	1.6 miles	2.57 km
Secondary Schools		
Chelmer Valley High School	0.7 miles	1.13 km
Saint John Payne Catholic School	2.3 miles	3.7 km
Chelmsford County HS for Girls	2.6 miles	4.18 km
King Edward VI Grammar School	2.9 miles	4.66 km

**Masterplan Considerations**

- Cycle and pedestrian footpaths will be provided for safe and easy access to primary schools in Little Waltham and Broomfield. Existing footpaths and cycle connections will be utilised for access to secondary education in Broomfield.
- Provision on-site for Childcare and early years facility.



Site location in relation to primary schools (2 mile radius)



Site location in relation to secondary schools (3 mile radius)

# SITE CONSIDERATIONS

This section summarises the Site considerations that the masterplan proposals need to respond to including planning policy, community, environmental and technical considerations.

## Planning policy

- The proposals need to accord with the planning policy framework set out unless material considerations dictate otherwise.
- This includes various infrastructure requirements, levels of open space provision and housing mix.
- The development proposals need to demonstrate that they align with best practice design guidance.
- The Chelmsford Local Plan masterplanning principles should be incorporated.
- On-Site recreational facilities should be provided to mitigate wider disturbance on ZOI receptors areas.
- Commitment to Live Well principles

## Local community facilities & services

- The Site is well served by existing services and facilities in Broomfield and Little Waltham. Chelmsford city centre is around 3km away and easily accessible by bicycle or bus.
- A new community led neighbourhood centre will be located centrally within the site with access from the main spine road and within easy walking distance for all residents. The facilities will be focused on a multi-functional community building and an early years and childcare facility. At this time there are ongoing talks with the NHS about integrating local healthcare provision with this Local Centre or nearby, but this is subject to further discussion with the NHS.
- There is no requirement for a new primary school on the Site. The children are most likely to attend schools in Little Waltham and Broomfield.
- The additional housing will help support and sustain local businesses, such as the nearby shops and pubs.
- Connections to existing facilities by walking and cycling will be a priority.

## Access & Movement

- **Vehicular Access:** the Site must be served via a new access off the B1008 Blasford Hill. This should be in the form of a new roundabout, designed to act as a positive and attractive new gateway into Broomfield, including appropriate signage.
- **Public Transport:** early phases of the development can include safe and convenient walking routes to the existing bus stops along Blasford Hill, though later phases could provide an internal bus service. The internal road layout will be designed to accommodate additional bus stops on Site as part of any future proposed bus service.
- **Cycle connection:** cycle route through the Site connecting Little Waltham (subject to feasibility study) with city centre and Great Waltham cycle route to the south via woodhouse lane.
- **Walking routes:** Connection to walking routes leading to community facilities in Broomfield and Little Waltham. Improvements are needed including a potential crossing facility associated with the new access off Blasford Hill.
- A new vehicular, pedestrian and cycle access will be provided to connect with Broomfield Hospital internal perimeter road. The delivery of this access will either be directly by the developer of Blasford Hill (subject to the Hospital Trust making the land freely available) or via a financial contribution by the developer to finance the works to be undertaken by the Hospital Trust under governance of the Local Authority.

## Landscape & Visual

- Respect eastern views into the Site from the Chelmer Valley.
- Make best use of the existing landscape features on the Site as structuring elements for future development. These to include where appropriate hedgerows and trees.
- Recognise the key landscape feature of the former agricultural reservoir and build into the approach to green infrastructure.
- Enhance existing Site planting to help the design proposals integrate into the landscape surroundings including the wooded setting of Woodhouse Lane.
- Enhance the green corridor context of the public right of way which runs northwards through the site connecting Woodhouse Lane in the south with Lark's Lane in the north
- Deliver an appropriate landscape response to the Site including the field in the south east corner.
- Reflect local villages through provision of a series of greens.
- Enhance existing field boundaries to help the development proposals integrate into their landscape surroundings.
- Utilise existing topography to create a natural drainage strategy.

## Arboriculture & Ecology

- The layout should mitigate the presence of high-quality trees, particularly the on-Site TPO's, meaning where feasible the development proposals are shaped to retain them.
- Retain the main hedgerow running north south through the Site as a key structuring feature, limiting breaks where possible.
- There is an opportunity to provide additional trees and vegetation across the Site, improving its character and enhancing biodiversity.
- There is an opportunity to enhance the boundary planting, for example along the western boundary, which is mostly open at present, the northern boundary to limit long range views and the south to buffer the rural lane character.
- The hedgerow to the south of the agricultural reservoir is classified as low quality (Category C) and hence on balance could be removed to facilitate development.
- The approach to incorporating ecological features needs to be incorporated as part of the green infrastructure strategy.
- Opportunity to enhance biodiversity by planting new trees and vegetation within and around the edges of the Site, including green corridors.
- Planting to the western boundary provides the opportunity to create a habitat corridor linking Puddings Wood to the south with Sparrow Hawk Wood to the north.
- Integrate existing network of ditches and reservoir as a natural drainage solution into the proposed drainage strategy.
- Consider the approach to long term management of the grassland area within the south eastern corner and surrounding the agricultural reservoir as part of the landscape strategy.
- Deliver Biodiversity Net Gain by retaining and enhancing where possible existing trees and hedgerows, with additional landscape planting as part of extensive provision of public open space.
- Consider the potential for new buildings to contribute, for example by incorporating bird and bat boxes and other biodiversity enhancements.
- Public green spaces to help mitigate recreational disturbance (RAMS).

## Archaeology and Built Heritage

- Archaeology is not a constraint to masterplan layouts.
- Where Archaeology is affected, it will be investigated in advance and recorded.
- Respect the setting of the Listed Buildings to the south east corner of the Site, ensuring new buildings are set back an appropriate distance within an appropriate landscape setting.
- Respect the setting of the non-designated heritage assets.
- Awareness of the Schedules ancient monument located north of the Site.
- Respect the building frontage line on Blasford Hill.

## Minerals

- Geology and minerals are not a constraint to masterplan layouts.
- The eastern portion of the Site is considered to be the most suitable for accommodating shallow infiltration drainage via soakaways.

## Flood risk

- Flooding is not a constraint to masterplan layouts.
- Requirement to maintain surface water runoff rates in accordance with national and local policy.
- The existing on-site ditches offer the opportunity to provide a sustainable drainage strategy along with new attenuation features introduced as part of the development.
- The development needs to provide appropriate surface water drainage attenuation, such as using the existing agricultural reservoir alongside an attenuation basin located in the south eastern part of the Site which is at the lowest level.

## Utilities

- To avoid any disruption on Blasford Hill (Distributor road) utilities and services will be directed along Woodhouse Lane and sensitively diverted into the south east corner of the Site to serve the development.
- The layout should take account of existing drainage, including an allowance for maintenance and easements.
- Consideration to be given to the natural attributes of the Site and in particular to the south east corner when installing drainage / utilities.
- The Site is well positioned to connect into existing utilities delivering the latest in communications such as high-speed broadband providing residents a reliable fast internet connection.

## Noise

- There are no particular masterplanning constraints identified at this stage in relation to noise impact upon the new residents which could not be mitigated through simple measures such as glazing.
- There are no particular constraints identified in relation to noise impact on existing residents or other sensitive receptors.

## Education

- Cycle and pedestrian footpaths will be provided for safe and easy access to primary schools in Little Waltham and Broomfield. Existing footpaths and cycle connections will be utilised for access to secondary education in Broomfield.
- Provision on-Site for Childcare and early years facility.



# 3. SITE OPPORTUNITIES AND DESIGN PRINCIPLES

The following series of diagrams explain the key points which inform the masterplanning principles and underpin some of the decisions made to inform the design process.

These reflect the specific spatial considerations of the Site and the feedback received from the engagement process. In addition to this the requirements of policy guidance and best practice referred to in section 2 of this document will be applied to all development proposals.



## 1. IDENTITY & HERITAGE

- Maintain separation between Broomfield and Little Waltham by providing a green gap i.e. limiting development within the north east corner.
- Respect adjacent uses, including the setting of Listed Buildings and non-designated heritage assets and Farleigh Hospice by providing a landscape buffer and / or setting back development.
- Retain a natural parkland setting to the historic buildings.
- Consider local design and layout cues from Broomfield and Little Waltham.



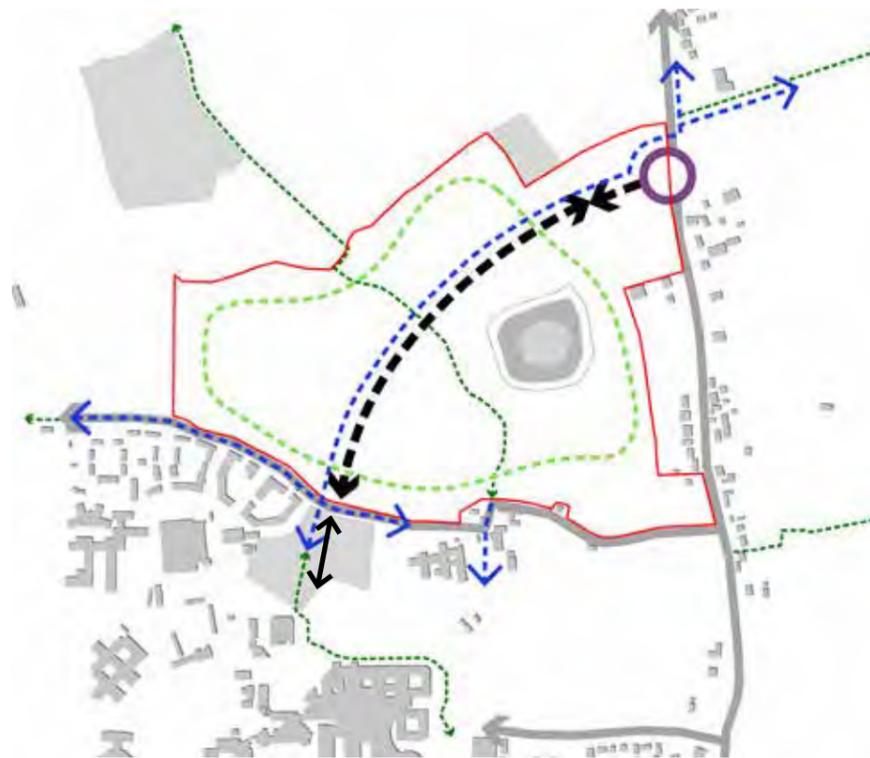
## 2. SITE TOPOGRAPHY & KEY VIEWS

- Utilise the natural fall of the land to provide an integrated drainage strategy within the landscape.
- Allow the Site topography to reinforce the sense of place and interest to the roofscape.
- Integrate the agricultural reservoir into the landscape strategy and make use of the level changes.
- Acknowledge building scale range likely to be predominantly two storey with potential for habitable rooms in the roof.
- Views from north / north western farmland plateau will be addressed with boundary planting.



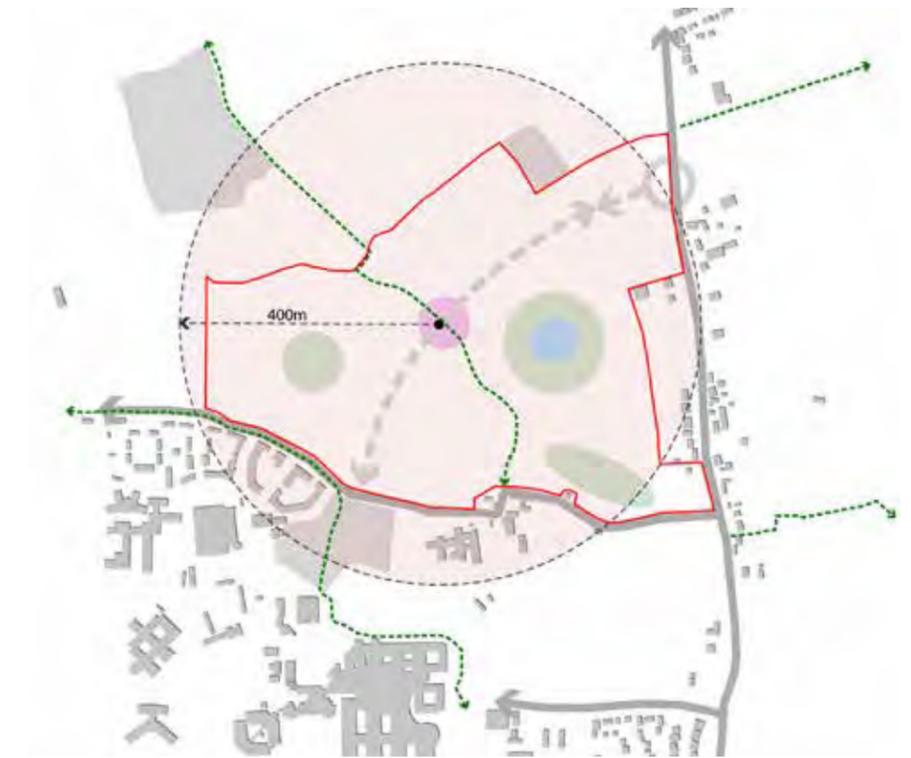
### 3. TREES AND ECOLOGY

- Opportunity to link Puddings Wood and Sparrow Hawk Wood with enhanced tree planting along the western boundary and along the outer perimeter of the Site.
- Opportunity to enhance existing wildlife habitats via a north to south green corridor .
- Remove hedgerow only where necessary.
- Retain the grassland area located in the south east corner to help improve biodiversity and ecology.
- Retain and enhance where possible existing trees and hedgerows alongside new provision as part of a network to secure biodiversity gains.
- Strengthen planting along the outer perimeter of the site



### 4. ACCESS & CONNECTIVITY

- Provide a new primary access point from Blasford Hill .
- A new vehicular, pedestrian and cycle access will be provided to connect with Broomfield Hospital internal perimeter road.
- Provide pedestrian / cycle links where feasible through to Broomfield and Little Waltham.
- Integrate existing public rights of way into layout along with the opportunity to connect into the wider network of shared foot/cycle paths.
- On-site routes including perimeter walks & cycle paths to provide opportunity for health and recreational benefits.
- Connect to the strategic pedestrian and cycle routes across Chelmer valley.
- Opportunities for accessible sustainable travel to key destinations.
- Pedestrian and cycleway links to adjacent uses and routes to engage communities, families and individuals to improve health and wellbeing.
- Public transport infrastructure to be provided within the site.
- Explore alternative future use of Woodhouse Lane to avoid rat running and issues of safety.



### 5. LIVEWELL & COMMUNITY INFRASTRUCTURE

- Incorporate the 'Livewell' principles to encourage the community, families and individuals to improve on health and wellbeing.
- Accessible open space within walking distance for all residents with activities for all ages.
- Provide a community led neighbourhood centre with childcare and early years facility, including potential for healthcare provision.

# 4. COMMUNITY ENGAGEMENT & LOCAL INVOLVEMENT

## CHELMSFORD CITY COUNCIL PPA

Bloor Homes entered into a Masterplan PPA in early 2019. The Masterplan PPA covers four stages in total, which address the following:

Masterplan PPA	Requirements
Stage 0	Chelmsford City Council (CCC) and Bloor Homes enter into a PPA. Bloor Homes agree Masterplan framework plans with CCC.
Stage 1	Undertake stakeholder engagement. Bloor Homes to draft a Masterplan document. CCC provide comments to Masterplan document. Masterplan document amended and agreed with CCC.
Stage 2	Bloor Homes submits Masterplan document. Formal public consultation commences on Masterplan document. Masterplan document amended in light of feedback from public consultation.
Stage 3	CCC prepare consultation report. Masterplan document approved by Executive Cabinet as approved guidance for development.

Bloor Homes have worked closely with CCC in developing the framework plans and the Masterplan document.

## TECHNICAL WORKSHOP

On Tuesday 13 August, Bloor Homes organised a technical workshop for stakeholders, providing them with an opportunity to discuss and feed into the proposals for the Blasford Hill development. The workshop was held between the hours of 13:00-16:00. Eighteen stakeholders attended the workshop, from a range of organisations covering diverse areas of expertise.

### Main outcomes of discussion:

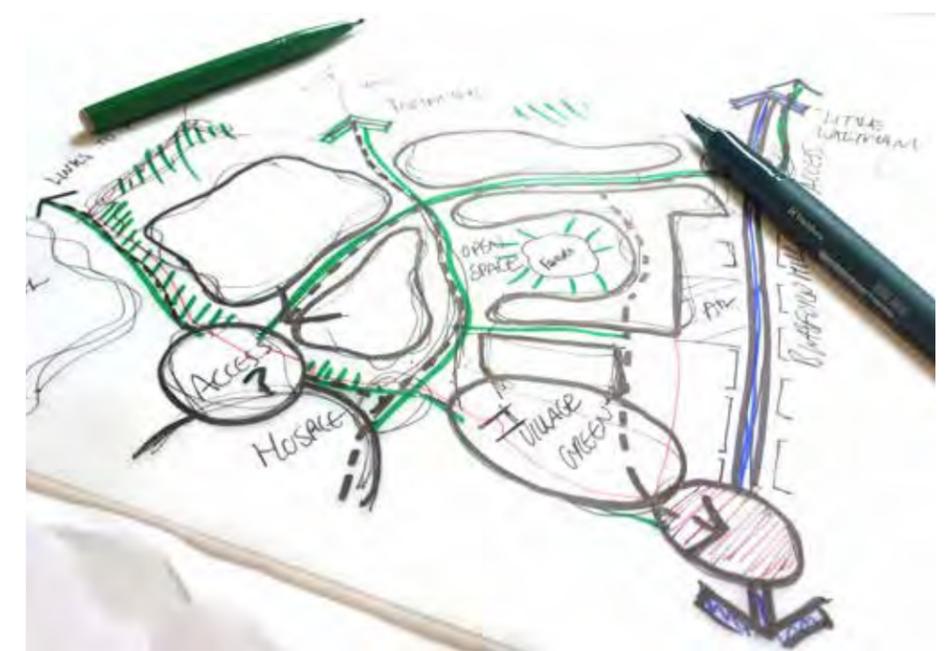
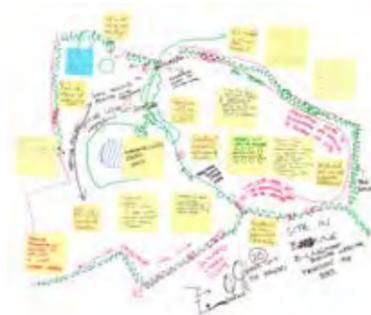
- Investment in green corridor footpaths.
- Retention of the reservoir.
- Creation of a village green.
- Provision of swift boxes across the Site.
- Low density housing.
- Open space walking area creating a connected circuit.
- The design attributes of the primary route through the Site and key junctions.
- Internal movement and relationship with Woodhouse Lane.
- Approach to foul and surface water drainage.
- Ecological corridors and the need to sensitively design the south east corner of the Site.
- Constraints on drainage.

## PARISH COUNCIL WORKSHOP 1

On Tuesday 13 August evening a meeting took place between Bloor Homes and representatives from Broomfield Parish's Neighbourhood Planning Group and Little Waltham Parish Council. This meeting followed previous engagement undertaken with the Parishes, regarding the proposals for the Blasford Hill development.

### Main outcomes of discussion:

- Density & quantum of proposed development.
- Creation of village green to south eastern corner.
- Importance to retain existing reservoir as a community asset.
- Access road routing into Broomfield Hospital.
- Use of the access road into Broomfield Hospital.
- Stopping up of Woodhouse Lane.
- Impacts upon Farleigh Hospice in terms of traffic management.
- Traffic reduction measures along Blasford Hill.
- Potential controlled pedestrian crossing along Blasford Hill.
- Pedestrian and cycle connectivity to Broomfield and Little Waltham.



## PARISH COUNCIL WORKSHOP 2

On the evening of Tuesday 5th September, a further meeting took place between Bloor Homes and representatives from Broomfield Parish’s Neighbourhood Planning Group and Little Waltham Parish Council.

### Main outcomes of discussion:

- Presentation of parishes’ concept aspirations for site.
- Creation of village green central to development.
- Importance to retain existing reservoir as a community asset.
- Access road routing into Broomfield Hospital.
- Stopping up of Woodhouse Lane.
- Traffic reduction measures along Blasford Hill.
- Potential controlled pedestrian crossing along Blasford Hill to Little Waltham.
- Content and requirements for neighbourhood centre.
- Potential for a work hub with a multifunctional community use.
- Types of housing required.
- Incorporating architectural themes from Little Waltham and Broomfield.

## COMMUNITY WORKSHOP

On Tuesday 10 September, Bloor Homes organised a community workshop for stakeholders, providing them with an opportunity to discuss and feed into the proposals for the Blasford Hill development. The event was held between 6.30 to 9 pm, at the Broomfield Methodist Church. Following a presentation about the Site and the masterplan process, a round table discussion was held with attendees. This provided local stakeholders with the opportunity to discuss any specific areas of interest they have on proposals directly with the project team.

### Main outcomes of discussion:

- Consideration of key worker accommodation, potentially off-site provision.
- Provide additional greenery and footpaths around Woodhouse Lane.
- Preference for the route to be accessible for staff working at either the Hospice and Hospital. In addition to local buses and “blue light traffic”.
- Opportunity for development to connect with local walking and cycling routes.
- Addressing potential rat running through Woodhouse Lane depending on use of link access.
- Neighbourhood centre should be well located to with good pedestrian and cycle links.
- Neighbourhood centre should serve the residents of the proposed development and the wider settlements of Little Waltham and Broomfield.
- Neighbourhood centre would best be used for community use, with potential for a satellite doctors surgery, remote working space, and other similar community uses.
- Potential doctors surgery within the site would not be supported by the CCG.
- Development should not give the appearance of merging Broomfield and Little Waltham.

## PUBLIC EXHIBITION

In line with the requirements for stage 2 of the masterplanning process, a consultation event was arranged for Saturday 18th January 2020 at Broomfield Village Hall, 158 Main Road, Chelmsford. The consultation provided the community with an opportunity to see and feed into the submitted masterplan proposals and formed a principle element of the pre-application engagement Bloor Homes is undertaking with stakeholders ahead of the submission of a future planning application, to develop the site.

Prior to the consultation event, invitations were delivered to 1,992 addresses around the site. Local Councillors received a personalised invitation to the event, alongside representatives from Broomfield Parish Council and Little Waltham Parish Council. A meeting was also arranged with the parish councils in advance of the consultation, to brief them on the materials and information that will be on display at the event.

In total, 116 residents attended the consultation with 19 feedback forms returned at the event. A number of local councillors were in attendance, including ward members for Broomfield and The Walthams; Cllr Wendy Daden (Independent Group) Cllr Barry Knight (Conservative), Cllr Mike Steel (Conservative).

### Main outcomes of discussion:

- How the development would affect traffic levels on local roads across Broomfield and Little Waltham.
- Delivery of the Link Road through the site to provide an access to Broomfield Hospital.
- Positive discussions on the proposed green infrastructure strategy for the site. Residents welcomed the plans to utilise the site’s natural green space, alongside the provisions for a new village green and plans to make the reservoir available to the local community.
- How local infrastructure facilities (specifically educational facilities and GP surgeries) are likely to be affected with new residents moving to the area.
- The investment being made in preserving and enhancing vegetation and greenery across the site, alongside the measures being taken to enhance local wildlife habitats

## RESPONSE TO FEEDBACK

The following key aspects were captured through the engagement process:

### Design

- Consider a range of housing & densities that reflect the characteristics of the Site and surroundings.
- Careful consideration to be given to the approach to drainage.
- Design of the key route through the Site.
- Content and design for a Community Led Neighbourhood Centre.
- Consider architectural cues from Broomfield and Little Waltham.
- Ensuring the community facilities are complementary to others locally.
- Maintain the separation with Little Waltham.

### Masterplan Response

- Identification of character areas to respond to the different aspects of the Site.
- Careful design of the main access into the Site and route as a key feature.

- A network of swales and other sustainable drainage features.
- Proposition for a ‘community led’ neighbourhood centre.
- Limiting development in the north east corner of the Site.
- Design analysis of neighbouring settlements.

### Green Infrastructure

- Retention of the reservoir as a key feature on the Site.
- Investment in green corridors and footpaths across the Site.
- Preservation of existing vegetation and landscape features.
- Potential to link to landscapes beyond the Site.

### Masterplan Response

- Incorporation of the reservoir as a key element of the green space approach.
- A Landscape Framework for routes and spaces across the Site & connected beyond.
- A landscape approach that builds on existing features and enhances these where possible.

### Transport & Access

- Create on Site walking routes that are connected & linked to open space.
- Provision of a new vehicular route into the Site from Blasford Hill.
- Approach to wider traffic management to be considered.
- Securing footpath and cycle connections to Broomfield and Little Waltham.

### Masterplan Response

- An integrated network of green corridors & walking routes.
- Provision of a new junction onto Blasford Hill and a new route into the Site .
- Consideration of the wider transport context on Woodhouse Lane and Blasford Hill.
- Connecting the Site more broadly via walking and cycling routes & public transport.
- A new vehicular access to be provided to connect with Broomfield Hospital

### Ecology & Heritage

- Creating opportunities for ecology through the design of routes and spaces.
- Consideration of village greens to reflect the heritage of the area.
- Care to be taken with the design approach to the south east corner of the Site.
- Accounting for archaeology and heritage.

### Masterplan Response

- Undertaking archaeological and ecology surveys.
- Reflecting the ecology of the Site by retaining key habitats and integrating into the design.
- Creating a new semi-natural open space in the south east corner.
- Incorporating village greens into the green infrastructure network.

## 5. MASTERPLAN FRAMEWORK

The Masterplan Framework Plan draws on the analysis of the Site, the feedback from the engagement process and the Site opportunities and principles to provide structure for future development. Taken with the Site principles and objectives, this plan provides the parameters for any future proposals through the planning process. The Indicative Plans that follow demonstrate one way in which development might respond to these parameters.

The Masterplan Framework has been informed by a thorough assessment of the Site and relationship to the immediate and wider context. It provides a framework for the delivery of a high quality, sustainable extension to the existing built up area of Broomfield. The key principles underpinning the design proposals are set out below.

### NEW HOMES

- Deliver approximately 450 new homes.
- Provide of a mix of types and tenures, including affordable homes to meet the housing needs of the local community.
- Provide a coherent network of public open space, formal and community space within the Site.

### ACCESS & SUSTAINABLE CONNECTIONS

- Create links and connections that will help integration of Blasford Hill with the communities of Little Waltham.
- Access served via a new roundabout off the B1008 Blasford Hill.
- A new vehicular, pedestrian and cycle access will be provided to connect with Broomfield Hospital internal perimeter road.
- Safe and convenient walking and cycling routes to community facilities in Broomfield and Little Waltham where feasible.
- Provide an on-site network of shared foot/cycle paths.

### GREEN SPACE, ENHANCING HABITATS AND BIODIVERSITY

- Create a network of Green infrastructure and provision of public open space.
- Enhance existing habitats and biodiversity through a comprehensive network of planting connected to the wider ecological features.
- Retain and enhance existing Site planting and field boundaries to help the design proposals integrate into the landscape surroundings.
- Retain the main hedgerow & PRoW running north south through the Site as a key structuring feature, limiting breaks where possible.
- Retain and enhance the agricultural reservoir as a key landscape feature within the development.
- Integrate existing network of ditches and reservoir into the proposed drainage strategy.
- Respect the setting of the Listed Buildings to the south east corner of the Site by provision of open space parkland.

### COMMUNITY FACILITIES

- A new community led neighbourhood centre will be located centrally within the site with access from the main spine road and within easy walking distance for all residents. The facilities will be focused on a multi-functional community building and may include a children's' nursery and / or a primary health care practice, subject to agreements with Essex County Council or the NHS.

### RESPECTING WIDER COMMUNITIES

- Maintain separation between little Waltham and Broomfield.
- Provide links to exiting pedestrian and cycle networks.
- Complement existing uses rather than compete.
- Provide a new village greens to complement local character.
- Enhance links and connections to the wider PRoW for new and existing residents.

MASTERPLAN FRAMEWORK



- Masterplan Site Area
- Development Envelope including open space provision
- Green Corridors
- Existing Agricultural Reservoir
- On Site Attenuation (Indicative)
- Community Led Neighbourhood Centre / Early Years Facility
- Landscape Enhancement
- Primary Access
- Potential Hospital Access Location
- Crossing Point Located on Existing Agricultural Access
- Indicative Primary Street
- Indicative route of connection to hospital
- PRoW
- Existing Hedgerows & Trees
- Existing Woodland
- Existing Road Network
- Approved Development
- Approved Development
- Cycle Route
- Footpath Through Puddings Wood

reproduced from the Ordnance Survey Map with the permission of the Controller of HMSO. Crown Copyright Reserved. Licence No. 1000192/9.

# 5. INDICATIVE MASTERPLAN

## MASTERPLAN

The Indicative Masterplan set out opposite shows how the development could look in terms of block structure, buildings, open space, landscape and movement.

Particular care has been taken to integrate the Site into the surrounding landscape context, retaining existing landscape assets and provision of new open space typologies to create a multi-functional green infrastructure network.

Embracing the Site's very good relationship to existing facilities, public transport routes and public rights of way has created a permeable network of routes within the Site. These routes will be direct, safe and convenient to maximise the opportunities for people to travel by sustainable modes:

- A series of 'greens' will provide a focus and sense of arrival for the development reinforced by the character and pattern of streets, key spaces, landmark buildings and retained vegetation to create a place of the highest design quality.
- The development can deliver a broad mix of housing types and tenures as part of creating a balanced, safe and sustainable community for the future.
- The development will comprise approx 450 new homes, neighbourhood centre, formal and informal open spaces, and extensive landscaping.
- A new vehicular, pedestrian and cycle access will be provided to connect with Broomfield Hospital internal perimeter road. The delivery of this access will either be directly by the developer of Blasford Hill (subject to the Hospital Trust making the land freely available) or via a financial contribution by the developer to finance the works to be undertaken by the Hospital Trust under governance of the Local Authority.

## LAND USE STRUCTURE

The proposed land uses are set out on the plan opposite. The proposed residential area is approximately 13ha which equates to around two-thirds of the total Site area.

The disposition of land uses will be carefully considered to respond to the unique characteristics of the Site and contribute to the principles of the other thematic objectives as follows:

- Residential development shall be accommodated within 'pockets' of development separated by areas of green infrastructure.
- Non residential community uses shall be located centrally adjacent to the spine road consistent with ensuring non residential uses are well located relative to the community.
- A range of open space typologies shall be provided that meet the open space policy requirements and positioned in locations that are accessible to the community.
- The access road and green infrastructure provision shall be accommodated in locations that maximise the retention and potential for enhancement of existing vegetation.

## New homes

Housing is the primary land use incorporating a mix of units in terms of size and tenure, ranging from one bedroom apartments to four bedroom detached houses and includes a proportion of affordable housing. The housing mix will be determined at a later stage. There will be an opportunity for self and custom build within the masterplan.

The Indicative Masterplan uses a perimeter block typology which helps maximise security and natural surveillance. Dwellings will be arranged in traditional 'perimeter block' style whereby fronts of properties overlook streets and public spaces, and back gardens or rear parking are kept private within the block in order to maximise safety and security. This approach is consistent with the principles established by 'Secured by Design' because it maximises 'active frontages' on the street, providing natural surveillance.

An area for self build plots will be identified through the planning application process for the site and appropriate design guidance prepared in consultation with Chelmsford City Council.

## Neighbourhood Centre

The neighbourhood centre will provide a focal point for the new community, located in proximity to the central open space and related reservoir. Consultation responses and assessments of existing local facilities have made clear that this should be a community focused centre. To this end, it is anticipated that a multi-functional community building will be accommodated alongside the required early years and childcare facility as set out in the local plan policy, though with the potential to include healthcare.

## Open Space / Green Infrastructure

The Indicative Masterplan includes a significant amount of open space including a neighbourhood equipped play area (NEAP), green links and natural or semi natural green space. The NEAP will be located centrally within the development and accessible for all providing opportunities for play for children of all ages. The Site also provides the opportunity to create new recreational routes and activities to support the 'Livewell' initiative such as linking and utilising the existing PRoW to the east for running and jogging to improve the health and well being of new and existing residents.



# INDICATIVE LANDSCAPE / GREEN INFRASTRUCTURE FRAMEWORK

## GREEN & BLUE INFRASTRUCTURE

The NPPF defines Green Infrastructure as:

‘A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.’

Green Infrastructure (GI) delivers a range of benefits including the following:

- Amenity, or recreational benefits;
- Community benefits;
- Health and well-being benefits;
- Ecological benefits ;
- Biodiversity benefits; and
- Landscape and visual mitigation benefits.’

The approach to the delivery of a comprehensive green and blue infrastructure across the Site is underpinned by the following principles:

- A network of swales and attenuation features shall embrace best practice to treat, convey, store and discharge water to green field run-off rates.
- The reservoir shall be retained and re-imagined as part of a new multifunctional public green space connected with the wider green infrastructure network and other green space within the Site.
- The tree and hedgerow line associated with the existing public right of way shall be retained and enhanced as part of widened green corridor linking the semi improved neutral grassland with Sparrowhawk Wood.
- The grassland area located in the south east corner will be retained and enhanced for wildlife, biodiversity and utilised for on site attenuation.
- Enhance the planting along the southern and western boundaries linking the semi-improved neutral grassland with Sparrowhawk Wood.

- Integrate development parcels with green spaces through street layout / design.
- Incorporation of village greens into the green network to reflect local heritage.
- Green space and planting to Blasford Hill to help maintain separation between Broomfield and Little Waltham.
- The proposed development seeks to provide biodiversity net gains in accordance with Policy S11 and NE1 of the Council’s adopted Local Plan. The landscape strategy identifies substantial areas of landscaping which will provide biodiversity net gains within the site.
- Mitigate the impacts of new roads.

The Indicative Masterplan comprises a green network that integrates landscape and water components. This will provide a framework for creating varied landscape typologies which reinforce the local sense of place and transition with the adjoining countryside.

An enhanced green link is proposed across the middle of the Site, strengthening the existing trees and hedgerows and delivering a new ecological asset. Further landscape and ecological benefits will be derived from the landscape improvements which can be delivered around the existing reservoir.

Additional planting will be added around the periphery of the Site, including the south and south west boundaries which will provide new ecological connection between Puddings Wood and Sparrowhawk Wood and act as a transition with the surrounding open landscape and soften views from the adjoining countryside and public rights of way.

The south east corner has the potential to become an attractive new habitat and incorporate the surface water attenuation basins within the landscape setting.

The proposal includes open space, trees and hedges around all of the edges of the Site. This creates a suitable transition with the surrounding landscape, enhances ecology opportunities, whilst providing an attractive setting for the new housing.

Streets, particularly along the spine road, will incorporate swales. These form part of the surface water drainage strategy whilst also adding interest and character to the street scene.

## Blasford Lake

The landscape proposals look to connect with the existing agricultural reservoir by making it accessible, attractive and safe whilst enhancing ecology and amenity provision.

The key landscape strategies are:

- Creating a gently sloping lawn on the sunny side of the reservoir, opening up views to the water and maximising amenity use around the northern edge.
- Creating a strong ecological belt around the western edge of the lake connecting into the existing hedgerow to the west.
- The creation of a stepped footpath route down to the water’s edge making it accessible.
- The creation of a sloped path running around the southern edge down to the water to make the feature accessible for all.

## Blasford Parkland

The south east corner provides a semi natural open space within a parkland setting. Housing will form the northern boundary of the open space where possible helping to create a safe and secure environment. Public footpaths will lead through this area of open space connecting the development with Woodhouse Lane and links out onto Blasford Hill. Should the existing hedgerow in this location be removed compensation planting will be provided.

## Blasford Village Green

The west of the Site includes Blasford Village Green providing a more formal open space feature for the surrounding residents. Housing will front onto the village green directly contributing to the character of this space. New public footpaths will lead through this area of open space connecting to the wider footpath network and surrounding country side.



Indicative Drainage Strategy



Existing Landscape features

INDICATIVE LANDSCAPE FRAMEWORK



- 01 Blasford Lake
- 02 Blasford Village Green
- 03 Blasford Parkland

Key Open Spaces

# INDICATIVE MOVEMENT FRAMEWORK

## MOVEMENT FRAMEWORK

The plan on the following page illustrates the indicative movement network within the Site and the connections with the surrounding context.

The development will be served by a new roundabout junction along the B1008 Blasford Hill. The design of the new roundabout is shown on page 36.

A hierarchy of streets of varying standards are proposed with regard to the needs of expected occupiers and policy standards and advice. Streets will be designed to a maximum of 20mph which will be reinforced by traffic management measures. These measures will be designed to integrate into the built environment and add to the 'sense of place' rather than allowing highway features to dictate the built form.

### Traffic Calming

Traffic calming will help ensure that the design traffic speeds are maintained. The primary method of traffic calming will be horizontal alignment reinforced by building form and landscape treatment. Other appropriate measures include:

- Key spaces with changes in surface treatment and landscape measures.
- Junctions, squares and pinch points deflections.
- Road narrowing.
- Highway gateways, which set vehicle speeds on entry to the development.

All measures will be fully integrated with building form, landscape and public realm treatments.

### Car Parking

Parking for the development will be provided in line with the Council's parking standards with a preference for on-plot parking.



- Masterplan Site Area
- Existing Roads
- Spine Street
- Secondary Street
- Tertiary Street
- Footpath
- PRoW
- Cycle path
- Existing footpath / Proposed as cycle route under City Growth Package
- ← → Indicative Route through Puddings Wood

Indicative Movement Framework

### PUBLIC TRANSPORT

There are numerous bus services running along the B1008 Blasford Hill immediately east of the Site. These provide regular and convenient links into Broomfield and Chelmsford city centre.

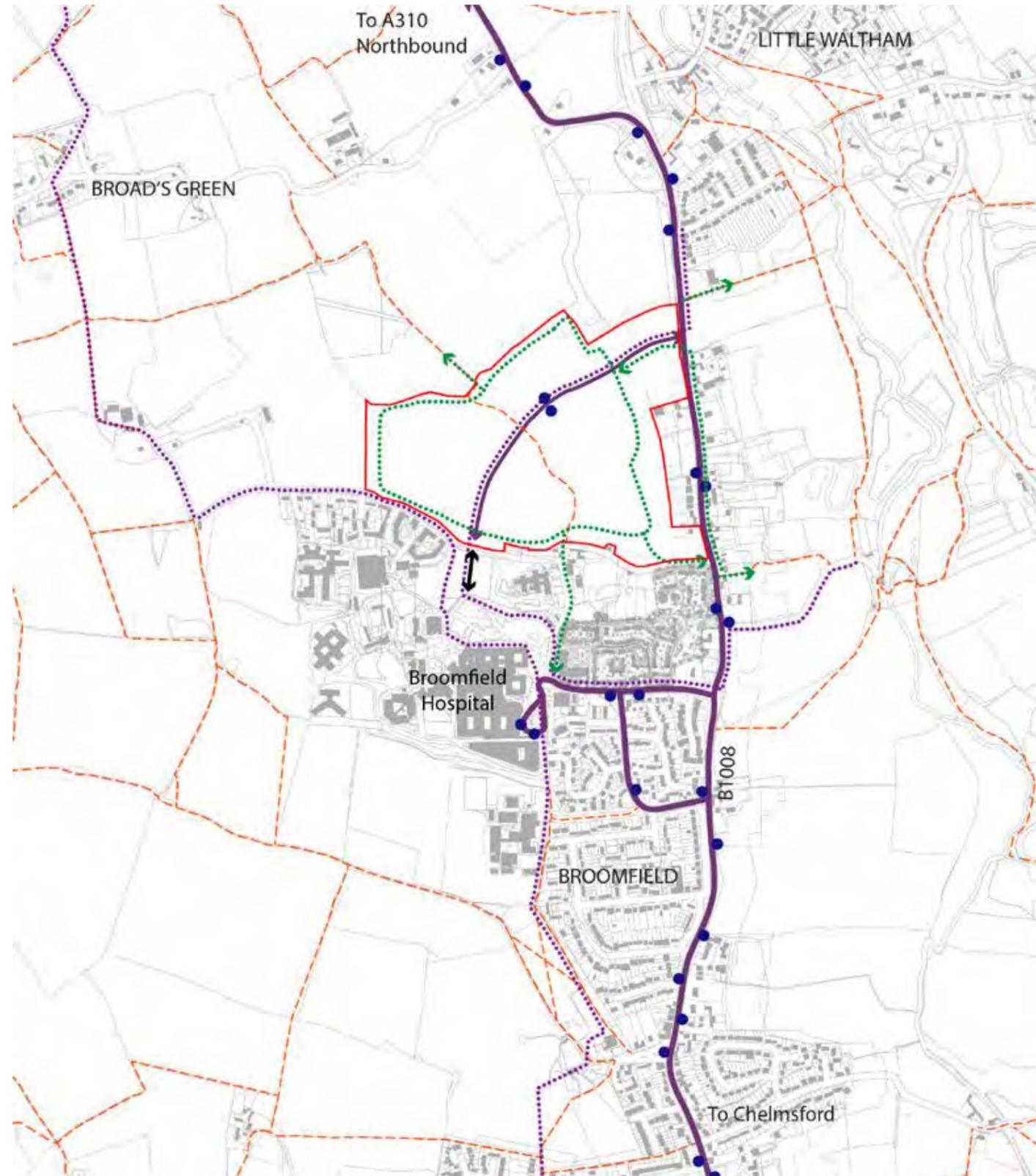
Residents have the opportunity of two bus stops nearby, both stops are linked to the Site by pavements. The bus stop locations are east along Blasford Hill and Broomfield Hospital. The proposal includes an opportunity for bus operators to access the Site to provide a service as part of the wider bus network.

### PEDESTRIAN AND CYCLE

Careful consideration has been given in the masterplan to how the development will integrate with the existing network of routes surrounding the Site and provide a new network that will encourage movement by sustainable modes of transport.

The key principles underpinning the footpath and cycleway strategy are as follows:

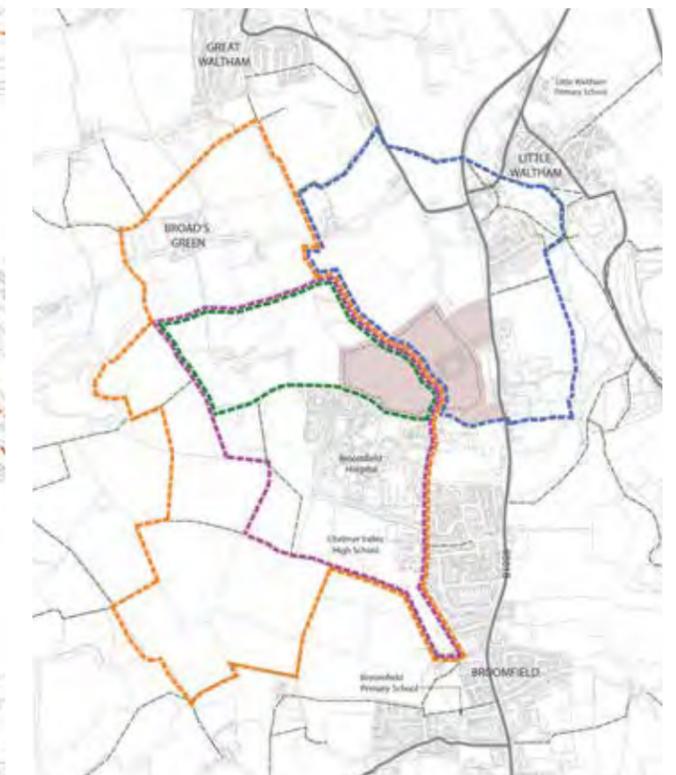
- A new pedestrian and cycle path running along the main spine through the development, easily accessible and linked to the existing pedestrian and cycle network, including the hospital.
- Pedestrian/cycle connections onto Woodhouse Lane connecting into the strategic on-road cycle route running along Woodhouse Lane and North Court Road linking to the city centre and Waltham Cycle route.
- Routes are direct and overlooked by adjacent development to ensure they feel safe and minimise the opportunities for crime.
- Cycle & pedestrian connectivity to Little Waltham via a new footpath /cycle link including junction crossings.
- The existing public right of way crossing the Site will be upgraded and connected into the new development.



Proposed Public Transport and Wider Access Plan

### RECREATIONAL ROUTES & TRAILS

A series of trim trails could be created around the Site and Broomfield which utilise the existing public rights of way to the west of the Site. These routes could cater for all levels of fitness to encourage health and wellbeing. These routes could also be incorporated into the wider network of public footpaths to create longer more challenging routes.



Indicative Recreational Routes & Trails



# ACCESS

## ACCESS STRATEGY

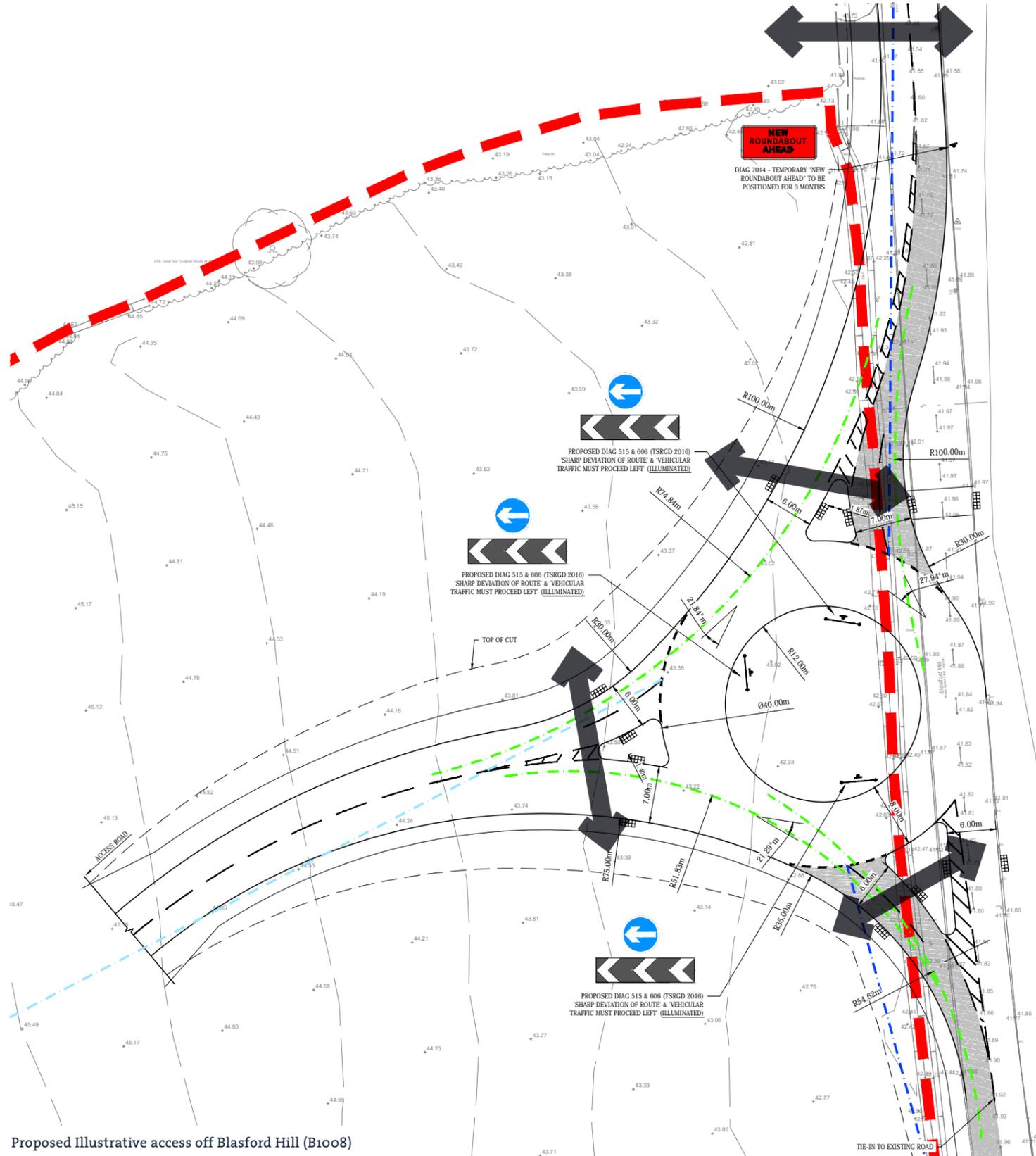
The access strategy is set out below. It addresses the following key objectives:

- Provides a suitable access off Blasford Hill.
- Provides a spine street linking all parts of the development designed to accommodate a new bus route connection within the Site from Blasford Hill.
- Provide access to Broomfield Hospital
- Coordinate the future downgrading of Woodhouse Lane with the provision of the Hospital Link Road
- Creates a network of direct and attractive cycle and pedestrian connections to key destinations within the existing built up area and the wider area.
- Provides a safe, legible and permeable layout for all modes within the Site.

The key elements of the Strategy are considered in more detail in the following pages.

Junctions within the development will be designed to add to the wider public realm rather than simply being designed to cater for car movements. In this context it is envisaged that junctions will be designed to reflect and respond to the character of the surrounding road hierarchy and built form, and will consider the movement requirements of all road users especially pedestrians and cyclists.

↔ Crossings located on Blasford Hill



Proposed Illustrative access off Blasford Hill (B1008)

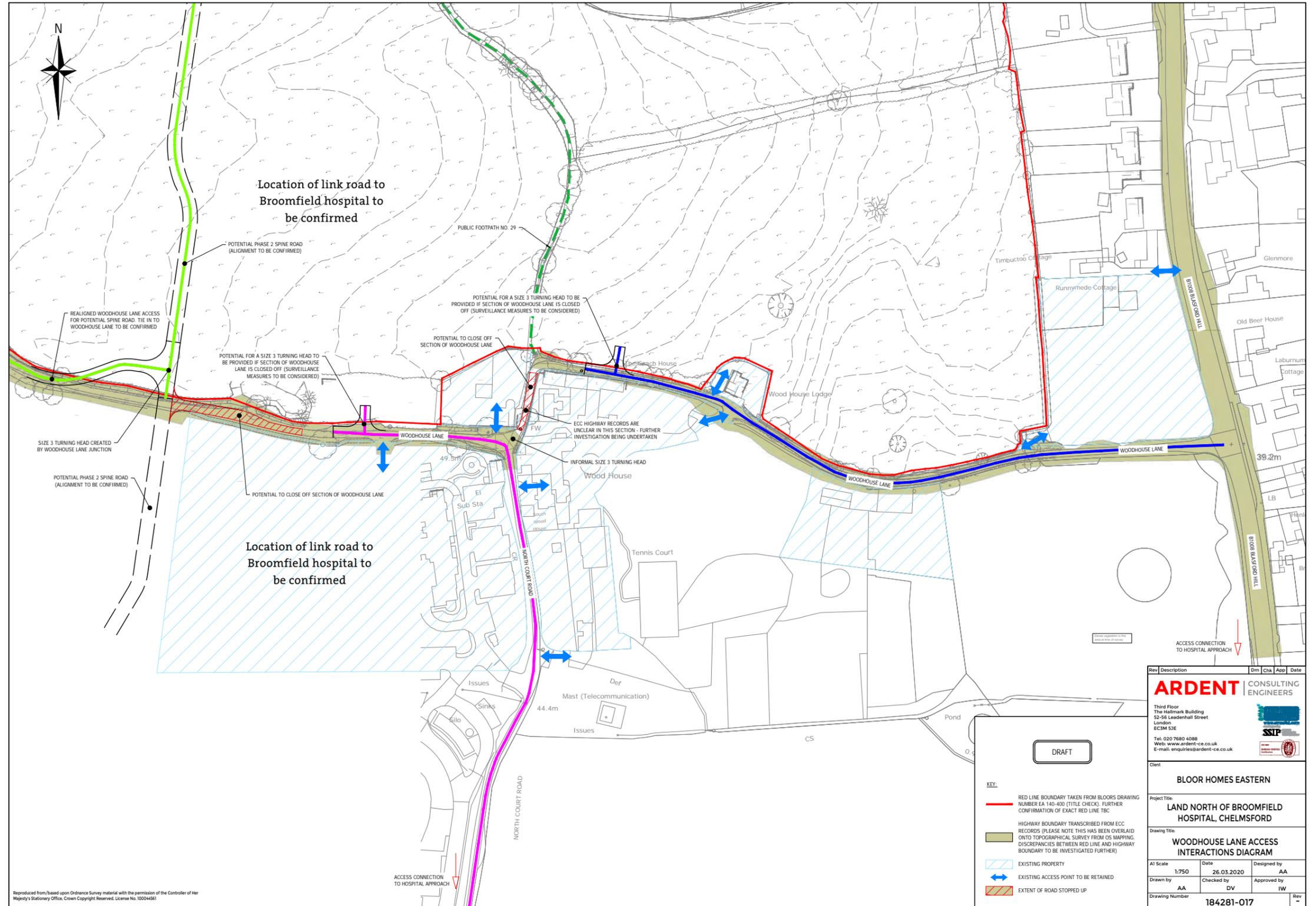


Access location plan

### WOODHOUSE LANE - HIGHWAY IMPROVEMENT OPTIONS

As part of the masterplanning process for Blasford Hill, the wider connectivity of the Site to the neighbouring communities and strategic linkages have been considered, including the role and function of Woodhouse Lane and the means to prevent greater use of this road either in conjunction with the Blasford Hill development or as part of the hospital access. Chelmsford City Council and Essex County Council are therefore working with us to explore the potential to rationalise access via Woodhouse Lane in conjunction with the provision of the access road into the hospital, whilst maintaining access to properties along Woodhouse Lane.

The comments made as part of the public consultation on the masterplan have been and will continue to be considered as part of this work. Full modelling of junction queueing will be provided as part of the Transport Assessment submitted with the Outline planning application to allow further refinement of the final approach to be taken forward.



Reproduced from/based upon Ordnance Survey material with the permission of the Controller of Her Majesty's Stationary Office. Crown Copyright Reserved. License No. 100046581

Rev	Description	Drn	Chk	App	Date
<p><b>ARDENT CONSULTING ENGINEERS</b></p> <p>Third Floor The Hallmark Building 52-56 Lundenhall Street London EC3M 5JE Tel: 020 7680 4088 Web: www.ardent-ce.co.uk E-mail: enquiries@ardent-ce.co.uk</p>					
Client: <b>BLOOR HOMES EASTERN</b>					
Project Title: <b>LAND NORTH OF BROOMFIELD HOSPITAL, CHELMSFORD</b>					
Drawing Title: <b>WOODHOUSE LANE ACCESS INTERACTIONS DIAGRAM</b>					
AI Scale	Date	Designed by			
1:750	26.03.2020	AA			
Drawn by	Checked by	Approved by			
AA	DV	IW			
Drawing Number	Rev				
184281-017					

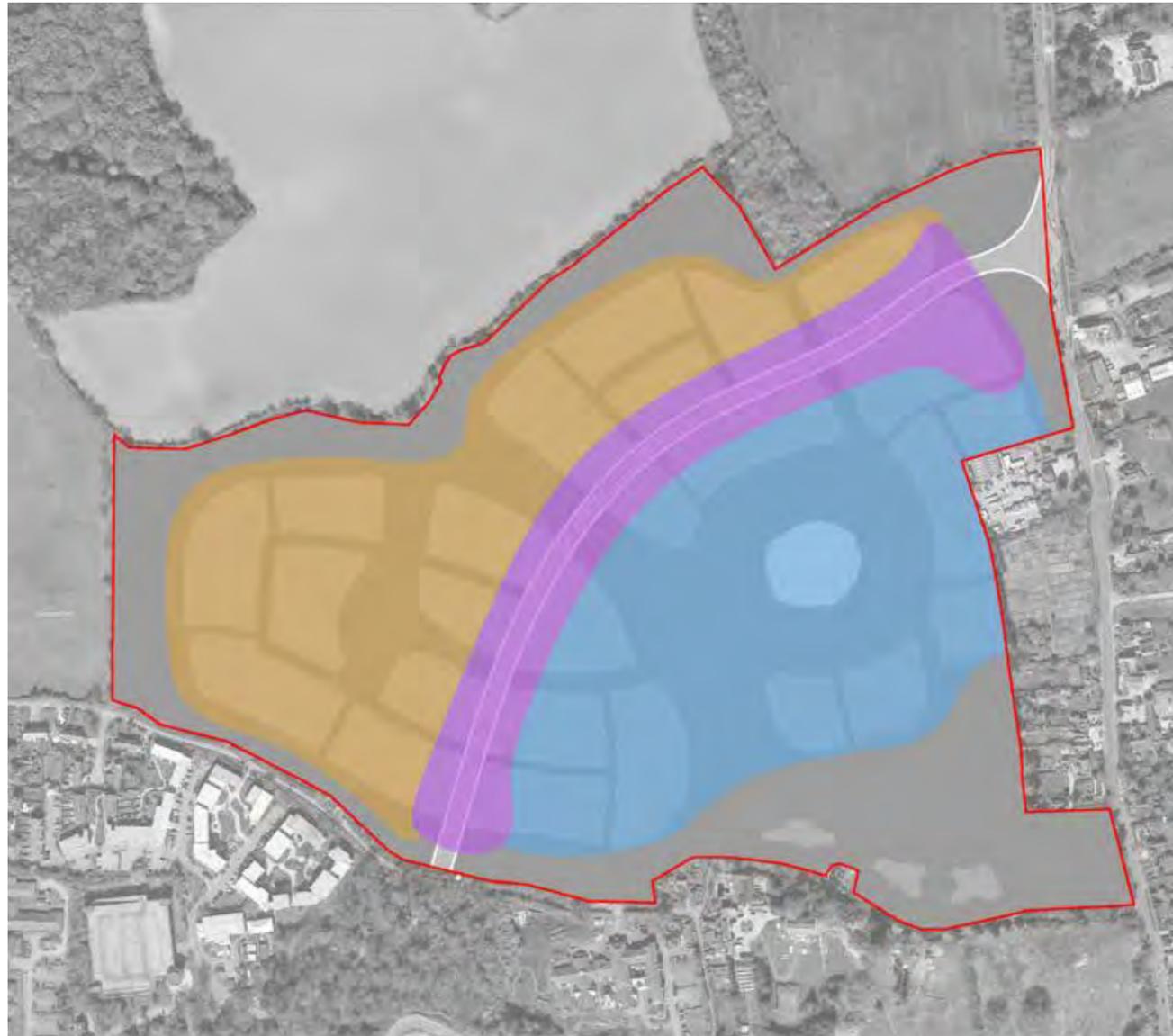
**DRAFT**

**KEY:**

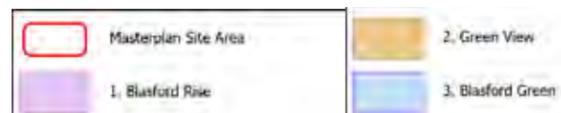
- RED LINE BOUNDARY TAKEN FROM BLOOR'S DRAWING NUMBER EA 140-400 (TITLE CHECK). FURTHER CONFIRMATION OF EXACT RED LINE TBC.
- HIGHWAY BOUNDARY TRANSCRIBED FROM ECC RECORDS (PLEASE NOTE THIS HAS BEEN OVERLAID ONTO TOPOGRAPHICAL SURVEY FROM OS MAPPING. DISCREPANCIES BETWEEN RED LINE AND HIGHWAY BOUNDARY TO BE INVESTIGATED FURTHER)
- EXISTING PROPERTY
- EXISTING ACCESS POINT TO BE RETAINED
- EXTENT OF ROAD STOPPED UP

# INDICATIVE CHARACTER & FOCUS AREAS

This section describes the potential characteristics and appearance of the development. It sets out the strategy for achieving a sense of individuality within a coherent and legible strategy. The development has a fluid and responsive layout and structure, influenced by the Site's features and surrounding context. A traditional form of architecture is proposed for all areas, with pitched roofs and materials in keeping with the local vernacular. There are three main character areas proposed, as set out within the illustration below and described over the following pages.



Indicative Character Areas



## 1. BLASFORD RISE

Blasford Rise will be a comparatively higher density part of the development to address the urbanised route to the hospital. It will have a formal character and consistent appearance within the street typology and public realm treatment. Buildings will be set back, except at key locations or where the access arrangements change. A variety of units and materials will add interest.

Most of the homes will be 2 storey or 2.5 storeys adding interest and improving legibility. Building frontages will have comparatively stronger building line with parking provided onplot.

Adding to its a formal character, the street will be lined by avenue trees within grass verges accommodating swales on both sides with limited visitor parking. One side of the street will incorporate a cycle path linking into the wider cycle network. Access to housing will be via private drives off the main Spine (refer to page 43 section A-A for indicative Spine Street).



Pair of buildings located at development gateway



Detached homes located off Spine road



Opportunity to reflect local style



Homes set back off the street

## 2 - GREEN VIEW

Located around the edges of the development housing will respond to the surrounding landscape. The outer edges of the development will accommodate the lowest densities with integrated trees and shrub planting to complement the landscape setting.

Building heights are up to 2 storeys, frontages are less continuous and buildings lines have greater variety.

These areas are more landscape dominated spaces containing open spaces, trees and other vegetation, provided as part of the development and along its interface with its surroundings.



## 3 - BLASFORD GREEN

Blasford Green will be predominantly detached or semi detached housing and include a higher proportion of terrace and apartments and opportunities for incidental open spaces. The two areas of open space surrounding the reservoir / Neighbourhood Equipped Area for Play and the south east corner will make a significant contribution towards its character. The homes fronting the neighbourhood equipped area of play / Reservoir will have a more consistent character with all buildings fronting and contributing towards the open space.

Building heights will tend to be 2 storeys with 2.5 in key locations enclosing spaces or movement routes. There will be a greater variety in building set backs with less continuous frontages with on-plot parking.



Homes facing onto green space



Homes overlooking the green edge



Focal building overlooking open space



Buildings overlooking key spaces



Homes overlooking a play space



Homes located around a village green



Buildings overlooking green space



Homes looking over the landscape edge

# FOCUS AREAS

## INDICATIVE NEIGHBOURHOOD CENTRE

A new community led neighbourhood centre will be located centrally within the site with access from the main spine road and within easy walking distance for all residents. The facilities will be focused on a multi-functional community building and an early years and childcare facility. At this time there are ongoing talks with the NHS about integrating local healthcare provision with this Local Centre or nearby, but this is subject to further discussion with the NHS.

Existing residents of Broomfield and little Waltham will be encouraged to use the community facility as it will complement the existing facilities available rather than compete with them. The neighbourhood centre will be located adjacent to several green links and footpaths and close proximity to the neighbourhood play area and landscaped reservoir which will be accessible for all to enjoy.



Great Western, Community Building



Dickens Heath Village Hall / Early years



Carterton Community Centre, Oxford

## COUNTRYSIDE EDGE

The Countryside Edge character area will provide a transition to the surrounding countryside and create a landscaped edge to the new community where lower density housing is interspersed with an organic/informal arrangement in a landscape setting.

This character area comprises the lower density residential areas around the perimeter of the development. Residential properties will be up to a maximum 2 storey in height. The building line in these areas will be broken, with a variety of setbacks, with housing interspersed with car ports, garages, trees and soft landscape.



## SPINE STREET

The Spine Street will provide primary route and strategic connection through the residential areas of the development. It will have a distinctive character with a strong sense of landscape and openness, informed by regular formal tree planting and green verges on both sides of the carriageway, along with a combined cycle route and footpath. This street typology provides access to residential properties through private drives that will minimise the number of points where the cycle route and footpath is crossed to access drives and garages.



# FOCUS AREAS- STREET SECTIONS

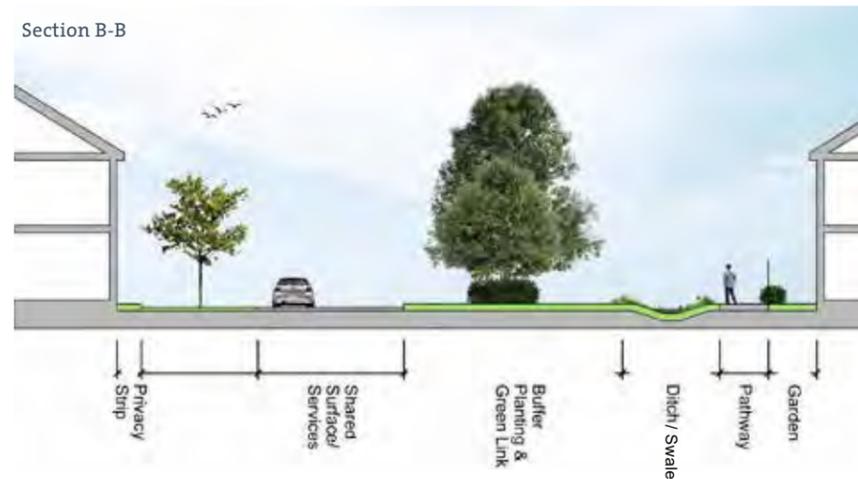
## INDICATIVE SPINE STREET A-A

The Spine Street will provide the primary route through the residential areas to the southern boundary to facilitate access to Broomfield Hospital. It will have a distinctive character with a strong sense of landscape and openness, informed by regular formal tree planting and green verges with varied widths on both sides of the carriageway, along with a combined cycle route and footpath. This street typology provides access to residential properties through private drives that minimises the number of points where the cycle route and footpath is crossed to access drives and garages.



## INDICATIVE GREEN CORRIDOR B-B

The green corridor provides a key pedestrian link through the Site from the south to the north connecting to the wider network of footpaths to the north and Broomfield to the south. The existing water course running parallel to the footpath will be upgraded and integrated with the agricultural reservoir as part of the Site drainage strategy. There will be a series of different open space typologies including play and natural space located off the green link which is also linked to the green network of foot paths within the Site.



Section location plan

## INDICATIVE WOODHOUSE LANE INTERFACE C-C

The section below is indicative of how the new development will interact with the existing interface of Woodhouse Lane and the taller accommodation buildings located on the hospital Site. There will be a generous landscape buffer which varies in width on the southern edge of the development which enables existing planting to be enhanced and provide a pedestrian route within the green corridor which also connects to the wider pedestrian and cycle network.



# LANDSCAPE FOCUS AREAS

## Northern boundary : section AA

Houses will provide a positive frontage over the new areas of wildflower and amenity grassland with trees. Closer to the boundaries, the existing hedgerow will be bolstered with new native tree and shrub planting. A formal path will wend its way through the grassland and scattered trees, providing a pleasant open walk, forming part of the circular footpath network within the site and connecting to the footpaths in the countryside beyond.



## South East boundary : Section BB

A new native hedgerow will be planted along the southern edge of the new built line, replacing the hedgerow removed during the construction process. This hedgerow will be kept low to ensure the houses can provide passive surveillance over the open space to the south, and to allow sunlight to reach the houses to the north. Large areas of amenity grassland with wildflower edges will be crossed by pathways, allowing informal use of the grassed areas. Trees will be located so as to maintain privacy to the rear gardens of the houses on Blasford Hill whilst not overshadowing them.



## INDICATIVE LANDSCAPE FRAMEWORK

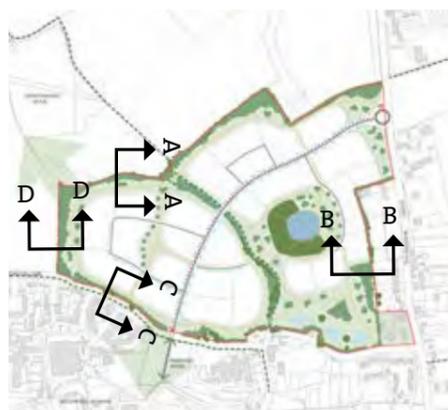
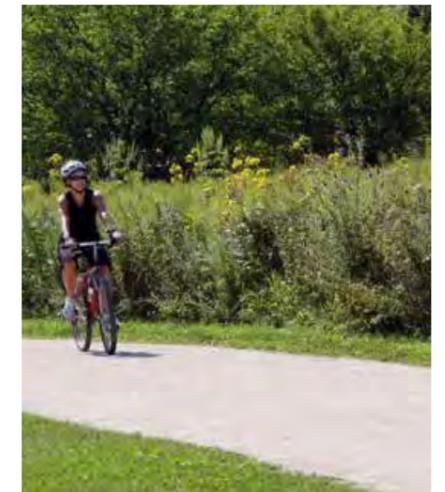
### Southern boundary : Section CC

A new native hedgerow will be extended along the southern boundary of the Site, reinstating that once present along the edge of Wood House Lane. This will restore the sense of enclosure along the road and will contribute to its more rural character. The new houses will be set back behind areas of amenity and wildflower grassland planting with isolated trees breaking up the building line and creating a rural character.



### Western boundary : Section DD

A new native hedgerow will be established along the western boundary, with a wide swathe of native trees and understorey planting to the east, providing new wildlife habitat and a route for bats from Puddings Wood in the south to Sparrowhawk Wood in the north. A formal path will extend along the edge of the native tree and shrub planting, bordered to the east by wildflower grassland with scattered trees. The path will form part of the wider footpath network within the site, connecting to the network of footpaths in the countryside beyond. This area will also benefit from positive surveillance by the neighbouring houses.



Section location plan



# 8. DELIVERY & PHASING

This section of the masterplan provides an indicative phasing strategy for the Site.

### Phase 1 (0-2 Years)

- A new roundabout is built along Blasford Hill for the first phase of housing.
- Green infrastructure improvements around the reservoir and drainage basin further south.
- New trees and vegetation around the edges of the Site are planted, ahead of the 2nd and 3rd phases to provide time for these to mature.
- Local centre, including early years facility.

### Phase 2 (2-3 years)

- The housing south of Phase 1 constructed along with a pedestrian and cycle link onto Woodhouse Lane.
- Landscape proposals begin to mature.

### Phase 3 (3-5 years)

- The homes in the south west area are constructed along with remainder of the spine road.
- Final areas of green infrastructure completed.
- Other pedestrian and cycle links are completed.

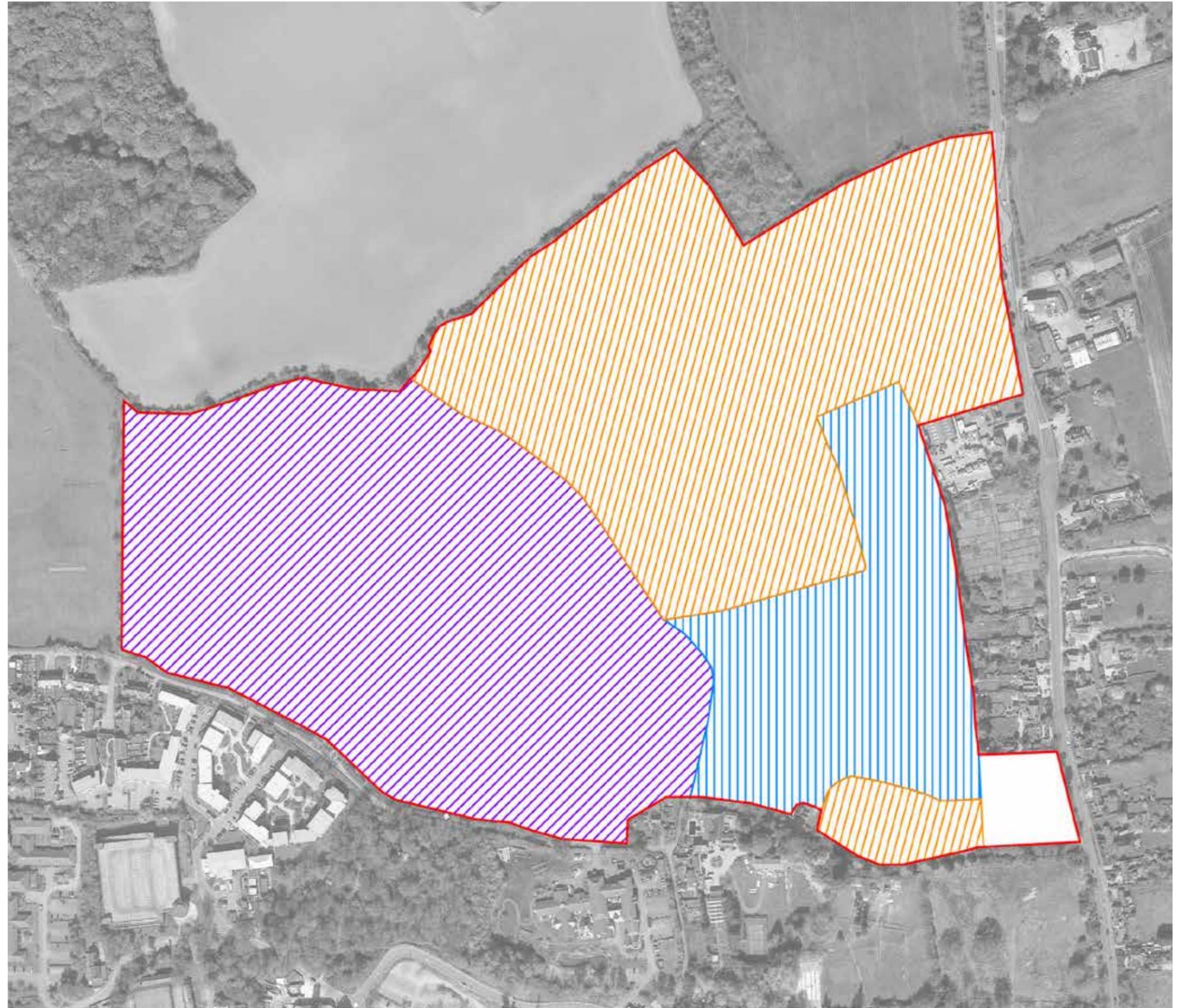
The indicative phasing strategy for the Site would be subject to further negotiation through the planning application, but this initial draft has been carefully considered and formulated to ensure that the development is brought forward in a logical and coordinated manner. This takes account of the need to match housing delivery with infrastructure, facilities and access.

The strategy takes account of physical land parcels, constraints and uses, as well as market demand and construction rates. The overall intention will be to commence construction at the earliest opportunity.

The proposed housing trajectory contained within the Council's Pre-submission Draft Local Plan identifies that the Site at North of Broomfield will start to deliver houses on Site from years 2020/21, through to years 2025/26. Bloor Homes supports this housing trajectory, although it is likely that whilst the first homes may be delivered in 2021/22 this will be limited in number.

The aim is to deliver housing and infrastructure at an early opportunity, increasing supply and helping the local authority meet the requirements set out in the new Local Plan.

The intention is to provide the access road across the site and into the hospital early in the development, subject to design and technical approvals. The exact programming of this is expected to be secured by a legal agreement at the time of the Outline planning application.



Indicative Phasing Plan



**BLOOR HOMES**<sup>®</sup>

**BARTON  
WILLMORE**



## Chelmsford City Council Chelmsford Policy Board

16 July 2020

# Adoption of the Essex Coast Recreational Disturbance Avoidance & Mitigation Strategy Supplementary Planning Document

---

Report by: Director for Sustainable Communities

---

### Officer contacts:

Claire Stuckey, [claire.stuckey@chelmsford.gov.uk](mailto:claire.stuckey@chelmsford.gov.uk), 01245 606475

---

### Purpose

The purpose of this report is to update the Chelmsford Policy Board on the outcome of public consultation on the Essex Coastal Recreational disturbance Avoidance and Mitigation Strategy Supplementary Planning Document and to recommend to the Council's Cabinet that the revised SPD, presented in Appendix 2, be adopted. It also provides an update on work for Chelmsford City Council to become the project 'Accountable Body' for a period of three years, subject to the signing of a 'Partnership Agreement'.

### Recommendation:

1. To consider the contents of the Essex Coastal Recreational disturbance Avoidance and Mitigation Strategy Supplementary Planning Document, presented in Appendix 2, and recommend to the Council's Cabinet that it be adopted.
2. To consider the contents of the Essex Coastal Recreational disturbance Avoidance and Mitigation Strategy Supplementary Planning Document Adoption Statement, presented in Appendix 3, and recommend to the Council's Cabinet that it be published in accordance with Regulation 14 of the Town and Country Planning (Local planning) (England) Regulations 2012 (as amended).

3. To consider the contents of the 'You Said We Did' Feedback Report, presented in Appendix 1, and recommend to the Council's Cabinet that it be published.
4. To consider the contents of the SEA/HRA Screening Report, presented in Appendix 4, and recommend to the Council's Cabinet that it be published.
5. That the Board recommend to the Council's Cabinet that the Director of Sustainable Communities in consultation with the Cabinet Member for Sustainable Development be authorised to make minor changes to the Supplementary Planning Document, Adoption Statement, You Said we Did Feedback Report and SEA/HRA Screening Report in Appendices 1 – 4 should it be necessary before adoption/publication, and to undertake all the necessary legal and procedural adoption processes.
6. To note that Chelmsford City Council will become the Essex Coastal Recreational disturbance Avoidance and Mitigation Strategy project 'Accountable Body' for a period of three years, subject to the signing of a 'Partnership Agreement'.

## 1. Introduction

- 1.1 Chelmsford City Council (CCC) is one of twelve partner local authorities who are working together, along with Natural England, to implement the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS). The Strategy sets out a long-term strategic approach to avoid and mitigate recreational disturbance on European designated sites along the Essex Coast, from an increasing residential population arising from new housebuilding throughout the County. The RAMS was adopted by CCC in March 2019.
- 1.2 The RAMS aims to prevent bird and habitat disturbance from recreational activities through a series of management measures which encourage all coastal visitors to enjoy their visits in a responsible manner. Natural England has identified the need for a RAMS to ensure compliance with the Habitat Regulations<sup>1</sup>.
- 1.3 The RAMS enables a housebuilder to make a monetary 'developer contribution' towards the delivery of strategic mitigation measures to help address recreational pressures that would otherwise occur, instead of needing to provide bespoke mitigation themselves. CCC has been collecting developer contributions on all new qualifying residential developments since November 2018.
- 1.4 The RAMS Supplementary Planning Document (SPD) provides a county-wide mechanism for securing developer contributions to fund measures identified in the Strategy. It distils the Strategy document into a practical document for use by local planning authorities, developers and the public. At the meeting on 5 March 2019, Cabinet considered the draft SPD and approved it for public consultation. This was undertaken by Essex Place Services across all the Essex authorities for six weeks in January and February 2020. A summary of the main issues raised in the consultation responses and how they have been used to inform the revised SPD is presented in a 'You Said We Did' feedback report in Appendix 1. The revised SPD is attached in Appendix 2.

---

<sup>1</sup> Conservation of Habitats and Species Regulations 2017, as amended (commonly known as the 'Habitats Regulations')

- 1.5 CCC has offered to initially manage and administer all the developer contributions on behalf of all the Essex authorities. This will avoid the duplication of resources across the Councils and keep administration costs to a minimum. A 'Partnership Agreement' has been prepared for all of the authorities to sign up to which will formalise the arrangements with CCC and set out how its costs for undertaking this role will be recovered.

## 2. Background

- 2.1 The Essex coastline extends from the Thames Estuary in the south, northwards to the port of Harwich and the Stour Estuary. The coastline is extremely diverse and features a variety of habitats and environments and which are internationally important for wildlife. Most of the Essex Coast is designated under the UK Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') as part of the European Natura 2000 network. This includes Special Protection Areas, Special Areas of Conservation and Ramsar sites, which are defined as Habitats sites in the National Planning Policy Framework (2019).
- 2.2 There are 10 Habitats sites in the Essex Coast RAMS areas including the Crouch and Roach Estuaries SPA and Ramsar at South Woodham Ferrers. The sites are shown in Figure 2.1 on page 4 of the SPD in Appendix 2.
- 2.3 The Essex coast provides opportunities for a range of recreational activities including dog walking, hiking, cycling and sailing. Research undertaken to inform the RAMS shows that housing growth is likely to increase the number of people visiting these sensitive coastal areas. This could create the potential for impacts from increased recreational disturbance to the birds and their habitats unless adequately managed.
- 2.4 Natural England, the Government's advisor for the natural environment in England identified the need for a strategic approach, or RAMS, to understand the likely increased recreational impacts and to identify effective avoidance and mitigation measures. Accordingly, Essex local authorities have worked together with Natural England on a RAMS. Essex County Council Places Services were commissioned to prepare the RAMS and SPD on behalf of the partners. RAMS have been successfully implemented throughout other areas of the country for example, in the Solent, Thames Basin Heaths and North Kent.
- 2.5 The commitment to prepare and implement the RAMS and SPD is set out in the adopted Chelmsford Local Plan 2013-2036. The RAMS will support sustainable residential growth in Essex while protecting Habitats sites and their wildlife from the increased disturbance from recreation associated with a growth in population. Specifically, it will enable planned housing and associated population growth within the strategy area to go ahead, without adversely affecting the designated features of the Habitats sites.

### 3. Consultation on the Essex RAMS Supplementary Planning Document

3.1 The draft SPD was published for consultation for six weeks between 10 January 2020 and 21 February 2020 in accordance with the planning consultation requirements of each partner Council. A wide range of organisations and individuals were consulted on the draft SPD across Essex including:

- Statutory bodies including neighbouring Councils, local Parish and Town Councils and Government bodies such as Natural England;
- Local stakeholders including the RSPB and Essex Wildlife Trust;
- Developers and landowner and their agents;
- Local businesses, voluntary and community groups, and
- The public.

3.2 The consultation material was available to view and comment on the Essex County Council 'Citizen Space consultation portal' and to view from partner Council main offices and at a number of local public libraries during the consultation period. Information was also provided on the partner Council websites and the project Bird Aware website [www.essexcoast.birdaware.org](http://www.essexcoast.birdaware.org).

3.3 Each Council sent direct emails/letter notifications to consultees registered on their Local Plan consultation databases. A public notice was also included in the Essex Chronicle to advise how to respond and the consultation dates and information on the consultation was also posted on social media.

3.4 The SPD consultation received a total of 146 comments, 87 of these being from Essex residents and 59 being from various organisations including Natural England, Essex County Council, the RSPB, the Marine Management Organisation and South Woodham Ferrers Town Council. Of the resident responses, 21 were made from residents of Chelmsford. All the responses are available to view online at <https://consultations.essex.gov.uk/place-services/the-essex-coast-rams-spd/>

3.5 Comments were received on a wide range of themes, relating to the SPD, the RAMS document itself and also the format of the consultation exercise. The main issues that were raised included:

- Confusion about the purpose and aims of the RAMS;
- Scope and detail of mitigation measures;
- Concern regarding the effectiveness of the RAMS approach;
- Query whether the right key stakeholders have been involved in the RAMS;
- Questioning the status of protected wildlife sites following the UK's withdrawal from the European Union;
- Concern that RAMS will enable inappropriate development to be allowed;
- Suggestions that money should be spent on other projects;
- Concern with the calculation and definition of the Zones of Influence;
- Arguments that the tariff is set too high, or alternatively too low;

- Questions over the adequacy of the proposed budget and staff to deliver project across such a wide area;
- Concerns about monitoring (both in relation to the tariff and Zones of Influence);
- Suggestion that other land uses (other than residential) should come within the scope of the tariff;
- Perceived conflict of RAMS purpose (protecting against recreational disturbance) and aims with the England Coastal Path project (increasing public access to the coast);
- Concerns that RAMS will impact on existing and future strategies and aspirations for tourists and residents to access and enjoy the coast, for economic growth and health and wellbeing; and
- Suggestions that alternatives to paying into the RAMS should either not be allowed, or that alternative approaches should be more clearly set out.

3.6 In response to the various comments received, Essex Place Services have produced a 'You Said, We Did' document which considers the comments and recommends whether or not changes to the SPD are required. These have been considered by the RAMS Steering Group of Officers from the twelve Essex Authorities and a revised version of the SPD has been agreed. The main revisions include:

- A glossary and list of acronyms and a description of what they mean is now included at the beginning of the SPD;
- A clearer description of how overheads and other costs have been identified within the RAMS mitigation package;
- The first paragraph of the SPD will be amended to state 'birds and their habitats' rather than 'Wildlife' to make it clearer from the outset as to what type of wildlife the RAMS and the SPD is primarily seeking to protect;
- More recognition of the South East Marine Plan and the East Inshore and East Offshore Marine Plans which, when adopted, will become part of the statutory Development Plan for the relevant Councils
- An amendment to include reference to fishing / bait digging to paragraph 2.2 is proposed;
- Reference to the 'Outer Thames Estuary SPA' rather than the 'Thames Estuary SPA' is proposed;
- Previous maps replaced with higher resolution images;
- Additional clarification within Paragraph 3.7 making the SPD more explicit regarding proposals for single dwellings being subject to the RAMS tariff;
- More explanation of requirements of development proposals in regard to statutory HRA procedures and on-site mitigation, and that the specific effects the RAMS will mitigate in accordance with Regulation 122 of the CIL Regulations;
- More justification for the inclusion of C2 Residential Institutions and C2A Secure Residential Institutions as being liable for tariff payments;
- Inclusion of the National Planning Policy Framework (NPPF) within the 'useful links' section;
- Clarification that non-residential proposals are exempt from the tariff;

- Amendments to the map in Appendix 2 of the Essex Coast RAMS SPD SEA/HRA Screening Report (presented in Appendix 4 to this report) be amended to reflect the Outer Thames SPA designation;
- Clarification on the requirements for project-level Habitat Regulations Assessment (HRA) and Appropriate Assessment (AA) of development proposals which will explore the hierarchy of avoidance and mitigation, and that the SPD is relevant to 'in-combination' recreational effects only;
- Clear explanation that the intention of Essex Coast RAMS mitigation is to enable the conclusion of no adverse effect on the integrity of the international designated sites;
- Removal, from the relevant map in the SPD and RAMS Strategy, all areas of Suffolk from the Zone of Influence; and
- Clearer explanation of the relationship between the effects of a population increase resulting from net new dwelling increases.

3.7 In addition, further changes have been made to ensure that the revised SPD is up to date including:

- Clarification that ways of paying the tariff contributions varies between partner Councils;
- Reference to the governance arrangements for the RAMS including the Project Board and Essex Coastal Forum; and
- Clarification that the RAMS monitoring framework will be agreed on appointment of the delivery officer.

3.8 The entire 'You Said, We Did' Feedback Report is presented in Appendix 1 and the revised SPD is at Appendix 2.

3.9 Natural England were involved with the preparation of the draft SPD so did not make any specific comments on it in their consultation representation. However, Natural England have reviewed the revised SPD and confirmed that they endorse it.

3.10 Following adoption of the SPD, it becomes a material consideration that can be taken into account in the determination of planning applications. As soon as reasonably practical following adoption of the SPD, Regulation 14 of the Town and Country Planning (Local planning) (England) Regulations 2012 (as amended) require the Council to make available the SPD and an Adoption Statement. The Council is also required to send the Adoption Statement to anyone who has asked to be notified of the adoption of the SPD. A copy of the Adoption Statement is presented in Appendix 3.

3.11 Although the Council is not obliged to adopt the SPD a decision not to do so would not remove the Council's duties under the Habitats Regulations and would not remove the need to implement the RAMS, or another appropriate strategy, to avoid or mitigate the impacts of new housing on the integrity of habitats sites. Failure to avoid or mitigate the impacts of recreational disturbance arising from new housing in the determination of planning applications would leave decisions vulnerable to legal challenge. The RAMS Document and SPD are intended to ensure the Council's obligations under the Habitats

Regulations are effectively discharged. Failure to do adopt the SPD would be contrary to the Council's adopted Local Development Scheme.

3.12 It is anticipated that each partner local authority will adopt the revised SPD in 2020.

#### 4. SEA/HRA Screening Report

4.1 A Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) Screening Report was published alongside the draft SPD.

4.2 The SEA process seeks to ensure that environmental and possibly other sustainability aspects are considered effectively in plans and programmes. The HRA process seeks to ensure that plans and programmes are not likely to result in significant effects on any nationally or internationally designated wildlife sites known as European sites, either alone or 'in combination' with other plans or programmes.

4.3 The SEA/HRA screening report determines that there would be no significant effects on the environment resulting from the SPD and therefore that a SEA is not required. It also concludes that the SPD cannot have any negative effects on designated wildlife sites so there is no requirement to undertake further assessment under the Habitats Regulations 2017.

4.4 The following changes have been made to the SEA/HRA Screening Report in light of consultation comments received:

- References have been made to refer to the RAMS seeking to 'enable the conclusion of no adverse effect on the integrity of the Habitats sites' rather than the previous wording - ensuring that there will be no significant effects on the Habitats sites; and
- Inclusion of updated maps in the Appendices to be consistent with the revised SPD.

4.5 The updated SEA/HRA Screening Report is presented in Appendix 4 to this report.

#### 5. Partnership Agreement

5.1 The RAMS Strategy identifies the mitigation measures needed over the project period to 2038 and their estimated cost at £8,900,000. The estimated number of dwellings to be built within the project Zones of Influence is around 73,000 over the same period, equating to the per dwelling charge of around £120.

5.2 To date, the money collected from tariff contributions is being held by individual partner authorities. Going forward, the tariff contributions will be 'pooled' together into a single RAMS mitigation pot, to be administered by the project Accountable Body.

5.3 Following agreement by CCC's Management Team and the Cabinet Member for Sustainable Communities, CCC has offered to be the initial project Accountable Body for three years and a legal agreement has been prepared to set out the roles, responsibilities and costs for each partner Council.

5.4 As Accountable Body, the Council will hold all tariff contributions from the twelve partner Councils. It will also employ the full-time Delivery Officer to oversee the project and who will be funded from the tariff contributions.

5.5 A legal agreement, has been drawn up by CCC Legal with the input of Officers in Planning Policy, Finance and HR. This ensures that the risks and costs associated with implementing and administering the project are shared amongst partners and ensures that CCC recoups its costs for being the Accountable Body including annual Delivery Officer line management costs and accountancy costs. It also requires partners to perform and fulfil the tasks assigned to them by the Accountable Body or risk exclusion from the arrangement. The Accountable Body role will pass to another partner Council after three years.

## 6. Conclusion

6.1 Once adopted, the SPD will be a material consideration in the determination of planning applications. As such, it will help to protect the wildlife of the Essex coast from the increased visitor pressure associated with new residential development in-combination with other plans and projects. It will also support the implementation of the Chelmsford Local Plan 2013-2036.

6.2 Being the Accountable Body and employing the Delivery Officer will enable CCC to oversee the effective administration and use of tariff contributions. The project will also build on CCC's successful track record of leading Essex-wide partnership projects such as South Essex Parking Partnership.

## List of Appendices

Appendix 1 – You Said We Did Feedback Report

Appendix 2 – Essex Coastal Recreational disturbance Avoidance and Mitigation Strategy Supplementary Planning Document

Appendix 3 – Essex Coastal Recreational disturbance Avoidance and Mitigation Strategy Supplementary Planning Document Adoption Statement

Appendix 4 – SEA/HRA Screening Report

---

## Background papers

None

---

## Corporate Implications

Legal/Constitutional:

The Conservation of Habitats and Species Regulations 2017, as amended, require the Council as a 'competent authority' to ensure that planning permission is not granted for development that will have an adverse impact upon a protected site in its administrative area, unless appropriate mitigation is sought. Any mitigation is a requirement of legislation so must be delivered.

Although the UK Government is currently in a 'transition period', usual business applies with regard to European Directives. As such, for the purposes of the RAMS project, the Directives will still apply.

Financial:

CCC's contribution toward the cost of the RAMS project has been met through the agreed Local Plan budget. Officers from the Council's Spatial Planning Team have been actively involved in the Officer Steering Group for RAMS.

CCC has offered to be the initial project 'Accountable Body' to manage and administer all the developer contributions on behalf of all the Essex authorities. This will avoid the duplication of resources across the Councils and keeping administration costs to a minimum. There should be no financial disadvantage to CCC being the Accountable Body as costs will be recouped e.g. annual Delivery Officer HR line management costs and annual financial management costs.

The cost for administering the RAMS tariff and for the Supplementary Planning Document consultation are covered by existing budget provision.

Potential impact on climate change and the environment:

The purpose of the RAMS project is to ensure that the integrity of habitats sites along the Essex coast can be effectively preserved. The SPD provides a distillation of the RAMS strategy for the use of applicants, developers and the Council's development management team. In doing so, it will enable the Council to more effectively protect, enhance and conserve habitats and species through the planning process.

Contribution toward achieving a net zero carbon position by 2030:

There are no contributions arising directly from this report.

Personnel:

CCC has a S106 Monitoring Officer in post who is responsible for administering the RAMS tariff payments.

Staff are already in the Spatial Planning Team who will line manage the project Delivery Officer and their time for this will be recouped through the legal Partnership Agreement.

Risk Management:

The RAMS is needed to deliver the new Local Plan. The RAMS and Supplementary Planning Document will reduce the risk of legal challenges by ensuring that all applications that pay the tariff comply with the Habitats Regulations.

Equalities and Diversity:

An Equality and Diversity Impact Assessment has been undertaken for the Council's adopted Local Plan.

Health and Safety:

There are no Health & Safety issues arising directly from this report.

Digital:

There are no IT issues arising directly from this report.

Other:

The Essex Coast RAMS has the potential to impact on the priorities in the Council's Our Chelmsford, Our Plan 2020: A Fairer and Inclusive Chelmsford, A Safer and Greener Place, Healthy, Enjoyable and Active Lives and A Better Connected Chelmsford.

---

Consultees:

Development Management  
Legal Services  
Accountancy Systems & Exchequer  
Human Resources

---

Relevant Policies and Strategies:

The report takes into account the following policies and strategies of the City Council:

Chelmsford Local Plan 2013-2036, 2020  
Draft Planning Obligations Supplementary Planning Document, 2018  
Statement of Community Involvement, 2018  
Climate and Ecological Emergency Action Plan, January 2020

---

Our Chelmsford, Our Plan

The above report relates to the following priorities in the Corporate Plan:

Promoting sustainable and environmentally responsible growth to stimulate a vibrant, balanced economy, a fairer society and provide more housing of all types.

Making Chelmsford a more attractive place, promoting Chelmsford's green credentials, ensuring communities are safe and creating a distinctive sense of place.

Encouraging people to live well, promoting healthy, active lifestyles and reducing social isolation, making Chelmsford a more enjoyable place in which to live, work and play.

Bringing people together, empowering local people and working in partnership to build community capacity, stronger communities and secure investment in the city.



# Essex Coast Recreational disturbance Avoidance and Mitigation Strategy

---

## Supplementary Planning Document (SPD)

---

You Said We Did - Consultation Report  
April 2020



## Contents

1. About the RAMS .....	1
Background context .....	1
Development of the strategy .....	1
A flexible approach to mitigation .....	2
Monitoring and review process .....	2
2. Introduction .....	3
3. Consultation .....	3
Who was consulted? .....	4
How did we consult? .....	4
4. Consultation comments .....	5
5. The main issues raised .....	5
6. Proposed amendments to the Supplementary Planning Document (SPD) .....	8
7. Detailed summaries of the comments received .....	9
Appendix One - Strategic Mitigation .....	102
Appendix Two - Essex Coast RAMS Guidelines for proposals for student accommodation .....	110

## Tables

Table 1 – Main issues raised.....	6
Table 2 – Schedule of amendments to the SPD .....	8
Table 3 – Section One: Summary of consultation responses and actions.....	11
Table 4 – Section Two: Summary of consultation responses and actions.....	24
Table 5 – Section Three: Summary of consultation responses and actions .....	36
Table 6 – Section Four: Summary of consultation responses and actions .....	47
Table 7 – Section Five: Summary of consultation responses and actions.....	66
Table 8 – Section Six: Summary of consultation responses and actions .....	75
Table 9 – Section Seven: Summary of consultation responses and actions .....	85
Table 10 – Section Eight: Summary of consultation responses and actions .....	91
Table 11 – Section Nine: Summary of consultation responses and actions .....	95
Table 12 – Section Ten: Summary of consultation responses and actions .....	99
Table 13 – Appendix One: Summary of consultation responses and actions.....	102
Table 14 – Appendix Two: Summary of consultation responses and actions.....	110
Table 15 – Other Comments: Summary of consultation responses and actions .....	114

## Glossary

Appropriate Assessment	Forms part of the Habitats Regulations Assessment
Annual Monitoring Report	Provides information on all aspects of a planning department's performance.
Community Infrastructure Levy	A charge which can be levied by local authorities on new development in their area to help them deliver the infrastructure needed to support development.
Competent Authority	Has the invested or delegated authority to perform a designated function.
England Coast Path	Natural England are implementing the Government scheme to create a new national route around the coast of England
General Permitted Development Order	The Town and Country Planning (General Permitted Development) (England) Order 2015 is a statutory instrument that grants planning permission for certain types of development (such development is then referred to as permitted development).
House in Multiple Occupation	A property rented out by at least 3 people who are not from 1 'household' (for example a family) but share facilities like the bathroom and kitchen.
Habitats sites	Includes SPA, SAC & Ramsar sites as defined by NPPF (2018). Includes SPAs and SACs which are designated under European laws (the 'Habitats Directive' and 'Birds Directive' respectively) to protect Europe's rich variety of wildlife and habitats. Together, SPAs and SACs make up a series of sites across Europe, referred to collectively as Natura 2000 sites. In the UK they are commonly known as European sites; the National Planning Policy Framework also applies the same protection measures for Ramsar sites (Wetlands of International Importance under the Ramsar Convention) as those in place for European sites.
Habitats Regulations Assessment	Considers the impacts of plans and proposed developments on Natura 2000 sites.
Impact Risk Zone	Developed by Natural England to make a rapid initial assessment of the potential risks posed by development proposals. They cover areas such as SSSIs, SACs, SPAs and Ramsar sites.
Local Planning Authority	The public authority whose duty it is to carry out specific planning functions for a particular area.
Natural England	Natural England - the statutory adviser to government on the natural environment in England.
National Planning Policy Framework	Sets out government's planning policies for England and how these are expected to be applied.

Recreational disturbance Avoidance and Mitigation Strategy	A strategic approach to mitigating the 'in-combination' recreational effects of housing development on Habitats sites.
Ramsar site	Wetland of international importance designated under the Ramsar Convention 1979.
Section 106 (S106)	A mechanism which make a development proposal acceptable in planning terms, that would not otherwise be acceptable. They are focused on site specific mitigation of the impact of development. S106 agreements are often referred to as 'developer contributions' along with highway contributions and the Community Infrastructure Levy.
Section 278 (S278)	Allows developers to enter into a legal agreement with the council to make alterations or improvements to a public highway, as part of planning approval.
Special Area of Conservation	Land designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora.
Special Protection Area	Land classified under Directive 79/409 on the Conservation of Wild Birds.
Supplementary Planning Document	Documents that provide further detail to the Local Plan. Capable of being a material consideration but are not part of the development plan.
Site or Specific Scientific Interest	A Site of Special Scientific Interest (SSSI) is a formal conservation designation. Usually, it describes an area that is of particular interest to science due to the rare species of fauna or flora it contains.
Unilateral undertaking	A legal document made pursuant to Section 106 of the Town and Country Planning Act 1990, setting out that if planning permission is granted and a decision is made to implement the development, the developer must make certain payments to the local authority in the form of planning contributions.
Zone of Influence	The Zol identifies the distance within which new residents are likely to travel to the Essex coast Habitats sites for recreation.

## Acronyms

AA	Appropriate Assessment
AMR	Annual Monitoring Report
CIL	Community Infrastructure Levy
EA	Environment Agency
EC	European Commission
EEC	European Economic Community
EWT	Essex Wildlife Trust
FAQ	Frequently Asked Questions
GPDO	General Permitted Development Order
HMO	House in Multiple Occupation
HRA	Habitat Regulations Assessment
LPA	Local Planning Authority
NE	Natural England
NPPF	National Planning Policy Framework
RAMS	Recreational disturbance Avoidance and Mitigation Strategy
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SIP	Site Improvement Plan
SMART	Specific, Measurable, Attainable, Relevant & Timely
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site or Specific Scientific Interest
UK	United Kingdom
UU	Unilateral undertaking
ZoI	Zone of Influence

## 1. About the RAMS

### **Background context**

- 1.1 The Essex Coast RAMS was initiated by Natural England, the government's adviser for the natural environment in England, in 2017. Natural England identified the Habitats sites and local planning authorities that should be involved in the Essex Coast RAMS based on existing evidence of visitor pressure. Essex County Council provides an advisory role but are not one of the RAMS local authority partners.
- 1.2 The Essex Coast is rich and diverse and has many protected habitats sites (also referred to as European sites and Natura 2000 sites). These sites are protected by the Conservation of Habitats and Species Regulations (2017). Joint working offers the opportunity to protect the Essex Coast from increased recreational disturbance as a result of new housing across Essex. Likely significant effects to habitats sites from non-residential development will be considered, through Habitat Regulations Assessments, on a case by case basis by the relevant local planning authority in consultation with Natural England. A Habitat Regulations Assessment has been/ will be completed for each of the projects that form part of the England Coast Path.
- 1.3 There are numerous examples elsewhere around the country of mitigation strategies that avoid and mitigate the impacts of recreational disturbance on habitats sites, such as Bird Aware Solent, Bird Wise North Kent and Thames Basin Heaths. This is a new and growing area in the conservation community and those working on mitigation strategies regularly share good practice and assist each other.
- 1.4 Visitor surveys were carried out at key locations within each of the Habitats sites. Zones of Influence (Zoi) were calculated for each Habitats site using the survey data and these are used to trigger developer contributions for the delivery of avoidance and mitigation measures.

### **Development of the strategy**

- 1.5 The Essex Coast RAMS Strategy Document was completed in January 2019. Natural England provided advice throughout the preparation of the Essex Coast RAMS Strategy and 'signed off' the RAMS Strategy Document before it was finalised and adopted by local planning authorities. The local planning authority partners are collecting RAMS contributions for development within the Zone of Influence (Zoi), which will be spent on the mitigation measures package detailed in the RAMS Strategy Document. Mitigation measures are listed as: immediate, shorter to medium-term, and longer-term projects. A contingency is included and an in-perpetuity fund will be established. The first measure is staff resources: The Delivery Officer and then two rangers.

- 1.6 Through the provision of a per dwelling tariff, the RAMS enables the achievement of proportionate mitigation measures and enables development proposals of all scales to contribute to necessary mitigation. The RAMS is fully funded by developer contributions.
- 1.7 During development of the Strategy Document workshops were held with key stakeholders with local and specialised knowledge to capture the mitigation measures considered as most effective to avoid the impacts likely to result from increased recreational pressure.

### **A flexible approach to mitigation**

- 1.8 The costed mitigation package (Table 8.2 of the RAMS Strategy Document) includes an effective mix of measures considered necessary to avoid likely disturbance at key locations with easy public access. The package is flexible and deliverable and based on best practice elsewhere in England. A precautionary approach has been adopted, with priority areas for measures identified as those which have breeding SPA birds which could conflict with high numbers of summer visitors to the coast and those with important roosts and foraging areas in the winter. Sensitive habitats have also been identified for ranger visits. The mitigation package prioritises measures considered to be effective at avoiding or mitigating recreational disturbance by Habitats sites managers. For example, Maldon District Council are managing water sports on the Blackwater estuary. Encouraging responsible recreation is a key measure endorsed by land managers of important wildlife sites across the country, including Natural England, RSPB and the wildlife trusts. These bodies regularly provide educational material at sites to encourage visitors to comply with key objectives.
- 1.9 The RAMS is intended to be a flexible project that can adapt quickly as necessary. The rangers will quickly become familiar with the sites and areas that are particularly sensitive, which may change over time, and sites that experience a high number of visitors. The rangers on the ground experience will steer the project and necessary measures.

### **Monitoring and review process**

- 1.10 The Essex Coast RAMS will provide a flexible and responsive approach, allowing it to respond to unforeseen issues. Close engagement will continue with Natural England who will be able to advise if recreational disturbance is increasing at particular Habitats sites and specific locations. Thus, enabling these locations to be targeted by the rangers to have an immediate impact. Updated visitor surveys, which are included in the mitigation package, will enable the Zol to be reviewed and expanded if it is shown that visitors are travelling further than previously found. There is scope to adjust the tariff too if it is shown that contributions are not covering the identified measures, if the Zol is made smaller or to respond to changes in housing numbers across Essex.

- 1.11 The Essex Coast RAMS will be monitored and reviewed on a regular basis by the RAMS project staff. The Essex Coast RAMS will be deemed successful if the level of bird and habitat disturbance is not increased despite an increase in population and the number of visitors to the coastal sites for recreation (paragraph 1.7 of the RAMS Strategy). The baseline has been identified in the RAMS Strategy Document and will be used to assess the effectiveness of the RAMS.
- 1.12 The effectiveness of the Essex Coast RAMS has been considered/examined as part of Chelmsford City Council's Local Plan Examination. Chelmsford City Council's Local Plan Inspector's Report states that: *"Overall, the HRA concludes that there will be no adverse effect on the integrity of European protected sites, either alone or in-combination with other plans or projects, subject to the mitigation set out in the Plan policies. Natural England agrees with these conclusions and I have no substantive evidence to counter these findings. The requirement to undertake an appropriate assessment in accordance with the Regulations has therefore been met."* The mitigation set out in the Plan policies includes reference to the Essex Coast RAMS. The Inspector states that it is necessary to incorporate RAMS into strategic policies to ensure that all relevant development within the Zol contribute accordingly and reference to RAMS should be incorporated into several site allocation policies. These modifications will be incorporated into the adopted Local Plan.

## 2. Introduction

- 2.1 The Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Supplementary Planning Document (SPD) focuses on the mitigation that is necessary to protect the wildlife of the Essex Coast from the increased visitor pressure associated with new residential development in-combination with other plans and projects, and how this mitigation will be funded.
- 2.2 The SPD has been produced by a total of 12 Local Planning Authorities (LPAs) in Essex, which are partners in and responsible for the delivery of the RAMS. These partner LPAs are listed below:

- Basildon Borough Council
- Braintree District Council
- Brentwood Borough Council
- Castle Point Borough Council
- Chelmsford City Council
- Colchester Borough Council
- Maldon District Council
- Rochford District Council
- Southend Borough Council
- Tendring District Council
- Thurrock Borough Council
- Uttlesford District Council

## 3. Consultation

- 3.1 A draft SPD was published for consultation between Friday 10<sup>th</sup> January 2020 and Friday 21<sup>st</sup> February 2020 in accordance with the planning consultation requirements of each LPA.

- 3.2 These consultation requirements require the publication of a 'You Said We Did' report, which outlines details on who and how the public, organisations and bodies were consulted, the number of people, organisations and stakeholders who submitted comments, a summary of the main issues raised in the comments received, and the proposed amendments to the SPD that the LPAs intend to make in response to them.
- 3.3 Following the close of the consultation, all comments have been considered and the main issues summarised within Section 4 of this report. Where amendments have been deemed necessary as a result of any main issues, these will be factored into a new iteration of the SPD, prior to its adoption by each LPA. These amendments are set out in Section 5 of this report.

### **Who was consulted?**

- 3.4 The consultation was undertaken jointly by the 12 Councils and hosted by Essex County Council. The 12 Councils consulted the following bodies and persons:
- Statutory bodies including neighbouring councils, local parish and town councils, utility companies, health representatives and Government bodies such as Highways England, Natural England, Historic England and the Environment Agency;
  - Local stakeholders including the Business Forums, Essex Wildlife Trust, Sport England, and the Police;
  - Developers and landowner and their agents;
  - Local businesses, voluntary and community groups, and
  - The public.
- 3.5 For more details on the bodies consulted please contact the relevant partner council.

### **How did we consult?**

- 3.6 The consultation was available to view and comment on the Essex County Council Citizen Space consultation portal during the consultation period. The consultation material was also available to view on partner council's websites, from their main offices and at a number of local public libraries. Information was also provided on the project Bird Aware website [www.essexcoast.birdaware.org](http://www.essexcoast.birdaware.org).

- 3.7 For those who do not have access to computers, paper response forms were made available.
- 3.8 The councils sent direct emails/letter notifications to all consultees registered on their Local Plan consultation databases. A public notice was also included in the Essex Chronicle advising how to respond and the consultation dates. Information on the consultation was also posted on social media.

#### **4. Consultation comments**

- 4.1 The Essex Coast RAMS draft SPD consultation received a total of 146 comments, 87 of these being from Essex residents and 59 being from various organisations. All the comments received can be viewed in full on Essex County Council's Consultation Portal at <https://consultations.essex.gov.uk/place-services/the-essex-coast-rams-spd/>.
- 4.2 Of the resident responses, the following numbers of responses were received from individual administrative areas:
- 21 were made from residents of Chelmsford;
  - 18 were made from residents of Tendring;
  - 16 were made from residents of Basildon;
  - 14 were made from residents of Braintree;
  - 12 were made from residents of Rochford;
  - 11 were made from residents of Colchester;
  - 8 were made from residents of Maldon;
  - 6 were made from residents of Uttlesford;
  - 2 were made from residents of Brentwood;
  - 2 were made from residents of Castle Point;
  - 2 were made from residents of Southend-on-Sea; and
  - 0 were made from residents of Thurrock.

#### **5. The main issues raised**

- 5.1 Comments were received on a wide range of themes, relating to the SPD, the RAMS itself and also the format of the consultation exercise.

- 5.2 A number of themes emerge through reviewing the comments received. These themes respond to the comments that were made by a number of respondents, or otherwise pointed out areas of improvement for the SPD as consulted upon.
- 5.3 Table 1 below sets out the main issues received during the consultation. Table 2 (in Section 6) then details the changes to be made to the SPD. A summary of all representations received is included later in this report.

**Table 1 – Main issues raised**

<b>Main issues raised</b>
<b>Confusion about the purpose and aims of the RAMS</b> – including the need for jargon and acronyms to be explained; the SPD to cover all wildlife on the coast not just birds and to also address sea level rises and coastal erosion caused by climate change; confusion regarding the role of Essex County Council in implementing RAMS; confusion over who pays the tariff; and that mitigation payments should be ring fenced towards care for people not wildlife.
<b>Scope and detail of mitigation measures</b> – only relevant and necessary mitigation should be provided, based upon the scale of the proposal, its use and the site context, to accord with the Community Infrastructure Levy Regulations. SPD could also provide some examples of physical mitigation measures, for instance prevention of powered water sports or exclusions for wind powered watersports, and restrictions on off-lead dogs near areas known for ground nesting birds.
<b>Concern regarding the effectiveness of the RAMS approach</b> – concerns include it's an overly bureaucratic process to collect small sums, there is a lack of scientific evidence to demonstrate provision of alternative green space will detract from visits to SPA/Ramsar sites; question deliverability of mitigation, question provision for enforcement of tariff collection.
<b>Query whether key stakeholders have been involved in the RAMS</b> - including Essex Wildlife Trust, RSPB, Bug Life, Woodland Trust, National Trust, CPRE, British Trust for Ornithology, and local ornithology groups.
<b>Will habitats sites continue to be protected as a result of Brexit?</b>
<b>The RAMS will allow inappropriate development</b> – RAMS will allow harmful development to proceed; will fast track planning applications; no control or scrutiny of cumulative impact of smaller planning applications; does not consider development outside Zones of Influence; total avoidance of disturbance should be an option; should be no more building in Essex, and none on or adjacent to important coastal wildlife sites.
<b>Money should be spent on other projects</b> - funding should not be taken away from essential services to fund the strategy.
<b>Concern with the Zones of Influence</b> – regarded by some as too small and by others as too big; also the zoned tariff should be based upon the number of Zones of

**Main issues raised**

Influence a site is within and the distance it is away from the Zone of Influence should be applied. In addition, the mapped Zones of Influence for the Blackwater Estuary, Stour Estuary and Hamford Water stretch into the Suffolk Coast RAMS area. This could be confusing for developers of new dwellings in south Suffolk, as it implies that a contribution is required to the Essex Coast RAMS, in addition to the Suffolk Coast RAMS.

**The tariff is set too high, or alternatively too low** – e.g. not realistic, should be based on a percentage of the purchase price of a property. Also considered that the number of dwellings which are currently identified to be built over Local Plan periods until 2038 does not accurately reflect the number which will actually come forward, so the contributions collected would exceed the overall cost for the mitigation package. The tariff should also reflect the size of the dwelling so that more is paid for larger dwellings. All authorities must also test the level of contribution, alongside all their policy requirements contained in their Local Plans to ensure that the contributions are viable.

**Adequacy of proposed budget and staff to deliver project across such a wide area** – staff level and costs are too low; alternative view is that funding for personnel is excessive and the work duplicates that of other stakeholders. Also unclear what assumptions have been made in respect of overheads on top of salary costs for the staff identified as being needed.

**Concerns about monitoring (the tariff and Zones of Influence)** – monitoring should be more frequent.

**Other land uses should come within the scope of the tariff** - including tourist accommodation and caravan parks/chalets, airport related development, other commercial development.

**Perceived conflict of RAMS purpose and aims with the England Coast Path project which will increase access to the coast, and existing and future strategies for tourists and residents to access and enjoy the coast, for economic growth and health and wellbeing.**

**Alternative to paying into the RAMS should not be allowed, or if it is the process should be clarified** - developers may use this alternative as a way of avoiding the payments without showing any real commitment to the alternative. If allowed, the SPD would be more effective if it clearly sets out the process for agreeing bespoke mitigation for strategic sites.

## 6. Proposed amendments to the Supplementary Planning Document (SPD)

6.1 In response to the main issues summarised in Section 5, this report sets out a number of amendments that will be forthcoming in a new iteration of the SPD. These amendments have been agreed by all of the partner LPAs. The following table outlines this schedule of changes.

**Table 2 – Schedule of amendments to the SPD**

Amendment	
1	A glossary and list of acronyms and a description of what they mean is included within the Supplementary Planning Document (SPD); however, it is proposed that the Glossary and Acronym sections are moved to the beginning of the SPD. Further amendments to expand the Glossary and list of Acronyms included within these sections to reflect all of those used in the SPD, RAMS and supporting documents.
2	Amendments clearly setting out how overheads and other costs have been identified within the RAMS mitigation package are proposed within the SPD.
3	The first paragraph of the SPD will be amended to state 'birds and their habitats' rather than 'Wildlife' to make it clearer from the outset as to what wildlife the RAMS and the SPD seek to protect.
4	Once approved the South East Marine Plan as well as the East Inshore and East Offshore Marine Plans will become part of the Development Plan for the relevant LPAs. An amendment to recognise these Plans, and their policies, within the SPD is proposed.
5	An amendment to include fishing / bait digging to paragraph 2.2 is proposed.
6	An amendment to refer to the 'Outer Thames Estuary SPA' rather than the 'Thames Estuary SPA' is proposed.
7	Amendments to replace existing maps with higher resolution images are proposed.
8	An amendment introducing additional clarification within Paragraph 3.7 is proposed. This will ensure that the SPD is more explicit regarding proposals for single dwellings being subject to the RAMS tariff.
9	An amendment to the SPD setting out the requirements of development proposals in regard to statutory HRA procedures and on-site mitigation, and the specific effects the RAMS will mitigate in accordance with Regulation 122 of the CIL Regulations, is proposed.

<b>Amendment</b>	
10	An amendment justifying the inclusion of C2 Residential Institutions and C2A Secure Residential Institutions as qualifying within the scope of tariff payments is proposed.
11	Within the 'useful links' section, an amendment to include the National Planning Policy Framework (NPPF) is proposed.
12	It is proposed that the SPD is amended to set out that all non-residential proposals are exempt from the tariff.
13	It is proposed that the map in Appendix 2 of the Essex Coast RAMS SPD SEA/HRA Screening Report be amended to reference the Outer Thames SPA designation.
14	Amendments are proposed that reiterate the requirement for project-level HRA/AA of development proposals which will explore the hierarchy of avoidance and mitigation, and that the SPD is relevant to 'in-combination' recreational effects only.
15	Amendments are proposed to the SPD and the Essex Coast RAMS SPD SEA/HRA Screening Report to clearly set out that the intention of Essex Coast RAMS mitigation to enable the conclusion of no adverse effect on the integrity of the international designated sites.
16	An amendment to the relevant map in the SPD and RAMS is proposed, which will remove all areas of Suffolk from the Zone of Influence.
17	It is proposed that an amendment explaining more clearly the relationship between the effects of a population increase resulting from net new dwelling increases is included within the SPD.
18	An amendment is proposed to include all measurements in miles as well as kilometres.

## 7. Detailed summaries of the comments received

7.1 Tables 3 to 13 of this report shows a summary of the comments received during the consultation on the Essex Coast RAMS draft SPD. The summaries do not seek to identify all the issues raised in the representations. These tables however show:

- The name and type (resident / organisation) of each respondent;
- A summary of the main issues raised in the comments per section of the draft SPD; and



- The LPAs' response to each main issue and whether actions and / or amendments are considered necessary as a result.

7.2 A number of respondents suggest ideas for how to better manage visitors to the Essex Coast e.g. keep dog on leads, fencing, restore Oyster reefs. These will be reviewed by the project Delivery Officer and Rangers once they are appointed and have not been specifically responded to in tables 3 to 13.



## Section One - Introduction

**Table 3 – Section One: Summary of consultation responses and actions**

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	There should be no use of acronyms in the Report.	A list of acronyms and a description of what they mean is included within the Supplementary Planning Document (SPD). It is however proposed that the Acronym section is moved to the beginning of the SPD. No amendment proposed.
2	Mr Alan Hardy	Resident	I believe there is a need for clear policies and regulation and the whole document seems to take that approach. Future policy must support and enhance all Government and legal policies already existing and where necessary provide greater protection than required by statute. I think there should be greater reference to flood risk, management and mitigation and how this can impact or be integrated into recreational use and habitat protection.	The SPD is related only to those 'in-combination' recreational impacts identified through the Local Planning Authorities' (LPAs) Local Plan Habitats Regulations Assessment / Appropriate Assessment. No amendment proposed.
3	Mrs Frances Coulsen	Resident	No comments as this section seems to set out the facts.	Noted. No amendment proposed.
4	Mrs Amy Gardner-Carr	Resident	The building of homes is the threat to the natural habitat. The suggestion of a tariff for avoidance is ridiculous in the face of mounting and current evidence that destruction of habitat is having disastrous effects on wildlife. Move the builds to somewhere else, not the habitats.	The SPD is related only to 'in-combination' recreational impacts and not habitat loss. No amendment proposed.
5	Mr Brian Springall	Resident	Before protecting wildlife, the Council needs to get its housing development plans sorted & improve the district's infrastructure i.e. roads, flood protection etc.	The need for the Essex Coast Recreational disturbance Avoidance Mitigation Strategy (RAMS) and the SPD stems from planned growth. Local Plans have been prepared or are in preparation and set out the housing need and infrastructure requirements for each Council area. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
6	Mr Terry Newton	Resident	No comments. It's an introduction and no information is given, other than to outline how you have set out the sections, and in what format you have set out the document.	Noted. No amendment proposed.
7	Mr Brian Mills	Resident	Cannot see any contingency for enforcement or punitive action, if required results are not obtained / maintained.	Section 4.8 of the SPD sets out that if the tariff is not paid on qualifying proposals, or if suitable mitigation is not provided, then planning permission should not be given. No amendment proposed.
8	Mr Charles Joynson	Resident	I don't think £8.9 million is enough to cover mitigation over such a long time period. Developers could and should contribute far more than £122.30 per dwelling. I do not believe that this is sufficient funding to fully mitigate the effects of new housing on the Essex Coast.	The Essex Coast RAMS SPD sets out a tariff that will be used to fund mitigation related to 'in-combination' recreational effects only. The tariff is 'evidence based' and has been calculated by dividing the cost of the RAMS mitigation package by the number of dwellings (housing growth) proposed in LPA Local Plans. The tariff will be subject to review during the life of the RAMS project. Other mechanisms and requirements exist outside the scope of the SPD for other required and related mitigation. No amendment proposed.
9	Mr Nigel Whitehouse	Wildlife Defenders	We believe we need to protect all wildlife on our coast not just birds. Protected areas for wildlife should be provided.	The Essex Coast RAMS SPD relates only to the effects on Habitats sites (as defined) which are designated on the Essex Coast in relation to birds. Other forms of mitigation addressing any effects on other designations across Essex are not within the specific scope of the SPD. The first paragraph of the SPD will be amended to state 'birds and their habitats' rather than 'Wildlife'

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				to make it clearer from the outset as to what wildlife the RAMS and the SPD seek to protect.
10	Mrs Mary Drury	Resident	Documents and plans are on paper, and it is only man power that will make any positive outcome for wildlife, wherever it manages to survive. The only change necessary is to stop building on the Green Belt, as it acts as rich habitats and has benefit to humans. It is vital that building on flood plains is stopped. There is a need to stop ignoring local advice and knowledge.	The Essex Coast RAMS SPD relates only to the effects on Habitats sites (as defined) which are designated on the Essex Coast. The tariff is proposed to fund a RAMS Delivery Officer and Rangers. Other forms of mitigation addressing effects on other designations across Essex are not within the specific scope of the SPD. The distribution of new development growth is a matter for individual LPAs through their Local Plans. No amendment proposed. Not all of Essex is within the Green Belt.
11	Mrs Alwine Jarvis	Resident	I agree that changes are necessary although I don't quite follow the costs broken down in Appendix 2.1. The cost of a delivery officer at £45k seems very high and the cost of a ranger at £36k is also high. I am also questioning the table which shows for year 2 - one ranger then on the next line year 2 one ranger again. So is the suggestion we recruit 2 rangers at year 2, or is there a mistake in the table whereby this line has been duplicated?	The mitigation package 'total costs' for the Delivery Officer and Rangers include the salary cost and necessary overheads. Amendments clearly setting out how overheads and other costs have been identified within the RAMS mitigation package are proposed within the SPD. A total of three Rangers are proposed in the mitigation package: two for Year 2 and one additional ranger from Year 5. No amendment proposed.
12	Ms Rachel Cross	Resident	What are the aims of the SPD? Have the Essex Wildlife Trust, RSPB, Bug Life, Woodland Trust, National Trust, CPRE, British Trust for Ornithology, local ornithology groups and Site of Special Scientific Interest (SSSI) councils been involved or consulted? How have other areas like	The SPD sets out a mechanism for funding mitigation, which is outlined in more detail in the RAMS document, a link to which was provided as part of this consultation. The approach is

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			Pembrokeshire approached this? Has the local government association got some best practice examples to benchmark against?	similar to other strategies across the country as endorsed by Natural England; a common stakeholder regarding Habitats sites. Various groups have been invited to respond to this consultation including Essex Wildlife Trust (EWT) and the Royal Society for the Protection of Birds (RSPB). Amendments proposed to the SPD in response to the comments received are set out in section 5 of this Report.
13	Ms Caroline Macgregor	Brightlingsea village councillor	I believe that developer contributions should be more per dwelling to offset the costs of protecting wildlife. I also believe protected areas should be extended.	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. Protecting wildlife from development is and can be ensured and funded through other mechanisms. The extension of protected areas is not within the scope of the RAMS or the SPD. No amendment proposed.
14	Mr Christopher Marten	Resident	Planners do not necessarily have the appropriate knowledge about understanding the type of habitat required for wading wildfowl. The RSPB must be consulted on every application. If wetland wildfowl are disturbed, they will not return.	The Essex Coast RAMS has been devised and will be managed by specialist ecologists and proposes strategic mitigation regarding in-combination recreational effects only. Habitat creation forms part of the mitigation package, and the Strategy and SPD recognise that there will be a need to work with landowners and the Environment Agency. The RSPB are consulted on relevant planning

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				applications in line with LPA procedures. No amendment proposed.
15	Mr Peter Dervin	Resident	Funding should not be taken away from essential services to fund this.	The funds collected will not take any funding away from essential services. The RAMS funding will help support critical environmental services and initiatives along the Essex Coast. No amendment proposed.
16	Mr Neil Hargreaves	Resident	<p>I am uneasy with creating or extending yet another bureaucracy. This one to collect very small sums from new housing developments, in our case some way from the coast. This is hypothecation which normally is frowned on, because among other things it requires a heavy admin cost. I think these things should be properly funded at a national level. It needs a continuing funding from all of us not one-off payments from landowners / developers with no certainty of income stream and 99.9% of the nation not contributing.</p> <p>And what about the reverse? New developments near the coast will burden for example Stansted Airport. On this same principle Uttlesford should receive payment to mitigate the impacts of surrounding development on our area.</p> <p>Perhaps we should be contributing towards marine conservation?</p>	The Zone of Influence has been justified through visitor surveys at the Essex Coast, determining that existing residents within it travel to the Essex Coast for recreation. The SPD is required to fund the mitigation required of the effects from future housing growth within the Zone of Influence, and it is considered appropriate that these are paid for through a planning contribution. The impacts of development in Uttlesford are a matter for the Uttlesford local plan No amendment proposed.
17	Mr Brian Jones	Resident	The section is clear enough, except the use of jargon is likely to deter people.	Noted. Where technical terminology and acronyms are used, these are defined in the SPD. Efforts have been made to ensure that the SPD is clear, minimises the use of jargon. An abbreviations list is also provided. No amendment proposed.
18	Dr John L Victory	Resident	The proposed England Coast Path will directly affect these areas and should be highlighted in this process of mitigation. Consultation with interested bodies must include that of the Essex Local Access Forum - a	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. Members

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			statutory body that advises authorities on strategy for Public Rights of Way.	of the Essex Local Access Forum were consulted where they appear on LPA databases. No amendment required.
19	Mr Andrew Whiteley	Resident	I would like to see less focus on developers' requirements and more focus on Essex residents, wildlife, climate impact and infrastructure support.	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. Local Plans are dealing with the other impacts of new development. No amendment required.
20	Mr Peter Bates	Resident	No changes required.	Noted. No amendment proposed.
21	Mr Stephen Ashdown	Resident	The document is not written in plain English and is confusing to the reader, especially those not aware of jargon and specific language used. This document is not written with the entire residents of the area in mind and excludes many who would benefit from inclusion, many of whom would be users of the coastal areas supporting wildlife.	Noted. Where technical terminology and acronyms are used, these are defined in a glossary. Efforts have been made to ensure that the SPD is clear, minimises the use of jargon. An abbreviations list is also provided. No amendment proposed.
22	Mr Graham Womack	Resident	<p>It is unclear what other 'plan and projects' (in addition to residential developments) are to be considered as within the scope. The Essex County Council's Green Space Strategy (2019), encouraged organisations responsible for managing wildlife sites to become self-funding through commercial activities provided at their sites. This is likely to increase the footfall at these sites (including those on the coast), even before new developments are considered.</p> <p>Has any work been done to estimate the expected visitor numbers to the Essex Coast, both now and for future years?</p>	The Essex Coast RAMS has been developed in response to the recommendations of each partner LPA's HRA/AA work for their emerging or adopted Local Plans. These HRA/AAs set out those other plans and projects that in combination with the Local Plans may have effects on recreational disturbance at the Essex Coast. The Essex Coast RAMS process began with visitor surveys and counts at the Essex Coast to determine the extent of the Zone of Influence. No amendments are proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
23	Mr Kevin Smith	Resident	The Geese overwintering on Hanford Water appear to be greatly reduced this year (2019/20); this would be to wild-fowlers rather than local development, this seems to be too narrow minded to easily blame developers.	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only on the Essex Coast. The SPD therefore, does not blame the developers, but assesses the impact of increased visitors to the coast as a result of increased population within most of Essex. No amendment proposed.
24	Mrs Anne Clitheroe	Essex County Council	Essex County Council is satisfied with the content of the Essex Coast RAMS SPD and confirms that it wishes to continue to be engaged in this process.	Noted. No amendment proposed.
25	Mrs Joanna Thornicroft	Resident	It was difficult to locate the RAMS which needed better signposting.	Noted. The RAMS was available as a supporting document during the consultation period and is available at <a href="https://essexcoast.birdaware.org/home">https://essexcoast.birdaware.org/home</a> . No amendment proposed.
26	Mr Mark East	Resident	I do not consider that the proposals in the first instance avoid harm. It appears that the strategy is to fast track planning applications and there is insufficient evidence that alternative site allocation for development outside of the Zone of Influence has been considered. On the contrary it is clear that proposals tend to concentrate development within the Zone of Influence. I believe the intent of the author(s) of the legislation are to avoid harm and if it can't be avoided then to move to mitigation and finally compensate. It is understood that English High Court's ruling that mitigation was acceptable without consideration of avoidance was over-ruled by the ECJ.	The SPD does not promote fast tracking planning applications and makes little difference to the speed of applications or prioritising applications for developments which make a contribution. The impact on habitats is one of many considerations in determining planning applications, and agreement to pay the contribution does not mean that an application will be granted if other factors mean it should be refused. The consideration of alternative site allocation outside of the Zone of Influence represents Stage 3 of the HRA process and if deemed necessary would be applicable to the

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				HRAs of the LPAs' Local Plans. The HRAs of the LPAs' Local Plans all considered, at Stage 2 of that process (AA), that mitigation is possible to ensure that development proposals would not have any in-combination recreational effects on the Essex Coast's Habitats sites. The RAMS exists to set out that mitigation, and the approach has been endorsed by Natural England as the relevant statutory authority. As such, there was no need for any of the Local Plans to progress to Stage 3 of the HRA process. No amendment proposed.
27	Mrs Michelle Endorsor	Resident	Mitigation is purely speculative and unproven. The expansion of London Southend Airport with its added noise and pollution has already done untold damage to wildlife. The Council would rather build on land that may disrupt the habitat of endangered wetland birds and wildlife than utilise urban and industrial sites.	The Essex Coast RAMS toolkit (Table 4.1 of the SPD) sets out monitoring arrangements, amounting to 'birds and visitor surveys, including a review of the effectiveness of mitigation measures.' The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. No amendment proposed.
28	Mr David Gollifer	Resident	The outline of proposals are satisfactory to protect wildlife particularly migrating birds.	Noted. No amendment proposed.
29	Mrs April Chapman	Resident	A map of the Zone of Influence would help at this earlier stage.	Noted. An improved map of the Zone of Influence is proposed to be included earlier on in the SPD where it is first mentioned.
30	Mrs Linda Findlay	Resident	Good to see a raise in profile of environmental concerns. Congratulations on work to restore wetlands for the benefit it brings.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
31	Mrs Susie Jenkins	Brightlingsea Nature Network	<p>I feel that disturbance being avoided totally should be stated more clearly as an option. If we are to halt the decline in the UK's wildlife, there are undoubtedly areas where the habitat needs to take a precedence and be left undisturbed.</p> <p>At the moment the introduction appears to immediately be putting forward a message that LPA's have the go ahead to accommodate people disturbing natural areas through mitigation.</p>	The specific scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth. Imposing restrictions on access to areas of the Essex Coast is a possible mitigation measure. No amendment proposed.
32	Councillor Frank Belgrove	Alresford Parish Council	There could be some explanation in this section - so at an early stage in the document - of the type of physical arrangements that could be implemented to mitigate the effects of increased visitor pressure.	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. Other forms of on-site mitigation will be delivered through other mechanisms and through measures recommended within project-level HRA/AAs, which will still be necessary for individual development proposals. No amendment proposed.
33	Mr Roy Hart	Skee-tex Ltd Local Councillor, Head of the River Crouch Conservation Trust & owner of 1.5 miles of river banks of the Crouch	Pollution from sewerage works is a problem. Anglian Water are not keeping pace with the explosion of new housing being built in the south east. There is now a very serious lack of infrastructure, which includes road and fresh water run off. The sea wall, tidal mud flats and salt marshes, etc do make a good natural barrier.	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. Local Plans take into consideration the wider impacts of new development on infrastructure such as sewerage and water supply. No amendment proposed.
34	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	It would appear that this document thinks that simply raising money will protect the birds and the wildlife on the Essex Coast. There are many other aspects to consider, e.g. The coastal footpath should be abandoned / The Essex Wildlife Trust should cease bringing coachloads of children to the Walton cliffs looking for fossils / The right to roam should be restricted / Planning committees should restrict development in Conservation Areas	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only and to deliver the mitigation proposed in the RAMS.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			/ An artist's impression 2019 of a proposal between Crossrail and the RSPB to develop Wallasea Island into a wetland site for birdlife shows a maze of pathways and viewing areas for the public.	The SPD sets out how the tariff, and how the money will be collected and spent. No amendment proposed.
35	Mr Peter Steggles	Resident	There must be allocated areas for similar activities namely jet skis, water skiing, sea kayaking etc and education of the general public too. New homeowners should be included and given the opportunity to take 'pride of ownership' and take part in clean-up projects etc.	The RAMS document outlines and justifies the various strategic mitigation measures proposed. No amendment required.
36	Mr Hugh Toler	Blackwater Wildfowlers Association (BWA)	First, the BWA supports the principle of preventing an increase to disturbance of wetlands on the Essex coastal area. Secondly, we recognise that some level of visitors to the wetlands is both necessary and unavoidable and would like to consider the current state as a baseline.	Noted. No amendment proposed.
37	Councillor Jenny Sandum	Braintree District Council	Very much welcome the requirements for mitigation.	Noted. No amendment proposed.
38	Mr Mark Nowers	RSPB	Whilst we were an active and willing participant in the workshops that took place in 2018, we were not invited, nor given the opportunity to comment on the Habitats Regulations Assessment for this strategy. Crucial to the success of this strategy is: 1. effective monitoring of recreational activity; 2. effective monitoring and analysis of impacts on waterbird populations (WeBS data is useful but this only covers roosts at high tides and will not cover the impacts on feeding birds on mudflats or functionally-linked cropped lands for foraging dark-bellied brent geese); 3. access management strategies that are tailored to each site; 4. effective coverage of sites by the right number of rangers at key sites and at key times of the week/weekends and the right periods in the day, i.e. early morning dog-walks; 5. rangers should be full-time throughout the year to ensure expertise and site knowledge is retained and face-to-face time with the public is prioritised over administration and other tasks; 6. The strategy must take advantage of the best practice developed elsewhere in the country, i.e. Bird Aware Solent, and seek to continually evolve and avoid re-inventing the wheel.	The Essex Coast RAMS SPD Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA) Screening Report accompanied the SPD as part of this consultation and was separately subject to consultation with the statutory consultees of Natural England (NE), Historic England (HE) and the Environment Agency (EA).  It can be considered that the points made may be addressed if appropriate through the actions of the Delivery Officer. The involvement of the RSPB is welcomed and once approved, the Delivery Officer will engage directly with key local stakeholders including RSPB. The effectiveness of the

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				mitigation will be monitored as outlined within Section 6 of the SPD. The project is considered best practice elsewhere and in 2019 become part of the Bird Aware brand. No amendment proposed.
39	Mrs Jackie Deane	Great Dunmow Town Council	The Town Council is supportive of the proposals.	Noted. No amendment proposed.
40	Mr Gavin Roswell	Resident	In 1.1, the wording 'is necessary' is alarmist, as it is only the opinion of a relatively small amount of people. There are studies out there that are in complete contradiction to the whole RAMS ethos, but the agenda cloaking has already started, with narrow focus groups promoting their thoughts as fact.	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only and to deliver the mitigation proposed in the RAMS. The RAMS is evidence-based and has been developed in conjunction with Natural England. No amendment proposed.
41	Mr Stephen Tower	Resident	Protecting wildlife is of utmost importance.	Noted. No amendment proposed.
42	Miss Georgie Sutton	Marine Management Organisation (Planning)	<p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the SPD, the draft South East Marine Plan is of relevance. The South East Marine Plan is currently out for consultation until 6th April 2020. As the plan is out for consultation, it is now a document for material consideration.</p> <p>All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the draft South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Please see suggested policies from the draft South East Marine Plan that we feel are most relevant. They are provided only as a</p>	Once approved the South East Marine Plan as well as the East Inshore and East Offshore Marine Plans will become part of the Development Plan for the relevant LPAs. An amendment to recognise these Plans, and their policies, within the SPD is proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>recommendation and we would suggest your own interpretation of the South East Marine Plans is completed: MPAs, Tourism and Recreation, Biodiversity, Disturbance, Marine Litter, Water quality, Access.</p> <p>The area in the Stour Estuary Zone of Influence and the Hamford Water Zone of Influence also extend into the East Marine Plan area. Therefore, you may need to consider the East Inshore and East Offshore Marine Plans as well. Please see suggested policies which may be of relevance: Social, Ecology, Biodiversity, MPAs, Governance, Tourism and Recreation.</p>	
43	Ms Liz Carlton	Resident	<p>While we understand the need for more housing, we feel very strongly that mitigation in this area is essential. We are not sure that the tariff of £122.30 per dwelling will suffice to protect the area for wildlife. We believe that it will be imperative to ensure that some areas are restricted and protected as wildlife only areas. There will need to be a budget for ensuring that damage is monitored, and repair is carried out before becoming irreversible.</p>	<p>The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. Other forms of mitigation will be delivered through other mechanisms and through measures recommended within project-level HRA/AAs, which will still be necessary for individual development proposals. No amendment proposed.</p>
44	Mr Steve Betteridge	Resident	<p>While we understand the need for more housing, we are not sure that the plan to charge residents for this mitigation will be sufficient to protect the area for future generations.</p>	<p>The tariff is charged to developers not residents. The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. Other forms of on-site mitigation will be delivered through other mechanisms and through measures recommended within project-level HRA/AAs, which will still be necessary for individual development proposals. No amendment proposed.</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
45	Mr Bernard Foster	Resident	Some projects that would mitigate potential damage to RAMS areas flounder for a variety of unnecessary reasons. There should be a specific section, referenced, that would cover areas in and around the Zone of Influence that would assist in protecting various sections within the RAMS format. It should enable LPA's, parish councils etc to support and draw support from governing bodies in areas that they cannot directly control such as Essex Highways. Regulations around unauthorised developments need to be changed for these types of areas to give the planning and enforcement groups some support, stopping the irritating and harmful occupations that can go on for years.	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only and to deliver the mitigation proposed in the RAMS. Essex Highways and LPA planning enforcement are outside the scope of the SPD. No amendment proposed.
46	Mr Mark Marshall	Resident	The consultation is a great step forward for conservation. It may not address all problems, but awareness is the key.	Noted. No amendment proposed.
47	Mr Tim Woodward	The Country Land & Business Association (CLA)	No comments on this introductory section.	Noted. No amendment proposed.
48	Parish Clerk Kim Harding	West Horndon Parish Council	West Horndon Parish Council supports the broad principles of the RAMS.	Noted. No amendment proposed.
49	Mrs Jenny Clemo	Langford & Ulting Parish Council	Langford & Ulting Parish Council agree that it is necessary to protect the wildlife of the Essex Coast from increased visitor pressure associated with new residential development. There is also a need to protect the wildlife on the rivers and canals in Essex as the increase in population will lead to an increase in the use of them for amenity purposes (walking, boating, fishing, dog walking, cycling etc).	Noted. No amendment proposed.
50	Mrs Christa-Marie Dobson	Feering & Kelvedon Wildlife Group	It is worth explaining here that Bird Aware Essex Coast is the brand name of the Essex Coast Recreational disturbance Avoidance and Mitigation Partnership.	An amendment is proposed to explain the role of Bird Aware Essex Coast within this section of the SPD.
51	Ms Beverley McClean	Suffolk Coast & Heaths AONB team	The AONB team is not proposing any changes to the Introduction section of the RAMS SPD.	Noted. No amendment proposed.
52	Mrs Cecilia Dickinson	Resident	I don't like this format - section by section.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.

## Section Two – Summary of the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy

**Table 4 – Section Two: Summary of consultation responses and actions**

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Frances Coulson	Resident	As we cannot stem building unfortunately, this seems to set out the facts.	Noted. No amendment proposed.
2	Mrs Aileen Cockshott	Resident	Apply protective measures for protected areas of the coast - prevent powered water sports and set out exclusion zones for wind powered water sports. Dogs should be kept on lead near areas known for ground nesting birds. If protective measures are broken, then hefty fines should be imposed.	The mitigation proposed within the RAMS does not seek to prevent visitors to the Essex Coast, rather its focus is on raising awareness of issues at the coast and to foster positive behaviours. No amendment proposed.
3	Mrs Amy Gardener-Carr	Resident	Do not build here.	All of the LPAs have a statutory requirement to plan for new housing growth. The RAMS seeks to mitigate recreational impacts on protected Habitats sites on the Essex Coast arising from the increase in population associated with these housing growth requirements. No amendment proposed.
4	Mr Philip Dangerfield	Resident	Ensure that protection of the coast is spread evenly across the whole of Essex. Those who visit areas that are now more populated may visit more remote areas of the coastline home to nesting birds.	This is a principal aim of the RAMS and SPD. No amendment proposed.
5	Mr Bob Tyrrell	West Bergholt Parish Council	Agree and support the SPD.	Noted. No amendment proposed.
6	Mr Brian Springall	Resident	Before protecting wildlife, the Council needs to get its housing development plans sorted & improve the district's infrastructure i.e. roads, flood protection etc.	The need for the Essex Coast Recreational disturbance Avoidance Mitigation Strategy (RAMS) and the SPD stems from planned growth within the LPAs' adopted or emerging Local Plans. Local Plan progression is

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				ongoing within each of those partner LPAs that do not have an adopted Local Plan. No amendment proposed.
7	Mrs Julie Waldie	Resident	Happy to see wildlife taken into consideration.	Noted. No amendment proposed.
8	Mr Terry Newton	Resident	Use counties in the West Country as case studies for successful coastal management.	Elements of RAMS across the country have been considered in the formulation of the Essex Coast RAMS, where relevant to the Essex Coast. No amendment proposed.
9	Mr Brian Mills	resident	I agree with assessment.	Noted. No amendment proposed.
10	Mrs Angela Harbottle	Resident	Include wildlife protection measures such as RAMS within Essex Local Authority Local Planning documents.	The need for strategic mitigation in the form of the RAMS has been included in relevant emerging and recently adopted LPA Local Plans. No amendment proposed.
11	Mr David Kennedy	Resident	Expansion of Southend Airport contradicts Essex RAMS commitments by supporting development that would impact on nesting birds on Wallasea Island. Air traffic collision with bird population could result in disaster.	The SPD is related only to in-combination recreational impacts identified through the LPAs' Local Plan HRA/AAs. No amendment proposed.
12	Mr Charles Joynson	Resident	Why does the Essex RAMS document not include the protection of seals / seahorses? How will the tariff fund the protection of the coast? Include more manned exclusion zones along the coast to prevent disturbance from dog walkers.	The Essex Coast RAMS SPD relates only to in-combination recreational effects on Habitats sites (as defined) which are designated on the Essex Coast in relation to birds. Other forms of mitigation addressing other effects and on other designations across Essex are not within the specific scope of the SPD. No amendment proposed.
13	Mr John	Resident	Development should not be permitted on or adjacent to important coastal wildlife sites.	Noted. This is matter for individual Local Plans. The RAMS allows for new

No.	Name	Organisation	Main Issues Raised	Response / amendment required
	McCallum			coastal residential development subject to providing appropriate mitigation measures. No amendment proposed.
14	Mrs Mary Drury	Resident	Implement more sets of coastal pathways. Stop speed boat usage along protected coastline. Prevent blocking of PROW. Ensure footpaths are open 24/7 and include more bins and maps. Clear pathways at coastal sites such as Danbury Common – brambles force members of public to overuse specific paths.	Noted. Maintenance of footpaths is not within the scope of the SPD. No amendment proposed.
15	Mrs Alwine Jarvis	Resident	Mitigation package costs should be split across entire borough – including existing households. Free parking for local residents – paid parking for those visiting from afar.	The Essex Coast RAMS SPD is applicable within the Zone of Influence only and the tariff cannot be retroactively applied to consented / existing development. The SPD sets out a tariff that will be used to fund mitigation related to ‘in-combination’ recreational effects relevant to planned growth in Essex. Car parking charges are a matter for individual LPAs and landowners. Local residents should be encouraged to walk or cycle to the coast. No amendment proposed.
16	Ms Rachel Cross	Resident	What is best practice for Ramsars, SPAs and SACs? Any policy must exceed the provisions to protect wildlife and respect the environment. What about representation from the ports?	The SPD is related only to those recreational impacts identified within the LPAs’ Local Plan HRA/AAs and related to residential growth. The RAMS draws on best practice from elsewhere and has been developed in conjunction with Natural England. No amendment proposed.
17	Mrs Joanna Spencer	Resident	Planes release fuel over designated sites.	The SPD is related only to those recreational impacts identified within the LPAs’ Local Plan HRA/AAs and related to residential growth. The

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				impact of aviation on the environment is taken into consideration in local plans which promote airport growth, masterplans for airports, planning applications for airport facilities and regulations on pollution through the environmental and aviation regulatory bodies. No amendment proposed.
18	Ms Caroline Macgregor	Brightlingsea village councillor	Town councils should be given more weight in deciding planning applications for development whereas local councils should be more concerned with preservation and conservation.	The SPD is related only to those recreational impacts identified within the LPAs' Local Plan HRA/AAs and related to residential growth. Decision-making on planning applications is outside the scope of this SPD. No amendment proposed.
19	Mr Christopher Marten	Resident	Development in designated areas is completely inappropriate.	Noted. No amendment proposed.
20	Mr Alan Lycett	Resident	How will BREXIT impact on coastal designations?	The content of the relevant EU Directives related to birds and habitats have been transposed into UK law and will continue to apply. No amendment proposed.
21	Mr Brian Jones	Resident	The SPD is clear and effective if actually put into practice.	Noted. No amendment proposed.
22	Mr Kenneth Dawe	Resident	There needs to be a balance between safeguarding wildlife and providing access for wellbeing.	The mitigation proposed within the RAMS does not seek to prevent visitors to the Essex Coast, rather its focus is on raising awareness of issues at the coast and to foster positive behaviours. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
23	Mr Frederick Ager	Resident	The increase in local housing will increase visitors to this area of the path and in turn increase danger to public with the Wildfowlers Club using this area.	The SPD is related only to the in-combination recreational impacts identified within the LPAs' Local Plan HRA/AAs. The effectiveness of the mitigations will be monitored during the life of the project. No amendment proposed.
24	Mr Aubrey Cornell	Resident	Housing should not be in proximity to designated areas. New residents/visitors will not respect the wildlife/countryside, making the tariff redundant. Existing visitors already disturb birds whether they are children or dogs off lead.	The need for the Essex Coast RAMS and the SPD stems from planned growth within the LPAs' adopted or emerging Local Plans. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
25	Mr Andrew Whiteley	Resident	A similar plan to RAMS could be implemented for inland habitats. Infrastructure should be evenly distributed across Essex to prevent future isolation issues.	Noted. No amendment proposed.
26	Mrs Angela McQuade	Resident	Extend designated areas to create wildlife corridors.	Protecting wildlife from development is and can be ensured and funded through other mechanisms. The extension of protected areas is not within the scope of the RAMS or the SPD. No amendment proposed.
27	MR John Camp	Resident	Exclusion zones for jet skis should be introduced.	Noted. No amendment proposed.
28	Mr Peter Bates	Resident	No. The section seems reasonable.	Noted. No amendment proposed.
29	Mr Stephen Ashdown	Resident	The section should include the benefits for community mental health.	The SPD is related only to those recreational impacts identified through the LPAs' Local Plan HRA/AAs. The mitigation proposed within the RAMS does not seek to prevent visitors to the

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				Essex Coast, rather its focus is on raising awareness of issues at the coast and to foster positive behaviours. No amendment proposed.
30	Mr Graham Womack	Resident	How will Brexit impact European Directives that the RAMS is based on?  The strategy only covers the coast, but some waterfowl species may also rely on inland sites.	The content of the relevant EU Directives related to birds and habitats have been transposed into UK law and will continue to apply. No amendment proposed.  The Essex Coast RAMS SPD relates only to the effects on Habitats sites (as defined) which are designated on the Essex Coast. Other forms of mitigation addressing effects on other designations across Essex are not within the specific scope of the SPD. No amendment proposed.
31	Mr Michael Blackwell	Resident	Tourists also visit the coast.	The SPD sets out that tourism related development will be considered on a case-by-case basis through a project level HRA. If adverse effects on integrity are predicted, appropriate mitigation will be required, which could relate to the tariff proposed in the SPD. No amendment proposed.
32	Mr Mark East	Resident	How are the effects of smaller planning applications taken into consideration? It is evident from comments above that visitors travel some distance to SPA/Ramsar sites and whilst Local Plans and major projects consider the cumulative effect there is no objective evidence that I have seen that planning applications are controlled and come under the same scrutiny. This is leading to over development in sensitive areas.	All residential development proposals, including planning permission for an individual net new dwelling within the Zone of Influence will be required to undertake a project-level HRA/AA within which specific and in-combination effects of specific proposals will be considered. The

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				Zones of Influence extend beyond local authority boundaries and show that many people travel far to visit the coast. No amendment proposed.
33	Mrs Michelle Endsor	Resident	Mitigation does not guarantee that adverse effects will not occur. The only route to success would be to completely isolate nesting bird species and prevent disturbance altogether. Housing development should seek to be located on areas that would result in the least amount of environmental impact.	Locational criteria for development are a matter for Local Plans / development management at the LPA level and not within the scope or remit of the RAMS or SPD. The mitigation proposed within the RAMS focuses on raising awareness of issues at the coast and to foster positive behaviours. No amendment proposed.
34	Mr. David Gollifer	Resident	The proposals are satisfactory.	Noted. No amendment proposed.
35	Mrs April Chapman	Resident	The RAMS should also consider the future expansion of recreational establishments alongside housing.	The SPD is related only to those recreational impacts resulting from residential development identified through the LPAs' Local Plan HRA/AAs. Any Habitat Site mitigation associated with other types of development (e.g. retail, education, business) would be considered at individual planning application stage by the relevant LPA. No amendment proposed.
36	Mrs Linda Findlay	Resident	Restore oyster reefs alongside emerging coastal wind turbines.	The SPD is related only to those recreational impacts resulting from residential development identified through the LPAs' Local Plan HRA/AAs. No amendment proposed.
37	Mr Barrie	Resident	No, looks good and sensible.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
	Ellis			
38	Mr David Evans	Resident	Hamford Water is a man-made environment and does not fall under the EC Habitats Directive. Protection also needs to be attributed to other wildlife such as shellfish and sea mammals.	The Essex Coast RAMS SPD relates only to the effects on Habitats sites (as defined) which are designated on the Essex Coast in relation to birds. This includes the Hamford Water SPA and Ramsar. No amendment proposed.
39	Mrs Susie Jenkins	Brightlingsea Nature Network	There is not enough focus on situations where mitigation is not possible, too much focus on accommodating development. I find the way this statement has been used misleading "In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.' (Principle 15) of Agenda 21, agreed at the Rio Earth Summit, 1992. " My understanding of the precautionary approach is well described here by J. Hanson, in Encyclopaedia of the Anthropocene, 2018, "The process of applying the Precautionary Principle must be open, informed and democratic and must include potentially affected parties. It must also involve an examination of the full range of alternatives, including no action." No action has to be a clear option available to LPA's to enable them to properly consider the genuine disturbance avoidance of vulnerable and valuable habitats.	Alternative means would only need to be considered in Stage 3 of the HRA process of the LPA's Local Plans. Stage 2 of that process (AA) considers that mitigation is possible to ensure that development proposals would not have any in-combination recreational effects on the Essex Coast's Habitats sites. As such there was no need for any of the Local Plans to progress to Stage 3 of the HRA process and the RAMS follows the process of the Stage 2 determinations / recommendations. No amendment proposed.
40	Councillor Frank Belgrove	Alresford Parish Council	At this stage in the document the actual "mitigation measures" are not clearly defined. "Alternative means" - needs to be defined.	Section 4.1 details the planned mitigation to be implemented as part of the Essex Coast RAMS. Alternative means would only need to be considered in Stage 3 of the HRA process of the LPA's Local Plans. Stage 2 of that process (AA) considers that mitigation is possible to ensure that development proposals would not have any in-combination recreational effects on the Essex Coast's Habitats

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				sites. As such there was no need for any of the Local Plans to progress to Stage 3 of the HRA process and the RAMS follows the process of the Stage 2 determinations / recommendations. No amendment proposed.
41	Mr Roy Hart	Skee-tex Ltd Local Councillor, Head of the River Crouch Conservation Trust & owner of 1.5 miles of river banks of the Crouch	Boat movements are declining. Speed boats should be kept to low speeds to prevent disturbance. Main activity is Autumn, Winter and very early spring.	Noted. No amendment proposed.
42	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	Hamford Water area requires the amalgamation of existing organisations managing the area. Hamford Water has seen many signs of degradation: sand dunes at Walton Hall marshes lost, healthy saltmarsh destroyed, Stone Point beach disappeared, cliff erosion, Naze Tower under threat and Walton Navigation channel also threatened.	Noted. The RAMS toolkit states that, for the 'Habitat based measures' Action Area, partnership working may include such organisations as 'Natural England, Environment Agency, RSPB, Essex Wildlife Trust, National Trust, landowners, local clubs and societies.' No amendment proposed.
43	Mr John Fletcher	Resident	Wildlife at Hamford Water can be disturbed by boat, despite this the 450 boat Marina has not caused ill-effect on wildlife. Locals do not disturb wildlife, disturbance is caused predominantly by those visiting from out of the area. The England Coast Path and Essex Wildlife Centre encourage disturbance, as do dog walkers and general public.	Noted. No amendment proposed.
44	Mr Hugh Toler	Blackwater Wildfowlers Association (BWA)	Paragraph 2.2 – add fishing / bait digging and wildfowling. BWA monitors member activity. Litter and effluent also impacts on designated areas.	An amendment to include fishing / bait digging is proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
45	Mr Mark Nowers	RSPB	Paragraph 2.5 – The Outer Thames Estuary SPA should also be included. Impacts will not be limited to terrestrial activities; powered watercrafts will also need to be accounted for.	Natural England initiated the RAMS project and advised on the 10 Essex coastal sites that should be included within this project. The Outer Thames Estuary is included within Table 3.1 of the SPD as 'Thames Estuary and Marshes SPA and Ramsars'. An amendment to include the word 'Outer' is proposed.
46	Mr Gavin Rowsell	Resident	Natural England promoted increased access for public on all foreshores along the England Coast Path. Using this access as a 'land-grab'. RAMS is not seen as fair and uses 'left-wing' principals.	The SPD is related only to those recreational impacts identified through the LPAs' Local Plan HRA/AAs. The RAMS is an evidence-based project and has been produced in conjunction with Natural England. No amendment proposed.
47	Mr Gerry Johnson	Essex Birdwatching Society	In order to reduce disturbance to wildlife: - Dogs should be kept on leads - Fencing should be used to protect ground nesting birds - Signage should be erected to warn walkers to take care in areas of nesting birds	Section 4.1 details the planned mitigation to be implemented as part of the Essex Coast RAMS. No amendment proposed.
48	Mr Bernard Foster	Resident	Online maps should have greater clarity. Both HRA & AA are negative policies. The RAMS project like the NPPF does not carry enough weight to promote areas that would divert footfall from designated areas. More co-operation between LPAs and associated bodies (Highways) would prevent the refusal of mitigation projects. Decisions need to be justified more clearly.	Amendments to replace existing maps with higher resolution images are proposed.  The SPD, in conjunction with the RAMS, ensures that mitigation is enshrined / adopted in local policy of all the LPAs. No amendment required.
49	Mr Mark Marshall	Resident	Designated areas need to be protected to prevent irreversible loss.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
50	Mr Tim Woodward	The Country Land & Business Association (CLA)	England Coast Path will increase recreational pressure on the coast by providing access to areas that previously did not. Why should those delivering housing be targeted by the RAMS strategy when a government body is facilitating recreational pressures on the Essex Coast?	The SPD is related only to those recreational impacts identified through the LPAs' Local Plan HRA/AAs. No amendment proposed.
51	Parish Clerk for West Horndon Parish Council Kim Harding	West Horndon Parish Council	West Horndon Parish Council supports the broad principles of the RAMS	Noted. No amendment proposed.
52	Mrs Jenny Clemo	Langford & Ulting Parish Council	Impacts are unable to be mitigated, developments that are predicted to impact should not be granted planning permission.	Each LPA within Essex has a statutory duty to address housing need in their area. The mitigation proposed in the RAMS ensures that 'no significant effect' on the integrity of the Habitats sites will be realised regarding recreational disturbance. No amendment proposed.
53	Ms Jo Steranka	Resident	<p>RAMS is inadequate to deal with future issues as there are limits to the amount of development that can take place in Essex. There will come a point where further development will have detrimental impact on the quality of the environment. Wildlife is already pressured by inappropriate behaviour; increased visitors will exacerbate these. The habitats are incredibly important as there is so little left across Europe.</p> <p>Essex County Council should provide guidance that restricts recreational development that would act to disturb wildlife populations at the coast, as well as, development that would act to connect undesignated areas to designated sites. Essex County Council should also recognise that continued development will impact on existing international commitments.</p>	The need for the Essex Coast RAMS and the SPD stems from planned growth within the LPAs' adopted or emerging Local Plans. The mitigation proposed in the RAMS ensures that 'no significant effect' on the integrity of the Habitats sites will be realised regarding recreational disturbance. It is the LPAs that are responsible for preparing, adopting, delivering and implementing the RAMS and the SPD, not Essex County Council (ECC). No amendment proposed.
54	Mrs Christa-Marie Dobson	Feering & Kelvedon Wildlife Group	Similar strategies endorsed by Natural England are not tried and tested.	The effectiveness of the mitigation will be monitored as outlined within

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>Paragraph 2.6 – Who is the regulatory body that ensures Habitats Regulations are met? Will NE, RSPB and EWT be statutory consultees on all planning applications?</p> <p>Paragraph 2.13 – Requires strengthening – variable tariff required?</p> <p>Paragraph 2.14 – Independent bodies are not endorsing the strategy. Strategy is a ‘soft’ approach, no code of conduct for water sports clubs currently available. By-laws will require updating as they are not directly related to birds or wildlife. Those caught littering should be fined as part of updated by-laws.</p> <p>Paragraph 2.15 – The tariff charged to developers could be passed to home owners – increasing property prices.</p>	<p>Section 6 of the SPD. No amendment proposed.</p> <p>Natural England are the statutory body that ensure the Habitats Regulations are met, as a consultee for HRA/AA documents. Other bodies are permitted to comment on all live planning applications.</p> <p>A variable tariff has not been supported within the RAMS and SPD as overall ‘in-combination’ effects are not variable and distinguishable across the County.</p> <p>The remit of the RAMS and SPD is to ensure the strategic mitigation package is delivered. No amendment proposed.</p>
55	Ms Beverley McClean	Suffolk Coast & Heaths AONB team	<p>For consistency the following text should be added to the notes section:</p> <p>Special Protection Areas (SPAs) are sites which support rare, vulnerable and migratory birds and are designated under the Birds Directive.</p> <p>Special Areas for Conservation (SACs) are sites which support high-quality habitats and species and are designated under the Habitats Directive.</p>	<p>An amendment to move the glossary to front of the SPD is proposed, with added description explained in footnotes where necessary and newly introduced.</p>
56	Mr Michael Hand	Campaign to Protect Rural England - Essex Branch	<p>The importance of the Essex coastline for wildlife - as evidenced by the extent of designated Habitats sites - cannot be over emphasised. CPRE very much supports the strategic approach to mitigation measures outlined in this section - not least, for the consistent, pragmatic and fair process which it provides. The provisions of the SPD need to be</p>	<p>Noted. No amendment proposed.</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			implementable and effective and this combined approach creates the robust framework to achieve the objectives of RAMS.	
57	Mrs Cecilia Dickinson	Resident	I don't like this format - section by section - my comments are general.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.

### Section 3 – Scope of the SPD

*Table 5 – Section Three: Summary of consultation responses and actions*

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	Do not build so many homes.	All of the LPAs have a statutory requirement to plan for new housing growth. How this is achieved is set out in Local Plans. The RAMS seeks to mitigate recreational impacts on protected Habitats sites on the Essex Coast arising from the increase in population associated with these housing growth requirements. No amendment proposed.
2	Mrs Aileen Cockshott	Resident	Tourist accommodation and caravan parks should be within scope.	The effects and subsequent mitigation of tourist related development proposals will be considered on a case by case basis. Section 3.9 of the SPD states that, 'tourist accommodation, may be likely to have significant effects on protected habitat sites related to recreational pressure and will in such cases need to be subject of an Appropriate Assessment as part of the

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				Habitats Regulation.' No amendment proposed.
3	Mrs Amy Gardener-Carr	Resident	Instead of building properties, fence this land off and make them sanctuaries.	All of the LPAs have a statutory requirement to plan for new housing growth. The RAMS SPD does not propose new development. The mitigation proposed within the RAMS focuses on raising awareness of issues at the coast and to foster positive behaviours. No amendment proposed.
4	Mr Bob Tyrrell	West Bergholt Parish Council	Fully agree.	Noted. No amendment proposed.
5	Mrs Julie Waldie	Resident	Sounds fair.	Noted. No amendment proposed.
6	Mr Terry Newton	Resident	How do you collect post code data from visitors? If property has not been built on these sites, then no data will be available yet. Could it also be that a small number of visitors to the coastal areas of concern are the same repeat visitors, and that the majority of local residents never, or rarely visit most of the coast.	Survey data was collected from the general public who visited the coast prior to the new development to best understand where visitors come from and are likely to come from in the future. The Zones of Influence were then calculated to determine what areas would be required to contribute to the RAMS tariff to provide strategic mitigation across Essex. No amendment proposed.
7	Mrs Angela Harbottle	Resident	I agree with the measures outlined.	Noted. No amendment proposed.
8	Mr David	Resident	The tariff should apply to commercial development as well.	The SPD is related only to recreational impacts identified through the LPAs'

No.	Name	Organisation	Main Issues Raised	Response / amendment required
	Kennedy			Local Plan HRA/AAs and as a result of recreational effects caused by new housing. Other effects on Habitats sites from commercial development will be considered through individual project-level HRA/AAs, if such assessment is required. No amendment proposed.
9	Mr Charles Joynson	Resident	This all seems very sensible.	Noted. No amendment proposed.
10	Mrs Mary Drury	Resident	<p>Maldon riverside is becoming a commercial venue- a mock attempt at a seaside, as it is easy to drive to but it is spoilt along the Promenade now and charging for a huge car park is not being returned to improve anything in the way of doing anything to help the wildlife.</p> <p>Hullbridge riverside has many birds but as each new development takes out more hedges and trees where do they go? The once narrow Hullbridge riverside path is now cut right back for public access and tall grass edges mown and that is along a natural riverside walk - why?</p>	<p>The need for the Essex Coast RAMS and the SPD stems from planned residential growth within the LPAs' adopted or emerging Local Plans. Other forms of mitigation addressing effects on other designations across Essex are not within the specific scope of the SPD.</p> <p>No amendment proposed.</p>
11	Mrs Alwine Jarvis	Resident	Mitigation package costs should be split across the entire borough – including existing households. Free parking for local residents – paid parking for those visiting from afar.	The Essex Coast RAMS SPD is applicable within the Zone of Influence only and the tariff cannot be retroactively applied to consented / existing development. The SPD sets out a tariff that will be used to fund mitigation related to 'in-combination' recreational effects relevant to planned growth in Essex. Car parking charges are a matter for individual LPAs and landowners. Local residents should be encouraged to walk or cycle to the coast. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
12	Mr Matt Eva	Resident	The Zone of Influence for Southend and Crouch/Roach estuaries seem too small.	The Essex Coast RAMS Zones of Influence are based upon data collected through visitor surveys approved by Natural England. No amendment proposed.
13	Mrs Jane Rigler	Resident	Why is the measurement in kilometres - we still use miles in the UK so I think it should be changed.	An amendment is proposed to include both kilometres and miles within the SPD.
14	Ms Caroline Macgregor	Brightlingsea village councillor	Distance boundaries should be extended.	The Essex Coast RAMS Zones of Influence are based upon data collected through visitor surveys approved by Natural England. No amendment proposed.
15	Mr Peter Dervin	Resident	People should at every stage be the number one consideration, while we have people living on the streets and sofa surfing, and a lack of care for the elderly and disabled sorry but wildlife has to come second.	The SPD and RAMS ensures that residential development schemes within the Zone of Influence can come forward with an assurance that there will be no significant in-combination recreational effects on Habitats sites on the Essex Coast. No amendment proposed.
16	Mr Brian Jones	Resident	Ok.	Noted. No amendment proposed.
17	Mr Andrew Whiteley	Resident	No mention of improved infrastructure. Essex roads, trains and buses are already stretched and that's without the impact on social services.	The SPD is related only to those in-combination recreational effects identified through the LPAs' Local Plan and infrastructure delivery plans. No amendment proposed.
18	Mrs Angela McQuade	Resident	Regulations should be upheld in all cases.	The SPD provides the robust framework for ensuring the regulations are upheld. Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
19	Mr Peter Bates	Resident	Zone of Influence for both Benfleet and Southend Marshes and Thames Estuary and Marshes should be larger. Commercial development should also be considered within the RAMS.	The Essex Coast RAMS Zones of Influence are based upon data collected through visitor surveys approved by Natural England. Other effects on Habitats sites from commercial development will be considered through individual project-level HRA/AAs, if such assessment is required. No amendment proposed.
20	Mr Stephen Ashdown	Resident	Should include Hanningfield Reservoir as this also supports wildlife relevant to this document and has the same pressures as those discussed in the subject matter.	The Essex Coast RAMS SPD relates only to the effects on Habitats sites (as defined) which are designated on the Essex Coast in relation to birds. No amendment proposed.
21	Mr Graham Womack	Resident	With regards to para 3.10. What happens if outline permission has already been granted (without consideration of RAMS). Will it become compulsory to add it to the subsequent full application?	The SPD proposes that if in-combination recreational effects have been suitably addressed at the outline stage, in the form of mitigation, then the tariff would not apply at the reserved matters stage. If such effects have not been addressed of individual proposals at the outline stage, then the tariff would be applicable to that proposal at the reserved matters stage. No amendment proposed.
22	Mrs Joanna Thornicroft	Resident	Visitors to the Essex Coast are not just residents, general public from all over the country visit also.	The SPD is related only to those in-combination recreational effects identified through the LPAs' Local Plan HRA/AAs. No amendment proposed.
23	Mr Mark East	Resident	Why do the Zone of Influence distances vary greatly? How were the Zones of Influences calculated from visitor surveys?	The Essex Coast RAMS Zones of Influence are based upon data collected through visitor surveys, such as postcode data of visitors. This exercise helps to determine where and

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				how far residents will travel to the Essex Coast, and has been approved by Natural England. No amendment proposed.
24	Mrs Michelle Endsor	Resident	<p>The wetland areas along The River Crouch also makes the village of Great Stambridge and surrounding areas a flood plain which is at risk of extreme flooding approx. every 50-100 years.</p> <p>Whilst we take this into consideration when insuring our properties and are lucky enough to be surrounded by farmers who will "double ditch" when the rain levels increase, to consider building housing in areas of flooding seems completely irresponsible. Not to mention that increasing the population in an area with no facilities, no doctor's surgery, no bus services, no shops, etc ensures that roads that were not built to take large amounts of traffic are stretched to the limit as road travel is the only way to access work and necessities for a larger population. That larger population and their road travel, as well as visitor influx will again only serve to disrupt the wildlife population further.</p> <p>As long standing residents that have been witness to the wildlife decline in this area over the last 3 generations, we cannot object enough to any development of the wetland areas.</p>	The SPD is related only to those in-combination recreational effects identified through the LPAs' Local Plan HRA/AAs. Issues raised relate to the distribution of new development and supporting infrastructure as matters for Local Plans. This includes the possible impacts on and mitigations for flooding. No amendment proposed.
25	Mrs Linda Findlay	Resident	More emphasis on environmental impact in the long term. Infrastructure must come before greater demand is generated.	The SPD is related only to those in-combination recreational effects identified through the LPAs' Local Plan HRA/AAs. The impact of the RAMS will be regularly monitored. Infrastructure to support new housing growth is a matter for Local Plans. No amendment proposed.
26	Mr David Evans	Resident	There are significant and important other Statutory Bodies with strong legal and commercial interests in Hamford Water - Harwich Harbour Authority, who has control over the navigation and collect Port Dues for	Noted. Joint working arrangements can be acted upon by the Delivery Officer. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			shipping movements to Bramble Island; Crown Estates, who own most of Hamford Water below the low tide level.	
27	Mrs Susie Jenkins	Brightlingsea Nature Network	<p>Please include the point that certain habitats cannot be mitigated against and are too valuable to have building close by which will increase the disturbance.</p> <p>There should be clear provision and targets to leave some habitat entirely undisturbed.</p>	The Essex Coast RAMS SPD relates only to the effects on Habitats sites (as defined) which are designated on the Essex Coast. Under the Habitats Regulations each development proposal will need a project-level HRA. This is still the case for proposals within the Zone of Influence, and any resultant AA will set out recommendations to mitigate effects that are directly related to the proposal. No amendment proposed.
28	Councillor Frank Belgrove	Alresford Parish Council	This section is well written and explores the practicalities.	Noted. No amendment proposed.
29	Mr Roy Hart	Skee-tex Ltd Local Councillor, Head of the River Crouch Conservation Trust & owner of 1.5 miles of river banks of the Crouch	Yes, South East Essex, is now past breaking point with the recent addition of new dwellings. Release all farmland around London, say a radius of 8 miles. This also would mean less journey times.	Locational criteria for development are a matter for Local Plans and development management at the LPA level and not within the scope or remit of the RAMS or SPD. No amendment proposed.
30	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	<p>Increase the Zone of Influence to include boroughs of London due to weekend visitors to areas of the Essex Coast.</p> <p>The only possible way Recreational disturbance Avoidance can be applied is to control the number of dwellings permitted in designated areas.</p>	The SPD is related only to those in-combination recreational effects identified through the LPAs' Local Plan HRA/AAs. The ZOI were informed by visitor surveys. No amendment proposed.
31	Mr John	Resident	A very unfair and totally unnecessary 'tax'.	The RAMS seeks to mitigate recreational impacts on protected

No.	Name	Organisation	Main Issues Raised	Response / amendment required
	Fletcher			Habitats sites on the Essex Coast arising from the increase in population associated with these housing growth requirements. The tariff is 'evidence based' and has been calculated by dividing the cost of the RAMS mitigation package by the number of dwellings (housing growth) proposed in LPA Local Plans. The tariff is paid by developers of new houses, not residents, and as a one-off payment. It is not a tax. No amendment proposed.
32	Mr Hugh Toler	Blackwater Wildfowlers Association (BWA)	The BWA is not planning any building work within the RAMS Zone of Influences. Predatory species such as foxes thrive in urban areas, potentially increasing pressure on ground nesting birds.	Noted. No amendment proposed.
33	Mr Mark Nowers	RSPB	3.4 The Outer Thames Estuary SPA should be added here. Paragraph 2.2 above sets out the coast is "a major destination for recreational use such as walking, sailing, bird-watching, jet skiing and dog walking."	The Outer Thames Estuary is included within Table 3.1 of the SPD as 'Thames Estuary and Marshes SPA and Ramsar'. An amendment to include the word 'Outer' is proposed.
34	Mr Stephen Tower	Resident	No residential housing should be built around this area as it is vital to protect the region and its wildlife. How about using housing that is not currently being used?	Under the Habitats Regulations each development proposal will need a project-level HRA. This is still the case for proposals within the Zone of Influence, and any resultant AA will set our recommendations to mitigate effects that are directly related to the proposal. New housing growth is a matter for Local Plans. No amendment proposed.
35	Mrs Angela Faulds	Brentwood and Chelmsford Green Party	We feel the Zones of Influence are understated.	The Essex Coast RAMS Zones of Influence are based upon data collected through visitor surveys

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				approved by Natural England. No amendment proposed.
36	Mr Bernard Foster	Resident	<p>It is being recognised more and more that the changes to where people live along with other publicity has started to change the way many residents are behaving. In some areas it has already changed the way councils are looking at housing design, road design and development.</p> <p>In these areas, roads are only built where they are needed to feed residents' requirements and earlier designations no longer directly feeding dwellings are changed to paths and cycle ways to develop green links between areas. This is not only important so as to encourage healthier life styles as designated in the NPPF but to give an acceptable alternative to paths within the Ramsar or SPA areas which do not currently exist for the many cyclists, horse riders and strollers within the various communities.</p> <p>This will not happen by chance it needs the legislation adjusted to give greater backing to LPA and parish councils who understand what is needed for their areas.</p>	Noted. These issues relate to Local Plans rather than specifically to this SPD. No amendment proposed.
37	Mr Tim Woodward	The Country Land & Business Association (CLA)	<p>CLA members in the areas and Zones of Influence covered by the SPD may be considering small-scale residential developments on their land, and others may be considering setting up tourism enterprises. These enterprises will provide employment opportunities and will make a valuable contribution to the rural economy. Housing developments on our members' land will help the Government and local authorities to meet housing targets and may include low-cost "starter" units on rural exception sites.</p> <p>These projects will be affected by the financial contributions proposed, when combined with any Community Infrastructure Levy (CIL) contributions additionally levied.</p>	The RAMS seeks to mitigate recreational impacts on protected Habitats sites on the Essex Coast arising from an increase in population associated with housing growth. This includes both allocations in the LPAs' Local Plans and also non-allocated growth that may come forward within Local Plan periods. No amendment proposed.
38	Mr Steven Smith	Comments offered on behalf of Lower Farm,	In line with the NPPF and Local Plan Policy the definition of exclusions within Table 3.2: Planning Use Classes covered by the Essex Coast RAMS, under the Sui Generis Planning Class should be amended to clarify that it applies to: leisure and tourism facilities:	The SPD wording regarding residential caravan sites reflects the permanency of residents, with those associated with tourism (holiday caravans and

No.	Name	Organisation	Main Issues Raised	Response / amendment required
		East End Green, Brightlingsea	<p>Amend: - Residential caravan sites (excludes holiday caravans and campsites) To: - Residential caravan sites (excludes leisure and tourism facilities)</p> <p>In addition, para 3.9 of the SPD states that "... tourism accommodation, may be likely to have significant effects on protected habitat sites related to recreational pressure ...". It is proposed that this should be amended to: "... tourism accommodation, could potentially effect protected habitat sites related to recreational pressure ..."</p> <p>It is recognised that any contribution that may result from an Appropriate Assessment of leisure and tourism facilities would be assessed on a "case by case basis" (clarified within footnote *** of Table 3.2). However, the level of contribution should be benchmarked and clarified within the SPD i.e. £5 per facility/unit (similar to an all-day parking fee at an Essex Wildlife Trust site), or in line with the Tourism Sector Deal (November 2018) local Environmental and Tourism Trust Funds could be set up between a developer/operator and the relevant District Authority whereby a contribution of £1 per tourist per day is paid to support the management of the specific habitat site that may be affected by the development.</p>	<p>campsites) being subject to consideration on a case-by-case basis.</p> <p>The wording 'may be likely to have significant effects' is specifically in line with the wording of the Habitats Regulations, and in reference to the test in those regulations to assess 'likely significant effects'. No amendment proposed.</p> <p>Regarding the extent of the tariff that may be applicable to tourist related development, it would be inappropriate to benchmark this per unit, as the level of recreational effect may vary from proposal to proposal. No amendment proposed.</p>
39	Parish Clerk for West Horndon Parish Council Kim Harding	West Horndon Parish Council	West Horndon Parish Council supports the broad principles of the RAMS.	Noted. No amendment proposed.
40	Mrs Jenny Clemo	Langford & Ulting Parish Council	Support the approach.	Noted. No amendment proposed.
41	Mrs Christa-Marie Dobson	Feering & Kelvedon Wildlife Group	Para 3.6 A case could be made for new large business units over a certain square footage contributing to the mitigation strategy here. Large corporate companies, such as Amazon, could help cover the cost of their environmental impact.	The SPD is related only to those recreational effects identified through the LPAs' Local Plan HRA/AAs. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>Para 3.9 Tourist accommodation: To stop people flying, we need to encourage "stay locations", Many small businesses like family run B&amp;B's will probably not be able to succeed financially if a tariff or tax for the strategy was imposed on them. Again, larger, corporate entities such as hotel chains need to carry the cost if this is going to be looked at.</p> <p>Para 3.10 We already have experience where HRA's have not been completed as part of a reserved matter planning application where the original outline application is over 2 years old. How will parallel or twin tracked applications be dealt with that exist under one outline application?</p>	<p>Any tariff imposed on tourist related development would not be retroactively sought, and will apply only to new development proposals No amendment proposed.</p> <p>The tariff will be imposed to those proposals at the reserved matters stage that have not considered recreational effects at the outline stage. No amendment proposed.</p>
42	Ms Beverley McClean	Suffolk Coast & Heaths AONB team	<p>The scope of the RAMS SPD is considered appropriate. The AONB team agrees with the Use Classes and the types of developments that will be subject to a RAMS tariff.</p> <p>Paragraph 3.7 of the SPD could be more explicit and state that proposals for single dwellings will be subject to a RAMS tariff.</p>	Noted. An amendment introducing additional clarification within Paragraph 3.7 is proposed.
43	Mr Michael Hand	Campaign to Protect Rural England - Essex Branch (CPRE)	<p>This is a key section of the SPD because it identifies where the RAMS is applicable. The Zones of Influence (Zone of Influence) map is critical. It attempts to show the sphere of influence - based on the postcode of coastal visitors - as roughly concentric circles. The result is nonsensical in that up to 40-50% of some of the Zones is North Sea. A methodology which centres a Zone of Influence on a designated Habitats site is therefore flawed. Instead the Zone should reflect the fact that many visitors come from without a tight circular catchment, often living in major centres of population and close to the main highway network. Linear Zones therefore stretch beyond the immediate local catchment area. In this respect, there is no indication as to how the Zones are defined - i.e. the proportion of total visitor numbers and from which postcodes.</p> <p>This is exemplified by the influence of the main sailing centres - notably on the Stour and Blackwater estuaries but also elsewhere - where considerable numbers of boat owners (regular visitors) live much further</p>	The Essex Coast RAMS project and associated methodology has been recognised and approved by Natural England. The methodology that determined the Zones of influence was also approved by NE. The Essex Coast RAMS is also only concerned with recreational pressures arising as a result of proposed development found within emerging and adopted Local Plans. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>afield. Also, this approach results in high proportions of certain Zones of Influence stretching outside of Essex and there is no indication of the existence or relationship with similar SPDs adopted by the appropriate Suffolk and Kent local authorities.</p> <p>CPRE supports the range of applications, schemes and Use Classes covered by the SPD. However, given the potential for significant and higher impact from proposals for tourist accommodation, CPRE suggests there should be more explicit guidance in the SPD as to how LPAs would make "a different assessment of effects".</p>	
44	Mrs Cecilia Dickinson	Resident	I do not like this format - section by section.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.

## Section Four - Mitigation

**Table 6 – Section Four: Summary of consultation responses and actions**

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	The per tariff detail seems somewhat irrelevant when I have no idea how much money this will generate per annum and how much money is actually needed per annum.	The mitigation package has been calculated based upon the period of March 2019-2038. Details of this can be found in Section 4.3 which details the overall cost. The RAMS itself includes phasing details of Local Plan housing allocations, and the tariff will be collected for these dwellings. Therefore, the money collected per annum reflects housing growth directly. No amendment proposed.
2	Magister Debbie Bryce	Landlord	The Essex Coast cannot be 'recreated', 'moved elsewhere' or 'compensated for'.	Each LPA within Essex has a statutory duty to address housing need in a way that will not cause significant effects on

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>Birds do not Need People visiting and disturbing them. You should therefore not do anything that would cause this. One example is to build more houses such that this will happen. It is simply a point of logic.</p> <p>A tariff is no use to birds. You have stated that their survival depends on preserving their environment and not disturbing them. How does a 'tariff' assist that?</p> <p>Your reasoning is faulty. Clearly there is conflict in what you say. You cannot mitigate the effects of disturbance. Especially not with money.</p> <p>If, as you say, you want to prevent disturbance to European bird sites, do not create more disturbance by recreation, housing or anything else. You are kidding yourselves if you think you can have your cake and eat it.</p>	Habitats sites. The RAMS and SPD ensures that this can be done. No amendment proposed.
3	Mrs Frances Coulson	Resident	Seems a small financial contribution so long as developers can't fiddle their way out of it as they seem to with social housing commitments.	Section 5.2 of the SPD sets out that if the tariff is not paid on qualifying proposals, then alternative mitigation, agreed by Natural England, would be required or planning permission would not be given. No amendment proposed.
4	Mrs Amy Gardener-Carr	Resident	Make more actuaries for wildlife.	Noted. No amendment proposed.
5	Mr Bob Tyrrell	West Bergholt Parish Council	The proposals seem reasonable.	Noted. No amendment proposed.
6	Mrs Julie Waldie	Resident	I am glad the developers will foot the bill, sounds right to me.	Noted. No amendment proposed.
7	Mr Terry Newton	Resident	Without doing the sums this figure of 9 million pounds seems a bit vague, as there seems a lot of unknown variables, which are not easy to quantify. Am I right in thinking that this is an annual payment by each household?	The Essex Coast RAMS tariff is a one-off cost that applies to residential developments within the Zone of

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			Also, that the property must be a future build within certain designated zones?	Influence when they are consented. No amendment proposed.
8	Mr Brian Mills	Resident	I see no mention of actual measures to enforce the requirement -- money will not always correct a poor situation.	Section 4.8 of the SPD sets out that if the tariff is not paid on qualifying proposals, then alternative mitigation, agreed by Natural England, would be required or planning permission would not be given. No amendment proposed.
9	Mrs Linda Samuels	Resident	Are the contributions compulsory? What will be consequences of non-payment?	Section 4.8 of the SPD sets out that if the tariff is not paid on qualifying proposals, then alternative mitigation, agreed by Natural England, would be required or planning permission would not be given. No amendment proposed.
10	Mr David Kennedy	Resident	Should apply to commercial development also.	The SPD is related only to recreational impacts identified through the LPAs' Local Plan HRA/AAs and as a result of recreational effects. Other effects on Habitats sites from commercial development will be considered through individual project-level HRA/AAs, if such assessment is required. No amendment proposed.
11	Mr Charles Joynson	Resident	The fact that there may be other site-specific mitigation requirements in respect of Habitats sites and ecology gives me some hope that effective mitigation can be implemented. I still suspect the cash contribution for each dwelling will be far too low.	The Essex Coast RAMS SPD sets out a tariff that has been calculated using the projected costs of mitigating the effects of 'in-combination' recreational effects only. Other types of effect can be expected to be mitigated in other ways. No amendment proposed.
12	Mr John	Resident	You cannot mitigate for loss of wildlife habitat. I fundamentally disagree that there should be any permitted development in protected zones.	The Essex Coast RAMS SPD addresses development within the

No.	Name	Organisation	Main Issues Raised	Response / amendment required
	McCallum			defined Zones of Influence. Each LPA within Essex has a statutory duty to address housing need in their area. No amendment proposed.
13	Mrs Mary Drury	Resident	Money will not fix the problem - it is care of natural places. All roads should be made with tunnels for animals to cross and all new developments should have to leave wild verges and hedges and trees. Destroying old hedges/trees should be banned, as it takes a whole generation - 50 years to grow a mature tree. Tariffs of £100,000,000 will not fix up a river overnight and meanwhile the animals look for homes to breed where theirs have been destroyed.	The SPD is related only to those recreational effects identified through the LPAs' Local Plan HRA/AAs. The tariff provides the funding to take mitigation measures to address the impacts of increased visitors to the coastal areas. No amendment proposed.
14	Mrs Joanna Spencer	Resident	The Section 106 agreement, is this based on the agreement between the Council and Southend Airport?	Section 106 is a mechanism to secure infrastructure or funding to address the impacts of new development. The Section 106 agreement for Southend Airport is a separate matter. No amendment proposed.
15	Mr Matt Eva	Resident	Need to think about unintended consequences. Will this lead to greater development just outside of the proposed Zone of Influence - which will impact the habitats but lead to no revenue for mitigation.	Zones of Influence (Zols) have been identified based upon visitor surveys conducted to determine the distance at which visitors to the Essex Coast can be expected to travel from. The Local Plans of each Local Planning Authority allocate land to meet required housing growth, and some of this land falls within the Zol. Local Plan allocations are not changed as a result of the Zol and some partner LPAs' Local Plan areas fall entirely within the Zol. No amendment proposed.
16	Ms Caroline Macgregor	Brightlingsea village councillor	Mitigation costs should be vastly increased and also be required to produce sustainable zero carbon footprint buildings to increase protection of areas.	The Essex Coast RAMS SPD sets out a tariff that has been calculated by identifying the costs of mitigation

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				required to address planned housing growth within the LPA's adopted or emerging Local Plans. No amendment proposed.
17	Mr Christopher Marten	Resident	Placing a tax on developers to dissuade them from submitting an application is not a solution in my view. It is not possible to enforce any of these statutes, people cannot be trusted to obey the law. Existing laws are broken on a daily basis, adding new ones would only make policing them more difficult.	Section 4.8 of the SPD sets out that if the tariff is not paid on qualifying proposals, then alternative mitigation, agreed by Natural England, would be required or planning permission would not be given. The tariff is not designed to dissuade applications, but to ensure that funding is in place to address the impacts of increased visitors to the Essex coastal area. No amendment proposed.
18	Cllr Malcolm Fincken	Halstead, Hedingham and District Branch Labour Party	We agree with these proposals.	Noted. No amendment proposed.
19	Mr Peter Dervin	Resident	The mitigation payments should be ring fenced towards care for people not wildlife. The RAMS seeks to mitigate recreational impacts on protected Habitats sites on the Essex Coast arising from the increase in population associated with these housing growth requirements. It is pure madness to add an additional payment to developers that is not people-centred.	The SPD is related only to those recreational impacts identified through the LPAs' Local Plan HRA/AAs. No amendment proposed.
20	Mr Alan Lycett	Resident	Tariffs should be progressive so that larger properties pay more. Perhaps charge by number of bedrooms?	The Essex Coast RAMS SPD sets out a tariff that has been calculated using the projected costs of mitigation and planned housing growth contained within the LPA's adopted or emerging Local Plans. The tariff is evidence based and proportionate so as to not make new development unviable. It is considered inappropriate to apply a

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				'sliding-scale' in regard to the tariff at this stage and a 'blanket tariff' is proposed as the RAMS seeks to mitigate 'in-combination' effects i.e. those identified from accumulated housing growth in the Zol. This can however be reviewed annually by the Delivery Officer once appointed. No amendment proposed.
21	Mr Brian Jones	Resident	OK.	Noted. No amendment proposed.
22	Mr Aubrey Cornell	Resident	Increase the tariff significantly in order to deter the initiation of such developments close to these sites.	The Essex Coast RAMS SPD sets out a tariff that has been calculated by identifying the costs of mitigation required to address planned housing growth within the LPA's adopted or emerging Local Plans. No amendment proposed.
23	Mr Andrew Whiteley	Resident	No mention of improved infrastructure. Essex roads trains and buses are already stretched and that is without the impact on social services.	The SPD is related only to those in-combination recreational effects identified through the LPAs' Local Plan HRA/AAs. No amendment proposed.
24	Mrs Angela McQuade	Resident	Payment is not enough.	The Essex Coast RAMS SPD sets out a tariff that has been calculated by identifying the costs of mitigation required to address planned housing growth within the LPA's adopted or emerging Local Plans. No amendment proposed.
25	Mr Peter Bates	Resident	It is essential to ensure that all financial contributions [including for part-projects] meet all costs identified and that they are paid before commencement of the work [or stage of project], and that all funds are held securely and that they are used in the local community directly	The tariff will need to be paid before the commencement of the development in all cases. As effects are related to housing growth in the

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			affected and not in other locations. Funding should only be used for physical measures, not legal advice, administration etc.	entirety of the Zone of Influence, mitigation will be limited to within the Zone of Influence as appropriate. No amendment proposed.
26	Mr Stephen Ashdown	Resident	Developers of larger sites must as well as paying levies make suitable arrangements to integrate the disturbed wildlife. Examples being tunnels under roadways, extra plantations of hedgerows/trees, or sponsorship of a suitable wildlife scheme developed for that zone.	The on-site requirements of large scale housing development proposals are not within the remit of the RAMS or SPD and will be identified through project-level HRA/AAs. Developers of strategic sites are encouraged to engage with the relevant LPA for specific guidance on what is considered appropriate. No amendment proposed.
27	Mr Graham Womack	Resident	<p>I support the concept of requiring the payments to be made at the start of a development phase.</p> <p>I have reviewed several planning documents over the past 12 months. I cannot recall having seen any specific reference to the tariff that is now being proposed.</p> <p>How will the tariff funding be allocated to mitigation work. Who will ensure that the relevant funds are only allocated to RAMS mitigation, and not to other local projects? I can recall several instances where local councils have proposed uses for S106 monies, only to be told that the funds are no longer available.</p>	The SPD, once adopted, will form a planning document that sets out the implications of the RAMS for developers. The Essex Coast RAMS mitigation will be managed by a dedicated RAMS Delivery Officer who will liaise with each LPA's own monitoring officers. Mitigation will be delivered at a strategic level ensuring it is applied to mitigate the effects of housing growth. No amendment proposed.
28	Mr Michael Blackwell	Resident	This seems reasonable.	Noted. No amendment proposed.
29	Mrs Joanna Thornicroft	Resident	I think the tariff is too low. I also have concerns that the buyer actually ends up paying this. I would prefer to see more ecological building material and a focus on sustainability for houses within these zones. If you want to live near a beautiful place that attracts wildlife, then your property and lifestyle should not cause damage. A one-off fee for a house that will	The Essex Coast RAMS SPD sets out a tariff that has been calculated using the projected costs of mitigation and planned housing growth contained within the LPA's adopted or emerging

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			last hundreds of years seems pretty insignificant in the great scheme of things. Could building limits be considered? I do agree that something should be put in place.	Local Plans. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
30	Councillor Richard van Dulken	Braintree District Council	I question the acceptability of Section 106 monies generated in Braintree, for instance, being used 20 or 30 miles away for totally unconnected purposes.	The Essex Coast RAMS aims to deliver a strategic approach to mitigation that was recommended within each LPAs' Local Plan HRA/AA, including that of Braintree District Council. Zones of Influence were based upon visitor surveys conducted to determine the distance at which visitors can be expected from new development. The collection of the tariff does not prejudice investment in infrastructure by developers in the locality of the new development. No amendment proposed.
31	Mr Mark East	Resident	The tariff is a drop in the ocean against the margin of profit for developers. The document implies that it is avoiding harm, but it is in fact fast tracking planning applications which are the source of harm. It is inconceivable that the provision of a small green space will deter residents from visiting the sites. Is there any scientific evidence or survey to objectively demonstrate any notable change of movement away from visiting SPA/Ramsar sites when green space is provided?	The SPD is related only to those in-combination recreational impacts identified through the LPAs' Local Plan HRA/AAs. It can be expected that other mitigation requirements and contributions will be expected of developments, to address other effects on Habitats sites identified within project-level HRA/AAs. No amendment proposed.
32	Mrs Michelle Endsor	Resident	As previous stated, these factors are speculative and unproven. Once these "mitigations" fail, which with the delicate wildlife balance in this area, we have no doubt they will, it is too late, and we have lost valuable breeding areas for future generations.  It is also stipulated that payments will be charged to fund this gamble with	The Essex Coast RAMS toolkit (Table 4.1 of the SPD) sets out monitoring arrangements, amounting to 'birds and visitor surveys, including a review of the effectiveness of mitigation measures.' The scope of the SPD, and

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			our native wildlife but there is never any guarantee that these monies will not at some point in the future be absorbed into other projects that are deemed more relevant to the climate of the time. The same happened with the funds from council house sales with very little being ploughed back in to finance new social housing at the time. There is always a cause considered more important down the road but in this case, unsuccessful mitigation and cuts in future funding could see the devastation of our wetland wildlife, something which can never be rectified.	the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. No amendment proposed.
33	Mrs Linda Findlay	Resident	<p>This must be actioned before development takes place.</p> <p>Too often developers try to reduce their section 106 agreements having built the most profitable part of the development. E.g. reducing number of "Affordable" housing or finding reasons why agreed access changes aren't practical.</p> <p>There need to be realistic penalties for later alterations that reflect loss to the community at large. Too often reneging on commitment remains more profitable, which should never be the case.</p> <p>Use local, possibly smaller companies to develop housing, as these have more stake in the local environment and have a more transparent reputation</p>	Section 4.8 of the SPD sets out that if the tariff is not paid on qualifying proposals, and alternative bespoke mitigation is not forthcoming (and agreed as suitable by Natural England) then planning permission would not be given. The tariff will need to be paid before the commencement of the development in all cases. No amendment proposed.
34	Mr David Evans	Resident	<p>The whole basis of how this income from a tax on new development is to be spent seems skewed to provide resources for semi-police activities and restrictions on human activity.</p> <p>Hamford Water has managed itself and the wildlife present to a very high standard, without draconian legal powers and without constant surveillance.</p> <p>The Hamford Water Management Committee, upon which all statutory bodies, Tending District Council, Essex County Council, the Environment Agency, users of the area, Yacht Clubs, the Royal Yachting Association, Wildfowlers, Riparian Landowners, Marinas plus all the various</p>	The Essex Coast RAMS SPD relates only to the effects on Habitats sites (as defined) which are designated on the Essex Coast. The tariff is proposed to fund a RAMS Delivery Officer and Rangers to address recreational impacts identified through the LPA's Local Plan HRA/AAs, but not to impose restrictions beyond these specific effects. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			commercial interests are all members of this organisation and which supervises the area at nil cost. Anyone except those organisations that willingly contribute, has not been mentioned once in the RAMS documentation.	
35	Mrs Dawn Afriyie	Resident	<p>Essex is already overpopulated, the road network is in a dire state, the sewer systems are old and falling apart, more housing is not needed in Essex, coastal and non-coastal.</p> <p>Our wildlife must be preserved at all costs. How many more natural habitats must be destroyed before Essex council stops building.</p>	The SPD is related only to those recreational impacts identified through the LPAs' Local Plan HRA/AAs. Each LPA within Essex has a statutory duty to address housing need in a way that will not cause significant effects on Habitats sites. It is the LPAs who are responsible for determining development proposals and delivering and implementing the RAMS and SPD, not Essex County Council. No amendment proposed.
36	Mrs Karen Hawkes	South Woodham Ferrers Town Council	<p>Bullet point 4 states "Information on alternative sites for recreation". Whilst it is appreciated that the area needs to be protected, the preferred message should be with information signage and alternative routes within the same location. This would also support tourism in the area and encourage sustainability and health benefits. If visitors are being sent to alternative locations this would result in increased motor vehicle usage; visitors may be less likely to visit the site which would affect their health and wellbeing.</p> <p>Bullet point 6 "Interpretation and signage". Members would welcome universal / uniform signage throughout all the Essex Coastal Habitats. This would assist visitors when visiting other sites as the signage format would be recognisable which would aid enforcement as visitors would be familiar with the signage.</p> <p>Page 12 Action Area Table Members would request that relevant Town and Parish Council are detailed as partnership organisation.</p>	<p>The message regarding 'alternative sites for recreation' can be expected to apply to future trips for recreation.</p> <p>Noted. Comments regarding uniform signage and additional stakeholders in the partnership organisation can be acted upon by the Delivery Officer, once appointed. The project has the brand: Bird Aware Essex Coast, which Bird Aware Solent is seeking to extend around the country. No amendment proposed.</p> <p>The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. The Delivery Officer, once appointed, will engage</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>Page 13 Budget and Appendix 1 Strategic Mitigation. Whilst members are supportive of the Action Areas identified, there are concerns as to whether they are deliverable within the budget identified. Mitigation package is £8,916,448 from March 2019 – 2038. Members suggest that the toolkit needs revisiting to ensure that the projects can be delivered within the budget available. They also identified that there is excessive funding on personnel and enforcement and insufficient funding on the delivery of actual projects.</p> <p>Members are also concerned that the type of projects proposed are already being delivered by other stakeholders and that this is an unnecessary duplication of work.</p> <p>Page 15 Schemes under 10 dwellings There are concerns that item 4.16 with regard to reasonable costs of completing and checking the agreement is not required and that a more straight forward method would be as a matter of course to charge the £122 a home once the location is identified within a zone as detailed on page 7.</p>	<p>with key local stakeholders. No amendment proposed.</p> <p>The mitigation package costed within the RAMS responds to new initiatives or resources required only, and similarly the tariff will not be used to pay for any existing initiatives. There will therefore be duplication of projects. No amendment proposed.</p> <p>Some LPA partners do not charge a legal fee for minor applications; however these applicants are required to pay the tariff. No amendment proposed.</p>
37	Mrs Susie Jenkins	Brightlingsea Nature Network	<p>I feel it necessary to recognise that the disturbance of some habitats cannot be mitigated with financial payments. It is not clear under which circumstances this would be the case and is therefore more likely to leave habitats open to disturbance to the integrity of the habitat through a planning system weighted towards mitigation.</p> <p>We need clearer thought translated into understanding of when mitigation is not appropriate.</p> <p>Certain areas should be protected from development and disturbance.</p>	<p>The SPD is related only to in-combination recreational effects on Habitats sites as identified within the LPAs' emerging or adopted Local Plan HRA/AAs. Other mitigation on-site will still be required to address effects, as and when identified in project-level HRA/AAs of development proposals. No amendment proposed.</p>
38	Mrs Lesley Mitchelmore	Danbury Parish Council	<p>Any costs involved in protecting the Coastal Recreational Areas should be funded by legally binding section 106 agreements with developers without impacting on local councils.</p>	<p>Noted. Coastal Protection Areas are outside the scope of the RAMS. No amendment proposed.</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
39	Mr Graham Pike	Resident	A flow chart determining your obligations dependent on the development's size would be helpful.	The on-site requirements of large scale housing development proposals are not within the remit of the RAMS or SPD and will be identified through project-level HRA/AAs. No amendment proposed.
40	Councillor Frank Belgrove	Alresford Parish Council	The use of Rangers to enforce / upkeep protected areas is good. In addition, Water Bailiffs could be employed. The £122 levy does seem low as Essex has a long coastline to "police".	The Essex Coast RAMS SPD sets out a tariff that has been calculated using the projected costs of mitigation and planned housing growth contained within the LPA's adopted or emerging Local Plans. No amendment proposed.
41	Mr Roy Hart	Skee-tex Ltd Local Councillor, Head of the River Crouch Conservation Trust & owner of 1.5 miles of river banks of the Crouch	Planning must not be passed, where new builds increase the lack of ground soak, and will increase flooding to established property in low lying areas	The SPD is related only to in-combination recreational effects on Habitats sites as identified within the LPAs' emerging or adopted Local Plan HRA/AAs. No amendment proposed.
42	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	This is just another form of tax which will affect the less well off in society. 1. Who will be responsible for the setting of the tax levels? 2. How will the tax be collected? 3. How will this tax be used? 4. Who will oversee the administration? 5. It will prove to be very unpopular 6. It will affect the housing market and the national economy	The SPD sets out who is responsible for the setting of the tariff, how it will be collected, how it will be used and who will oversee the administration of the project. No amendment proposed.
43	Mr John Fletcher	Resident	How do you mitigate? Here we have a superb Warden who is employed by Tendring District Council. He is experienced and has been doing the job for many years. He patrols Hamford Water and ensures the rules are not broken. I would have thought you would have understood that birds adapt. Apart from the boats, the marina has two helicopter landing sights which cause no problems. Incidentally, at Culdrose in Cornwall, the Royal	The good work of existing wardens / rangers is recognised, and a key part of the mitigation package is the employment of additional coastal rangers to patrol the area and educate visitors. The SPD is related only to

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			Navy has the largest helicopter base in Europe, and they have to keep Lanner hawks to keep the birds away.	those in-combination recreational impacts identified through the LPAs' Local Plan HRA/AAs. Mitigation is set out in the costed mitigation package included within Appendix 1 of the SPD. No amendment proposed.
44	Councillor Jenny Sandum	Braintree District Council	Anything that can be done to strengthen the requirement to avoid adverse impacts on Habitats sites (e.g. strengthened requirements to retain existing hedges, trees and vegetation) would be extremely well received.	The SPD is related only to in-combination recreational effects on Habitats sites as identified within the LPAs' emerging or adopted Local Plan HRA/AAs. Other mitigation on-site will still be required to address effects, as and when identified in project-level HRA/AAs of development proposals. No amendment proposed.
45	Mr Gavin Rowsell	Resident	£9 million of tax to be spent on telling people how they should not scare birds... just imagine how much that could help change people's lives for the better if spent on making sure ex-servicemen/women had psychological support, jobs training and housing help, or assisting rape victims of grooming gangs, or a multitude of other social issues.	The Habitat Regulations require likely significant effects on Habitats sites to be mitigated. The SPD is related only to those recreational impacts identified through the LPAs' Local Plan HRA/AAs. No amendment proposed.
46	Mrs Angela Faulds	Brentwood and Chelmsford Green Party	The mitigation amount as a whole, and the amount per dwelling, seem ridiculously small, considering the cost of housing in this area.	The Essex Coast RAMS SPD sets out a tariff that has been calculated using the projected costs of mitigation and planned housing growth contained within the LPA's adopted or emerging Local Plans. Other mitigation on-site will still be required to address effects, as and when identified in project-level HRA/AAs of development proposals. No amendment proposed.
47	Mrs Katherine Kane	Rettendon Parish Council	Rettendon Parish Council supports the tariff to fund mitigation measures.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
48	Mr Bernard Foster	Resident	<p>Before you decide if tariffs work you have to be clear on your goals. If it is to cover the costs of a scheme to reduce harm, then the tariff system with continuous monitoring may well achieve this. This does by definition mean the acceptance of gradual decline of these areas due to increasing human activity with the certainty but hopefully rare occurrence of serious failures being inevitable. Adding 0.03% to the price of a dwelling is unlikely to restrict access except possibly to the less well-paid local residents, so to constrain the developments in these sensitive areas is the only real answer. The pressure and legislation that is being used to drive the mass erosion of the Green Belt needs to be matched by an equal pressure to provide open areas, parks with the roads being balanced with paths, cycle tracks and bridle ways to provide residents an acceptable alternative. The constant erosion of PRoW's due to inadequate protection and enforcement drives walkers, riders etc to the only areas left accessible inflicting unnecessary damage. Localism suggests that listening even to rural locals might on occasion bear fruit when it comes to understanding residents' attitudes and that of those most likely to visit.</p>	<p>The Essex Coast RAMS SPD sets out a tariff that has been calculated using the projected costs of mitigation and planned housing growth contained within the LPA's adopted or emerging Local Plans. Other mitigation on-site will still be required to address effects, as and when identified in project-level HRA/AAs of development proposals.</p> <p>Additionally, the effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.</p>
49	Mr Mark Marshall	Resident	<p>Developer tariffs and control should be enforced more. In my area a developer tore out a protected ancient hedgerow with little more than a slap on the wrist. If there was a large fine and enforcement other developers would think twice about flouting the rules.</p>	<p>Payment of the tariff will be required when development is consented. No amendment proposed.</p>
50	Mr Tim Woodward	The Country Land & Business Association (CLA)	<p>CLA members in the areas and Zones of Influence covered by the SPD may be considering small-scale residential developments on their land, and others may be considering setting up tourism enterprises such as camping sites, farm shops, and other retail outlets. These enterprises will provide employment opportunities and will make a valuable contribution to the rural economy. Housing developments on our members' land will help the Government and local authorities to meet housing targets and may include low-cost "starter" units on rural exception sites.</p> <p>These projects will be affected by the financial contributions proposed, when combined with any CIL contributions additionally levied.</p>	<p>The tariff has been calculated based on the level of growth of the LPAs' Local Plans, including allocations and windfall allowances. As the tariff is applicable on a per dwelling basis, it will also apply to unplanned growth that may come forward in the timeline of the project. The tariff is evidence based and proportionate so as to not make new development unviable. This can however be reviewed annually by the Delivery Officer once appointed.</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				No amendment proposed. No amendment proposed.
51	Parish Clerk for West Horndon Parish Council Kim Harding	West Horndon Parish Council	West Horndon Parish Council supports the broad principles of the RAMS	Noted. No amendment proposed.
52	Mr Alasdair Daw	Billericay Action Group (part of Billericay District Residents Assoc)	<p>The Zones of Influence are based on clumsy radii, in the west and north-west of Basildon Borough this excludes (and only just) the source of the Crouch in Billericay and some of the headwaters of the Mid-Blackwater catchment such as the Mountnessing Brook.</p> <p>The Mountnessing Brook will be affected by the development of 1700-2000 new houses (Policy H17 of the Basildon Local Plan). 2000 x £144 amounts to £288,000 so there would be a significant benefit in altering the boundary in this case.</p> <p>The Crouch would also be effected in a similar way, but it is hard to determine whether the edge of the Zone of Influence includes sites such as H18, H19 and H20.</p> <p>So it is proposed that the Zone of Influence be adjusted very slightly to reflect catchments, at least within Basildon Borough. This could apply to the Blackwater, though the arguments for the Crouch would be weaker (smaller draft Zone of Influence) and those for the Thames weaker again (only parts of it a RAMS site).</p>	The Zones of Influence found within the RAMS document have been calculated based upon data collected through visitor surveys and are only relevant to Habitats Site designations. Any future adjustments to the ZoI are required to be data driven and subject of ongoing monitoring proposed. No amendment proposed.
53	Mr James Taylor	Resident	I support the mitigation tariff.	Noted. No amendment proposed.
54	Ms Jo Steranka	Resident	The SPD's current approach to mitigation appears at this stage to be simply one of 'doing something that might help, although the Council accepts that in the long term it will be quite unable to protect these precious habitats'.	Many of the suggested actions are considered relevant for exploration by the Delivery Officer, once appointed. This includes the annual review of both

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>I would suggest the mitigation package is a very defeatist approach to protecting the Designated Sites, particularly since 5 people is an insufficient resource to police public access and environmental degradation on 350 miles of coastline.</p> <p>The mitigations need to include many more pro-active measures giving the County Council powers to manage access in a much more proactive manner. Such measures might include:</p> <ul style="list-style-type: none"> <li>* Bye-laws governing access to and public behaviour specific to each Designated Site.</li> <li>* Periods of site closure at sensitive times such as nesting of ground-nesting birds or seal pupping.</li> <li>* Imposition of significant on-the-spot fines on members of the public caught disturbing wildlife.</li> <li>* Prosecution of members of the public caught damaging Designated Sites, whether through littering and fly-tipping, theft of shingle and sand or other actions which degrade the quality of a Site.</li> </ul> <p>Whilst the public education approach is a start, this is too little and ineffectual.</p> <p>There is no attempt to even suggest mitigations for the pollution to the Designated Sites from land-based sources. The Essex coastline is littered with plastics which have escaped from recycling bins.</p> <p>Having set out a minimalist approach to protection of the Designated Sites, the tariff per new dwelling is then calculated by the simple division of total cost for this inadequate programme by the expected number of new dwellings. In February 2020, the average cost of a house in Essex was £377,984. The Tariff therefore represents 0.032% of the average purchase price of the new developments. This is a drop in the ocean compared to the cost of purchasing a newly-built house.</p>	<p>the effectiveness of the mitigation package and the extent of the tariff over the lifespan of the RAMS project. No amendment proposed.</p> <p>The RAMS and SPD are relevant to housing growth at the LPA level. It is the relevant LPAs who are responsible for preparing, adopting, delivering and implementing the RAMS and SPD, not ECC. No amendment proposed.</p> <p>The RAMS toolkit includes many of the proposed mitigations included in the response. The Essex RAMS toolkit includes, within the 'education and communication' Action Area, direct engagement with clubs and relevant organisations. The implementation of this can begin once the Delivery Officer is appointed. Additionally, the effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>I suggest that the approach to calculating the financial requirements for mitigating the effects of new residential development over the next 20 years needs to be revised. For the reasons above, there is no reason why the Council should not increase the budget to protect the Designated Sites fourfold to £35,661,792 so that a more credible set of mitigations can be implemented. This would increase the tariff on each new dwelling to a mere £489, or 0.13% of the average purchase price.</p>	
55	Mrs Christa-Marie Dobson	Feering & Kelvedon Wildlife Group	<p>4.3 The cost has been worked out based on figures from February 2019. Before this strategy is accepted, an increase in line with inflation will have to take place.</p> <p>Tariff 4.4: A tariff of £122.30 per new dwelling is being discussed as a way of paying for this mitigation strategy but (as I understand it), it is not currently adopted by all councils and therefore revenue is being lost.</p> <p>4.5: Have pay rises been factored into this cost, or does that come under the tariff being index linked? The contingency is already tight. What happens if not all the homes planned get built? Will fines contribute to the cost of the strategy going forward?</p> <p>4.12 I refer to a previous comment that LPA's are under pressure to provide housing numbers, thus, potentially, the tariff may not be collected if developers push back.</p>	<p>The final SPD will factor in inflation to reflect accurate costs at the time of adoption and index-linked (using Retail Price index (RPI)) to 2038. This includes salary pay rises, which are factored into the mitigation costs and not part of the 10% contingency. Contributions are already being collected by the LPAs. No amendment proposed.</p> <p>The tariff will need to be paid before the commencement of the development in all cases and as a requirement of planning permission, unless alternative bespoke mitigation is delivered and agreed as suitable by Natural England. No amendment proposed.</p>
56	Mr Michael Hand	Campaign to Protect Rural England - Essex Branch	<p>The current tariff of £122.30 per dwelling is a minuscule proportion of the development cost of a new home and CPRE questions why the costed mitigation package (and resultant tariff) is therefore not larger. This could be affected by a phased or dual zoning - as evident in the Suffolk approach. It is therefore considered to be too simplistic an approach and dwellings already consented in the Local Plan periods - but where building has not already commenced - could surely be retrospectively included to</p>	<p>The Essex Coast RAMS SPD sets out a tariff that has been calculated using the projected costs of mitigation and specifically in relation to in-combination recreational effects resulting from planned housing growth contained within the LPA's adopted or emerging</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>provide a higher overall level of total contributions.</p> <p>It is reassuring that the RAMS contribution is in addition to the payment of any Community Infrastructure Levy or other form of developer contribution. Similarly, it is right and proper that the LPAs legal costs associated with the drafting and checking of the deed are covered by the applicant and are in addition to the statutory planning application fee.</p>	<p>Local Plans. Other mitigation can be expected to be delivered to address other effects identified on Habitats sites to address the recommendations of project-level HRA/AAs. The tariff payment is in addition to any relevant CIL payments. No amendment proposed.</p>
57	Mrs Cecilia Dickinson	Resident	I do not like this format - section by section.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.
58	Mr Gerald Sweeney	Carney Sweeney on behalf of Seven Capital (Chelmsford)	<p>Whilst the SPD seeks to provide a mechanism for how a RAMS contribution has been calculated and how it is payable, we do not agree with the implementation of a 'blanket tariff' for a RAMS contribution. The SPD proposes the collection of RAMS contribution through a Section 106 Agreement or Unilateral Undertaking.</p> <p>The proposed tariff of £122.30 per dwelling is in our opinion premature, as some developments may have less or more harm than others. As such, the implementation of a 'blanket tariff' does not take into account whether the planning obligation to secure the proposed RAMS contribution is necessary; directly related to the development and fairly and reasonably related to the scale and kind of development as required at Paragraph 56 of the NPPF.</p> <p>It is noted at Appendix 2 that a RAMS contribution in respect of Student Accommodation schemes is proposed to be applied on a 'proportionate basis'. From our reading of Appendix 2, it appears that part of the justification for this approach is due to such uses having an absence of car parking and the inability for students in purpose-built student accommodation to keep pets, and therefore, "... the increase in bird disturbance and associated bird mortality, will be less than dwelling houses...". This approach demonstrates that there is an ability to make some concession for certain types of 'housing developments' depending</p>	<p>The RAMS and SPD applies only to 'in-combination effects' which have been identified within the HRAs of the LPAs' Local Plans. Each Local Plan's resultant AA, and consultation with Natural England, has identified the need for the RAMS to mitigate in-combination effects and enable development.</p> <p>The Essex Coast is unique and cannot be replicated. Evidence shows that residents living within the Zone of Influence visit the coast, thus the tariff is applicable to mitigate the effects of new housing growth.</p> <p>The tariff is evidence based and proportionate so as to not make new development unviable. It is considered inappropriate to apply a 'sliding-scale' in regard to the tariff at this stage and a 'blanket tariff' is proposed as the</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>on the nature of the use, but we would go further as matters relating to the location and sustainability credentials of a site and the proposed scheme should also be taken into account.</p> <p>Therefore, we request that any contribution should be proportionate as to the degree of proven harm from a scheme, and in addition to this, where it is commercially viable for the scheme to make a RAMS contributions (over and above any CIL liability and other requested S106 contributions). As such, Paragraph 4.4. should be amended to include the following:</p> <p>"Contributions from developments towards mitigation and measures identified in the Essex Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) will be sought against the identified harm of that scheme. The level of contribution will also be tested in the context of commercial viability of the overall scheme to avoid non-delivery of allocated sites."</p> <p>The basis for the RAMS contribution is noted as being to "... mitigate the additional recreational pressure in a way that ensures that those responsible for it, pay to mitigate it at a level consistent with the level of potential harm" (Paragraph 2.15 of the draft SPD).</p> <p>The payment of any RAMS contribution prior to commencement of development is therefore not deemed necessary as a scheme during the construction phase would not generate additional population. It is more appropriate that any RAMS contribution should be payable prior to the occupation of the development. and Paragraph 4.6 should be amended accordingly.</p>	<p>RAMS seeks to mitigate 'in-combination' effects i.e. those identified from accumulated housing growth in the ZoI. This can however be reviewed annually by the Delivery Officer once appointed. No amendment proposed.</p> <p>An amendment to the SPD setting out the requirements of development proposals in regard to statutory HRA procedures and on-site mitigation, and the specific effects the RAMS will mitigate in accordance with Regulation 122 of the CIL Regulations, is proposed.</p> <p>An amendment justifying the inclusion of C2 Residential Institutions and C2A Secure Residential Institutions as qualifying within the scope of tariff payments is proposed.</p> <p>Paragraph 4.6 of the SPD justifies that the tariff will be payable prior to commencement as 'this is necessary to ensure that the financial contribution is received with sufficient time for the mitigation to be put in place before any new dwellings are occupied.' Elements of the mitigation package, such as the appointment of staff, can take time to implement. Others, such as surveying work, can only be undertaken at</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				certain times of the year. It is considered important that mitigation relevant to the RAMS is delivered first, rather than potentially retrospectively, in order to ensure there is no possibility of harm resulting from development. No amendment proposed.

## Section Five – Alternative to paying into the RAMS

**Table 7 – Section Five: Summary of consultation responses and actions**

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	I am concerned that there is a conflict of interest if the developers are contributing and in return this helps speed up the planning/approval process. Tight measures need to be in place.	Noted. No amendment proposed.
2	Magister Debbie Bryce	Landlord	Mitigation or compensation? Local authorities are not aware of the distinction. Do you want to prevent damage or just feel better and kid yourself that you can recreate Habitat elsewhere? The fact that the Habitat does not occur naturally elsewhere should tell you that you can't mitigate or compensate.	The SPD is related only to those in-combination recreational impacts identified through the LPAs' Local Plan HRA/AAs. The tariff can only legally be utilised to deliver the detailed mitigation included within the RAMS and reiterated within Appendix 1 of the SPD. No amendment proposed.
3	Mrs Frances Coulson	Resident	I would rather trust council visitor data than applicants'.	Noted. No amendment proposed.
4	Mrs Aileen Cockshott	Resident	RAMS seems a more pragmatic solution and we should not offer an alternative.	Although the tariff is introduced, applicants may wish to propose bespoke mitigation as an alternative to the tariff, if it is deemed suitable by

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				Natural England and the LPA. No amendment proposed.
5	Mrs Amy Gardener-Carr	Resident	Do not build here.	All of the LPAs have a statutory requirement to plan for new housing growth. The RAMS seeks to mitigate recreational impacts on protected Habitats sites on the Essex Coast arising from the increase in population associated with these housing growth requirements. No amendment proposed.
6	Mrs Julie Waldie	Resident	Para 5.1 seems more sensible to me. Fairer and more cost effective too.	Noted. No amendment proposed.
7	Mr Terry Newton	Resident	I think a more inclusive survey would be necessary at this time. With the emphasis on what local households would prefer at this time and going forward for future generations. This would be prudent, whoever is paying for mitigation to take place.	Noted. No amendment proposed.
8	Mr Brian Mills	Resident	The proposals look ok.	Noted. No amendment proposed.
9	Mrs Angela Harbottle	Resident	I agree developer contributions are the better option.	Noted. No amendment proposed.
10	Mr Charles Joynson	Resident	It hardly seems likely that the developer will go to all the effort to perform visitor surveys in order to reduce the £122.30 payment. However, if they do attempt to do this before the dwellings are occupied it will under-represent the true figure. Many future residents will discover the full geography available to them and their dogs. So, both before and after occupation visitor surveys will under-represent the true wildlife disturbance situation.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. Alternatives must be equal to or better than a payment of

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				the RAMS tariff. No amendment proposed.
11	Mr John McCallum	Resident	My alternative to paying into RAMS is to not allow the developments in the first place.	All of the LPAs have a statutory requirement to plan for new housing growth. The RAMS seeks to mitigate recreational impacts on protected Habitats sites on the Essex Coast arising from the increase in population associated with these housing growth requirements. No amendment proposed.
12	Mrs Mary Drury	Resident	Asking for money is not the answer; it will make for resentment as it will not be used properly. Councils waste money.	The tariff can only legally be utilised to pay for the mitigation contained within the RAMS and included within Appendix 1 of the SPD. The RAMS project will be overseen by a working group lead by a newly appointed Delivery Officer. No amendment proposed.
13	Mrs Joanna Spencer	Resident	All residents should be asked for comments on how they feel the wildlife would best be serviced.	A range of stakeholders were engaged during the preparation of the RAMS. No amendment proposed.
14	Cllr Malcolm Fincken	Halstead, Hedingham and District Branch Labour Party	We do not agree that an alternative to paying into the RAMS should be allowed. We consider that some developers may use this alternative as a way of avoiding the payments without showing any real commitment to the alternative.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.
15	Mr Peter Dervin	Resident	They could instead build more houses at a cheaper cost, if they did not have to pay an additional tax as this seems to be.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
16	Mr Neil Hargreaves	Resident	For c£100-ish per house no-one is going to bother paying for their own visitor survey.	Noted. No amendment proposed.
17	Mr Aubrey Cornell	Resident	All visitor surveys should be carried out by an independent, unbiased organisation.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.
18	Mr Peter Bates	Resident	No. Seems reasonable.	Noted. No amendment proposed.
19	Mr Stephen Ashdown	Resident	Any surveys must be peer assessed to prevent bias by a third party. Evidence must not be solely reliant on private parties and must include studies by relevant educational institutions (e.g. University).	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.
20	Mr Graham Womack	Resident	This is a bad idea. The whole idea is to plan mitigation measures at a strategic level. Allowing developers to propose their own measures contradicts this and will be seen as a 'loophole' to include measures that only they will benefit from.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
21	Mrs Joanna Thornicroft	Resident	Individual assessments should have some sort of national recognised certification otherwise unscrupulous developers will be able to bypass the requirements.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.
22	Mr Mark East	Resident	The above suggests that the proposals are in place to benefit applicants/developers and not the environment which the population are legally entitled to see protected.	Noted. No amendment proposed.
23	Mrs April Chapman	Resident	I cannot see any need to provide this alternative and see several drawbacks. It will delay schemes, cause court procedures where disputes occur which could add to local councils' costs and will engender resentment. It also encourages the idea that the RAMS mitigation system is flawed.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.
24	Mrs Linda Findlay	Resident	Worth and cost needs to be viewed long term. Many possible benefits will be lost when only short-term effects are taken into account.	It can be considered that this may be addressed if appropriate through the actions of the Delivery Officer. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
25	Mr David Evans	Resident	Use concerned organisations to self-police.	It can be considered that this may be addressed if appropriate through the actions of the Delivery Officer. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
26	Mrs Karen Hawkes	South Woodham Ferrers Town Council	Section 5 Alternative to paying into RAMS - Para 5.2 should be removed. There should be no option for developers to carry out their own surveys. If the surveyor evidenced that there was no requirement to fund the tariff; this would result in a shortfall in the anticipated income and as a result projects detailed may not be able to be funded. The tariff should be mandatory for all developments as identified and all applicants should be subjected to the same scrutiny.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.
27	Councillor Frank Belgrove	Alresford Parish Council	Town and Parish Councils could assist with surveys.	It can be considered that this may be addressed if appropriate through the actions of the Delivery Officer. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
28	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	<p>I would suggest the mitigation fee should be mandatory or not at all.</p> <p>Any alternative choice would be too difficult to manage and involve long winded negotiations.</p> <p>Mitigation is too big to be 'in house' (i.e. RAMS) Who elects the officers of RAMS? What authority do they have to raise a form of prohibition tax? What will RAMS do with the money raised?</p> <p>Any mitigation scheme should be applied by government taxation for protection.</p>	<p>The RAMS responds to the requirement of the LPAs' Local Plan HRA/AAs, that strategic mitigation is needed to ensure there would be no significant in-combination effects on the integrity of Habitats sites at the Essex Coast as a result of housing growth. The RAMS proposed a suite of mitigation measures that will be funded by the tariff contributions. This satisfies the requirements of the Habitats Regulations and is endorsed by Natural England. No amendment proposed.</p> <p>The provision of mitigation is mandatory for all proposing net new dwellings in the Zone of Influence. Developers have the option to conduct</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.
29	Councillor Jenny Sandum	Braintree District Council	I am a bit concerned about applicants conducting their own visitors' surveys. I would prefer if an independent environmental conservation agency such as the Essex Wildlife Trust could be involved.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.
30	Mrs Jackie Deane	Great Dunmow Town Council	No objection to the proposals.	Noted. No amendment proposed.
31	Mr Gavin Rowsell	Resident	The alternative in para 5.2 at least gives a slither of hope against this bird tax.	Noted. No amendment proposed.
32	Mrs Angela Faulds	Brentwood and Chelmsford Green Party	We hope this would be very vigorously monitored.	The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
33	Mr Bernard Foster	Resident	I am not sure there should be an alternative to paying into RAMS as having consistency can often be the best policy as it allows for quicker modification to be introduced should the current adopted standards be proven to fall short of what is required. Is it however currently accepted that paying into RAMS is an entrance fee to build and not an analysis prior to a decision that would ensure the inevitable damage that would occur when evaluated can be justified to future generations?	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				project-level. No amendment proposed.
34	Mr Mark Marshall	Resident	Progress can be positive as long as enforcement and funding is adequate.	Noted. No amendment proposed.
35	Mr Tim Woodward	The Country Land & Business Association (CLA)	<p>We would agree that a "developer contribution" could be more cost-effective for an applicant than carrying out a visitor survey. A properly-conducted survey can be a time-consuming and expensive business, and so applicants might have to engage external consultants to carry out the work.</p> <p>This does not mean, however, that we support the imposition of a developer levy, when extra visitor access (and hence disturbance) to the coast is being actively encouraged by Natural England, and when some local authorities will be imposing a CIL charge on development projects as well.</p>	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. The SPD and RAMS ensures that residential development schemes within the Zone of Influence can come forward with an assurance that there will be no significant in-combination recreational effects on Habitats sites on the Essex Coast. No amendment proposed.
36	Parish Clerk for West Horndon Parish Council Kim Harding	West Horndon Parish Council	West Horndon Parish Council supports the broad principles of the RAMS.	Noted. No amendment proposed.
37	Mrs Jenny Clemo	Langford & Ulting Parish Council	Delete para 5.2. I do not support applicant/developer conducting their own visitor surveys.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				project-level. No amendment proposed.
38	Mr James Taylor	Resident	No alternative route should be provided.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.
39	Mrs Christa-Marie Dobson	Feering & Kelvedon Wildlife Group	Why would Natural England not be consulted on both scenarios? Natural England could then undertake an independent review of the HRA and the timings of the surveys.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.
40	Mr Michael Hand	Campaign to Protect Rural England - Essex Branch	This section is disconcerting, as despite the rigorous and consistent approach provided by the SPD, it also allows an applicant to take alternative action to secure bespoke mitigation to avoid impacts on Habitats sites. In spite of the identified mitigation measures provided by the costed package in Appendix 1, the provision for an applicant to negotiate alternatives to remain in perpetuity will involve considerably more time and cost for the Local Planning Authority (and English Nature). This should be reflected in the level of charge levied by the LPA on the applicant.	Developers have the option to conduct surveys to provide data to support any mitigation options they propose to ensure as an alternative to the tariff, however these must be approved by Natural England and be supported by a legally compliant HRA/AA at the project-level. No amendment proposed.
41	Mrs Cecilia Dickinson	Resident	The more I see of this format the more irritating it becomes - section by section is unnecessary, off-putting and boring.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.

## Section Six – Monitoring of this SPD

**Table 8 – Section Six: Summary of consultation responses and actions**

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	I think there should be an independent body monitoring the RAMS to ensure there is no conflict of interest and correct measures etc. are actually in place.	The RAMS project will be overseen by a working group and a Delivery Officer once appointed, a Steering Group, Project Board and elected members group. No amendment proposed.
2	Magister Debbie Bryce	Landlord	Monitoring is not conducted. Only enforcement after damage has been done. For example, at Bath & North East Somerset Council, they state they do not monitor mitigation and compliance in S.106 Agreements. What sort of monitoring do you seriously think you can afford? You are an under-resourced small local authority with one tree officer. Try to be realistic.	The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. Monitoring will be undertaken by the project staff which will include a full-time Delivery Officer. No amendment proposed.
3	Mrs Frances Coulson	Resident	Seems adequate.	Noted. No amendment proposed.
4	Mrs Julie Waldie	Resident	I agree but there is need to check this works. More checks the better.	Noted. No amendment proposed.
5	Mr Terry Newton	Resident	How will visit surveys be carried out? Also, will Essex residents be consulted on what is needed for local recreational needs and green and sustainable wildlife needs? Future generations will not be able to self-monitor if they do not understand their local environment.	Visitor surveys will be carried out by the RAMS delivery team at the Essex Coast. Postcode data will be sought. No amendment proposed.
6	Mr Brian Mills	Resident	What action will be taken if monitoring shows an unacceptable or irreversible situation?	The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. This may lead to changes to the mitigation package proposed and possibly changes to the tariff. No amendment proposed.
7	Mrs Linda Samuels	Resident	Will the RSPB have a role within the monitoring process?	It can be considered that the finer details of the monitoring process may be addressed if appropriate through

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				the actions of the Delivery Officer, but it is envisaged that the RSPB will have a role. No amendment proposed.
8	Mr David Kennedy	Resident	Explanation as to how this activity will be funded is needed.	Further monitoring will be funded by the contributions collected through the RAMS project. No amendment proposed.
9	Mr Charles Joynson	Resident	This is good. But what action can they take with limited funds if they find mitigation is not working. Also, what about after 2038? I take it the residents will not be evicted and the houses demolished. Will any mitigations be surrendered, fences removed, and signs left to rust?	As the effects that the RAMS addresses are identified as occurring as a result of LPA Local Plans, the lifetime of the mitigation must reflect that of the Local Plan lifetimes, to 2038. As explained in the RAMS Strategy Document, an in-perpetuity fund will be developed to ensure that mitigation will be delivered in-perpetuity. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. This may lead to changes to the mitigation package proposed and possibly changes to the tariff. No amendment proposed.
10	Mr John McCallum	Resident	The monitoring process should include bodies like Essex Wildlife Trust who already have protected reserves on the coast.	It can be considered that the finer details of the monitoring process may be addressed if appropriate through the actions of the Delivery Officer. No amendment proposed.
11	Mrs Mary Drury	Resident	Monitoring and delivery officers, why? How?	The mitigation package identifies the need of a full-time RAMS Delivery Officer to oversee and manage the RAMS. The effectiveness of the mitigation will be monitored as outlined

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				within Section 6 of the SPD. No amendment proposed.
12	Ms Rachel Cross	Resident	Monitoring of the process needs to happen in year 3 as well or even annually as climate change gains momentum. How will wildlife be monitored?	The Essex Coast RAMS monitoring process, undertaken annually, will be used to inform future reviews of the RAMS and the SPD; therefore, any necessary changes will be made following this process. No amendment proposed.
13	Mrs Joanna Spencer	Resident	An independent wildlife person should be involved.	It can be considered that the finer details of the monitoring process may be addressed if appropriate through the actions of the Delivery Officer. No amendment proposed.
14	Ms Caroline Macgregor	Brightlingsea village councillor	Involvement of local town councils would better express the views of local people rather than district councils.	It can be considered that the finer details of the monitoring process may be addressed if appropriate through the actions of the Delivery Officer. No amendment proposed.
15	Mr Christopher Marten	Resident	Parish wildlife groups and the RSPB must be consulted on any application and the RSPB must be compensated for their involvement.	Natural England are the statutory body that ensure the Habitats Regulations are met, as a consultee for HRA/AA documents. Other bodies are permitted to comment on all live planning applications. No amendment proposed.
16	Mr Peter Dervin	Resident	We do not have enough carers for our old and disabled, nurses in our hospitals, and in almost every other council funded field, but you are now finding the money for monitoring?	The SPD is related only to those in-combination recreational impacts identified through the LPAs' Local Plan HRA/AAs. The SPD proposes a tariff to fund mitigation, and no other sources of funding will be used to

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				ensure its delivery. No amendment proposed.
17	Mr Alan Lycett	Resident	What happens to the results of monitoring. If wildlife is to be protected effectively someone needs to have authority to take appropriate remediation.	The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. This may lead to changes to the mitigation package proposed and possibly changes to the tariff. No amendment proposed.
18	Mr Neil Hargreaves	Resident	This is an example of the bureaucratic cost of this scheme. Please just read how much work and staffing is in the paragraphs above. Add to this the work at LPAs, including putting in Local Plans and doing the s106 requirement and collection and payment!	Noted. No amendment proposed.
19	Mr Andrew Whiteley	Resident	Monitoring should be set for every 2 years	The RAMS sets out that the visitor survey information is updated within the first two years of the Essex Coast RAMS adoption and repeated every 5 years afterwards to maintain postcode evidence of new residents and justifiable Zones of Influence. The Essex Coast RAMS package of measures will need to be prioritised and delivered on several timescales. The initial priorities will be reviewed by the Essex Coast RAMS Delivery Officer, however, once they are in post. No amendment proposed.
20	Mrs Angela McQuade	Resident	Please monitor closely and robustly.	Noted. No amendment proposed.
21	Mr Stephen Ashdown	Resident	Any major structural changes must result in a public consultation process being repeated.	Any fundamental updates or revisions to the SPD resulting from future monitoring will be subject to consultation in line with the requirements of the Statement of

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				Community Involvement (SCI) of each LPA. No amendment proposed.
22	Mr Michael Blackwell	Resident	This is a good checking system.	Noted. No amendment proposed.
23	Mrs Joanna Thornicroft	Resident	I would like to see more regular scrutiny than annually.	Noted. A review of the monitoring arrangements proposed will be undertaken by the Delivery Officer, once appointed, as stated in Section 7.19 of the RAMS Strategy. No amendment proposed.
24	Mr Mark East	Resident	This all seems rather vague and lacking detail. The public cannot have confidence in its robust delivery.	Noted. No amendment proposed.
25	Mrs Michelle Endsor	Resident	This is paper pushing, meeting after meeting that is being funded when all that is needed is for proposed housing development to take place elsewhere other than an area of natural beauty that requires wildlife conservation, not destruction, not mitigation. There are many urban areas that have fallen into decay and require refurbishment or rebuilding and we would urge that these be utilised before destruction of the few historic wetlands that England has left.	All of the LPAs have a statutory requirement to plan for new housing growth. The RAMS seeks to mitigate recreational impacts on protected Habitats sites on the Essex Coast arising from the increase in population associated with these housing growth requirements. No amendment proposed. The SPD relates to all residential development resulting in a net increase of new dwellings within the Zone of Influence, extending 22km from the coast. This includes many town centres across the county. No amendment proposed.
26	Mrs Linda Findlay	Resident	Once decision made the committee and its leader need to have the power to enforce or penalise.	Section 5.2 of the SPD sets out that if the tariff is not paid on qualifying proposals, then planning permission would not be given. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
27	Mr David Evans	Resident	<p>If monitoring this process and the sites, is anything like the level of evidence submitted in the report then this will be a worthless activity. I point to the statement about the so-called damage being done to Hamford Water.</p> <p>1) It clearly states that there is Jet-Ski activity in Hamford Water and to contain this, the launching of Jet Skis will be prohibited by legislation at Titchmarsh Marina and in the area around Mill Lane in Walton. I would submit that there is no Jet-Ski activity in Hamford Water, the last one was seen several years ago, the launching of Jet-Skis is not permitted at Titchmarsh Marina or at the Walton &amp; Frinton Yacht Club or at the Walton Town Hard. The only place that Jet-Skis launch in this area is in Dovercourt Bay, which is a Tending District Council designated small craft area. Additionally proscribing Jet-Skis totally is contrary to the United Nations Charter of the Seas and Freedom of Navigation to which the UK is a signatory. This applies to all coastal areas that do not dry out at low-tide.</p> <p>2) It states (without clearly identifying the precise location) that people walking on the salt-marsh in the south-eastern corner of Hamford Water, is causing significant damage. Whilst being unsure quite where this alleged activity is occurring, I visit Hamford Water on a daily basis and have done so for over 55 years, I have not seen any such activity and the only places of access in the south eastern area where the foreshore is accessible are at Island Lane and a very small area in Foundry Creek which is a designated industrial site. Even at these sites you would disappear in soft mud if such activity was tried.</p> <p>3) The document includes the Naze area, and states that this is part of the Nature Reserve and has issues with the effect of people going there especially with dogs off the lead, which is seriously affecting the wildlife. It should be noted that this area is not controlled by Essex Wildlife Trust, it is owned by TDC, and was sold to Frinton and Walton Urban District Council (TDC is the successor Council) by Essex County Council on the condition</p>	<p>Effects have been identified within the HRA/AAs of the LPAs Local Plans, regarding future growth, and the RAMS and SPD deals with recommended mitigation. The Essex Coast RAMS monitoring process will be used to inform future reviews of the RAMS and the SPD; therefore, any necessary changes will be made following the review process. No amendment proposed.</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			that it remained a Public Area with the public having complete freedom of access in perpetuity, plus banning dogs off the lead would cause a revolution. There never has been much in way of wildlife up there, a couple of Muntjacs and a few rabbits that have escaped the recent myxomatosis outbreak and a few gulls are about the sum total, nothing has changed there since I first visited the area on the first day it opened to the public in the 1950s after the Ministry of Defence vacated it.	
28	Mrs Karen Hawkes	South Woodham Ferrers Town Council	Page 17, 6.3 Steering Group - This should include relevant partners as detailed in table 4.1 including as proposed previously in this sub-mission in respect of page 12 above. With reference to the steering group, members would welcome a representative from all partnership organisations as detailed on page 13 with the addition of town and parish councils. As currently stipulated in the plan there is no input from RSPB, Essex Wildlife Trust and town and parish councils.	It can be considered that the points made may be addressed if appropriate through the actions of the Delivery Officer. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
29	Mrs Susie Jenkins	Brightlingsea Nature Network	Will the general public be able to view the monitoring data?  Monitoring data should be transparent to enable the community directly affected by the disturbance of their designated habitats to be alerted to oversights or lack of proper data.  This section should inform the public where this information will be available to view and where to raise the alert if the data is not sufficient or available.	All monitoring data will be made publicly available. No amendment proposed.
30	Councillor Frank Belgrove	Alresford Parish Council	Town and Parish Councils could be involved in the monitoring process.	It can be considered that this point may be addressed if appropriate through the actions of the Delivery Officer. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
31	Mr Roy Hart	Skee-tex Ltd Local Councillor, Head of the River	There are plenty of groups who do this such as Essex Wildlife Trust.	It can be considered that this point may be addressed if appropriate through the actions of the Delivery

No.	Name	Organisation	Main Issues Raised	Response / amendment required
		Crouch Conservation Trust & owner of 1.5 miles of river banks of the Crouch		Officer. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
32	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	<p>RAMS will be yet another organisation on top of the existing 31 organisations.</p> <p>Who monitors the care of the designated areas? The proposed scheme is purely to raise money for mitigating purposes. The scheme is so complicated, layered and requiring a large army of enforcers to be employed, meaning that money raised for mitigation will simply be used up in salaries. This is just creating jobs for the boys.</p>	The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
33	Mr John Fletcher	Resident	The area is already well monitored by the Environment Agency, Natural England, RSPB and Marine Management Organisation. How many more monitors do we want?	The effectiveness of the specific mitigation proposed will be monitored as outlined within Section 6 of the SPD. The effectiveness of the RAMS is not currently monitored by any other party. No amendment proposed.
34	Mr Hugh Toler	Blackwater Wildfowlers Association (BWA)	Regarding paragraph 6.4, the BWA maintains a record of all visits by members to its sites. The BWA also places limits on the number of visitors allowed per site, frequency and overall numbers within the organisation. Through this we have managed to maintain a fairly consistent level of activity, which is judged to minimise disturbance while balancing the demands of our members.	Noted. No amendment proposed.
35	Mr Mark Nowers	RSPB	The RSPB would welcome being part of the RAMS Steering Group (section 6.3).	The Delivery Officer and Rangers can explore joint working arrangements, once appointed. No amendment required.
36	Mr Gavin Rowsell	Resident	<p>How can this project have any measurable outcome?</p> <p>Maybe the RSPB will arrange huge catch nets, usually triggered by loud explosives, to tangle up and capture hundreds of birds, then weigh them,</p>	A strategic monitoring process is proposed to be put in place and will be managed by a dedicated RAMS delivery officer in liaison with each

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			tag them, and note down that they seem happy having not been disturbed due to RAMS.	LPA's own monitoring officers. No amendment proposed.
37	Mr Bernard Foster	Resident	<p>It is essential that for the effectiveness of the RAMS and this SPD, a strategic monitoring process is in place and that it will be managed by a dedicated RAMS delivery officer in liaison with each LPA's own monitoring officers.</p> <p>One problem is that it is reactive with monitoring only taking place annually and the report being provided to each LPA to inform their individual Authority Monitoring Report (AMR). Also, I fear it will become another meeting someone has to attend like buses or highways as long as the box is ticked that is OK. Who will be responsible for activating fit for purpose checks and be responsible for the results if less than satisfactory? A lot can happen in five years, once bad habits can become the acceptable norms. It is common to have personnel progress as part of a career path so how do you intend to create a responsive environment within the group. Does responsibility stay within the group or stay with the decision makers? It does not help you build any trust when individuals, communes or travellers move onto a site in a Ramsar area and years later are still there playing the planning system.</p>	It can be considered that this point may be addressed if appropriate through the actions of the Delivery Officer. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. A strategic monitoring process is proposed to be put in place and will be managed by a dedicated RAMS delivery officer in liaison with each LPA's own monitoring officers. No amendment proposed.
38	Mr Mark Marshall	Resident	A lot can happen in a year, 6 monthly monitoring should be considered.	The RAMS sets out that the visitor survey information is updated within the first two years of the Essex Coast RAMS adoption and repeated every 5 years afterwards to maintain postcode evidence of new residents and justifiable Zones of Influence. The Essex Coast RAMS package of measures will need to be prioritised and delivered on several timescales. The initial priorities will be reviewed by the Essex Coast RAMS Delivery Officer, however, once they are in post. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
39	Mr Tim Woodward	The Country Land & Business Association (CLA)	<p>As pointed out above, extra recreational access to the Essex Coast will be encouraged and facilitated by the delivery of the England Coast Path by Natural England. This will inevitably increase disturbance to habitats and resident and migratory bird species, regardless of the extent of any development in the area. In some sections of the coast, there will now be formalised recreational access for walkers and dogs where hitherto there has been no public access.</p> <p>It is hoped that monitoring will have regard to this and will not lay responsibility for the effects of increased access solely at the door of landowners and developers.</p>	The SPD is related only to those in-combination recreational impacts identified through the LPAs' Local Plan HRA/AAs. No amendment proposed.
40	Parish Clerk for West Horndon Parish Council Kim Harding	West Horndon Parish Council	West Horndon Parish Council supports the broad principles of the RAMS.	Noted. No amendment proposed.
41	Mrs Jenny Clemo	Langford & Ulting Parish Council	Monitoring should be after 1 year and subsequently every 2 years.	The RAMS sets out that the visitor survey information is updated within the first two years of the Essex Coast RAMS adoption and repeated every 5 years afterwards to maintain postcode evidence of new residents and justifiable Zone of Influences. The Essex Coast RAMS package of measures will need to be prioritised and delivered on several timescales. The initial priorities will be reviewed by the Essex Coast RAMS Delivery Officer, however, once they are in post. No amendment proposed.
42	Mrs Christa-Marie Dobson	Feering & Kelvedon Wildlife Group	Para 6.1 - Will the RAMS Officer be truly independent of the LPA's?	It can be considered that this point may be addressed if appropriate through the actions of the Delivery

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>Para 6.2 - Will the annual report be submitted to independent bodies, such as the RSPB and EWT?</p> <p>Para 6.3 - EWT are not part of the steering group and they are present at Abberton Reservoir which is a key site for birds. General Comment: Similar schemes have been created in other parts of the country, but they haven't been running long enough to ascertain if these schemes actually work.</p>	Officer. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. A strategic monitoring process is proposed to be put in place and will be managed by a dedicated RAMS delivery officer in liaison with each LPA's own monitoring officers. The Delivery Officer will be employed by one of the partner LPAs and engage with key local stakeholders once appointed. The RAMS annual report will be published. No amendment proposed.
43	Mrs Cecilia Dickinson	Resident	The more I see of this format the more irritating it becomes - section by section is unnecessary, off-putting and boring.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.

## Section Seven - Consultation

**Table 9 – Section Seven: Summary of consultation responses and actions**

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	There is not enough detail to comment at this stage. I need to understand what areas could be affected, what is actually being done to mitigate. If there is a breeding season, then possibly pathways need to be closed off etc.	Noted. No amendment proposed.
2	Magister Debbie Bryce	Landlord	There should be no development that will lead to more disturbance of European protected sites.	The principle of the RAMS and the SPD ensures that in-combination recreational effects will not be realised on the Essex Coast's Habitats sites as a result of residential development. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
3	Mrs Frances Coulson	Resident	It is important to maintain the wildlife. Mitigation of damage is vital, and I think the suggestions are good for a code, designated paths etc.	Noted. No amendment proposed.
4	Mrs Amy Gardener-Carr	Resident	Why is this even being considered with growing flood concerns, destruction of habitat of wildlife.	All of the LPAs have a statutory requirement to plan for new housing growth. The RAMS seeks to mitigate recreational impacts on protected Habitats sites on the Essex Coast arising from the increase in population associated with these housing growth requirements. No amendment proposed. The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only and to deliver the mitigation proposed in the RAMS. No amendment proposed.
5	Rev. Ian Scott-Thompson	Resident	These consultations seem designed for planning professionals. The language and response format are difficult for ordinary residents to use.	Where technical terminology and acronyms are used, these are defined in the SPD. Efforts have been made to ensure that the SPD is clear and minimises the use of jargon. An abbreviations list is also provided. No amendment proposed.
6	Mr Charles Joynson	Resident	I wonder what the environmental charities Royal Society for the Protection of Birds, Essex Wildlife Trust etc have to say about this plan. The excessive use of acronyms makes these documents hard to read.	The RSPB and EWT have been invited for comment as part of the consultation. Where technical terminology and acronyms are used, these are defined in the SPD. Efforts have been made to ensure that the SPD is clear and minimises the use of jargon. An abbreviations list is also provided. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
7	Mrs Mary Drury	Resident	The subject of ecology/environment care should be started as soon as a child starts to read.	Noted. No amendment proposed.
8	Mrs Alwine Jarvis	Resident	I think it is great that the general public are consulted for their views. However, the papers are extensive to read and not many people will find the time to read them. I would have felt it would have been better to do this as a survey with suggestions and tick boxes to obtain people's' view, with a section at the end for additional comments.	Where technical terminology and acronyms are used, these are defined in the SPD. Efforts have been made to ensure that the SPD is clear and minimises the use of jargon. An abbreviations list is also provided. No amendment proposed.
9	Mrs Joanna Spencer	Resident	This consultation should have been widely advertised in papers and local communities.	Noted. The consultation was conducted in line with national Regulations and LPA Statements of Community Involvement. A Public Notice was placed in the Essex Chronicle. No amendment proposed.
10	Ms Caroline Macgregor	Resident	This consultation should have been more widely publicised by alerts and newspaper and radio articles.	Noted. The consultation was conducted in line with national Regulations and LPA Statements of Community Involvement. A Public Notice was placed in the Essex Chronicle. No amendment proposed.
11	Mr Alan Lycett	Resident	The SPD is a very high-level document. It needs to be converted into a more detailed document so that important features such as metrics can be added.	Noted. Further detail is provided in the RAMS. No amendment proposed.
12	Mr Brian Jones	Resident	All sections are clear but it seems likely that outside pressures to ignore some of the rules will occur.	The RAMS and SPD will be subject to annual monitoring regarding effectiveness, as outlined in Section 6 of the SPD. No amendment proposed.
13	Mr Peter Bates	Resident	I consider that the letter informing residents about this consultation is designed not to encourage responses: it was not written with anyone except planners or solicitors in mind. It is necessary to scroll down to see the entire text - many people will not realise the full extent of the document they are answering questions on.	Noted. LPAs will seek to ensure that future consultation notifications are as clear as possible. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
14	Mr Graham Womack	Resident	When is the SPD expected to be implemented? How will it be applied retrospectively to the Local Plans that are currently out for consultation?	The SPD is expected to be adopted by each authority by Summer 2020. The collection of the tariff by partner LPAs has been ongoing since the emergence of the RAMS document in 2018/19.
15	Mrs Joanna Thornicroft	Resident	The consultation did not seem to be too well advertised. It has also asked me for a lot of personal information, and I cannot see anything telling me how data will be used as per the General Data Protection Regulation.	Noted. The consultation was undertaken in accordance with each authority's Statement of Community Involvement (SCI) and was advertised accordingly. No personal information will be published and it will be kept by Place Services only for the purposes of notifying respondents on the progression of the SPD. The 'Statement of Representations' includes details on how comments will be used and GDPR. The consultation was conducted in line with national Regulations and LPA Statements of Community Involvement. A Public Notice was placed in the Essex Chronicle. No amendment proposed.
16	Councillor Richard van Dulken	Braintree District Council	Local Authority and related documents never seem to have summaries of the contents, to avoid the need to plough through page after page, and in the case of this consultation, document after document.	Sections 2 and 3 of the SPD provide summaries of the RAMS and scope of the SPD. Additionally, the SPD signposts a 'frequently asked questions' (FAQ) document' which is available on the Bird Aware Essex Coast website. No amendment proposed.
17	Mr Mark East	Resident	The consultation lacks evidence of data collected to date to formulate the RAMS. This should be made available for transparency purposes.	The RAMS document, signposted within the SPD and linked within the consultation portal, includes the data

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				collected in formulating the RAMS. No amendment proposed.
18	Mr. David Gollifer	Resident	Satisfactory.	Noted. No amendment proposed.
19	Mrs Linda Findlay	Resident	Give feedback. Justify decision made relating to consultation points. Do not allow repeated consultations to delay positive decisions.	This 'You Said We Did' report intends to justify decisions made related to points raised during the consultation. No amendment proposed.
20	Mr Barrie Ellis	Resident	No amendments proposed. The document is clear.	Noted. No amendment proposed.
21	Mr David Evans	Resident	We believe the spending of tax-payers money to impose restrictions on the lawful and peaceful use of this very unique area is totally unwarranted and may even prove to be counterproductive. If it is bird life you are concerned about, I strongly suggest that you look at the Hamford Waters Bird surveys conducted by the Warden, these show consistent healthy increases. It should also be questioned why the EA licence the blowing of eggs of the Lesser Black Backed Gull on Hedge End Island, or is it that only certain parts of the natural world are to be allowed to blossom?	The RAMS and SPD relate to future planned growth, and the recreational impact that housing can be expected to have across the 12 partner LPAs. Current conditions act as a baseline against which future effects and mitigation can be identified. No amendments proposed.
22	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	This Essex Coast RAMS Supplementary Planning Document was not sufficiently promoted. It was only by word of mouth that this document has been circulated. This scheme is unnecessary, unworkable and dictatorial.	The RAMS and SPD have been identified as required through compliance with EU law, namely the 'Habitats Directive' and 'Birds Directive'. The consultation was conducted in line with national Regulations and LPA Statements of Community Involvement. A Public Notice was placed in the Essex Chronicle. No amendment proposed.
23	Mr Hugh Toler	Blackwater Wildfowlers Association	In principle we support the objectives of the SPD. We limit disturbance in two ways first by limiting the numbers in our organisation and secondly by minimising public access to our wetlands by appropriate signs.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
24	Mr Gavin Rowsell	Resident	I look forward to my comments being considered properly, as at every stage of the process so far, concerns of anyone other than those with a vested interest in the project, have fallen on deaf ears.	Noted. All comments received to the consultation will be considered and used to inform the final SPD. More details will be set out within a 'You Said We Did' document. No amendment proposed.
25	Mr Bernard Foster	Resident	The consultation system is reasonably easy to work through.	Noted. No amendment proposed.
26	Parish Clerk for West Horndon Parish Council Kim Harding	West Horndon Parish Council	West Horndon Parish Council supports the broad principles of the RAMS.	Noted. No amendment proposed.
27	Mrs Christa-Marie Dobson	Feering & Kelvedon Wildlife Group	<p>Will the comments taken from the NEGC Inspector Review Workshops in January 2020 also be taken into account? Points that were made include: Other RAMS that exist in the country are new and mitigation measures have not been tried and tested due to their infancy / The RAMS are based on soft measures / The bye-laws will need to be updated as they are out of date as they look at things like vessel speeds / There is no code of conduct at present for clubs that organise water sports such as paragliding / Rangers will need to interact with users and the zones of interest are under-estimated / Paragliding, one of the worst offenders for bird disturbance, is a niche activity and it can be tourists to the area that have the worst impact, not the housing itself.</p> <p>Natural England wanted to be an independent body for wildlife, but the last coalition government told them they could not be truly independent and thus mitigation strategies were born rather than protecting areas of interest from development. RSPB has not endorsed this particular scheme, although it has been asked to be part of the steering group. What if not all the housing supply comes forward and the strategy is left in a deficit position? You cannot replace what is lost. The Essex Coast RAMS</p>	<p>The Essex Coast RAMS has been accepted by the Inspector who examined the Chelmsford Local Plan. It can be considered that the points made may be addressed if appropriate through the actions of the Delivery Officer. The SPD sets out a funding mechanism for the delivery of the mitigation included within the RAMS.</p> <p>Regarding effectiveness of the mitigation, Section 6 of the SPD outlines monitoring arrangements of the SPD and the RAMS. This will, alongside other monitoring requirements of the LPAs, cover housing delivery. The tariff may be liable to change over time to ensure effective mitigation can be delivered.</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			may take time to implement and thus developers will get their planning permission through before they have to contribute. The tariff per dwelling may need to change.	The RSPB are not members of the Steering Group.  No amendments proposed.
28	Mrs Cecilia Dickinson	Resident	The more I see of this format the more irritating it becomes - section by section is unnecessary, off-putting and boring.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.

## Section Eight – Useful Links

*Table 10 – Section Eight: Summary of consultation responses and actions*

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	Useful links are not enough. I want to see a summary which details the current issue, what the high-level mitigation proposals are, what they are going to cost, how long it is going to take etc. A simple excel spreadsheet/some visual aid would be very helpful.	It is considered that RAMS Strategy and SPD sufficiently summarises the issue, outlines strategic mitigation and its cost, and the timelines for the delivery of the mitigation. No amendment proposed.
2	Mrs Frances Coulson	Resident	Remember horse riders. We share access with those who do not understand horses and risk (loose dogs - also a risk to wildlife but no enforcement on requirement for leads). There is a concern that the RAMS would lead to a loss of places to ride.	Noted. There are no proposals in the RAMS to remove bridleways. No amendment proposed.
3	Mrs Aileen Cockshott	Resident	Are the RSPB involved in this process?	The RSPB were invited to both of the preliminary workshops essential to devising the RAMS and the RSPB provided valuable support for the RAMS and Bird Aware. Only the partner LPAs and Natural England were involved in the steering group as the RAMS and SPD are considered technical Local Plan documents.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				The RAMS toolkit states that, for the 'Habitat based measures' Action Area, partnership working may include such organisations as 'Natural England, Environment Agency, RSPB, Essex Wildlife Trust, National Trust, landowners, local clubs and societies.' No amendment proposed.
4	Mr Charles Joynson	Resident	The Bird Aware website is useful.	Noted. No amendment proposed.
5	Mrs Mary Drury	Resident	Ensure nature awareness in schools.	Noted. This can be considered by the Delivery Officer once in post. No amendment proposed.
6	Mr Christopher Marten	Resident	As a bird watcher I visit these areas on a regular basis and population levels have already reached unsustainable levels. At certain times of the day, roads in and out of these areas are impassable and restricted areas of parking mean an increase in traffic noise and pollution to local residents.	Noted. No amendment proposed.
7	Mr Gary Freeman	Resident	RSPB should be on the list.	<p>The RSPB were invited to both of the preliminary workshops essential to devising the RAMS and the RSPB provided valuable support for the RAMS and Bird Aware. Only the partner LPAs and Natural England were involved in the steering group as the RAMS and SPD are considered technical Local Plan documents.</p> <p>The RAMS toolkit states that, for the 'Habitat based measures' Action Area, partnership working may include such organisations as 'Natural England,</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				Environment Agency, RSPB, Essex Wildlife Trust, National Trust, landowners, local clubs and societies.' No amendment proposed.
8	Mr Alan Lycett	Resident	I suggest you consider including other stakeholders involved in the protection of wildlife. For example, Royal Society for the Protection of Birds; do not stop with the obvious local stakeholders.	The Royal Society for the Protection of Birds (RSPB) has been added to the list of useful links in the SPD.
9	Mr John Camp	Resident	Essex Wildlife Trust and Royal Society for the Protection of Birds should be added.	The Essex Wildlife Trust (EWT) and Royal Society for the Protection of Birds (RSPB) have been added to the list of useful links in the SPD.
10	Mr Stephen Ashdown	Resident	Should also contain details of Essex County Council and how the problem can be escalated.	Essex County Council sit on the Steering Group of the RAMS to provide advice and guidance. ECC are not a partner in the RAMS as it is the LPAs who are responsible for preparing, adopting, delivering and implementing the RAMS. No amendment proposed.
11	Mr Mark East	Resident	The links are top level perhaps they should link to RAMS elements.	Noted. No amendment proposed.
12	Mrs Linda Findlay	Resident	Utilise environmentalist knowledge and advice, e.g. Tony Juniper author of 'What has nature ever done for us?' This includes positive practical action to protect coasts.	Noted. No amendment proposed.
13	Mrs Susie Jenkins	Brightlingsea Nature Network	Very helpful links.	Noted. No amendment proposed.
14	Councillor Frank Belgrove	Alresford Parish Council	Link to the Environment Agency?	The Environment Agency has been added to the list of useful links in the SPD.
15	Mr Roy Hart	Skee-tex Ltd Local Councillor, Head of the River	These sites are easy to find.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
		Crouch Conservation Trust & owner of 1.5 miles of river banks of the Crouch		
16	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	The wildlife of the Essex Coast is threatened by the increase in population in the Zone of Influence and this aspect is controlled by the Planning Committees of these links.	Planning Officers from each LPA within the Zone of Influence have been involved within the process of the RAMS and the SPD through attendance of a RAMS Steering Group. It is expected that the SPD will be adopted by each authority by Summer 2020. No amendment proposed.
17	Mr Gavin Rowsell	Resident	I could not readily see any link to any empirical justification of the whole RAMS idea. Also, no link to studies by people like Professor John Goss-Custard whose talks and papers titled Mud, Birds and Poppycock make enlightening reading.	Justification to the RAMS and the SPD can be found within the Local Plan HRA/AAs of each partner LPA. No amendment proposed.
18	Mr Bernard Foster	Resident	Very useful both for this consultation and future reference.	Noted. No amendment proposed.
19	Mr Steven Smith	Comments offered on behalf of: Lower Farm, East End Green, Brightlingsea	Reference should be made to the England Coast Path (ECP). Natural England have started to investigate how to improve coastal access along an 81 km stretch of the Essex Coast between Salcott and Jaywick. This new access is expected to be ready in 2020. Officers from Essex County Council have provided Natural England with expert local advice and helped to make sure there is full consultation with local interests during the development of the route which is expected to be published later this year.	The Essex Coast Path proposal, and any effects on recreational disturbance, are not within the scope of the mitigation proposed in the RAMS and the SPD. No amendment proposed.
20	Parish Clerk for West Horndon Parish Council	West Horndon Parish Council	West Horndon Parish Council supports the broad principles of the RAMS	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
	Kim Harding			
21	Mrs Christa-Marie Dobson	Feering & Kelvedon Wildlife Group	National Planning Policy Framework (NPPF) is not listed here.	The content of the NPPF is effectively covered in the 'Planning Practice Guidance' link, however an amendment to include the NPPF within this section is proposed.
22	Mr Michael Hand	Campaign to Protect Rural England - Essex Branch	The Department for Environment Food & Rural Affairs (Defra) Magic Map tool is slow to load, difficult to navigate and functionally complex. It was not possible to find the definitive Zones of Influence mapping - as indicated in section 3 of the consultation document - despite several attempts.	It is proposed that the RAMS, SPD and this 'You Said, We Did' report are offered to Defra. No amendment proposed.
23	Mrs Cecilia Dickinson	Resident	The more I see of this format the more irritating it becomes - section by section is unnecessary, off-putting and boring.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.

## Section Nine - Glossary

**Table 11 – Section Nine: Summary of consultation responses and actions**

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	This section does not add any substance and could be shown as another "link"	Noted. No amendment proposed.
2	Mr Bob Tyrrell	West Bergholt Parish Council	Ok.	Noted. No amendment proposed.
3	Mr Terry Newton	Resident	I suspect that national guidelines and certain bodies could override local concerns and needs. Has Essex now become linked to the National Coast Path, and is it widely published, and the route signposted? It is correct to have all interested organisations to monitor the mitigation, but it could generate conflicts of interest.	The SPD is related only to those recreational impacts identified through the LPAs' Local Plan HRA/AAs. No amendment proposed.
4	Mr	Resident	Looks good	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
	Brian Mills			
5	Mrs Mary Drury	Resident	High schools and colleges should be given charts and information.	Noted. No amendment proposed.
6	Mrs Alwine Jarvis	Resident	I wished you had not used the abbreviations throughout the document as there are many abbreviations which makes it harder to follow reading the documents.	An amendment to move the glossary and list of abbreviations to front of the SPD is proposed, with added description explained in footnotes where necessary and newly introduced.
7	Mrs Joanna Spencer	Resident	Aircraft fuel dumping and fumes and shooting of birds needs to be looked at, you are trying to make a better place but at the same time killing birds and also harming them with aviation fuel.	Noted. No amendment proposed.
8	Ms Caroline Macgregor	Brightlingsea village councillor	Local people do not wish to see the further development of rural Essex as a part of the Haven Gateway to accommodate London overspill. The impact on human health as well as birds and wildlife from pollution will be catastrophic. Local monies would be better spent on conserving our coastline and preparing for rising sea levels.	Noted. No amendment proposed.
9	Mr Alan Lycett	Resident	Presumably this is a living document so additional information may be added to this and other sections. Need to ensure document management standards are visible on each section/ page.	The RAMS is a living document and will be reviewed annually and updated accordingly. Should any subsequent amendment to the RAMS lead in turn to a need for an amendment to the SPD, this will be forthcoming. An amendment to move the glossary and list of abbreviations to front of the SPD is proposed, with added description explained in footnotes where necessary and newly introduced. No amendment proposed.
10	Mr Stephen	Resident	The section needs to be written in plain English, wording again is not inclusive of people of every educational level.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
	Ashdown			
11	Mr Mark East	Resident	This section appears to be ok.	Noted. No amendment proposed.
12	Mr. David Gollifer	Resident	Satisfactory.	Noted. No amendment proposed.
13	Mrs Dawn Afriyie	Resident	Many rare bird species have been seen in the last few months on the Essex Coast. These birds will disappear when our coastal land is built on, having an impact on all the other wildlife. No more building.	All of the LPAs have a statutory requirement to plan for new housing growth. The RAMS seeks to mitigate recreational impacts on protected Habitats sites on the Essex Coast arising from the increase in population associated with these housing growth requirements. No amendment proposed. The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only and to deliver the mitigation proposed in the RAMS. No amendment proposed.
14	Mr Graham Pike	Resident	Very useful.	Noted. No amendment proposed.
15	Mr Roy Hart	Skee-tex Ltd Local Councillor, Head of the River Crouch Conservation Trust & owner of 1.5 miles of river banks of the Crouch	Let nature take its own course, it always wins.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
16	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	Now the UK is no longer a member of the EU it will no longer have to comply with the E.U directives and can now take back control to suit its own requirements?	The content of the relevant EU Directives related to birds and habitats have been transposed into UK law and will continue to apply. No amendment proposed.
17	Mr Hugh Toler	Blackwater Wildfowlers Association	Might it be worth noting 'A Site of Special Scientific Interest (SSSI) is a formal conservation designation' within the UK. Activities within SSSIs are subject to regulatory control.	An amendment to include SSSIs within the Glossary is proposed.
18	Mr Gavin Rowsell	Resident	The list of designations is not complete.	An amendment to include SSSIs within the Glossary is proposed.
19	Mr Bernard Foster	Resident	It is always useful to have a reference.	Noted. No amendment proposed.
20	Parish Clerk for West Horndon Parish Council Kim Harding	West Horndon Parish Council	West Horndon Parish Council supports the broad principles of the RAMS.	Noted. No amendment proposed.
21	Mr Michael Hand	Campaign to Protect Rural England - Essex Branch	The Zones of Influence are defined in the Glossary as "the distance within which new residents are likely to travel to the Essex Coast Habitats sites for recreation". Given the comments provided in Section 3 and 4 above, perhaps a more subtle graded Zone of Influence framework is more appropriate (such as Zones A & B in the equivalent Suffolk model). This would better reflect proximity to coast, centres of growing population and accessibility variables rather than a simplified single Zone.	The RAMS sets out how the Zone of Influence was calculated, including using visitor surveys. Questions asked of visitors to the SPA locations were designed to collect data on the reasons for visits as well as postcodes to evidence Zones of Influence. Additional surveys will improve the robustness of the datasets and repeat surveys of visitors will be undertaken at the earliest opportunity to review the postcode data and Zone of Influence. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
22	Mrs Cecilia Dickinson	Resident	The more I see of this format the more irritating it becomes - section by section is unnecessary, off-putting and boring.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.

## Section Ten - Acronyms

**Table 12 – Section Ten: Summary of consultation responses and actions**

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	Put your acronyms at the beginning of this consultation not at the end. Also, a search button would probably be more useful or an icon to click on for the acronym, glossary etc. This needs to be made easier for residents to read and fully understand.	It is proposed that the Acronym section is moved to the beginning of the SPD.
2	Magister Debbie Bryce	Landlord	SPA, SAR, SSSI, Ramsar - all apply to the Essex Coast. Why damage it further?	All of the LPAs have a statutory requirement to plan for new housing growth. The RAMS seeks to mitigate recreational impacts on protected Habitats sites on the Essex Coast arising from the increase in population associated with these housing growth requirements. No amendment proposed.
3	Mr Terry Newton	Resident	Acronyms are ok if they are known by the people who need to access the information. Most of the general public would not now what they represent.	It is proposed that the Acronym section is moved to the beginning of the SPD.
4	Mr Charles Joynson	Resident	No acronyms should be used if you want to engage the public. They are only useful for the writers.	Acronyms have been used throughout the SPD for the purposes of conciseness. It is proposed that the Acronym section is moved to the beginning of the SPD.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
5	Mrs Mary Drury	Resident	The acronym 'AA' means many things to many people. Instead of the acronym 'RAMS' why not just say care of environment? The 'Zone of Influence' is a zone -not an area.	Acronyms have been used throughout the SPD for the purposes of conciseness. It is proposed that the Acronym section is moved to the beginning of the SPD.
6	Mr Christopher Marten	Resident	RSPB must be consulted.	<p>The RSPB were invited to both of the preliminary workshops essential to devising the RAMS and the RSPB provided valuable support for the RAMS and Bird Aware. Only the partner LPAs and Natural England were involved in the steering group as the RAMS and SPD are considered technical Local Plan documents.</p> <p>The RAMS toolkit states that, for the 'Habitat based measures' Action Area, partnership working may include such organisations as 'Natural England, Environment Agency, RSPB, Essex Wildlife Trust, National Trust, landowners, local clubs and societies.' No amendment proposed.</p>
7	Mr Brian Jones	Resident	It is general practice to explain new terms and afterwards use an abbreviation, but this does not make complex documents easy to read.	Acronyms have been used throughout the SPD for the purposes of conciseness. It is proposed that the Acronym section is moved to the beginning of the SPD.
8	Mr Mark	Resident	They appear to be fine. I have noted that this document does not appear to deal with compensation. I do not share the view that these measures will	The Essex Coast RAMS SPD sets out a tariff that will be used to fund

No.	Name	Organisation	Main Issues Raised	Response / amendment required
	East		reasonably mitigate against harm let alone avoid harm. I do accept that these are challenging times with housing targets set by central Government, but I am not convinced that these measures will ultimately prevent the deterioration in numbers of our protected species and eventual end of some.	mitigation related to 'in-combination' recreational effects only. Other mechanisms and requirements exist outside the scope of the SPD for other required and related mitigation. No amendment proposed.
9	Mr. David Gollifer	Resident	All OK.	Noted. No amendment proposed.
10	Councillor Roy Martin	Resident	Acronyms should never be used.	Acronyms have been used throughout the SPD for the purposes of conciseness. It is proposed that the Acronym section is moved to the beginning of the SPD.
11	Mr Graham Pike	Resident	Very useful.	Noted. No amendment proposed.
12	Councillor Frank Belgrove	Alresford Parish Council	Very good to see the acronyms defined.	Noted. No amendment proposed.
13	Mr Roy Hart	Skee-tex Ltd Local Councillor, Head of the River Crouch Conservation Trust & owner of 1.5 miles of river banks of the Crouch	I have seen many surveys in the past, and I am sure there will be more in future.	Noted. No amendment proposed.
14	Mr Gavin Rowsell	Resident	The list of acronyms is not complete.	It is proposed to expand the list of Acronyms included within this

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				Section to reflect all of those used in the SPD and RAMS.
15	Mr Bernard Foster	Resident	I am sure many people will have found them useful as the same groups of letters re-occur in many different disciplines relating to different policies, documents etc.	Noted. No amendment proposed.
16	Mrs Christa-Marie Dobson	Feering & Kelvedon Wildlife Group	NPPF not detailed here and the list seems short.	It is proposed to expand the list of Acronyms included within this Section.
17	Mrs Cecilia Dickinson	Resident	The more I see of this format the more irritating it becomes - section by section is unnecessary, off-putting and boring.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.

## Appendix One - Strategic Mitigation

**Table 13 – Appendix One: Summary of consultation responses and actions**

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	This does not seem like a lot of people for such a large area. Maybe you should consider asking for volunteers in those areas. Also, selling some merchandise around the protection of the birds etc. to re-coup costs. Also, you mention the per tariff cost, but I have no idea how that supports the above table of costs.	Volunteers may be sought, and other enterprises explored, if deemed necessary by the Delivery Officer. The tariff cost per dwelling has been calculated by dividing the costed mitigation package by the number of unconsented dwellings earmarked for delivery in Local Plan periods by each LPA. No amendment proposed.
2	Magister Debbie Bryce	Landlord	There is research showing that mitigation does not work.	The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
3	Mrs Frances Coulson	Resident	What about holiday/maternity cover etc? Is one ranger enough to cover a wide area and deal with enforcement?	Holiday and maternity cover will be funded by the competent authorities and their terms of service. A total of three rangers are proposed within the lifespan of the RAMS. No amendment proposed.
4	Mrs Aileen Cockshott	Resident	Think there is more to this than signage. Admiralty charts and OS maps will require an update.	The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
5	Mrs Anne Wild	Resident	I have been impressed with all I have read so far. However, would it be possible to create - with the agreement of landowners where applicable - new bird reserves, with access only available through membership? Membership revenue could be divided between the organisation/rangers etc needed (also funded by RAMS) and the landowner.	A total of £500,000 is included within the packaged costs for habitat creation in key locations where it would provide benefits and work up projects. No amendment proposed.
6	Mr Terry Newton	Resident	Whilst some form of mitigation officers are needed, value for money must be monitored.	Noted. No amendment proposed.
7	Mrs Angela Harbottle	Resident	Not qualified to comment but seems to be a great deal of money.	Noted. No amendment proposed.
8	Mr David Kennedy	Resident	Salary of water bailiffs appears to be high, this should be explained.	Salaried costs have been identified by exploring the costs of similar existing roles. The costs for the water rangers also include training, maintenance and byelaws costs. No amendment proposed.
9	Mr Charles Joynson	Resident	Too little overall to mitigate such a long coastline.	The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
10	Mrs Mary Drury	Resident	This is a total waste of money and energy. I will need to ask our MP to look at this.	Noted. No amendment proposed.
11	Mrs Joanna Spencer	Resident	Explain how these figures are arrived at.	The RAMS gives more detail regarding the costed mitigation package. No amendment proposed.
12	Mr Peter Dervin	Resident	Please put the money in to employing people in positions that are so much more needed, for example health care assistants and nurses.	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only and to deliver the mitigation proposed in the RAMS. No amendment proposed.
13	Mr Neil Hargreaves	Resident	Does the package include the cost of each LPA's own monitoring officers?	The mitigation package does not include the staffing costs of each LPA's monitoring officers. No amendment proposed.
14	Mr Brian Jones	Resident	I am pleased to see an annual training budget.	Noted. No amendment proposed.
15	Mrs Angela McQuade	Resident	Surveys are too expensive.	Noted. No amendment proposed.
16	Mr Stephen Ashdown	Resident	The package does not include possible income streams to assist in payment.	The mitigation package is itemised to ensure mitigation is in conformity to Regulation 122 of the CIL Regulations. No amendment proposed.
17	Mr Mark East	Resident	Costs and staffing levels seem inadequate.	The RAMS gives more detail regarding the costed mitigation package. The effectiveness of the mitigation will be monitored as

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				outlined within Section 6 of the SPD. No amendment proposed.
18	Mrs April Chapman	Resident	Has use of drones been considered? One ranger is not enough. Two should be a minimum from the start of the scheme to ensure daily cover.	Two rangers have been included from Year 2 of the project. The RAMS seeks to mitigate future growth and does not directly seek to address the baseline position as it would not be appropriate. The use of drones may be considered by the Delivery Officer, if appropriate, and once in post. No amendment proposed.
19	Mrs Karen Hawkes	South Woodham Ferrers Town Council	Whilst members are supportive of the Action Areas identified, there are concerns as to whether they are deliverable within the budget identified. Mitigation package is £8,916,448 from March 2019 – 2038. Members suggest that the toolkit needs revisiting to ensure that the projects can be delivered within the budget available. They also identified that there is excessive funding on personnel and enforcement and insufficient funding on the delivery of actual projects. Members are also concerned that the type of projects proposed are already being delivered by other stakeholders and that this is an unnecessary duplication of work.	The RAMS gives more detail regarding the costed mitigation package. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
20	Mrs Susie Jenkins	Brightlingsea Nature Network	<p>The statement, "some of the survey costs may be absorbed into the budget for the HRAs needed for Local Plans. This could reduce the amount of contributions secured via RAMS which could be used for alternative measures" is a worrying statement. This money should not be available for the HRA's as it will diminish the good work that can be done.</p> <p>Regarding work with landowners, Habitats site managers &amp; partner organisations - I hope you will also be working with the local community and empowering them to get involved and learn more about the habitats they live near, thereby fostering the love of nature required for the future.</p> <p>I am concerned that giving planning permission for inappropriate development in the wrong place could now be seen as a way to make this mitigation</p>	The statement quoted is intended to be interpreted that Local Plan HRA work could cover the costs of the survey should there be any need to undertake such survey work as part of those processes. This would not lead to a shortfall in RAMS mitigation, as the survey work has been costed for in the package. It would however lead to a small reduction in the tariff as the survey work would already have been undertaken.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			package money for local councils. How will you stop this happening? How will over enthusiastic planning granting be avoided and mitigated against?	Locational criteria for development are a matter for Local Plans and development management at the LPA level and not within the scope or remit of the RAMS or SPD. No amendment proposed.
21	Mr Graham Pike	Resident	A very helpful breakdown of the project, costs and ambitions.	Noted. No amendment proposed.
22	Councillor Frank Belgrove	Alresford Parish Council	It may have been appropriate to mention some of these strategies earlier in the document as examples as to what types of mitigation - in practical terms - will be required.	Noted. No amendment proposed.
23	Mr Roy Hart	Skee-tex Ltd Local Councillor, Head of the River Crouch Conservation Trust & owner of 1.5 miles of river banks of the Crouch	This money could really be spent on other projects, such as roads and sheltered housing for the homeless.	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only and to deliver the mitigation proposed in the RAMS. No amendment proposed.
24	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	The mitigation package is totally unmanageable and must be the biggest waste of public money ever designed. What is a delivery officer? What does a ranger do? Who / what organisation is going to do training? What is the Partner Executive Group to do? What are new interpretation boards? How can visitor numbers be recorded? Who are Rangers? Who is / or how many delivery officers are required? Where will there be a Water Ranger? Is the Tendring District Council Warden to be axed to make savings for the rate payer?	The SPD sets out a funding mechanism for the RAMS in the form of a tariff to be paid by developers proposing net new dwellings in the Zone of Influence. The RAMS will not be funded by any other means. The RAMS sets out the roles of the newly created posts that are required to deliver mitigation. The precise nature and location of certain mitigation

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				measures e.g. interpretation boards and training will be decided by the Delivery Officer and project Steering Group who have day to day responsibility for delivering the project. Existing forms of mitigation such as the role performed by wardens currently employed by Tendring District Council will not be undermined or replaced by the RAMS project; instead the skills and expertise of existing wardens can be utilised. No amendment proposed.
25	Mr John Fletcher	Resident	The whole scheme is a diabolical waste of money. It serves no useful purpose. To say that people living within the Zone of Influence cause a problem is salacious. Why should they be asked to pay for all when most visitors come from outside the Zone? Maybe you should spend some money to encourage your 'experts' to come and actually live at the coast for a prolonged period. They may then know what they are talking about. We, who live and work on the coast appreciate and work with nature on a daily basis. Every day we note increases in wildlife on the coast - all this takes place without interference from human bureaucrats.	The SPD sets out a funding mechanism for the RAMS in the form of a tariff to be paid by developers proposing net new dwellings in the Zone of Influence. It is concerned with the effects of new housing development only. The RAMS sets out strategic mitigation to ensure no significant effects regarding recreational disturbance are realised on Habitats sites on the Essex Coast. No amendment proposed.
26	Mr Hugh Toler	Blackwater Wildfowlers Association (BWA)	The BWA notes the employment of Rangers for monitoring and briefing clubs on codes of conduct. Has consideration been given to using trained volunteers from Clubs such as ours with a knowledge of wetlands, wildfowl and habitat protection?	Volunteers may be sought if deemed necessary by the Delivery Officer but no itemised cost has been identified. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
27	Mr Mark Nowers	RSPB	<p>The ten SPAs around the Essex Coast support approximately half a million wintering waterbirds and important assemblages of breeding birds. Over 72,000 dwellings are due to be built before 2038.</p> <p>The Bird Aware Solent project covered three SPAs supporting 90,000 birds. 64,000 dwellings are due to be built before 2034. In the Solent Recreation Mitigation Strategy, Bird Aware Solent has identified that a team of rangers is the top priority followed by:</p> <ul style="list-style-type: none"> <li>• Communications, marketing and education initiatives</li> <li>• Initiatives to facilitate and encourage responsible dog walking</li> <li>• Codes of conduct</li> <li>• Site-specific visitor management and bird refuge projects</li> <li>• New/enhanced strategic greenspaces</li> <li>• A delivery officer (called 'Partnership Manager' from here on)</li> <li>• Monitoring to help adjust the mitigation measures as necessary</li> </ul> <p>To that end, they employ a team of 5-7 Rangers. To make the best use of resources, the RSPB recommends that Bird Aware Essex re-evaluates the number of rangers currently being considered here given the scale of importance of the Essex Coast outlined above.</p>	Noted. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
28	Mr Gavin Rowsell	Resident	The only positive is that within the £9 million you 'may' employ 5 people.	The plan is to provide lasting benefits to habitats of national and international importance in Essex. No amendment proposed.
29	Mr Bernard Foster	Resident	It would have been easier to read if the box could have been expanded instead of just the contents. Information useful as a guide or expectation.	Noted.
30	Mrs Christa-Marie Dobson	Feering & Kelvedon Wildlife Group	£1,000 for signage seems a small budget given the area of coverage and the potential Essex Coast Path. I do not understand the £5,000 cost associated with the visitor numbers and recreational activities. Communication: What about website updates? Is there no cost associated with updating the by-laws? Contingency seems small.	The RAMS gives more detail regarding the costed mitigation package. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
31	Ms Beverley McClean	Suffolk Coast & Heaths AONB team	<p>Proposals in the Essex Coast RAMS proposes signage at Mistley Walls. Mistley Walls lie within the proposed extension area to the Suffolk Coast &amp; Heaths Area of Outstanding Natural Beauty (AONB). The extension to the Suffolk Coast &amp; Heaths AONB is currently awaiting sign off by the Secretary of State. The AONB team are not objecting to the use of new signage in principle but we would like to be involved in discussions on the design of any new signage to be introduced in this area. Any new signage or interpretation boards introduced into the AONB extension area will need to be a high-quality design to reflect the high-quality landscape into which they are to be introduced.</p> <p>As part of the England Coast Path, Natural England is also proposing new signage along the following stretches of the south bank of the Stour: Ray Lane, Ramsey to Stone Point, Wrabness, Stone Point, Wrabness to Hopping Bridge, Mistley. It will be important to co-ordinate the installation of all new signage/ interpretation boards being proposed along the south bank of the Stour to avoid clutter within the extension area to the nationally designated landscape. The AONB team will be happy to provide any further advice on I'm a Good Dog Project if necessary when the RAMS Dog Project is being developed/expanded.</p>	Noted. The Delivery Officer will engage with key local stakeholders on implementation of the project once in post. No amendment proposed.
32	Mr Michael Hand	Campaign to Protect Rural England - Essex Branch	With reference to comments provided in Section 4 above, CPRE questions why the total package budget is not higher and funded through additional revenue from the inclusion of already consented dwellings within the provisions of the SPD.	The RAMS gives more detail regarding the costed mitigation package. There is no mechanism that can lawfully ensure retroactive costs are recouped once full planning permission is granted. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
33	Mrs Cecilia Dickinson	Resident	The more I see of this format the more irritating it becomes - section by section is unnecessary, off-putting and boring.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.

## Appendix Two – Essex Coast RAMS Guidelines for proposals for student accommodation

**Table 14 – Appendix Two: Summary of consultation responses and actions**

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	For supporting and monitoring the Zones of Influence the LPA's and other LPA's outside of Essex coming into the area could look at providing educational courses in the Zones of Influence helping the volunteers and full-time equivalents (FTEs). This could be another way to re-coup some money and also gain some etc. support.	Volunteers may be sought if deemed necessary by the Delivery Officer but no itemised cost has been identified. No amendment proposed.
2	Magister Debbie Bryce	Landlord	Students and Wildlife - stupid idea.	Noted. No amendment proposed.
3	Mrs Frances Coulson	Resident	I disagree. Most student accommodation these days is commercially built and run and charged at vast cost to students or their parents. They should also pay.	Appendix 2 of the SPD outlines that proportionate costs will be applicable to student accommodation in the majority of circumstances. No amendment proposed.
4	Mrs Aileen Cockshott	Resident	Regarding Colchester and Southend, student accommodation should be sited away from the coast.	Noted. The location of new student accommodation is outside the scope of this SPD. No amendment proposed.
5	Mr Terry Newton	Resident	It seems to make sense, but any increase in student impact will need to be monitored, as this can change according to many variables, such as nearby facilities frequented by students.	The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
6	Mrs Angela Harbottle	Resident	Not qualified to comment.	Noted. No amendment proposed.
7	Mrs Mary Drury	Resident	Not wasting any more time.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
8	Mrs Alwine Jarvis	Resident	Not sure I agree with the logic used. The document seems to miss out on how many people of the new dwellings will actually have pets. Dogs being the animal which disturbs the birds. I did not see this taken into consideration.	Many examples of student accommodation do not allow dogs to be kept on the premises, hence the different tariff approach proposed for student accommodation, no amendment proposed.
9	Ms Rachel Cross	Resident	Record number of dogs using the space and have rules for dogs and their owners such as those at Essex Wildlife Trust e.g. seen at Langdon nature reserve Dunton.	Noted. No amendment proposed.
10	Mrs Joanna Spencer	Resident	Affordable accommodation and parking needs to be provided.	Noted. No amendment proposed.
11	Mr Matt Eva	Resident	I do not think student accommodation should be made a special case - if you do this then what about nursing homes or any other housing for private rental where pets are not allowed? Keep it simple, if you are building then you pay.	The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
12	Mr Christopher Marten	Resident	Dogs must be kept on leads at all times and ownership of cats should be outlawed because cats can have a devastating effect on bird populations.	Noted. No amendment proposed.
13	Mr Peter Dervin	Resident	Put people first, we need to educate our young people and then maybe they might have a better understanding of the problem instead of taxing them. Every cost in the end is paid for by the end user so it will be our young people that will be put off becoming educated if the costs get too much.	The tariff is paid by the developers of new housing, not residents. It is a one off payment and does not affect investment made by other sources in general education. However, part of the mitigations will be to provide a better understating of the habitats and visitors responsibilities when visiting the coast. No amendment proposed.
14	Mr Neil Hargreaves	Resident	'So, a scheme for 100 student accommodation units would be considered 40 units. 40 units would then be halved providing that future occupiers are prevented from owning a car and keeping a pet.' This seems overly complex.	The effectiveness of the mitigation will be monitored as outlined

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			What happens if pets are banned but cars are not? How does anyone know if a student keeps a car off site and says nothing? Will there be a restrictive covenant to stop a future management changing the rules? What about holiday use when conferences are in? The payment would be £24.46. Is it worth all the form filling to collect this? I suggest make a flat rate for student accommodation	within Section 6 of the SPD. No amendment proposed.
15	Mr Brian Jones	Resident	Students often have societies that lead to visits to the coasts, e.g. Birdwatching, geology, botany etc. Such visits may be made by coach and can cause serious disruption to the habitats.	The SPD is related to new residential development only. No amendment proposed.
16	Mrs Joanna Thornicroft	Resident	I can understand a reduced fee per unit as each one would only house a single individual, but there is no reason to believe that students will not visit these areas as much as any other individual.	The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.
17	Mrs Susie Jenkins	Brightlingsea Nature Network	Good points.	Noted. No amendment proposed.
18	Mr Graham Pike	Resident	Nicely explained and detailed.	Noted. No amendment proposed.
19	Councillor Frank Belgrove	Alresford Parish Council	The evidence that dogs are the major threat in causing wild bird flight is interesting.	Noted. No amendment proposed.
20	Mr Roy Hart	Skee-tex Ltd Local Councillor, Head of the River Crouch Conservation Trust & owner of 1.5 miles of river banks of the Crouch	Wildlife is thriving.	Noted. No amendment proposed.
21	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	This is more taxation by the RAMS and will be difficult to apply.	The effectiveness of the mitigation will be monitored as outlined

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				within Section 6 of the SPD. No amendment proposed.
22	Mr John Fletcher	Resident	This is a waste of money.	Noted. No amendment proposed.
23	Mrs Jackie Deane	Great Dunmow Town Council	No objections to the proposals.	Noted. No amendment proposed.
24	Mr Bernard Foster	Resident	To start building student dwellings in vulnerable areas will raise a few eyebrows. Remembering that all forms of encroachment - light, noise, vibration - can have an impact over varying lengths of time. To encourage a generation to have environmental insight should be seen as proactive. If the correct balance is struck it will be proven in the future.	Locational criteria for development are a matter for Local Plans and development management at the LPA level and not within the scope or remit of the RAMS or SPD. No amendment proposed.
25	Mr Mark Marshall	Resident	Universities and developers make plenty of money from student accommodation. Why should they be exempt from costs others have to pay? If they do not pay their share, then others pick up the tab and that is not fair.	Appendix 2 of the SPD outlines that proportionate costs will be applicable to student accommodation in the majority of circumstances. The number of student accommodation proposals have not been used to calculate the scale of mitigation needed in the RAMS. Therefore, developers proposing other residential development schemes will not be charged a higher rate to compensate for a lower tariff for student accommodation. No amendment proposed.
26	Mrs Christa-Marie Dobson	Feering & Kelvedon Wildlife Group	A decision is needed for student tariffs.	Appendix 2 of the SPD outlines that proportionate costs will be applicable to student accommodation in the majority of

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				circumstances and sets out methodology. No amendment proposed.
27	Ms Beverley McClean	Suffolk Coast & Heaths AONB team	The AONB team welcome that a tariff is being considered for proposals for new student accommodation. The approach proposed and the tariff proposed are considered fair and proportionate. Some areas e.g. Colchester have large amounts of both on campus and private student accommodation built or planned within the Zone of Influence of the Colne Estuary. It is therefore appropriate that these developments contribute towards the cost of mitigating the impacts of increased recreational pressure linked to this type of development.	Noted. No amendment proposed.
28	Mrs Cecilia Dickinson	Resident	The more I see of this format the more irritating it becomes - section by section is unnecessary, off-putting and boring.	Noted. The SPD seeks to be as clear as possible and easy to follow. No amendment proposed.

## Other Comments

**Table 15 – Other Comments: Summary of consultation responses and actions**

No.	Name	Organisation	Main Issues Raised	Response / amendment required
1	Mrs Sharron Amor	Resident	I am glad that this is being looked into however developing more homes in Essex outside of the coastal areas is also an issue. I live in Billericay and am extremely concerned about the wildlife that would be affected if my LPA goes ahead with its housing plans.	The RAMS and SPD proposes a tariff within a Zone of Influence that extends 22km from coastal areas. No amendment proposed.
2	Magister Debbie Bryce	Landlord	European protected site is of international importance.	Noted. No amendment proposed.
3	Mrs Alwine Jarvis	Resident	This is important work to preserve the environment for birds and for us residents to be part of this. However, this needs to be summarised so more people will be able to actively read everything and get involved as it is so important for our future generations.	Summaries are provided in Sections 2 and 3 of the SPD, which also includes links to a 'Frequently Asked Questions' page on the Bird Aware website. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
4	Mrs Joanna Spencer	Resident	Too much of the countryside is being built on, not enough thought goes into road structures or new roads being produced, road designs. Residents are never consulted enough or given enough time to object to planning. Southend airport is damaging to peoples' health in the area and the culling of birds to support the airport is not acceptable.	Locational criteria for development, and supporting infrastructure, is a matter for Local Plans and development management at the LPA level and not within the scope or remit of the RAMS or SPD. The same applies to consultation of planning proposals and Local Plans. No amendment proposed.
5	Mr Matt Eva	Resident	There does not appear to be any consideration of negative impacts of the proposal, e.g. encouraging development elsewhere whilst not reducing impact on sites, and moving problems elsewhere.	Locational criteria for development are a matter for Local Plans and development management at the LPA level and not within the scope or remit of the RAMS or SPD. No amendment proposed.
6	Mr Bill Sedgwick	Resident	There will be no wildlife or green spaces if the various councils continue to concrete Essex. All that us being built is new estates that does nothing for the county or environment. There is an abject failure of house builders and councils to look at roads, schools, buses, railway capacity and hospitals.	Locational criteria for development, and supporting infrastructure, is a matter for Local Plans and development management at the LPA level and not within the scope or remit of the RAMS or SPD. No amendment proposed.
7	Mr Terry Wallace	Resident	Does not view the consultation as important.	Noted. No amendment proposed.
8	Heather Read	Natural England	Support for the determination of the Essex Coast RAMS, SPD, HRA and SEA Screening.	Noted. No amendment proposed.
9	Mr Richard Carr	Transport for London	Confirmation that we have no comments to make on the draft SPD.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
10	Mr Colin Holbrook	Blackmore Village Heritage Association	<p>I support this initiative. When Brentwood Council must consider Bird welfare that is 22 kilometres away from its boundary, it is a shame that more effort is not put into protecting the habitat of people when considering new build habitation. Brentwood Local Development Plan has been adversely impacted and damaged by new development approved by neighbouring Epping Forest District Council.</p> <p>I would urge that all planners are required to afford the same consideration to human neighbours they are legally bound to give to birds.</p>	Locational criteria for development, and supporting infrastructure, is a matter for Local Plans and development management at the LPA level and not within the scope or remit of the RAMS or SPD. No amendment proposed.
11	Ms Margaret Carney	Resident	Unsure what kind of response is required from the consultation and the subject matter.	Noted. No amendment proposed.
12	Mr Edward Harvey	Resident	Is there a document that explains what "Recreational disturbance Avoidance and Mitigation Strategy" actually means in plain English?	Summaries are provided in Sections 2 and 3 of the SPD, which also includes links to a 'Frequently Asked Questions' page on the Bird Aware website. No amendment proposed.
13	Mr Matthew Breeze	County Planning, Minerals & Waste, Cambridgeshire County Council	Confirmation that the County Council, in its role as a Minerals Planning Authority, has no comments on this document.	Noted. No amendment proposed.
14	Mr Stewart Patience	Anglian Water Services Limited	We note that the expectation is that all housing development located within the Zones of Influence as defined would be expected to make strategic contributions to the RAMS. Reference is also made to tourism accommodation potentially having significant effects on protected habitats sites and being required to provide a Habitats Assessment and potentially mitigation measures. However, there is no guidance provided for non-housing development which would not be expected to give rise to recreational disturbance. For the avoidance of doubt, we would ask that it made clear that other types of development including infrastructure provided by Anglian Water would not be expected to make contributions to RAMS.	Effects on Habitats sites from non-residential development proposals will be addressed in project-level HRAs of proposals, where relevant. It is however proposed that the SPD is amended to set out that all non-residential proposals are exempt from the tariff.
15	Mr John	Resident	It is important to take a detailed look at all adjacent waters to our estuaries as they are a vital link in the chain of protecting wildlife. All rivers feeding estuaries	The scope of the RAMS and SPD is specific to Habitats Site

No.	Name	Organisation	Main Issues Raised	Response / amendment required
	Parish		need careful management. A prime example is a new vast housing project next to River Blackwater Braintree Essex which is going to be far too close to the river corridor. With increasing population, sensible management of coastal areas is even more important. Dogs are a menace on sensitive areas and banning them may be necessary to protect nesting birds. Environment Agency will need to be aware and work with all other agencies etc to achieve improvement for future generations.	designations only. The need for project-level HRAs and where necessary AAs still applies to development proposals, and pathways to Habitats sites regarding non-recreational effects can be expected to be explored as part of those processes. No amendment proposed.
16	Unknown	CLH Pipeline System Ltd	We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to <a href="http://www.linesearchbeforeudig.co.uk">www.linesearchbeforeudig.co.uk</a> , our free online enquiry service.	Noted. No amendment proposed.
17	Ruth & David Burgess	Landowner	As land owners in the Thundersley, Benfleet area, we are interested to learn when the new draft Local Plan is likely to be introduced.	Section 8 of the SPD provides links to all partner LPA websites where updates to Local Plan progress can be found.
18	Mr Frank Last	Badger Rescue	I do not seem to be able to find any mention of Wat Tyler Country Park or Fobbing Marshes in your report. Can I ask why this is? especially due to the large amount of flora & fauna there is at both places.	The scope of the RAMS and SPD is specific to Habitats Site designations only. No amendment proposed.
19	Mr David Dunn	Resident	I feel far more representation on the issue of the effects of the ensuing climate crisis should be at the top of the agenda in all thinking. This along with more heat and new species of birds and marine life a whole new approach has to be adopted to cater for all the habitats they all use alongside our enjoyment of them. Surely to not maintain many of the sea defences is folly, when the already degraded marshes, saltings and cliffs are being wasted and not properly managed mainly due to lack of finances. There have been monies available from the EU in the past for various schemes but this has failed to materialise.	The scope of the RAMS and SPD is specific to Habitats Site designations only. No amendment proposed.
20	Mrs Anne Clitheroe	Essex County Council	Essex County Council is satisfied with the content of the Essex Coast RAMS SPD and confirms that it wishes to continue to be engaged in this process.	Noted. No amendment proposed.
21	Mr Derek T.	Resident	With so many problems currently confronting the UK, I am very surprised that the subject matter heading, justifies any consideration by central and local	The scope of the SPD, and the tariff proposed, is relevant to 'in-

No.	Name	Organisation	Main Issues Raised	Response / amendment required
	Park		government whatsoever. Furthermore, if pursued, it will incur costly resources, again defrayed by taxation at public expense. The disturbance of coastal bird habitats should be dealt with directly by the charities or trusts responsible for such nature reserves. Whoever is responsible for the reserves, could be required to secure boundaries with a single controlled gated access, enabling admission numbers to be limited and a fee charged for entry. Similarly, any erected viewing hides inside or outside the curtilage of sites, could have a charge machine installed to allow entrance. Any marine entry to reserves should be licensed, authorising where appropriate, limited pre-agreed scheduled frequency of visitation. Otherwise ban with a penalty such disturbing access. I am fascinated by the composition of the somewhat bureaucratic expansive subject heading.	combination' recreational effects from future housing growth only and to deliver the mitigation proposed in the RAMS. Charities and trusts cannot be expected to generate sources of funding to pay for the mitigation at the scale required. No amendment proposed.
22	Mr John H Bayliss	Hilbery Chaplin	I believe that this is a very important subject to be considered because there is no doubt that the Essex Coast and adjoining landscape is of vital importance for the protection of wildlife and the future of this unique part of the United Kingdom.	Noted. No amendment proposed.
23	Mr Mark East	Resident	I have a concern that there could be a legal challenge as no consideration has been given to whether alternative development sites outside of the Zone of Influence are appropriate to reduce the level of development within the Zones of Influence. Development is being encouraged to boost the economy without adequate care for the harm to our fragile environment. I feel more time and thought is necessary to find a pragmatic solution and one that delivers protection rather than a source to generate income.	Alternative site allocation outside of the Zone of Influence would only need to be considered in Stage 3 of the HRA process of the LPA's Local Plans. Stage 2 of that process (AA) considers that mitigation is possible to ensure that development proposals would not have any in-combination recreational effects on the Essex Coast's Habitats sites. As such there was no need for any of the Local Plans to progress to Stage 3 of the HRA process. No amendment proposed.
24	Mrs Linda Findlay	Resident	On any development look at the long-term impact and always ask how can we tweak this to improve our natural environment.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
25	Mr Barrie Ellis	Resident	I hope this level of support goes ahead to protect our coastal areas for birds, whilst taking into account our need for more affordable housing. It is good to see.	Noted. No amendment proposed.
26	Nicola Sirett	Resident	There is no mention of what the money would pay for, beyond a few wardens. Surely there should be some physical infrastructure to manage higher visitor numbers. The report only talks about the impact of visitor numbers. No mention of the pressure on water quality along the coast which comes from managing the increased sewage and storm runoff (due to increased percentage of impermeable surfaces). This is a significant threat to wildlife and local fishing / shell fish (oyster) production. Where can I read the plans to mitigate against these issues?	The RAMS provide more information of the mitigation measures to be funded. The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. The need for project-level HRAs and where necessary AAs still applies to development proposals, and water quality can be expected to be explored as part of those processes. No amendment proposed.
27	Mr Graham Farley	Resident	<p>The plan covers the period to 2038 and yet there is no mention of The National Infrastructure Project (NIP) at Bradwell in the form of new nuclear power station. Such a build will restrict new housing in particular on Mersea and around Bradwell for evacuation reasons then of course there will be the environmental issues, building issues and restrictions on movement to allow such a build to go ahead.</p> <p>You are costing charges and its admirable to support the numerous environmental protections but if this NIP goes ahead the damage caused to protected areas will completely undermine the Essex Coast RAMS.</p>	<p>The need for project-level HRAs and where necessary AAs still applies to development proposals, and other non-residential effects can be expected to be explored as part of those processes.</p> <p>The SPD does not apply to Nationally Significant Infrastructure Plans (NSIPs), which are dealt with under the 2008 Planning Act rather than the Town and Country Planning Acts for applications for planning permission. Engagement has not yet gone into sufficient detail however it is expected that the</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				Bradwell B Project would follow the SPD's advice that the 'applicant can provide information for a project level HRA/AA and secure bespoke mitigation to avoid impacts on Habitats sites in perpetuity'. We consider that the nuclear power station, and associated development including the proposed 4,500 temporary workers accommodation would be dealt with via the Development Consent Order. No amendment proposed.
28	Mrs Natasha Hurley	Savills On Behalf of Thames Water Planning Policy	The area affected does not include land served by Thames Water.	Noted. No amendment proposed.
29	Mrs Karen Hawkes	South Woodham Ferrers Town Council	<p>Throughout the SPD there are references to EU Legislation. What will happen after Brexit: will these laws be enshrined in UK Law?</p> <p>Bullet point 4 (Table 4.1) states "Information on alternative sites for recreation". Whilst it is appreciated that the area needs to be protected the preferred message should be with information signage and alternative routes within the same location. If visitors are being sent to alternative locations this would result in increased motor vehicle usage; visitors may be less likely to visit the site which would affect their health and wellbeing.</p> <p>Bullet point 6 "Interpretation and signage" - Members would welcome universal / uniform signage throughout all the Essex Coastal Habitats.</p> <p>Page 12 Action Area Table - Members would request that relevant town and parish councils are detailed as partnership organisation.</p> <p>Page 13 Budget and Appendix 1 Strategic Mitigation - Whilst members are</p>	<p>The content of the relevant EU Directives related to birds and habitats have been transposed into UK law and will continue to apply. No amendment proposed.</p> <p>The message regarding 'alternative sites for recreation' can be expected to apply to future trips for recreation.</p> <p>Noted. Comments regarding uniform signage and additional stakeholders in the partnership organisation can be acted upon by the Delivery Officer, once</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>supportive of the Action Areas identified, there are concerns as to whether they are deliverable within the budget identified. Members suggest that the toolkit needs revisiting to ensure that the projects can be delivered within the budget available. They also identified that there is excessive funding on personnel and enforcement and insufficient funding on the delivery of actual projects. Members are also concerned that the type of projects proposed are already being delivered by other stakeholders and that this is an unnecessary duplication of work.</p> <p>Page 15 Schemes under 10 dwellings - There are concerns that reasonable costs of completing and checking the agreement is not required and that a more straightforward method would be as a matter of course to charge the £122 a home once the location is identified within a zone as detailed on p7.</p> <p>Page 16 Section 5 Alternative to paying into RAMS – Para 5.2 should be removed. There should be no option for developers to carry out their own surveys. If the surveyor evidenced that there was no requirement to fund the tariff this would result in a shortfall in the anticipated income and as a result projects detailed may not be able to be funded.</p> <p>Page 17 Para 6.3 Steering Group - This should include relevant partners as detailed in table 4.1.</p> <p>With reference to the steering group, members would welcome a representative from all partnership organisations as detailed on page 13 with the addition of town and parish councils. As currently stipulated in the plan there is no input from RSPB, Essex Wildlife Trust and town and parish councils.</p>	<p>appointed. No amendment proposed.</p> <p>The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.</p> <p>Some LPA partners do not charge a legal fee for minor applications, they are solely required to pay the tariff. Schemes under 10 dwellings have been identified as requiring to pay for legal costs as no mechanism currently exists for smaller proposals to pay through a Section 106 agreement. No amendment proposed.</p> <p>Alternatives to paying developer contributions to the RAMS would only be acceptable where bespoke mitigation addressing recreational effects on the Essex Coast can be delivered. To identify and justify other forms of mitigation as suitable, visitor surveys would have to be produced by the applicant.</p>
30	Mrs Susie Jenkins	Brightlingsea Nature Network	<p>This strategy encourages LPAs to grant planning permission as a way to accrue money for this fund. How will this be avoided? Also, there is no mention throughout this strategy that there should be no development near the habitats due to disturbance. LPAs should feel supported in turning down inappropriate development.</p>	<p>The tariff is proportionate to the in-combination effect each new dwelling will have on the Essex Coast's Habitats sites and monies collected will not be used to fund</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				<p>anything other than the strategic mitigation of the RAMS. No amendment proposed.</p> <p>Each development proposal within the Zone of Influence will need to undertake an HRA and where appropriate an AA to assess other non-recreational effects on Habitats sites. This will include development near to the Habitats sites themselves. No amendment proposed.</p>
31	Mr PC Paul Rawson 2858	Essex Police Marine Unit	As part of Essex Police Marine unit, we would be very grateful to discuss potential outcomes for the future and any possibility of joint working.	Noted. Joint working requests can be acted upon by the Delivery Officer, once appointed. No amendment proposed.
32	Mr Edward Harvey	Resident	Is there a document that explains what "Recreational disturbance Avoidance and Mitigation Strategy" actually means in plain English?	Sections 2 and 3 of the SPD provide summaries of the RAMS and scope of the SPD. Additionally, the SPD signposts a 'Frequently asked Questions' (FAQ) document' which is available on the Bird Aware Essex Coast website. No amendment proposed.
33	Mrs Diane McCarthy	Billericay Town Council	The document makes no mention of any sustainable methods of transport.	Each partner LPA's Local Plan contains policies regarding sustainable transport. No amendment required.
34	Ms Diane Jackson	MAG London Stansted Airport	We have no aerodrome safeguarding objections to the proposals.	Noted. No amendment required.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
35	Councillor Roy Martin	Resident	The consultation has been badly designed, extremely lengthy and not user friendly, so it is not practical for everyone to respond in full. The main area of major concern in Hockley and the District of Rochford is the volume of massive new builds being allowed which impacts on every aspect of life including transport systems. Developers should be held responsible for the impact on infrastructure and protection of the environment with penalties applied for failure to comply. Local knowledge and views must be satisfactorily resolved to give the government a better understanding of the consequences of their decisions before planning is approved.	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. No amendment proposed.
36	Mr Graham Pike	Resident	I found this a very interesting exercise. The documentation was laid out well. Lots of useful data included. Findings very sound.	Noted. No amendment required.
37	Mrs Helen Waterfield	Black Notley Parish Council	<p>Black Notley Parish Council support the strategy. We generally agree on the action/examples given however we strongly feel that there should be no newbuilds at all in close proximity to sensitive sites. Development of recreational facilities must not impact on the character and charm of the very areas this is setting out to protect. Footpaths/access and parking facilities must only be developed in keeping with the existing location and area.</p> <p>In the more outlying locations diverting footpaths away from the waterside areas and installing screening is also unfair to ramblers and wildlife watchers who want to appreciate the estuary views.</p> <p>We look forward to more and better access to Footpaths along this special coastline and footpath maps should be provided. There should be separate routes for cyclists.</p> <p>Access to Sites of Special Scientific Interest should be limited only during the breeding season of birds and wildlife, and dogs must be kept on a lead at these times.</p>	<p>Each development proposal within the Zone of Influence will need to undertake an HRA and where appropriate an AA to assess other non-recreational effects on Habitats sites. This will include development near to the Habitats sites themselves. No amendment proposed.</p> <p>The Essex Coast RAMS toolkit (Table 4.1 of the SPD) includes 'Provision of information and education' as an Action Area. This could include 'maps with circular routes away from the coast on alternative footpaths.' No amendment required.</p>
38	Mr Vincent Titchmarsh	Titchmarsh Marina (Walton-on-the-Naze) Ltd	This scheme is totally undemocratic and dictatorial. It is obvious that this consultation document is circulated purely in order to comply with necessary regulations.	Noted. High-level oversight of the project is undertaken by the Essex Coastal Forum which

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			RAMS is an unmanageable, unnecessary proposed organisation, to be run by un-elected, un-regulated members with the power to raise money, at the expense of the housing market; mostly affecting the less well off in society who need affordable council or private sector housing.	included locally elected Members. No amendment proposed.
39	Mrs Jacqueline Smith	Resident	<p>I generally agree on the action/examples given, however strongly feel that there should be no newbuilds at all in close proximity to sensitive sites. Development of recreational facilities must not impact on the character and charm of the very areas this is setting out to protect. Footpaths/access and parking facilities must only be developed in keeping with the existing location and area.</p> <p>In the more outlying locations diverting footpaths away from the waterside areas and installing screening is also unfair to ramblers and wildlife watchers who want to appreciate the estuary views.</p> <p>I look forward to more and better access to Footpaths along this special coastline and Footpath Maps should be provided. There should be separate routes for cyclists.</p> <p>Access to Sites of Special Scientific Interest should be limited only during the breeding season of birds and wildlife, and dogs must be kept on a lead at these times.</p>	<p>Each development proposal within the Zone of Influence will need to undertake an HRA and where appropriate an AA to assess other non-recreational effects on Habitats sites. This will include development near to the Habitats sites themselves. No amendment proposed.</p> <p>The Essex Coast RAMS toolkit (Table 4.1 of the SPD) includes 'Provision of information and education' as an Action Area. This could include 'maps with circular routes away from the coast on alternative footpaths.' No amendment required.</p>
40	Mr Mark Nowers	RSPB	Regarding the 'Essex Coast RAMS SPD SEA/HRA Screening Report' - further to our comments regarding the Outer Thames SPA, we note that in Appendix 2 (Broad illustration of the Zone of Influence of the RAMS) that red line extends over the Outer Thames SPA designation, but it is not identified as such.	It is proposed that the map in Appendix 2 of the Essex Coast RAMS SPD SEA/HRA Screening Report be amended.
41	Mrs Jackie Deane	Great Dunmow Town Council	The Town Council is generally supportive of the proposals.	Noted. No amendment proposed.
42	Mr Gavin Rowsell	Resident	I think I have put my point across.	Noted. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
43	Mrs Angela Faulds	Brentwood and Chelmsford Green Party	We feel the area is already overdeveloped and the expectation of nearly a quarter of a million more people living alongside the coastal areas of Essex, with their priceless wildlife habitats is unsustainable.	Noted. No amendment proposed.
44	Mr Julian Novorol	Hamford Water Management Committee	We would like to request that when rangers are appointed for the coast/ Hamford Water area that we have the opportunity to meet with them to discuss the management/ problems that we experience in the Backwaters.	The Delivery Officer and Rangers can explore joint working arrangements, once appointed. No amendment required.
45	Mrs Jane Taylor	North East Essex Clinical Commissioning Group	<p>On behalf of the Health system in North East Essex namely;</p> <ul style="list-style-type: none"> <li>- North East Essex Clinical Commissioning Group</li> <li>- East Suffolk North Essex Foundation Trust</li> <li>- Anglian Community Enterprise</li> <li>- Essex Partnership University Trust</li> <li>- East of England Ambulance Service</li> </ul> <p>We have reviewed the above and acknowledge the content, we have no formal feedback to provide.</p>	Noted. No amendment proposed.
46	Mrs Kelly Holland	Canewdon Parish Council	Canewdon Parish Council support the aims of the document particularly the requirement that all developments would have to take the document into account especially those that do not go through the formal planning process.	Noted. No amendment proposed.
47	Mr K. Randall	Resident	<p>I feel the most important matter to consider in this Planning Document is the predicted rise in water levels caused by climate change. Another concern is coastal erosion which is extremely difficult to contain and resolve. As for developments, the Authorities should consider arranging for proposals to be based further inland and, if possible, on higher ground due to the threat of rising water levels. Also, the Authorities should mitigate the over development and instead concentrate on improving the environment, services and infrastructure in these coastal areas. No development should be allowed on Green Belt land. Due consideration should be given to building new housing in a manner that negates the effects of climate change in the future. Perhaps the Local Authorities could request that some trees are planted on new housing development estates.</p> <p>I feel that the priority of all the Local Authorities involved is to protect our</p>	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. Decisions on the distribution of new housing growth is outside the scope of this SPD. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			valued coastline areas from flooding and that any new housing proposals should be curtailed until this protection has been put in place.	
48	Mr Bernard Foster	Resident	If you want to sell what can only be seen by the general public as restrictions, you need to show that you support realistic alternatives away from the sensitive areas. Interact with local infant and junior schools in a positive way, children remember best what they enjoy, so make it fun to learn.	Each development proposal within the Zone of Influence will need to undertake an HRA and where appropriate an AA to assess other non-recreational effects on Habitats sites. This will include development near to the Habitats sites themselves. Engagement with local schools will be considered by the Delivery Officer once in post. No amendment proposed.
49	Mr Tim Woodward	The Country Land & Business Association (CLA)	We are very concerned that members, who may be considering a development on their land which will help local authorities meet their housing targets, or a visitor facility or commercial development which will help to boost tourism to the area or provide rural employment, could face CIL charges as well as the charges proposed in the SPD. It seems unfair that they will be held responsible for increased recreational access to the Essex Coast, and consequent disturbance to habitats and bird species, at a time when extra access is being actively encouraged and facilitated by the delivery of the England Coast Path by Natural England.	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only and enables housing growth to continue in line with the requirements of the Birds Directive and Habitats Directive. No amendment proposed.
50	Parish Clerk for West Horndon Parish Council Kim Harding	West Horndon Parish Council	West Horndon Parish Council supports the broad principles of the RAMS.	Noted. No amendment proposed.
51	Ms Jo Steranka	Resident	The Essex coastline, and therefore the Designated Sites are low-lying. The highest land point is at Walton-on-Naze, which is a mere 20 metres above sea level. This means that they are highly vulnerable to erosion and sea-level rise. The only mitigation for climate-induced habitat loss in the future is to minimise	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>the carbon emissions from residential dwellings.</p> <p>Whilst not specifically commenting on the section on student residential development, I note that it is considered that the Tariff for these developments should be reduced because students are not generally car or dog owners.</p> <p>The Strategy has missed an opportunity to use the residential planning process to control the availability of parking in new developments and household energy efficiency (for example) to mitigate against damage to the Designated Sites from climate heating. It might be argued that 73,000 new homes is a fraction of the carbon emissions threatening the planet, but on an annual basis those emissions will still make a contribution.</p>	<p>The type of new dwellings built within the Zones of Influence and parking standards for new dwellings is outside the scope of the SPD.</p> <p>Each development proposal within the Zone of Influence will need to undertake an HRA and where appropriate an AA to assess other non-recreational effects on Habitats sites. This will include development near to the Habitats sites themselves. No amendment proposed.</p>
52	Ms Beverley McClean	Suffolk Coast & Heaths AONB team	Please see the map for the Suffolk Coast & Heaths AONB extension area which may be useful for future discussions.	Noted. No amendment required.
53	Mrs Cecilia Dickinson	Resident	<p>The LPAs, Essex County Council and Natural England want to charge property developers per unit to mitigate potential disturbance to bird/coastal habitat, yet Natural England want to build a Coast Path – an invitation to people to trek the Coast Path causing the disturbance that mitigation is being planned for.</p> <p>One or the other. Either protect the coastal sites - or build a Coast Path and the wildlife can take its chances. The Habitats Regulations already require these sites to be protected. Use the collections to fund on-the-ground mitigation as well as digital media that should be provided by the LPAs and Essex anyway. Nobody asked us if we want all these residential units built - we are told we are going to get thousands. Do not build on greenfield sites, do not build near the coast, designate some sites as people sites. Natural England will have to reroute the path.</p>	The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. Natural England have been involved in the development of the RAMS and SPD. The distribution of new housing growth is outside the scope of this SPD. No amendment required.
54	Ms Jessica Ferguson	Martin Robeson Planning Practice	The Regulations require an assessment of whether a project i.e. a development proposal, is likely to have a significant effect either alone or in-combination with other plans or projects. Planning permission should not be	Under the Habitats Regulations each development proposal will need a project-level HRA. This is

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>granted for such unless appropriate mitigation is provided. It would seem appropriate, since development has to be assessed based upon the likelihood of significant effects arising from the development alone and relevant mitigation provided, that the same approach is also taken to assess 'in combination' effects. Relevant and necessary mitigation should only be provided, based upon the scale of the proposal, its use and the site context, rather than this being prescribed for every development. The SPD however takes a more generalised approach, requiring the same contribution from every development regardless of its context or specific use.</p> <p>Requiring a site-specific assessment takes a similar approach to that by an Inspector into a recent appeal in Chelmsford (Appeal Reference APP/W1525/W/19/3236158). He stated that he could "not be satisfied that the suggested mitigation measures within the planning obligation would be sufficient to mitigate the harm to the Blackwater Estuary SPA and Ramsar site and the Essex Estuaries SAC" (paragraph 19). This is suggestive that an approach to determining whether there is likely to be a significant effect should be determined on a case by case basis. This then raises a question as to whether Regulation 122 of the CIL Regulations is met, particularly in terms of whether such a contribution could be directly related to the development and fairly and reasonably related in scale and kind. Whilst the SPD seeks to justify the contribution against Regulation 122 at paragraph 4.12, this is tenuously linked.</p> <p>The SPD does not take into account other mitigation proposed or in place on site or in the vicinity of the site, which is aimed at ensuring that residents do not travel to Habitats sites. Whilst it is acknowledged that paragraph 5.2 of the SPD identifies that an alternative to such a contribution would be for applicants to conduct their own visitor surveys and secure bespoke mitigation, this is not particularly advocated by the SPD and does not specify other considerations that would have a bearing on the mitigation that might be required e.g. on site spaces and local facilities etc.</p> <p>The generalised approach taken also has implications for the applications to</p>	<p>still the case for proposals within the Zone of Influence, and any resultant AA will set our recommendations to mitigate effects that are directly related to the proposal. This will include other mitigation proposed or in place on site or in the vicinity of the site, which is aimed at ensuring that residents do not travel to Habitats sites No amendment proposed.</p> <p>The tariff is evidence based and proportionate. It is considered inappropriate to apply a 'sliding-scale' in regard to the tariff at this stage and a 'blanket tariff' is proposed as the RAMS seeks to mitigate 'in-combination' effects i.e. those identified from accumulated housing growth in the Zol. This can however be reviewed annually by the Delivery Officer once appointed. No amendment proposed.</p> <p>The appeal referred to was dismissed in January 2020. The Inspector states at paragraph 19 that a copy of the completed obligation towards mitigation measures at Blackwater Estuary SPA and Ramsar site and the</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>which the SPD applies which at paragraph 3.8 is identified to include residential care homes, boarding schools, military barracks along with Houses in Multiple Occupation. Realistically the recreational impacts of each of these will be significantly different from say a family home. However, the approach taken in the SPD is the same for all residential development listed. It is acknowledged that the RAMS tariff of £122.33 would not be a 'fair and proportionate contribution' as it is recognised that any recreational disturbance will not be dog related. The SPD also recognises that in Chelmsford, purpose-built student accommodation, given its distance from Habitats sites and the restrictions generally preventing students from owning a car or a pet, would mean that such developments will not lead to likely significant effects on Habitats sites from increased recreational disturbance. Thus, if it is recognised that a standard approach is not appropriate in some situations, it should equally be applied to others where there will be differing recreational impacts.</p> <p>Paragraph 3.12 of the SPD acknowledges that reserved matters applications will be considered on an individual basis having regard to whether the potential effects of the proposal were fully considered when the existing outline was granted. However, when developing Local Plans and when considering any new applications that come forward, these should have already taken into account any outline applications that had been determined at that time. Such proposals then risk double consideration and the requirement for a contribution towards 'in-combination' effects has the risk of being unrelated to the impacts of the development on the basis that it's 'in-combination' effects would already have been considered by other developments. Therefore, in such situations, when considering the application at the reserved matters stage it should instead be looking at the effects of the development alone.</p> <p>The SPD confirms that the requested contribution is to go towards funding measures set out in Table 4.1. Some measures may not however be relevant to all development proposals and others could be directly provided by the applicant themselves i.e. provision of information and education. This again indicates that a more tailored approach to each application is required. Having reviewed the mitigation package as costed at Appendix 1 we similarly note</p>	<p>Essex Estuaries SAC was not provided so the Inspector could not be satisfied that the suggested mitigation measures would be sufficient. The principle of the RAMS was not addressed further by the Inspector in the report.</p> <p>The RAMS and SPD applies only to 'in-combination effects' which have been identified within the HRAs of the LPAs' Local Plans. Each Local Plan's resultant AA and consultation with Natural England, has identified the need for the RAMS to mitigate in-combination effects and enable development.</p> <p>An amendment to the SPD setting out the requirements of development proposals in regard to statutory HRA procedures and on-site mitigation, and the specific effects the RAMS will mitigate in accordance with Regulation 122 of the CIL Regulations, is proposed.</p> <p>An amendment justifying the inclusion of C2 Residential Institutions and C2A Secure Residential Institutions as</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>items included which would not be relevant to every development, for instance, not every new residential unit will be for a household with a dog or one which undertakes water sports.</p> <p>There is also a concern with respect of the way in which the figure has been calculated. Whilst it is appreciated that the mitigation package cost has been identified as set out at Appendix 1, the division of this total cost by the total number of dwellings which are currently identified to be built over Local Plan periods until 2038 does not necessary accurately reflect the number which will come forward in the next 18 years. It is likely that, given the Government’s emphasis on building new homes, in response to consistent demographic change, that this number will increase. Consequently, this would mean that the contributions collected would exceed the overall cost for the mitigation package. It thus needs to be ensured that, should such an approach to mitigation be adopted (notwithstanding the concerns highlighted above), there are adequate reviews and adjustments to the unit charge accordingly to ensure such figures are fairly and reasonably related in scale and kind to the development. Thus, we endorse, without prejudice to our view that the approach is of itself too generalised, the suggestion at paragraph 6.4 that the monitoring process be “fit for purpose”.</p>	<p>qualifying within the scope of tariff payments is proposed.</p> <p>Regarding reserved matters applications, the quantum of development has been considered in regard to quantifying effects of Local Plan growth, where identified within those Plans. This justifies the tariff being applicable to reserved matters applications, however separate consideration should be given due to the findings of their project-level HRA/AAs where they may have been published prior to the emergence of the RAMS. No amendment proposed.</p> <p>Development proposals within the Zone of Influence will still need to undertake project-level HRA/AA. Proposals may also include bespoke mitigation, and the SPD includes details on this within sections 5 and paragraph 3.14. No amendment proposed.</p> <p>The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed. Adequate reviews and adjustments to the</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				tariff are included within the SPD. No amendment proposed.
55	Mrs Charlotte Bailey	Resident	<p>Natural England is a partner in RAMS, which is hypocritical as they will inflict the England Coast Path on to the river. More publicity means more people walking in the fragile countryside and disturbing birds. Notices warning dog owners to keep dogs on leads are currently ignored and notices are removed from fences.</p> <p>Attempts to try to 'educate the public' will not work and the RAMS will not be able to avoid disturbing birds. Essex has been destroyed with over development. Perhaps included in Information Packs for new home owners a guide could be enclosed to try and educate people on how to behave in the countryside, and how to behave amongst birds &amp; animals.</p>	<p>The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. The mitigation proposed within the RAMS does not seek to prevent visitors to the Essex Coast, rather its focus is on raising awareness of issues at the coast and to foster positive behaviours. No amendment proposed.</p>
56	Mrs Jane Black	The Wivenhoe Society	<p>The calculated tariff does not appear to make any allowance for the need to set aside funding to cover costs in perpetuity but is set at a rate which just covers costs over the period 2019 to 2038 (plus 10% contingency)</p> <p>The proposed tariff is set at the same level regardless of dwelling size. The potential for recreational disturbance will depend on the increase in population so it would be fairer to relate the contribution to dwelling size.</p> <p>In table 3.2 the use class C2 is included. In Appendix 2 there is discussion of how student accommodation should be treated but there is no similar discussion for care homes. Care homes for the elderly are unlikely to generate much recreational disturbance, particularly water based. Consideration should be given to this use class and how an appropriate tariff, if any, should be calculated.</p> <p>Holiday caravan/chalet developments are not included in the list of use classes. Nor is other tourist accommodation. This is discussed in paragraph 3.11 but it is not made clear whether a financial contribution to the scheme will be required.</p>	<p>The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.</p> <p>The per dwellings tariff is evidence based and proportionate to the 'in-combination' effects identified i.e. those identified from accumulated housing growth in the Zol. Each individual proposal is still required to address the specific effects on Habitats sites through project-level HRA/AA within the Zone of Influence, including recreational effects. At this stage effects resulting from dwelling size be addressed and mitigation recommended where necessary. This can however be</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				<p>reviewed annually by the Delivery Officer once appointed. No amendment proposed.</p> <p>Adequate reviews and adjustments to the tariff are included within the SPD. As explained in the RAMS Strategy Document, an in-perpetuity fund will be developed to ensure that mitigation will be delivered in-perpetuity. No amendment proposed.</p> <p>An amendment justifying the inclusion of C2 Residential Institutions and C2A Secure Residential Institutions as qualifying within the scope of tariff payments is proposed.</p> <p>Section 3.9 of the SPD states that, 'Other types of development, for instance tourist accommodation, may be likely to have significant effects on protected habitat sites related to recreational pressure and will in such cases need to be subject of an Appropriate Assessment as part of the Habitats Regulations. As part of this assessment any mitigation proposals (including those which address any</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				recreational pressure) will need to be considered separately from this strategy and taken into account by the appropriate authorities.' No amendment proposed.
57	Mrs Heather Archer	Highways England	Having examined the consultation documents, we are satisfied that its policies will not materially affect the safety, reliability and / or operation of the Strategic Road Network. Highways England does not offer any comments on the consultation at this time.	Noted. No amendment required.
58	Mr Phill Bamford	Gladman	<p>We welcome the proactive and strategic approach that the 12 authorities have taken to addressing this issue and we support the tariff approach to developer contributions which will hopefully simplify the S106 process and ensure a fair and transparent process. However, in introducing the tariff approach, it is essential that all authorities test the level of contribution, alongside all their policy requirements contained in their Local Plans to ensure that the contributions are viable. The level of contribution has been tested through some of the Essex Authorities Local Plan Viability Assessments, but to ensure that the level of contribution is acceptable and will not affect the overall viability of sites, it must be tested through all of the emerging Local Plans for the remaining affected authorities. Should it be found through this process that the level of contribution would cause any of the Essex authorities viability issues, then amendments need to be made to either the specific Local Plan policy in the relevant Local Plan or to the Essex Coast RAMS SPD, to review the level of contributions so that sites remain viable.</p> <p>This issue also applies to the comment made in Paragraph 4.4 of the Draft SPD which states that the tariff will be reviewed periodically and republished as necessary. If the tariff is to be amended, then the proposed revised tariff cost must be below the top of the range of figures tested through the viability assessments of the various Essex authorities Local Plans. If it is proposed that the tariff would increase above the range of costs tested in those viability assessments, then this would trigger a review of the Local Plans affected.</p>	Planning Policy Officers from each of the 12 LPAs have been involved in the progression of the RAMS and SPD since its inception and are thus aware of the tariff introduced. The subject of viability in regard to the tariff can be explored within Local Plan examinations, where deemed relevant. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
59	Mr Michael Atkins	The Port of London Authority (PLA)	<p>It is noted that table 4.1. (The Essex Coast and RAMS toolkit) identifies several mitigation measures. Of these mitigation measures the 'provision of information and education' action area includes a requirement to provide information on the sensitive wildlife and habitats. Although we would encourage education to improve awareness, it must be done in such a way as to not encourage people to visit to see the features of designation such as the populations of overwintering birds.</p> <p>Also, within table 4.1, under the 'habitat creation' and 'monitoring' action areas; to note any habitat creation schemes and/or surveys taken place on the River Thames may require a River Works License with the PLA. The PLA requests to be contacted at an early stage with regard to any habitat restoration proposals within the PLA's jurisdiction. The PLA should also be included under the list of potential partners under the 'partnership working' action area.</p> <p>Within appendix 1 (Strategic Mitigation) it is noted that the mitigation packages for habitat creation and ground nesting bird projects are not proposed to start until year five of the timeline. The PLA considers that these types of projects should be identified at an earlier stage to ensure opportunities for such projects are not lost before any assessments take place.</p> <p>With regard to monitoring of the SPD, it is noted that an annual report will be provided to each LPA to inform individual Authority Monitoring Reports (AMR). The PLA requests to also receive the annual report to be kept update on the progress on the actions contained in the SPD.</p>	The suggested actions are considered relevant for exploration by the Delivery Officer, once appointed. No amendment proposed.
60	Ms Alexa Burns	Emery Planning on behalf of the Williams Group	A blanket tariff does not seem to be a fair approach given that some locations within the Zone of Influence are up to 22 kilometres away from the relevant estuary and only within one Zone of Influence, whereas other locations are within a few kilometres of one or more estuaries and within the Zone of Influence of 5 estuaries. It is considered that a zoned tariff, based upon the number of Zones of Influence a site is within and the distance it is away from the Zone of Influence should be applied. Sites with a greater likely impact on the Zones of Influence will therefore pay a greater tariff and sites on the periphery of the Zones of Influence will pay less.	The RAMS sets out how the Zone of Influence was calculated, including using visitor surveys. Questions asked of visitors to the SPA locations were designed to collect data on the reasons for visits as well as postcodes to evidence Zones of Influence. Additional surveys will improve

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>In addition, the 72,907 dwellings upon which the tariff figure is calculated appears to be an uncertain basis upon which to base the tariff. The reference to the fact that this figure is not definitive and will be subject to review requires clarification. When and how will these reviews take place and how will they be reflected within the SPD?</p>	<p>the robustness of the datasets and repeat surveys of visitors will be undertaken at the earliest opportunity to review the postcode data and Zone of Influence. No amendment proposed.</p> <p>The tariff is evidence based and proportionate to the 'in-combination' effects identified i.e. those identified from accumulated housing growth in the ZoI. Each individual proposal is still required to address the specific effects on Habitats sites through project-level HRA/AA within the Zone of Influence, including recreational effects. At this stage, effects resulting from a proposal's proximity to the Habitats sites can be addressed and mitigation recommended where necessary. This can however be reviewed annually by the Delivery Officer once appointed. No amendment proposed.</p> <p>The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. Adequate reviews and adjustments to the tariff are included within the SPD and will</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				be undertaken annually in line with each LPA's requirement to publish an Annual Monitoring Report (AMR). No amendment proposed.
61	Heather Read	Natural England	<p>Essex Coast RAMS Supplementary Planning Document (SPD) - As mentioned, we understand that the aim of the SPD is to set out the procedures to facilitate the collection of financial contributions towards the identified mitigation measures. On this basis Natural England does not wish to offer substantive comments on SPD and the mechanisms outlined and generally supports its aims.</p> <p>Nevertheless, we would highlight the need for the SPD (and accompanying assessments) to accurately approach the requirements of the Habitats Regulations, such as the hierarchy of avoidance, mitigation and compensation, but also the terminology in terms of impacts. For example, paragraph 2.14 of the SPD refers to the delivery of mitigation to avoid likely significant effects, however the intention of Essex Coast RAMS mitigation is to enable the conclusion of no adverse effect on the integrity of the international designated sites and we would advise clarification on this point. Natural England would also draw your attention to our previous advice on the provision of avoidance measures, such as well-designed open space/green infrastructure, within development boundaries for larger scale schemes (as per our letter reference 244199). We would continue to promote this approach and would suggest this is reflected within the framework of the SPD.</p> <p>Finally, we note the intentions of Appendix 2 which refers to the proportionate assessment for student accommodation. Whilst Natural England does not wish to comment specifically on this approach, we would emphasise the need for consistency with the housing figures used to calculate the tariff to ensure that there is no shortfall in overall funds of the mitigation package, which is otherwise the responsibility of the Competent Authority.</p> <p>Essex Coast RAMS SPD Habitats Regulations Assessment and Strategic</p>	<p>Amendments are proposed that reiterate the requirement for project-level HRA/AA of development proposals which will explore the hierarchy of avoidance and mitigation, and that the SPD is relevant to 'in-combination' recreational effects only.</p> <p>Amendments are proposed to the SPD and the Essex Coast RAMS SPD SEA/HRA Screening Report to clearly set out that the intention of Essex Coast RAMS mitigation to enable the conclusion of no adverse effect on the integrity of the international designated sites.</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>Environmental Assessment Screening - In summary Natural England notes the undertaken assessment and we are generally satisfied with the conclusions of the SEA and HRA Screening report (August 2019), in that the SPD can be screened out for its requirement of Strategic Environmental Assessment and the conclusion of the Habitats Regulation Screening that no further assessment is necessary at this time. As above, we would emphasise the recognition of the aims of the Essex Coast RAMS mitigation in ensuring no adverse effect on integrity, rather than avoiding likely significant effects.</p>	
62	Mr Mark De Roy	Landowner	<p>Because of 'Natural England's' 'Coast Path scheme (my land is 5 miles from the 'Coast') I now have to fence and subdivide my land to protect a multiple of commercial interests and personal garden and amenity areas. I have been told some simple signage may be made available? I will witness a massive increase in the disturbance by 'walkers', 'visitors' to important designated sites of wildlife protection and previously privately protected 'Semi Natural Ancient Woodland' with protected wildlife habitats.</p> <p>A new 'tax/charge' on new dwellings is doubling up on an existing 'Community Infrastructure Levy' further dissuading philanthropic land owners to undertake the provision of village low cost housing provision to help the locally born working in the countryside to live in it. If this is to go ahead, I would only support it if the fund is administered by my 'Local Authority' who have to answer to the residents of this area as to how that money is accounted for and used. I would not support this levy if unaccountable 'Agencies' and dubious 'Charities' are handed yet more landowners money to be mis-spent and wasted yet again.</p>	<p>The scope of the SPD, and the tariff proposed, is relevant to 'in-combination' recreational effects from future housing growth only. No amendment required. The England Coast Path is outside the scope of the SPD.</p> <p>The tariff will be collected and administered at the LPA level and development applications will continue to be determined by the LPA also. No amendment required.</p>
63	Mr Gary Guiver	Tendring District Council on behalf of various key stakeholders with an interest in this project	<p>I am writing on behalf of Tendring District Council in response to the consultation exercise for the Essex Coast Recreation Avoidance Mitigation Strategy (RAMS) Supplementary Planning Document (SPD) to express some of the comments, issues and concerns raised to me by various key stakeholders with an interest in this project.</p> <p>Fundamental concerns have been expressed locally about any strategy or intervention that curtails or restricts the potential for residents and visitors to access and enjoy the coast and which would therefore diminish Tendring's</p>	<p>In ensuring that residential development can be permitted without the determination that there would be resultant significant effects on the integrity of Habitats sites due to recreational disturbance, the tariff can enable growth in Tendring. Many development proposals</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>potential for tourism, economic growth and a healthy resident population.</p> <p>Examples of the more specific concerns and suggestions raised by local stakeholders with unquestionable knowledge of their area (particularly Hamford Water) are summarised as follows:</p> <ul style="list-style-type: none"> <li>• That the money raised through RAMS contributions should not dissuade philanthropic land owners wishing to release land for the provision of low-cost housing for people born locally to live and work in the countryside.</li> <li>• That the RAMS contributions secured from developments in the Tendring area should be controlled and administered only by Tendring District Council as the local authority directly answerable to the landowners, businesses and residents affected. They should not be handed to a potentially unaccountable and faceless body.</li> <li>• The area termed Hamford Water is not, as the documentation suggests, a natural habitat. Instead it is a largely man-made environment that requires constant maintenance, dredging and management to avoid siltation caused by the grass and seaweeds growing in the water, which would otherwise rapidly turn into dried out marsh – as can already be witnessed at Hamford Water.</li> <li>• Whilst the emphasis of the documentation seems to major on birds, the whole chain of natural life requires far closer investigation – e.g. shellfish in Hamford Water (which have been poisoned by human e-coli through the release of sewage from Kirby and Bath House Meadows pumping stations); and sea mammals including seals and porpoises.</li> <li>• There are significant and important other Statutory Bodies with strong legal and commercial interests in Hamford Water including the Harwich Harbour Authority (who has control over the navigation and who collect Port Dues for shipping movements to Bramble Island); and Crown Estates, who own most of Hamford Water below the low tide level.</li> </ul>	<p>related to tourism, economic growth and health are exempt from the tariff.</p> <p>Tendring District Council, as one of the partner LPAs, will be accountable for the collection of the tariff and implementation of the mitigation measures in the Tendring District Council area. Section 6.3 of the SPD states that, 'A representative from each of the partner LPAs, together forming 'The RAMS Steering Group', shall work with the Essex Coast RAMS team...'</p> <p>The RAMS and SPD are related only to the effects of recreational disturbance on those wildlife designations that are classified as 'Habitats sites' of which some of the most significant are within Tendring District, such as Hamford Water and the Stour Estuary. At the Essex Coast these are predominantly designated due to birds. Other effects from development proposals would be explored at the development management stage, in line with requirements for project-level HRA/AA, ecology assessments and Environmental Impact</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<ul style="list-style-type: none"> <li>• Hamford Water has been able to manage itself and the wildlife present to a very high standard, without the need for draconian legal powers and without constant surveillance. The Hamford Water Management Committee already supervises the area at nil cost to anyone except the organisations that willingly contribute – however this body nor any of its members are mentioned once in the RAMS documentation.</li> <li>• The level and nature of monitoring being proposed in the documentation are likely to have little worth, if it is anything like the level of evidence in the report. For example, it is said that the launching of Jet-Skis will be prohibited by legislation at Titchmarsh Marina and in the area around Mill Lane in Walton – yet there is no Jet-Ski activity in Hamford Water and launching is already not permitted at Titchmarsh Marina, Walton &amp; Frinton Yacht Club or at the Walton Town Hard. Jet-Skis do launch from Dovercourt Bay.</li> <li>• Additionally proscribing Jet-Skis totally is contrary to the United Nations Charter of the Seas and Freedom of Navigation to which the UK is a signatory; applying to all coastal areas that do not dry out at low-tide.</li> <li>• It is suggested that people walking on the salt-marsh in the south-eastern corner of Hamford Water is causing significant damage, but without any evidence or detail of the alleged activity. In the last 55 years, little if any such activity has occurred and the only places of access in the south eastern area where the foreshore is accessible are at Island Lane and Foundry Creek where one would sink into soft mud if any such activity was tried.</li> <li>• The documentation states that the Naze are part of the Nature Reserve where wildlife is being affected by people walking there with dogs off their leads – but this area is owned by Tendring District Council having been sold to its successor (the Frinton and Walton Urban District Council) by Essex County Council on the condition it remained a public area with unrestricted public access in perpetuity. There is little wildlife to be found on the Naze other than</li> </ul>	<p>Assessments (EIA) where relevant and required of proposals at the LPA level.</p> <p>The Essex RAMS toolkit includes, within the ‘education and communication’ Action Area, direct engagement with clubs and relevant organisation. The implementation of this can begin once the Delivery Officer is appointed. The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.</p> <p>Moreover, all measures will be actioned meaning that contributions will fund this project. Because contributions are from within the zones of influence, there is no prospect of funding being diverted away from areas that require the greatest protection.</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>Muntjac, a few rabbits and various gulls.</p> <ul style="list-style-type: none"> <li>• Imposing restrictions on the lawful peaceful use of the area around Hamford Water is unwarranted and could prove to be counterproductive. Bird surveys conducted by the local Warden show consistent healthy increases in the bird population.</li> <li>• It should be questioned why the Environment Agency licence to the blowing of eggs of the Lesser Black Backed Gull on Hedge End Island – as this is clearly a man-made intervention that favours certain forms of biodiversity over others and supports the view that Hamford Water is man-made, as opposed to a natural, environment.</li> </ul>	
64	Ms Emma Wreathall	Bradwell Power Generation Company Limited	<p>Given the position of national policy, it is considered appropriate that the Essex Coast RAMS SPD recognises Bradwell as a potentially suitable site for a new nuclear power station. Essex County Council and Maldon District Council both recognise the Bradwell B power station (BRB) as a significant infrastructure project within Essex county and which reaffirms the need to take the Project into account within the new Essex Coast RAMS SPD.</p> <p>The spatial extent of the Zone of Influence for the Essex Coast RAMS (Figure 3.1) includes the Bradwell B nomination site boundary. It therefore follows that BRB GenCo has an interest in the RAMS proposals which may be of relevance in the context of the Environmental Impact Assessment (EIA) and HRA studies that it will need to complete to support a Development Consent Order application (and other regulatory consents) for a proposed nuclear power station.</p> <p>BRB GenCo has initiated a programme of baseline surveys to characterise the abundance distribution and behaviour of birds within a potential Zone of Influence of the proposed power station site. In due course, the results of these surveys will inform the EIA and HRA for the development. This survey work can make a contribution to the evidence base that is available to inform the targeting and deployment of mitigation measures to ensure that they are</p>	Noted. The implementation of specific communication and any joint-working can begin once the Delivery Officer is appointed. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>proportionate and appropriate given the range of pressures that may be prevalent as a result of new development proposals (either alone or in-combination).</p> <p>BRB GenCo looks forward to the opportunity to continue working with key stakeholders to ensure that effects arising from other developments can be taken into account during the forthcoming EIA and HRA studies for the Bradwell B Project.</p>	
65	Mr Matt Verlander	Avison Young on behalf of the National Grid	We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.	Noted. No amendments proposed.
66	Ms Michelle Curtis	Tollesbury Parish Council	<p>It is difficult for the Parish Council to be brought in at this late stage. Especially as we are not even listed under partnership working whereas 'local clubs and societies' are. Had we been included we would have shared our local knowledge which would have shown you that 'aerial disturbance' (page 38) was not the only form of disturbance present in the parish.</p> <p>On page 44 (also page 102 A10.5) we feel that the discussion of mitigation options is rather limited and your concentration on Maldon should possibly be reviewed. Has not the District Council established Tollesbury as an access hub for the estuary?</p> <p>On page 52 under Habitat Creation, your comment that artificial islands 'may' fit in the Shoreline Management Plan (SMP). From our experience, having the largest artificial island in the Blackwater in the Parish, they do fit in with the SMP so we suggest the word 'may' is removed.</p> <p>It is of concern to the PC that the governance of this whole project is still being discussed (page 68) with no reference to any feedback from local sources of information. This project is apparently to run until 2038. Might there not be some value to some two-way communication and representation with Parish Councils to ensure that the project remains fit for purpose?</p>	A consistent approach was adopted in collecting information to establish the RAMS baseline. The suggested actions are considered relevant for exploration by the Delivery Officer, once appointed, as is the implementation of the RAMS in practice. No amendment proposed.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
67	Ms Heather Biner	Resident	<p>The new Local Plan is unsound. The congestion around this area is already unacceptable. The roads cannot handle an increase in traffic especially at rush hour. The pollution levels in some places are already at dangerous levels. Some parts of the area are already at risk of flooding. The GPs, hospitals, schools and other services are already stretched to breaking point. The infrastructure is not in place, nor is the space to add it. As well as the detrimental affect it would have on our wildlife and precious natural spaces.</p>	<p>Noted. The Maldon Local Plan was found to be sound in 2017 and was approved by the Secretary of State in July 2017. These comments are related to the Local Plan in question rather than the SPD. No amendments proposed.</p>
68	Mr Shane Robinson	The British Association for Shooting and Conservation (BASC)	<p>The Birds Directive fully recognises the legitimacy of hunting of wild birds as a form of sustainable use. Wildfowling is an activity that provides significant social, cultural, economic and environmental benefits in the UK. Wildfowling clubs also have a longstanding reputation for their conservation activities. Their understanding of the sites they manage and willingness to work together to the greater good of the site should be embraced.</p> <p>BASC is concerned that the creation of new residential development along the Essex Coast will lead to increased visitor pressure on designated sites. Wildfowling clubs own and lease saltmarsh and foreshore along the Essex Coast.</p> <p>Wildfowling along the Essex Coast is consented by Natural England and has already been approved as having no likely significant effect on the features of designated sites. We are concerned that the proposed mitigating measures in the consultation documents will not address increased visitor pressure associated with new residential development along the Essex Coast.</p> <p>We are concerned that when new residential development inevitably leads to increased visitor pressure that regulated activities such as wildfowling will be targeted as a means of addressing failures with RAMS. Bye-laws restricting walking and walking with dogs could mitigate increased visitor pressure.</p> <p>Preventing or restricting any further residential development along the Essex Coast is the most appropriate means of mitigating increased visitor pressure.</p>	<p>The suggested actions are considered relevant for exploration by the Delivery Officer, once appointed, as is the implementation of the RAMS in practice. Distribution of housing growth is a matter for LPA Local Plans. No amendment proposed.</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>We would like to meet with the RAMS team as soon as possible to discuss our concerns and those of wildfowling clubs with you.</p>	
69	Ms Annie Gordon	Essex Wildlife Trust	<p>We wish to register our concern that neither Essex Wildlife Trust, the RSPB or the National Trust were included in the steering group for the development of the RAMS project. All three Non-Governmental Organisations have significant coastal landholdings either including, or directly adjacent to, Habitats sites.</p> <p>While we accept that this strategy is now widely advocated, there is a notable lack of evidence to support the assertion that the strategy is effective. It remains unclear and uncertain as to whether the proposed mitigation will be deliverable and whether it can be guaranteed for the long term. Using a precautionary approach, we therefore cannot agree with the HRA conclusion of no 'Adverse Effects on Integrity' (AEOI) of Habitats sites and their features of interest. There is no basis in evidence to support this conclusion. Endorsement of the strategy by Natural England is not, in itself, a guarantee of its effectiveness. Natural England is subject to the "Growth Duty" under Section 108 of the Deregulation Act 2015. This means it is required to have regard to the desirability of promoting economic growth and must consider "the importance for the promotion of economic growth of exercising the regulatory function in a way which ensures that regulatory action is taken only when it is needed, and any action taken is proportionate."</p> <p>We wish to point out that the precautionary principle needs to be applied as one of the three tests of the Habitats Regulations. There is no reference to this fundamental principle in the Essex RAMS document. Instead the strategy refers to pragmatism; we have serious concerns that economic "pragmatism" may be used to undermine the protection of internationally important habitats and species. The Essex RAMS should be based on a precautionary approach; to do otherwise risks facilitating development that does not meet the criteria for sustainability.</p> <p>In respect of personal watercraft we are of the opinion that a published Code of Conduct will fail to deliver the much-needed change in behaviour. We do not accept the claim that this strategy will be an effective measure against</p>	<p>The RSPB and EWT were invited to both of the preliminary workshops essential to devising the RAMS and the RSPB provided valuable support for the RAMS and Bird Aware. Only the partner LPAs and Natural England were involved in the steering group as the RAMS and SPD are considered technical Local Plan documents. No amendment proposed.</p> <p>The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.</p> <p>The need for and focus of the Essex RAMS has stemmed from the recommendations of the LPAs' Local Plan HRA/AAs and is not a document that needs to meet the Habitats Regulations Assessment regulations in and of itself. Section 2.15 of the SPD sets out that, 'the RAMS approach is fair and seeks to mitigate the additional recreational pressure in a way that ensures that those responsible for it, pay to mitigate it</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>personal watercraft misuse. A much more robust package of enforcement measures is needed to address this issue.</p> <p>Table 6.2 Potential for disturbance of birds in Hamford Water states that: "Skippers Island has regular visits by a volunteer warden who speaks to visitors" - We wish to point out that the current Skipper's Island warden is a volunteer who is only onsite occasionally (once a month on average).</p> <p>"The Colne Point is wardened and as such is likely to be resilient to increased visitor impacts" - Once again, the warden of Colne Point is only onsite occasionally; for most of the time the site is not patrolled. It is false to claim that Colne Point has resilience to increased visitor impacts.</p> <p>"St Osyth Stone Point and Brightlingsea Creek is another area where potential conflict could take place, however these areas are relatively remote" - St Osyth Stone Point is not remote, it is the pick-up point for the Brightlingsea Foot Ferry and therefore has a relatively high footfall when the ferry is running during the Spring and Summer season.</p> <p>In conclusion, while we recognise the need for the RAMS, we are of the opinion that the current iteration of the strategy is flawed and does not fully accord with the principles underpinning the Habitats Regulations. In its current form there are unsubstantiated claims of effectiveness, a failure to adopt the precautionary approach and a lack of robustness in some of the mitigation measures proposed. We would urge that these matters are addressed, and the revised version subjected to further consultation.</p>	<p>at a level consistent with the level of potential harm. It also obeys the 'precautionary principle'. Existing visitor pressure at Habitats sites would be mitigated through alternative means and any pressure that would arise from different types of development would be addressed through the project HRA'. No amendment proposed.</p> <p>Once appointed, the Delivery Officer will engage with local key stakeholders on the implementation of the project. No amendment proposed.</p>
70	Mr Barrie Stone	Resident	Wildlife mitigation on Wallasea Island has already been done.	Noted. No amendment proposed.
71	Ms Anna Roe	Ipswich Borough Council	Regarding Figure 3.1 which shows the Zones of Influence for the Blackwater Estuary, Stour Estuary and Hamford Water stretching into the Suffolk Coast RAMS area. I am concerned that this could be confusing for developers of new dwellings in south Suffolk, as it implies that a contribution is required to the Essex Coast RAMS, in addition to the Suffolk Coast RAMS. Can I please	An amendment to the relevant map in the SPD and RAMS is proposed, which will remove all areas of Suffolk from the Zone of Influence.

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			request that figure 3.1 is amended to clarify that the Essex Coast RAMS tariff area stops at the Essex border, I attach a map of the Suffolk Coast RAMS Zone of Influence to illustrate my point.	
72	Mr Sam Hollingworth	Strutt & Parker on behalf of the Chelmsford Garden Village Consortium	<p>The RAMS SPD does not appear to acknowledge the difference between the delivery of homes, and population increase. All three of the tests within Regulation 122 of the CIL Regulations must be met when requesting contributions. As such, it is essential that the RAMS SPD will only require contributions to be made where they are to mitigate impacts which inter alia are directly related to the development in question. They cannot be used simply to address an existing situation, or a situation that would arise irrespective of the development in question. It is therefore necessary to distinguish between the impacts of development and those that are simply of population increase which would have occurred regardless.</p> <p>The total number of new homes planned within the combined Zone of Influence does not reflect the total number of new homes required to meet the projected population growth. A number of Essex Local Planning Authorities' strategic housing policies are out-of-date, and do not meet current projection and household projections. By formulating a strategy based on mitigating population growth, but then introducing a per-dwelling charge to fund this based on current allocations which are not sufficient to meet this population growth, the current allocations will be required to make a disproportionately large contribution to the mitigation.</p> <p>We note reference in Table 2.3 to the brief for the preparation of the RAMS that this included identifying measures that have already been funded and providing details in respect of current funding mechanisms. Separately, we note reference at paragraph 6.6 of the RAMS the potential for Local Planning Authorities to identify mitigation measures to be provided through separate funding streams, citing the Local Growth Fund and Local Enterprise Partnership. However, the RAMS appears to conclude that full costs of the mitigation strategy (plus a further 10% contingency allowance) be borne by new developments, without explaining how alternative sources of funding have been explored.</p>	<p>It is proposed that an amendment explaining more clearly the relationship between the effects of a population increase resulting from net new dwelling increases is included within the SPD.</p> <p>The extent of each Local Plan's housing growth has been identified consistently, for the purposes of the RAMS and SPD, for all LPAs in determining a total number of new dwellings. The cost of mitigating the impact of 72,907 homes is £8,916,448.00. Section 4.7 of the SPD acknowledges that 'this figure is not definitive and likely to change as more Local Plans progress. As such the figure will be subject to review.' If more homes are built there will be a greater impact and so additional mitigation, funded by developer contributions, will be required. If less homes are built there will be less of an impact that that expected and so less mitigation will be required.</p> <p>The Chelmsford Local Plan 2013-2036 which includes the policy</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>The PPG2 confirms that policies on planning obligations should be set out in plans and examined in public, and informed by a proportionate assessment of viability. It goes on to expressly state that Supplementary Planning Documents should not be used to set out formulaic approaches to planning obligations, as these would not be tested through examination. We consider that the RAMS SPD should take a far less negative stance in respect of alternatives to simply making a financial contribution, and it would benefit from providing further guidance and/or flexibility to those wishing to implement alternatives. Furthermore, by addressing such alternatives, this will help ensure that it is consistent with emerging Local Plan policies which, as already discussed, acknowledge there may be situations where it would be inappropriate to require financial contributions to RAMS.</p> <p>There is a concern, as a matter of principle, that seeking contributions from developers to mitigate the impact of activity being actively promoted by others is questionable.</p> <p>In terms of how costs have been calculated, it is unclear what assumptions have been made in respect of overheads on top of salary costs for the staff identified as being needed. We suggest that, in the interests of transparency, this should be clearly set out. We suggest that the RAMS SPD needs to carefully consider whether it is indeed actually the case that all items proposed to be funded through developer contributions are necessary to make development acceptable in planning terms.</p>	<p>requirement for the RAMS, has been found 'sound' by an independent Planning Inspector.</p> <p>The tariff can only be applied to applications from a base date and cannot be collected retroactively on consented proposals despite some proposals being included within Local Plans. Consented proposals help define the baseline position, and the suite of mitigation costed and included within the SPD in Appendix 1 is suitable to both address these effects as well as those of unconsented proposals without exponentially increasing the costs of the mitigation package. A proposed amendment setting out this position more clearly is proposed.</p> <p>Bespoke alternatives to the tariff approach will be considered at the development management stage to ensure they are proportionate and suitable on a case-by-case basis. Alternative sources of funding for the mitigation package have not been explored as it is not considered appropriate for funds to be diverted from other sources when the HRA/AAs of the</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				<p>LPA Local Plans has associated the significance of the in-combination effects the RAMS seeks to mitigate directly to new housing growth. No amendment proposed.</p> <p>It is a requirement of the Habitats Regulations Assessment Regulations that 'in-combination' effects are considered. Other schemes not related to Local Plans growth will be subject to their own HRA/AA requirements if relevant. No amendment required.</p> <p>Amendments clearly setting out how overheads and other costs have been identified within the RAMS mitigation package are proposed within the SPD.</p>
73	Hannah Thomas-Davies	DWD Property + Planning on behalf of Countryside	<p>We consider that the SPD should provide more detailed wording to confirm the process for defining an alternative to paying into the RAMS. We consider that the SPD would be more effective if it clearly set out the process for agreeing bespoke mitigation for strategic sites. The SPD seeks the mitigation to the Essex Coast SPAs by one method, the payment towards a mitigation fund, however, strategic sites offer alternative methods to attain the protection of the Coastal SPAs from recreational use.</p> <p>Paragraph 3.9 make reference to tourist accommodation and states it 'may be likely to have significant effects on protected habitat sites. We do not consider this is an acceptable description of the potential impacts of tourist accommodation on the coastal SPAs. Rather than leaving this to a case-by-case assessment, the SPD should include measures to mitigate tourist</p>	<p>Bespoke alternatives to the tariff approach will be considered at the development management stage to ensure they are proportionate and suitable on a case-by-case basis. Appropriate alternatives could take various forms and are likely to differ from case to case. For this reason, developers of strategic sites are encouraged to engage with the relevant LPA for specific guidance on what is considered appropriate.</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>development on the coastal habitat as well as the recreational pressure posed by residential development.</p> <p>Further clarification is required detailing how the total number of dwellings figure of 72,907 was calculated. Appendix 1 provides a transparent breakdown of the mitigation package costed for 2018-2038, however the calculation used to determine the number of homes to be delivered is not clear. We are concerned that the 72,907 figure underestimates the potential number of homes delivered by the 12 LPAs within the period to 2038. By using a correct, much higher, figure of additional housing this would have the effect of reducing the tariff per property levied.</p> <p>The cost of mitigation has not been included as a planning policy requirement in recent Local Plan viability assessments. This additional cost burden brought forward by the councils late in the Local Plan process will mean that viability assessments of individual applications may become necessary to demonstrate whether or not the additional cost burden can be viably delivered.</p> <p>We consider that the calculation of housing numbers should be made more transparent, providing a description for each local authority of how the total housing figure has been calculated. This should include references to adopted and emerging development plan documents which have formed the figure.</p>	<p>The RAMS and SPD has been devised specifically to address the effects of Local Plan growth within the LPA areas. As ensuring a sufficient supply of dwellings through Local Plan periods is a requirement of Local Plans, including tourist accommodation proposals is not. As such, the effects of mitigating tourist accommodation, within the remit of the SPD, is considered best addressed on a case-by-case basis as and when applications for such proposals are submitted. No amendment proposed.</p> <p>The extent of each Local Plan's housing growth has been identified consistently, for the purposes of the RAMS and SPD, for all LPAs in determining a total number of new dwellings. Section 4.5 of the SPD acknowledges that 'this figure is not definitive and likely to change as more Local Plans progress. As such the figure will be subject to review.' No amendment proposed.</p> <p>The subject of viability in regard to the tariff can be explored within Local Plan examinations, where</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
				deemed relevant. No amendment proposed.
74	Unknown	The British Association for Shooting & Conservation (BASC)	<p>The proposed mitigating measures will not address increased visitor pressure associated with new residential development along the Essex Coast. Please provide BASC with evidence of how the proposed mitigation measures will be successful in mitigating the impact of increased visitor pressure.</p> <p>Please provide information to BASC on the areas that have been identified and permissions granted to allow this work to be undertaken prior to planning consent being granted.</p> <p>Any new car parks must be located away from sensitive areas and local byelaws must be introduced to restrict the public from walking and walking with dogs. Adequate regulation and enforcement must be in place prior to planning being approved.</p> <p>No evidence has been provided on how the employment of a ranger will be sufficient mitigation for the impact of increased visitor pressure on breeding and overwintering wildfowl. Please provide BASC with information on the inclusion of the ranger's work in the HRA process.</p> <p>Please provide BASC with written confirmation that when increased visitor pressure is caused by new residential development that this will not result in additional "in combination" effects with existing wildfowling consents. We are concerned that when new residential development inevitably leads to visitor pressure increases that regulated activities such as wildfowling will be targeted as a means of addressing failures with RAMS.</p> <p>Representatives of wildfowling clubs along the Essex Coast must be included in the proposed partnership approach. Merely stating that there will be some creation of salt marsh etc. will not be sufficient for an HRA process. Please provide information to BASC on the actions that would need funding.</p>	<p>The effectiveness of the mitigation will be monitored as outlined within Section 6 of the SPD. No amendment proposed.</p> <p>All partner LPAS have approved the RAMS. Relevant committee reports can be found on LPA websites.</p> <p>The employment of Rangers follows best practice established by existing RAMS projects and verified by Natural England through their input into the RAMS thus far. It can be considered that many of these points made can be considered by the Delivery Officer, once in post. This will include monitoring of the effectiveness of the mitigation as outlined within Section 6 of the SPD. No amendment proposed.</p> <p>'In-combination' effects are those that are identified through exploring the individual effects of those HRA/AAs undertaken for any plan or project in the area that would require compliance with the Habitats Regulations Assessment. This would include</p>

No.	Name	Organisation	Main Issues Raised	Response / amendment required
			<p>Permissions must be sought, projects must be highlighted, and plans put in place to ensure they are able to meet the conservation objectives required to mitigate the original issue.</p> <p>The HRA must include maximum permissible occupancy of those dwellings as it is the individuals within the dwelling that will increase the visitor pressure, not the dwelling itself. A precedent has been set that every application needs to be looked at on its individual merit. A blanket policy would be unlawful.</p> <p>Wildfowling actively warden the area's they manage along the Essex Coast. Funding from RAMS should be allocated to wildfowling clubs to employ club representatives to assist with direct engagement with the public. Please add wildfowling clubs as key partners in the RAMS.</p> <p>A severe weather policy must be drafted to use bye-laws to restrict the public from walking or walking with dogs during periods of severe weather. See the Joint Nature Conservation Committee Severe Weather Policy as a reference point.</p> <p>Preventing or restricting any further residential development along the Essex Coast is the most appropriate means of mitigating increased visitor pressure.</p>	<p>qualifying planning applications or development plans. Should an 'in-combination' effect be identified, it would be the responsibility of the new proposal to provide mitigation, not existing consented developments or activities.</p> <p>It is not considered possible to calculate, or appropriate to assume, dwelling occupancy with any degree of accuracy; hence the proposed blanket tariff being applicable per net new dwelling. The tariff as proposed, will ensure that the required mitigation can be delivered to enable housing growth. No amendment proposed.</p> <p>All of the LPAs have a statutory requirement to plan for new housing growth. The RAMS seeks to mitigate recreational impacts on protected Habitats sites on the Essex Coast arising from the increase in population associated with these housing growth requirements. Each LPA Local Plan will include locational criteria-based policies to determine where growth will be permitted. No amendment proposed.</p>





This publication is available in alternative formats including large print, audio and other languages.

If required, please contact:

Place Services  
Essex County Council  
County Hall  
Chelmsford  
Essex  
CM1 1QH

Email: [ecology.placeservices@essex.gov.uk](mailto:ecology.placeservices@essex.gov.uk)  
Telephone: 03330 322130  
Weblink: <https://consultations.essex.gov.uk/place-services/the-essex-coast-rams-spd>

Document published by © Place Services 2020



# Essex Coast Recreational disturbance Avoidance and Mitigation Strategy

---

## Supplementary Planning Document (SPD) May 2020

---



## Contents

Acronyms .....	iii
Glossary .....	iv
1. Introduction .....	1
2. Summary of the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy .....	2
3. Scope of the SPD .....	8
4. Mitigation .....	15
5. Alternative to paying into the RAMS .....	22
6. Monitoring of this SPD .....	23
7. Consultation.....	24
8. Useful Links .....	25
Appendix 1: Strategic Mitigation.....	27
Appendix 2: Essex Coast RAMS Guidelines for proposals for student accommodation .....	35



## Acronyms

AA	Appropriate Assessment
AMR	Authority Monitoring Report
CIL	Community Infrastructure Levy
EA	Environment Agency
EC	European Commission
EEC	European Economic Community
EWT	Essex Wildlife Trust
FAQ	Frequently Asked Questions
GPDO	General Permitted Development Order
HMO	House in Multiple Occupation
HRA	Habitats Regulations Assessment
LPA	Local Planning Authority
NE	Natural England
NPPF	National Planning Policy Framework
RAMS	Recreational disturbance Avoidance and Mitigation Strategy
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SIP	Site Improvement Plan
SMART	Specific, Measurable, Attainable, Relevant & Timely
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Specific Scientific Interest
UK	United Kingdom
UU	Unilateral undertaking
ZoI	Zone of Influence

## Glossary

Appropriate Assessment	Forms part of the Habitats Regulations Assessment
Authority Monitoring Report	Provides information on all aspects of a planning department's performance.
Community Infrastructure Levy	A charge which can be levied by local authorities on new development in their area to help them deliver the infrastructure needed to support development.
Competent Authority	Has the invested or delegated authority to perform a designated function.
England Coast Path	Natural England are implementing the government scheme to create a new national route around the coast of England
General Permitted Development Order	The Town and Country Planning (General Permitted Development) (England) Order 2015 is a statutory instrument that grants planning permission for certain types of development (such development is then referred to as permitted development).
House in Multiple Occupation	A property rented out by at least 3 people who are not from 1 'household' (for example a family) but share facilities like the bathroom and kitchen.
Habitats sites	Includes SPA, SAC & Ramsar sites as defined by NPPF (2018). Includes SPAs and SACs which are designated under European laws (the 'Birds Directive' and 'Habitats Directive' respectively) to protect Europe's rich variety of wildlife and habitats. Together, SPAs and SACs make up a series of sites across Europe, referred to collectively as Natura 2000 sites. In the UK they are commonly known as European sites; the National Planning Policy Framework also applies the same protection measures for Ramsar sites (Wetlands of International Importance under the Ramsar Convention) as those in place for European sites.
Habitats Regulations Assessment	Considers the impacts of plans and proposed developments on habitats/Natura 2000 sites.
Impact Risk Zone	Developed by Natural England to make a rapid initial assessment of the potential risks posed by development proposals. They cover areas such as SSSIs, SACs, SPAs and Ramsar sites.
In-combination effect	The cumulative effect of that a number of plans, policies, activities and developments can have on the coastal region.
Local Planning Authority	The public authority whose duty it is to carry out specific planning functions for a particular area.
Natural England	The statutory adviser to government on the natural environment in England.

National Planning Policy Framework	Sets out government's planning policies for England and how these are expected to be applied.
Recreational disturbance Avoidance and Mitigation Strategy	A strategic approach to mitigating the 'in-combination' recreational effects of housing development on Habitats sites.
Ramsar site	Wetland of international importance designated under the Ramsar Convention 1979.
Section 106 (S106)	A mechanism which make a development proposal acceptable in planning terms, that would not otherwise be acceptable. They are focused on site specific mitigation of the impact of development. S106 agreements are often referred to as 'developer contributions' along with highway contributions and the Community Infrastructure Levy.
Section 278 (S278)	Allows developers to enter into a legal agreement with the council to make alterations or improvements to a public highway, as part of planning approval.
Special Area of Conservation (SAC)	Land designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora.
Special Protection Area (SPA)	Land classified under Directive 79/409 on the Conservation of Wild Birds.
Supplementary Planning Document (SPD)	Documents that provide further detail to the Local Plan. Capable of being a material consideration but are not part of the development plan.
Site of Specific Scientific Interest (SSSI)	A Site of Special Scientific Interest (SSSI) is a formal conservation designation. Usually, it describes an area that is of particular interest to science due to the rare species of fauna or flora it contains.
Unilateral undertaking	A legal document made pursuant to Section 106 of the Town and Country Planning Act 1990, setting out that if planning permission is granted and a decision is made to implement the development, the developer must make certain payments to the local authority in the form of planning contributions.
Zone of Influence (Zol)	The Zol identifies the distance within which new residents are likely to travel to the Essex coast Habitats sites for recreation. This is based on visitor surveys.

## 1. Introduction

- 1.1 This Supplementary Planning Document (SPD) focuses on the mitigation that is necessary to protect the birds of the Essex coast and their habitats from the increased visitor pressure associated with new residential development in combination with other plans and projects, and how this mitigation will be funded.
- 1.2 This SPD accompanies the strategic approach to mitigation which is set out in the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (the 'RAMS'). The RAMS provides a mechanism for Local Planning Authorities (LPAs) to comply with their responsibilities to protect habitats and species in accordance with the UK Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations').
- 1.3 This SPD distils the RAMS into a practical document for use by LPAs, applicants and the public and provides the following information:
  - A summary of the RAMS;
  - The scope of the RAMS;
  - The legal basis for the RAMS;
  - The level of developer contributions being sought for strategic mitigation; and
  - How and when applicants should make contributions.
- 1.4 A 'frequently asked questions' (FAQ) document has also been produced to provide further information about the RAMS project. This is available on the Bird Aware Essex Coast website<sup>1</sup>.

---

<sup>1</sup> Bird Aware Essex Coast: <https://essexcoast.birdaware.org/home>

## 2. Summary of the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy

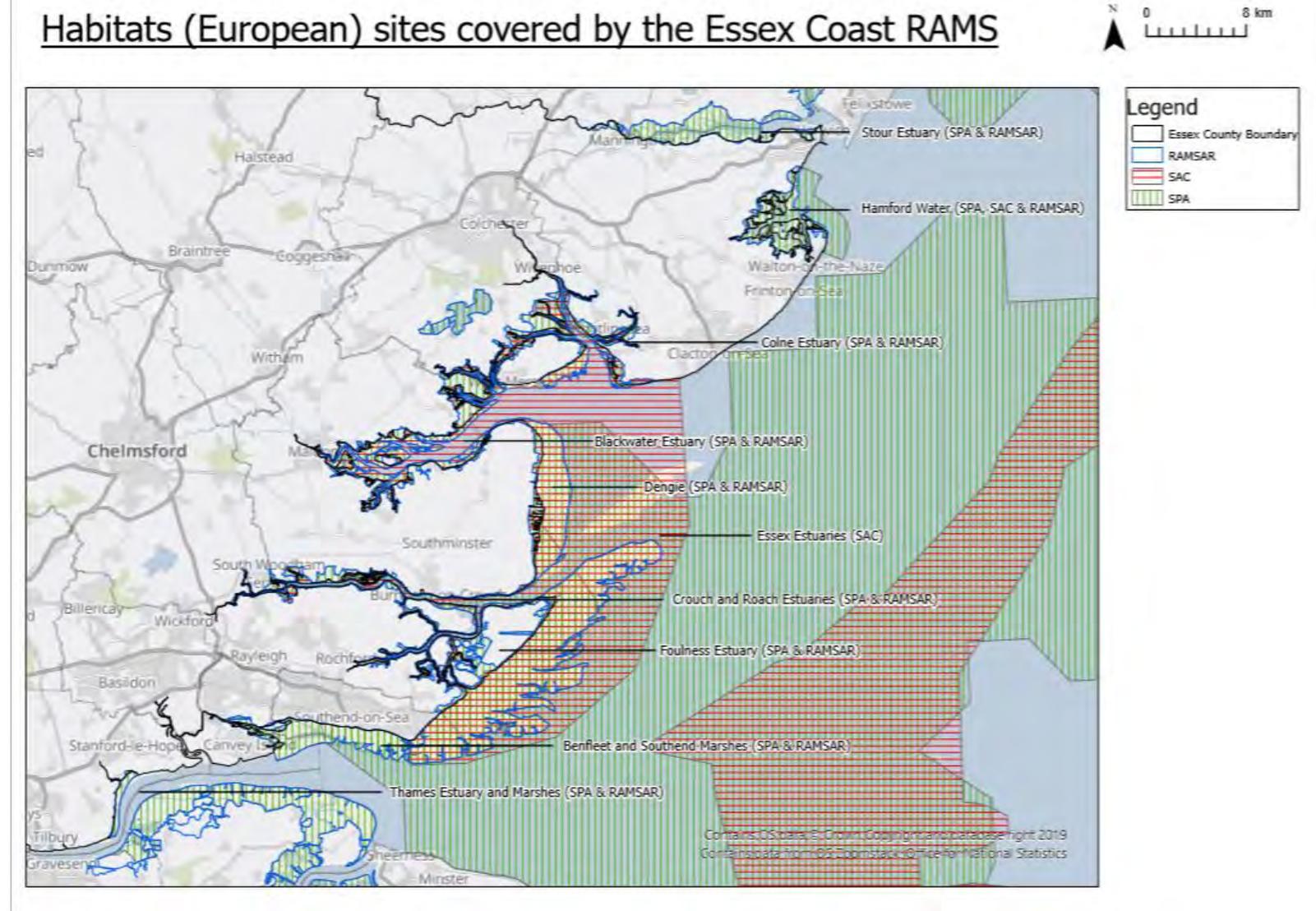
### The importance of the Essex coast

- 2.1 The Essex coastline is one of importance for birds and their habitat. It is home to internationally important numbers of breeding and non-breeding birds and their coastal habitats.
- 2.2 The coast is a major destination for recreational use such as walking, sailing, bird-watching, jet skiing, dog walking and fishing, including bait-digging. Evidence, described in detail in the RAMS, suggests that the majority of this activity is undertaken by people who live in Essex.
- 2.3 Although only Tendring District, Colchester Borough, Chelmsford City, Maldon District, Rochford District, Southend-on-Sea Borough, Castle Point Borough and Thurrock Councils lie on the coast, research has shown that residents from, Basildon Borough, Brentwood Borough, Uttlesford District and Braintree District are also likely to travel to the coast for recreational use.
- 2.4 A large proportion of the coastline is covered by international, European and national wildlife designations. A key purpose of these designations is to protect breeding and non-breeding birds and coastal habitats. Most of the Essex coast is designated under the Habitats Regulations as part of the European Natura 2000 network: for the purposes of this SPD these are Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites. These sites are also defined as 'Habitats Sites' in the National Planning Policy Framework (2019).
- 2.5 The Habitats Sites to which this SPD applies are as follows and these are shown overleaf on Figure 2.1:
  - Essex Estuaries SAC
  - Stour and Orwell Estuaries SPA and Ramsar
  - Hamford Water SPA and Ramsar
  - Colne Estuary SPA and Ramsar
  - Blackwater Estuary SPA and Ramsar
  - Dengie SPA and Ramsar
  - Crouch and Roach Estuaries SPA and Ramsar
  - Foulness Estuary SPA and Ramsar



- Benfleet and Southend Marshes SPA and Ramsar
- Outer Thames Estuary and Marshes SPA and Ramsar

Figure 2.1: Habitats sites covered by the Essex Coast RAMS



Notes:

- Ramsar sites are areas of wetland which are designated of international importance under the Ramsar Convention (1971).
- Special Protection Areas (SPAs) are sites which support rare, vulnerable and migratory birds.
- Special Areas of Conservation (SACs) are sites which support high-quality habitats and species.

The duties of Local Planning Authorities (LPAs)

- 2.6 LPAs have the duty, by virtue of being defined as ‘competent authorities’ under the Habitats Regulations, to ensure that planning application decisions comply with the Habitats Regulations. If the requirements of the Habitats Regulations are not met and impacts on Habitats sites are not mitigated, then development must not be permitted.
- 2.7 Where a Habitats site could be affected by a plan, such as a Local Plan, or any project, such as a new hospital/housing/retail development, then a Habitats Regulations Assessment (HRA) screening must be undertaken. If this cannot rule out any possible likely significant effect either alone or in-combination on the Habitats site prior to the implementation of mitigation, then an Appropriate Assessment (AA) must be undertaken. The AA identifies the interest features of the site (such as birds, plants or coastal habitats), how they could be harmed, assesses whether the proposed plan or project could have an adverse effect on the integrity of the Habitats site (either alone or in-combination), and finally how this could be mitigated.
- 2.8 The aim of the HRA process is to ***'maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest'*** [The EC Habitats Directive, 92/43/EEC, Article 2(2)].

The requirement for delivery of strategic mitigation

- 2.9 The published Habitats Regulations Assessments (HRAs) for the relevant Local Plans have identified recreational disturbance as an issue for all of the Essex coastal SPAs, SACs and Ramsar sites.
- 2.10 Mitigation measures have been identified in the HRA (screening and/or AAs) for many of the Local Plans. There are similarities in the mitigation measures proposed, reflecting the identification of ‘in-combination’ effects resulting from planned and un-planned growth in LPA areas. In recognition, this SPD and the RAMS are relevant to these ‘in-combination’ effects only, and do not focus on any other mitigation measures, such as those on-site, that might be required of development proposals in response to other types of effects on Habitats sites.

- 2.11 Natural England<sup>2</sup> recommended a strategic approach to mitigation along the Essex coast to enable the conclusion of ‘no adverse effect on the integrity of the international designated sites’ regarding in-combination recreational effects. Each Habitats site or complex of sites in England has a Site Improvement Plan (SIP), developed by Natural England. Recreational disturbance is identified as an issue for all ten of the Habitats sites considered in this strategy.
- 2.12 Mitigation measures are therefore necessary to avoid these likely significant effects in-combination with other plans and projects. Mitigation at this scale, and across a number of LPAs, is best tackled strategically and through a partnership approach. This ensures maximum effectiveness of conservation outcomes and cost efficiency.
- 2.13 Some housing schemes, particularly those located close to a Habitats site boundary or large-scale developments, may need to provide mitigation measures to avoid likely significant effects from the development alone, ***in addition to the mitigation*** required in-combination and secured for delivery through the RAMS. This would need to be assessed and, where appropriate, mitigated through a separate project level AA. The LPA, in consultation with Natural England, would advise on applicable cases. Therefore, the implementation of this SPD does not negate the need for an AA for certain types of development.
- 2.14 The Essex coast RAMS aims to deliver the mitigation necessary to avoid the likely significant effects from the ‘in-combination’ impacts of residential development that is anticipated across Essex; thus, protecting the Habitats sites on the Essex coast from adverse effect on site integrity. This strategic approach has the following advantages:
- It is endorsed by Natural England and has been used to protect other Habitats sites across England;
  - It is pragmatic: a simple and effective way of protecting and enhancing the internationally important birds and their habitat of the Essex coast and will help to reduce the time taken to reach planning decisions;
  - It provides an evidence based and fair mechanism to fund the mitigation measures required as a result of the planned residential growth; and
  - It provides applicants, agents and planning authorities with a comprehensive, consistent and efficient way to ensure that appropriate

---

<sup>2</sup> An executive non-departmental public body and the government’s adviser for the natural environment in England

mitigation for residential schemes within the Zone of Influence (see paragraph 3.2 below) is provided in an effective and timely manner.

- 2.15 The RAMS approach is fair and seeks to mitigate the additional recreational pressure in a way that ensures that those responsible for it, pay to mitigate it at a level consistent with the level of potential harm. It also obeys the 'precautionary principle'<sup>3</sup>. Existing visitor pressure at Habitats sites would be mitigated through alternative means and any pressure that would arise from different types of development would be addressed through the project HRA.
- 2.16 The majority of the HRAs produced by Essex LPAs as part of the production of their respective Local or Strategic Plans identified that the level of 'net new' planned housing growth may lead to disturbance of birds in coastal Habitats (European) sites within and beyond each individual LPA boundary.

---

<sup>3</sup> 'In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.' (Principle 15) of Agenda 21, agreed at the Rio Earth Summit, 1992.

### 3. Scope of the SPD

#### Where does the RAMS apply?

3.1 The 12 LPAs which are partners in and responsible for the delivery of the RAMS are listed below:

- Basildon Borough Council
- Braintree District Council
- Brentwood Borough Council
- Castle Point Borough Council
- Chelmsford City Council
- Colchester Borough Council
- Maldon District Council
- Rochford District Council
- Southend Borough Council
- Tendring District Council
- Thurrock Borough Council
- Uttlesford District Council

3.2 The SPD applies to new residential dwellings that will be built in the Zone of Influence (Zol) of the Habitats sites. It does not apply to any non-residential schemes, and all non-residential schemes are therefore exempt from the tariff. The Zol identifies the distance within which new residents are likely to travel to the Essex coast Habitats sites for recreation.

3.3 The Zol was calculated by ranking the distances travelled by visitors to the coast based on their home town postcode data. Not all postcode data is used as this can skew the results and therefore the Zol is based on the 75th percentile of postcode data. This provides the Zol distance.

3.4 This method has been used for a number of strategic mitigation schemes and is considered by Natural England to be best practice. The distances used to create the Zol are illustrated in Table 3.1 (below).

**Table 3.1: Zones of Influence for the Essex Coast RAMS**

European designated site	Final distance to calculate RAMS Zol (km/miles)
Essex Estuaries SAC	-*
Hamford Water SPA and Ramsar	8.0 km / 4.9 miles
Stour and Orwell Estuaries SPA and Ramsar	13.0 km / 8.1 miles
Colne Estuary SPA and Ramsar	9.7 km / 6.0 miles
Blackwater Estuary SPA and Ramsar	22.0 km / 13.7 miles
Dengie SPA and Ramsar	20.8km / 12.9 miles
Crouch and Roach Estuaries Ramsar and SPA	4.5 km / 2.8 miles
Foulness Estuary SPA and Ramsar	13.0 km / 8.1 miles
Benfleet and Southend Marshes SPA and Ramsar	4.3km / 2.7 miles
Outer Thames Estuary and Marshes SPA and Ramsar	8.1km / 5.0 miles

\* The Essex Estuaries SAC overlaps with the Blackwater Estuary, Colne Estuary, Crouch and Roach Estuaries, Dengie, Foulness and Outer Thames Estuary SPA and Ramsar sites.

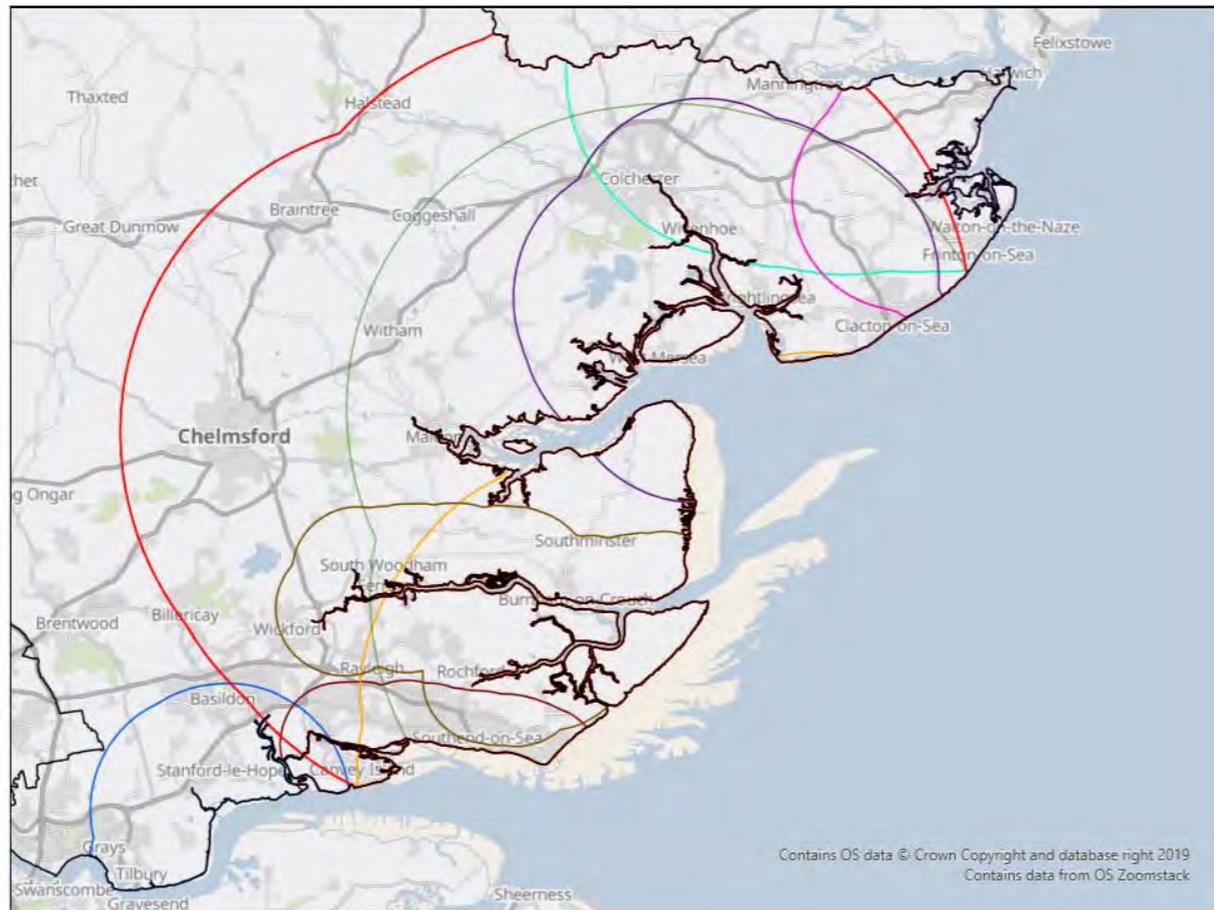
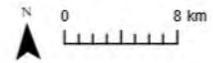
3.5 The Zol can be accessed via Magic Maps<sup>4</sup>, where you will find the definitive boundaries. Broad illustrations of the extent of all the individual Habitats sites' Zones of Influence and the overall Zol for the RAMS are shown below in Figure 3.1 and Figure 3.2 respectively.

---

<sup>4</sup> MAGIC website: <https://magic.defra.gov.uk/MagicMap.aspx>

Figure 3.1: Illustration of the individual Zones of Influence for the Essex Coast Habitats Sites

### Essex Estuaries Zones of Influences

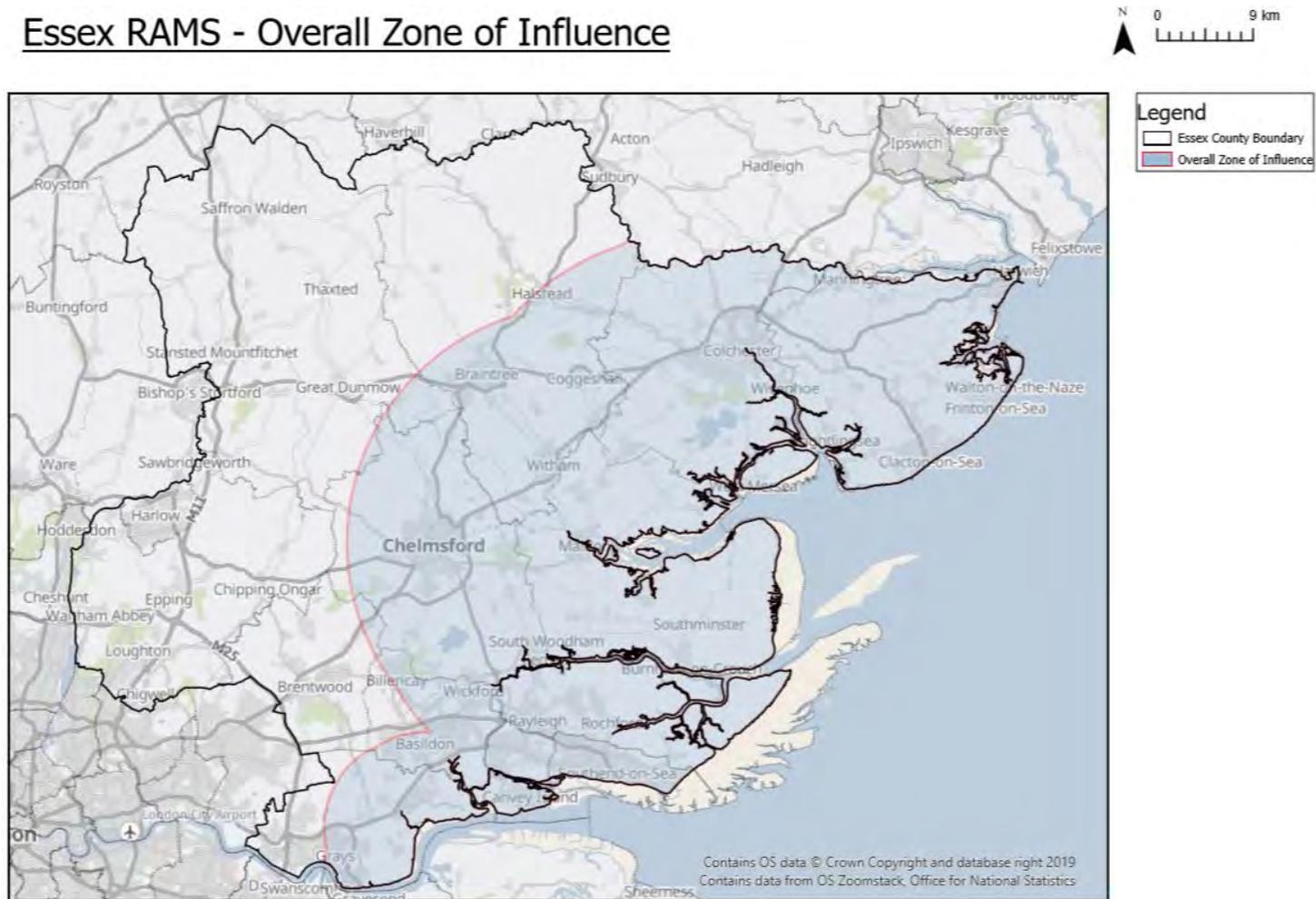


Legend	
	Essex County Boundary
	Blackwater ZoI
	Crouch & Roach ZoI
	Colne ZoI
	Dengie ZoI
	Foulness ZoI
	Hamford Water ZoI
	Southend & Benfleet ZoI
	Stour ZoI
	Thames ZoI

Contains OS data © Crown Copyright and database right 2019  
 Contains data from OS Zoomstack

Figure 3.2: Illustration of the Zone of Influence for the Essex Coast RAMS

### Essex RAMS - Overall Zone of Influence



What types of dwellings does this apply to?

3.6 Only new residential developments where there is a net increase in dwelling numbers are included in the RAMS. This would include, for example, the conversion of existing large townhouses into smaller flats, or the change of use of other buildings to dwellings. It excludes replacement dwellings (where there is no net gain in dwelling numbers) and extensions to existing dwellings including residential annexes. Applicants are advised to contact the LPA if in any doubt as to whether their development is within the scope of the RAMS.

Does it apply to all schemes?

3.7 The effects of recreational disturbance on the integrity of the Habitats Sites on the Essex coast are associated with the increase in population that new dwellings will ensure. This is because new residents can be expected to visit the coast, as evidenced by the visitor surveys undertaken. For this reason, the RAMS applies to all schemes regardless of size where there is a net gain in dwellings.

3.8 The contribution to RAMS is a simple way of allowing the AA of residential developments, including single dwelling schemes, to conclude that the in-combination effect will be mitigated. National Planning Practice Guidance<sup>5</sup> confirms that local planning authorities may seek planning contributions for sites of less than 10 dwellings to fund measures with the purpose of facilitating development that would otherwise be unable to proceed because of regulatory requirements. This means that the tariff proposed in this SPD will still apply for those residential proposals that are normally exempt from paying planning contributions under the Community Infrastructure Regulations, such as affordable housing proposals and single dwelling self-builds. These types of development are not exempt from the requirement under the Conservation of Habitats and Species Regulations 2017.

3.9 Natural England’s revised interim advice to the Essex LPAs (ref: 244199, 16 August 2018) set out those relevant development types to which the tariff should apply. The RAMS and this SPD apply to the following Planning Use Classes:

**Table 3.2: Planning Use Classes covered by the Essex Coast RAMS**

Planning Use Class*	Class Description
C2 Residential institutions	Residential care homes**, boarding schools, residential colleges and training centres.

<sup>5</sup> Planning Practice Guidance: <https://www.gov.uk/government/collections/planning-practice-guidance>

Planning Use Class*	Class Description
C2A Secure Residential Institution	Military barracks.
C3 Dwelling houses (a)	- covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.
C3 Dwelling houses (b)	- up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.
C3 Dwelling houses (c)	- allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger.
C4 Houses in multiple occupation	- Small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom
Sui Generis ***	- Residential caravan sites (excludes holiday caravans and campsites) - Gypsies, travellers and travelling show people plots

**Notes:**

\* *This table is based on Natural England advice (244199 August 2018, which was advisory, not definitive.*

\*\* *Care homes will be considered on a case-by-case basis according to the type of residential care envisaged.*

\*\*\* *Sui Generis developments will be considered on a case-by-case basis according to the type of development proposed.*

*A guide on student accommodation and RAMS is included as Appendix 2.*

3.10 As included above, C2 Residential Institutions and C2A Secure Residential Institutions are notionally included within the scope of the RAMS and tariff payments. This is due to an increase in population that would arise from any such developments, in the same vein as any other new residential development. It is proposed however that consideration as to whether such

developments qualify for the full extent of tariff payments should be done on a case-by-case basis. This is because some C2 and C2A proposals may provide a specific type of accommodation that would not result in new residents visiting the coast.

- 3.11 Other types of development, for instance tourist accommodation, may be likely to have significant effects on protected habitat sites related to recreational pressure and will in such cases need to be subject of an AA as part of the Habitats Regulations. As part of this assessment any mitigation proposals (including those which address any recreational pressure) will need to be considered separately from this strategy and taken into account by the appropriate authorities.

#### What types of application does this apply to?

- 3.12 The RAMS applies to all full applications, outline applications, hybrid applications, and permitted development (see 3.14 below). This includes affordable housing. Reserved matters applications will be considered on an individual basis having regard to whether the potential effects of the proposal were fully considered when the existing outline was granted or where information more recently provided would make for a different assessment of effects.
- 3.13 In order to consider RAMS contributions at the outline application stage, the application should indicate a maximum number of dwelling units.
- 3.14 The General Permitted Development Order (GPDO) allows for the change of use of some buildings and land to Class C3 (dwelling houses) without the need for planning permission, with development being subject to the prior approval process. However, the Habitats Regulations also apply to such developments. The LPA is therefore obliged by the regulations to scope in those GPDO changes of use to dwelling houses where these are within the Zol.
- 3.15 In practice, this means any development for prior approval should be accompanied by an application for the LPA to undertake an HRA on the proposed development. The development will need to include a mitigation package which would incorporate a contribution to the RAMS to mitigate the 'in-combination' effects.
- 3.16 The alternative is for the applicant to provide information for a project level HRA/AA and secure bespoke mitigation to avoid impacts on Habitats sites in perpetuity.

## 4. Mitigation

- 4.1 Measures to address adverse impacts on Habitats sites are statutory requirements and each proposal for residential development within the Zol will still be required to undertake a 'project-level' HRA/AA. These project-level HRA/AAs will explore the hierarchy of avoidance and mitigation. The recommendations of these project-level HRA/AAs may include measures to mitigate effects 'on-site' such as through open space provision or accessible alternative natural recreational green spaces which are relevant to individual developments only.
- 4.2 The RAMS seeks to mitigate 'in-combination' recreational effects only, to enable the conclusion of no adverse effect on the integrity of the international designated sites. Mitigation measures to address in-combination effects, which are required for any residential development within the areas of the LPAs that falls within a Zol, are identified in this SPD.
- 4.3 As the in-combination effects identified within the LPAs' Local Plan HRA/AAs are directly related to a cumulative increase in housing growth, the mitigation identified within the RAMS and this SPD is proportionate to that accumulation and necessary to make development acceptable in planning terms. The tariff is applicable to all residential development that will lead to a net increase in dwellings, as each new dwelling will lead to an increase in population and therefore an increase in the effects associated with recreational disturbance. This means that the mitigation is directly related to the development, as the source of the effects, and the requirement for the tariff to provide the mitigation is justified in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010.
- 4.4 The RAMS identifies a detailed programme of strategic mitigation measures which would be funded by contributions from residential development schemes. These measures are summarised in Table 4.1



**Table 4.1 – The Essex coast RAMS toolkit**

Action area	Examples
<b>Education and communication</b>	
Provision of information and education	<p>This could include:</p> <ul style="list-style-type: none"> <li>• Information on the sensitive birds and their habitats</li> <li>• A coastal code for visitors to abide by</li> <li>• Maps with circular routes away from the coast on alternative footpaths</li> <li>• Information on alternative sites for recreation</li> </ul> <p>There are a variety of means to deliver this such as:</p> <ul style="list-style-type: none"> <li>• Through direct engagement led by rangers/volunteers</li> <li>• Interpretation and signage</li> <li>• Using websites, social media, leaflets and traditional media to raise awareness of conservation and explain the Essex Coast RAMS project</li> <li>• Direct engagement with clubs e.g. sailing clubs, ramblers' clubs, dog clubs and local businesses</li> </ul>
<b>Habitat based measures</b>	
Fencing/waymarking/screening	<ul style="list-style-type: none"> <li>• Direct visitors away from sensitive areas and/or provide a screen such that their impact is minimised</li> </ul>
Pedestrian (and dog) access	<ul style="list-style-type: none"> <li>• Zoning</li> <li>• Prohibited areas</li> <li>• Restrictions of times for access e.g. to avoid bird breeding season</li> </ul>

Action area	Examples
Cycle access	<ul style="list-style-type: none"> <li>Promote appropriate routes for cyclists to avoid disturbance at key locations</li> </ul>
Vehicular access and car parking	<ul style="list-style-type: none"> <li>Audit of car parks and capacity to identify hotspots and opportunities for “spreading the load”</li> </ul>
Enforcement	<ul style="list-style-type: none"> <li>Establish how the crew operating the river Ranger patrol boat could be most effective. It should be possible to minimise actual disturbance from the boat itself through careful operation</li> <li>Rangers to explain reasons for restricted zones to visitors</li> </ul>
Habitat creation	<ul style="list-style-type: none"> <li>Saltmarsh recharge, regulated tidal exchange and artificial islands may fit with Environment Agency Shoreline Management Plans</li> </ul>
Partnership working	<ul style="list-style-type: none"> <li>Natural England, Environment Agency, RSPB, Essex Wildlife Trust, National Trust, landowners, local clubs and societies</li> </ul>
Monitoring and continual improvement	<ul style="list-style-type: none"> <li>Birds and visitor surveys, including a review of the effectiveness of mitigation measures. Outputs of the review may include the introduction of new ways to keep visitors engaged</li> </ul>

4.5 Appendix 1 contains details of the full mitigation package. The overall cost for the mitigation package is £8,916,448.00 in total from March 2019 until 2038.

#### What is the tariff?

4.6 The current tariff is £125.58 per dwelling as of 2020/21. This will be indexed linked, with a base date of 2019. This will be reviewed periodically and re-published as necessary.

4.7 In order to arrive at a per dwelling contribution figure, the strategic mitigation package cost (including an additional 10% for contingency purposes) was divided by the total number of dwellings (72,907 dwellings) which are currently identified to be built in the Zol over Local Plan periods until 2038. This includes dwellings which have not received Full/Reserved matters consent. Any dwellings already consented in the Plan periods are not included in this calculation. This figure is not definitive and likely to change as more Local Plans progress. As such the figure will be subject to review.

#### When will the tariff be paid?

4.8 Contributions from residential development schemes will be required no later than on commencement of each phase of development. This is necessary to ensure that the financial contribution is received with sufficient time for the mitigation to be put in place before any new dwellings are occupied.

4.9 Where development is built in phases this will apply to each phase of house building. A planning obligation will generally be used to ensure compliance.

#### How will the tariff be paid?

4.10 The statutory framework for planning obligations is set out in Section 106 of the Town and Country Planning Act 1990 (as amended) and Regulations 122 and 123 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended). In addition, paragraphs 54 to 57 of the National Planning Policy Framework (NPPF) 2019 sets out the Government's policy on planning obligations. The obligation can be a 'Unilateral Undertaking'<sup>6</sup> or a multi-party agreement, referred to as a 'Section 106 agreement'<sup>7</sup>. The applicant will be required to enter into a formal deed with the LPA to secure the payment of the required financial contribution. The RAMS contribution may form a clause within a wider S106 agreement.

---

<sup>6</sup> An offer to an LPA to settle obligations relevant to their planning application.

<sup>7</sup> A legal agreement under Section 106 of the Town and Country Planning Act 1990 made between local authorities and developers, and often attached to a planning permission, to make acceptable development which would otherwise be unacceptable in planning terms.

- 4.11 This contribution is payable in addition to any other contributions such as Community Infrastructure Levy liability or other S106 or S278 contributions and there may be other site-specific mitigation requirements in respect of Habitats sites and ecology as outlined above.
- 4.12 The mitigation measures identified in this SPD are specifically sought to avoid additional recreational pressures on Habitats sites and can be secured through Section 106 agreements (Regulation 123 of the Community Infrastructure Levy regulations). This approach is consistent with the views of other local authorities across the country in dealing with mitigation requirements for other Habitats sites and has been accepted by Planning Inspectors at appeal/examination.
- 4.13 Please contact Planning Officers at the relevant LPA at the earliest opportunity to discuss your application and the most appropriate method of paying your RAMS contribution as methods vary between authorities.

#### Section 106 (S106)

- 4.13 Planning obligations are legally binding on the landowner (and any successor in title). They enable the LPA to secure the provision of services (or infrastructure), or contributions towards them, which is necessary in order to support the new development i.e. by making an otherwise unacceptable development acceptable in planning terms.
- 4.14 Where S106 is used legal agreements for planning purposes should meet all the following tests in order to be taken into account when determining a planning application:

- They are necessary to make a development acceptable in planning terms;

*'LPAs, as competent authorities under the Habitats Regulations, have the duty to ensure that planning application decisions comply with regulations.'*

- They are directly related to the development;

*'Evidence in the RAMS demonstrates that visitors come mainly from within the Zol indicated above to the Habitats sites. The 'in-combination' impact of proposals involving a net increase of one or more dwellings within this Zol is concluded to have an adverse effect on Habitats site integrity unless avoidance and mitigation measures are in place.'*

- They are fairly and reasonably related in scale and kind to a development.

*The measures put forward in the RAMS represent the lowest cost set of options available which will be both deliverable and effective in mitigating the anticipated increase in recreational pressure from new residential development within the Zol. The costs are apportioned proportionately between all developments dependent on the scale of development. The contributions will be spent on both project-wide mitigations such as Rangers, and specific mitigations within the Zol in which the contribution was collected. This contribution is therefore fairly and reasonably related in scale and kind to the development.*

4.15 Applicants are expected to meet the LPA's legal fees associated with any drafting, checking and approving any deed. These legal fees are in addition to the statutory planning application fee and the contribution itself and must be reasonable. Details of the LPA's current legal fees can be found on the LPA's website. The website addresses for each LPA are included within Section 8 of this SPD.

#### Schemes under 10 dwellings

4.16 Applicants for schemes which will create up to 10 new units of residential accommodation can use a Unilateral Undertaking (UU). This should be submitted when the planning application is submitted.

4.17 Applicants will need to provide the following documents as part of their planning application where payment will be made through a UU:

- The original UU committing to pay the total RAMS contribution (index linked) before commencement of house building on the site/in accordance with the phasing of the development. This must be completed and signed by those who have a legal interest in the site including tenants and mortgagees;
- A copy of the site location plan signed by all signatories to the UU and included as part of the undertaking;
- Recent proof of title to the land (within the last month) which can normally be purchased from the Land Registry. Please note there are two parts to the proof of title: a Register and a Title Plan, both of which must be submitted;
- If the land is unregistered, the applicant must provide solicitors details and instruct them to provide an Epitome of Title to the LPA.

- 4.18 A payment for the LPA's reasonable costs of completing and checking the agreement will be necessary. The LPA will only charge for the actual time spent on this matter if the applicant follows the guidance. These legal fees are in addition to the statutory application fee and any contributions themselves. A separate payment for this fee should be submitted. This may be increased if the matter is particularly complex.
- 4.19 The LPA will require a payment towards the LPA's legal costs of completing and checking the UU. Current fees can be found on the respective LPA's website.

#### Schemes for 10 or more dwellings

- 4.20 In the case of larger or more complicated developments which include planning obligations beyond RAMS contributions, an appropriate route for securing contributions will be via a multi-party Section 106 Agreement.
- 4.21 Applicants must submit a Heads of Terms document for the Section 106 Agreement, identifying these requirements and specifying their agreement to enter into a planning obligation. Heads of Terms should be provided at the point of submission of the planning application.
- 4.22 Please contact Planning Officers at the relevant LPA at the earliest opportunity to discuss your application and the most appropriate method of paying your RAMS contribution.

## **5. Alternative to paying into the RAMS**

- 5.1 The 12 RAMS partner LPAs encourage mitigation to be secured via the strategic approach and prefer developer contributions to the RAMS. This approach will help to ensure planning applications are quicker and simpler to process and the adequate and timely delivery of effective mitigation at the Habitats sites. It is also likely to be more cost effective for applicants.
- 5.2 As an alternative, applicants may choose to conduct their own visitor surveys and provide information to support the LPA in preparing project level Habitats Regulations Assessment (HRA) Screening Reports (in order to ensure that they can demonstrate compliances with Regulation 63 of the Habitats Regulations) and secure the bespoke mitigation specified within. Where applicants choose to pursue this option, the LPA will need to consult Natural England on the effectiveness of the mitigation proposed.

## 6. Monitoring of this SPD

- 6.1 To monitor the effectiveness of the RAMS and this SPD, a strategic monitoring process is in place and will be managed by a dedicated RAMS delivery officer in liaison with each LPA's own monitoring officers.
- 6.2 Monitoring will be undertaken annually and a report will be provided to each LPA to inform their individual Authority Monitoring Report (AMR). As competent authorities under the Habitats Regulations, the delivery of the Essex Coast RAMS is the responsibility of each partner LPA needing it to ensure their Local Plan is sound and legally compliant.
- 6.3 A representative from each of the partner LPAs, together forming 'The RAMS Steering Group', shall work with the RAMS Delivery Officer to establish a monitoring process, which will include SMART targets<sup>8</sup> to effectively gauge progress. The work of the Steering Group will be overseen by the Essex Planning Officers Association Chief Officers Group (the Project Board). The Essex Coastal Forum which comprises Officers and Members from partner LPAs, will also discuss the Essex Coast RAMS at their meetings.
- 6.4 To ensure the monitoring process is fit for purpose, various monitoring activities will be undertaken at different times and at an appropriate frequency. The monitoring process will be used to inform future reviews of the RAMS and the SPD and details of the proposed monitoring framework are to be agreed on appointment of the delivery officer.
- 6.5 In addition to the monitoring of specific indicators, the progress of other relevant plans will be considered where they may require the consideration of a change to the RAMS or this SPD. At the time of writing, this includes the emerging South East Marine Plan, the East Inshore Marine Plan and the East Offshore Marine Plan. Once approved these plans will become part of the Development Plan for the relevant LPAs.

---

<sup>8</sup> Targets that are Specific, Measurable, Attainable, Relevant and Timely (SMART)



## 7. Consultation

- 7.1 A draft SPD was published for consultation between **Friday 10<sup>th</sup> January to Friday 21<sup>st</sup> February 2020** in accordance with the planning consultation requirements of each LPA.
- 7.2 Following the close of the consultation all comments were considered and a 'You Said We Did' Consultation Report published which outlined a response to each comment and suggested several amendments to this SPD. Where amendments were deemed necessary as a result of any comments, this SPD has factored them in prior to adoption by each LPA.

## 8. Useful Links

- Essex Coast Bird Aware - <https://essexcoast.birdaware.org/home>
- Basildon Borough Council (planning and environment) - <https://www.basildon.gov.uk/article/4622/Planning-and-environment>
- Braintree District Council (planning and building) - [https://www.braintree.gov.uk/homepage/22/planning\\_and\\_building](https://www.braintree.gov.uk/homepage/22/planning_and_building)
- Brentwood Borough Council (planning and building control) - <http://www.brentwood.gov.uk/index.php?cid=531>
- Castle Point Borough Council (planning) - <https://www.castlepoint.gov.uk/planning>
- Chelmsford City Council (planning and building control) - <https://www.chelmsford.gov.uk/planning-and-building-control/>
- Colchester Borough Council (planning, building control and local land charges) - <https://www.colchester.gov.uk/planning/>
- Maldon District Council (planning and building control) - [https://www.maldon.gov.uk/info/20045/planning\\_and\\_building\\_control](https://www.maldon.gov.uk/info/20045/planning_and_building_control)
- Rochford District Council (planning and building) - <https://www.rochford.gov.uk/planning-and-building>
- Southend Borough Council (planning and building) - [https://www.southend.gov.uk/info/200128/planning\\_and\\_building](https://www.southend.gov.uk/info/200128/planning_and_building)
- Tendring District Council (planning) - <https://www.tendringdc.gov.uk/planning>
- Thurrock Borough Council (planning and growth) - <https://www.thurrock.gov.uk/planning-and-growth>
- Uttlesford District Council (planning and building control) - <https://www.uttlesford.gov.uk/article/4831/Planning-and-building-control>
- Natural England - <https://www.gov.uk/government/organisations/natural-england>
- MAGIC (Map) - <https://magic.defra.gov.uk/MagicMap.aspx>
- Planning Practice Guidance - <https://www.gov.uk/government/collections/planning-practice-guidance>



- The National Planning Policy Framework (NPPF) - <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- Natural England - <https://www.gov.uk/government/organisations/natural-england>
- The Environment Agency - <https://www.gov.uk/government/organisations/environment-agency>

## Appendix 1: Strategic Mitigation

### Mitigation package costed for 2018-2038

Priority	Theme	Measure	One off cost?	Annual cost	No. of years	Total cost for developer tariff calculations	Notes
Immediate - Year 1/2	Staff resources	Delivery officer		£45,000	19	£1,027,825	Salary costs include National Insurance (NI) and overheads* & 2% annual increments
		Equipment and uniform		(small ongoing cost)		£5,000	Bird Aware logo polo shirts, waterproof coats and rucksacks, plus binoculars for Rangers
	Year 2	1 ranger		£36,000	18	£770,843	Salary costs include NI and overheads* & 2% annual increments
	Year 2	1 ranger		£36,000	18	£770,843	Salary costs include NI and overheads* & 2% annual increments
		Staff training		£2,000	19	£38,000	£500 training for each staff member

Priority	Theme	Measure	One off cost?	Annual cost	No. of years	Total cost for developer tariff calculations	Notes
		Partnership Executive Group		(LPA £1,000)	19	£0	This would need to be an 'in kind' contribution from the Local Planning Authority (LPA) as this is a statutory requirement of the competent authorities. NB This is over and above the requirement for S106 monitoring.
		Administration & audit		(LPA £1,000)	19	£0	As above.
	Access	Audit of Signage including interpretation	£1,000			£1,000	Undertaken by Delivery officer/rangers but small budget for travel.
		New interpretation Boards	£48,600			£48,600	£2,700 per board, based on Heritage Lottery Fund guidance. Approx. nine boards, one per Site. Cost allows for one replacement in the plan period.
	Monitoring	Levels of new development				£0	No cost as undertaken as part of LPA work in Development Management and S106 or Infrastructure officers.

Priority	Theme	Measure	One off cost?	Annual cost	No. of years	Total cost for developer tariff calculations	Notes
		Recording implementation of mitigation and track locations and costs				£0	No cost as delivered as part of core work by delivery officer.
		Collation & mapping of key roosts and feeding areas outside the SPA	£10,000			£10,000	Initial dataset to be available to inform Rangers site visits.
		Visitor surveys at selected locations in summer (with questionnaires)	£15,000			£15,000	Focus on Dengie, Benfleet & Southend Marshes and Essex Estuaries saltmarsh; estimated cost £5,000/Habitats site. Liaise with Natural England & Essex County Council Public Rights of Way team regarding England Coast Path.
		Visitor numbers and recreational activities	£5,000 (£500 / Habitats site / year)			£5,000	Rangers, partner organisations, LPAs.
		Consented residential development within Zol.	£0 / Habitats site / year)			£0	S106 officers to Track financial contributions for each development for all LPAs; liaise with LPA contributions officers

Priority	Theme	Measure	One off cost?	Annual cost	No. of years	Total cost for developer tariff calculations	Notes
	Communication	Website set up for Day 1				£0	Essex Coast Bird Aware webpage set up costs £3k to be covered by LPAs.
		Walks and talks to clubs and estuary user groups				£0	Covered by salary costs for Delivery officer
		Promotional materials				£5,000	Use Bird Aware education packs, stationery, dog bag dispensers, car stickers etc.
Short to Medium term	Dog related	Set up/expand Dog project in line with Suffolk Coast & Heaths AONB "I'm a good dog" and Southend Responsible Dog Owner Campaign	£15,000			£15,000	Use Bird Aware design for leaflets & website text, liaison with specialist consultants (Dog focussed), liaison with dog owners, dog clubs & trainers.
	Water sports zonation		£10,000			£10,000	Approx. costs only to be refined when opportunity arises.

Priority	Theme	Measure	One off cost?	Annual cost	No. of years	Total cost for developer tariff calculations	Notes
Year 5	Staff resources	1 additional ranger		£36,000	13	£456,567	Salary costs include NI and overheads* & 2% annual increments.
		Staff to keep website & promotion on social media up to date		£1,000	19	£19,000	Update/refresh costs spread over the plan period and include dog and water borne recreation focussed pages on RAMS/Bird Aware Essex Coast website plus merchandise e.g. dog leads.
	Monitoring	Update visitor surveys at selected locations in summer (with questionnaires)	£45,000			£45,000	Estimated cost £5,000 / Habitats site/year for nine sites. Liaise with Natural England & Essex County Council Public Rights of Way team regarding England Coast Path and LPAs regarding budgets as some of the survey costs may be absorbed into the budget for the HRAs needed for Local Plans. This could reduce the amount of contributions secured via RAMS which could be used for alternative measures.

Priority	Theme	Measure	One off cost?	Annual cost	No. of years	Total cost for developer tariff calculations	Notes
		Signage and interpretation	£13,500			£13,500	£13,500 allows for 3 sets of discs - 3 designs, £1,500 each; e.g. paw prints in traffic light colours to show where no dogs are allowed, dogs on lead and dogs welcome. This may link with a timetable e.g. Southend with dog ban 1 <sup>st</sup> May to 30 <sup>th</sup> September.
	Water based bailiffs to enforce byelaws	Set up Water Ranger	£50,000	£120,000	15	£2,029,342	Costs need to include jet ski(s), salary & on costs, training and maintenance plus byelaws costs. Priority is recommended for at least 1 Ranger to visit locations with breeding SPA birds e.g. Colne Estuary, Hamford Water and other locations e.g. Southend to prevent damage during the summer. Explore shared use at different times of year e.g. winter use at other Habitats sites, given increased recreation predicted.
		Additional River Ranger where needed		£120,000	15	£2,029,342	
	Codes of conduct	For water sports, bait digging, para motors/power hang gliders & kayakers	£5,000			£5,000	Use Bird Aware resources with small budget for printing. Talks to clubs and promotion covered by Delivery officer and rangers

Priority	Theme	Measure	One off cost?	Annual cost	No. of years	Total cost for developer tariff calculations	Notes
	Habitat creation - Alternatives for birds project – and long term management	Work with landowners & EA to identify locations e.g. saltmarsh creation in key locations where it would provide benefits and work up projects	£500,000			£500,000	Approx. costs only to be refined when opportunity arises for identified locations in liaison with EA and landowners via Coastal Forum and Shoreline Management Plans.
	Ground nesting SPA bird project – fencing and surveillance costs - specifically for breeding Little Terns & Ringed Plovers	Work with landowners & partners to identify existing or new locations for fencing to protect breeding sites for Little Tern & Ringed Plover populations	£15,000			£15,000	Check with Royal Society for the Protection of Birds, Natural England & Essex Wildlife Trust when project is prioritised.
Longer term projects	Car park rationalisation	Work with landowners, Habitats site managers & partner organisations	£50,000			£50,000	Approx. costs only to be refined when opportunity arises

Priority	Theme	Measure	One off cost?	Annual cost	No. of years	Total cost for developer tariff calculations	Notes
	Monitoring	Birds monitoring for key roosts & breeding areas within and outside SPAs		£5,000	10	£50,000	Costs for trained volunteers; surveys every 2 years
		Vegetation monitoring		£5,000	4	£20,000	Costs for surveys every 5 years
Year 10, 15 & 20	Monitoring	Update visitor surveys at selected locations in summer (with questionnaires)	£45,000			£135,000	Estimated cost £5,000 / Habitats site. Liaise with Natural England & Essex County Council Public Rights of Way team regarding England Coast Path.
	Route diversions	Work with PROW on projects	£15,000			£15,000	Approx. costs only to be refined when opportunity arises.

\*Staffing costs and overheads have been based on similar projects to the RAMS and existing HRA Partnership Ranger provision elsewhere in the UK, including a review on travel time / mileage provided by Habitats Site managers.

**TOTAL MITIGATION PACKAGE COSTS**

**£8,104,862**

**+10% contingency**

**£810,486**

**TOTAL COST**

**£8,915,348**

## **Appendix 2: Essex Coast RAMS Guidelines for proposals for student accommodation**

### Introduction

A2.1 The Essex coast Recreational disturbance Avoidance and Mitigation Strategy (the “Essex coast RAMS”) aims to deliver the mitigation necessary to avoid significant adverse effects from in-combination impacts of residential development that is anticipated across Essex; thus, protecting the Habitats (European) sites on the Essex coast from adverse effects on site integrity. All new residential developments within the evidenced Zones of Influence where there is a net increase in dwelling numbers are included in the Essex Coast RAMS. The Essex Coast RAMS identifies a detailed programme of strategic mitigation measures which are to be funded by developer contributions from residential development schemes.

A2.2 This note includes guidance for proposals for student accommodation to help understand the contribution required. It has been agreed by the Essex Coast RAMS Steering Group. The purpose of this note is to ensure that a consistent approach is taken across Essex when dealing with proposals for student accommodation within the Zones of Influence of the Essex Coast RAMS.

### Student Accommodation

A2.3 In their letter to all Essex local planning authorities, dated 16 August 2018, Natural England included student accommodation as one of the development types that is covered by the Essex Coast RAMS.

A2.4 It would not be appropriate to expect the full RAMS tariff for each unit of student accommodation. This would not be a fair and proportionate contribution. Nevertheless, Natural England has advised that there needs to be a financial contribution towards the RAMS as there is likely to be a residual effect from student accommodation development even though it will only be people generated disturbance rather than dog related. Natural England has advised that the tariff could be on a proportionate basis. It may also be possible for the on-site green infrastructure provision to be proportionate to the level of impact likely to be generated by the student accommodation, particularly as one of the main reasons for having on site green infrastructure is to provide dog walking facilities, which wouldn't be needed for student accommodation. The general model for calculation, set out below, explains how to obtain a fair and proportionate contribution for student accommodation.

A2.5 In the first instance, 2.5 student accommodation units will be considered a unit of residential accommodation.

A2.6 Secondly, it is recognised that due to the characteristics of this kind of residential development, specifically the absence of car parking and the inability of those living in purpose built student accommodation to have pets, the level of disturbance created, and thus the increase in bird disturbance and associated bird mortality, will be less than for dwelling houses (use class C3 of the Use Classes Order a).

A2.7 Research from the Solent Disturbance Mitigation Project showed that 47% of activity which resulted in major flight events was specifically caused by dogs off a lead. As such, it is considered that level of impact from student accommodation would be half that of C3 housing and thus the scale of the mitigation package should also be half that of traditional housing.

*So, a scheme for 100 student accommodation units would be considered 40 units. 40 units would then be halved providing that future occupiers are prevented from owning a car and keeping a pet:*

$$100/2.5 = 40$$

$$40/2 = 20$$

$$20 \times \text{£}125.58^9 = \text{£}2,511.60$$

A2.8 Please note that the calculation outlined above is to be used as a guide. The level of contribution would also need to consider the proximity of the accommodation to the Habitats sites in question and the total number of units being built.

### Chelmsford City Council

A2.9 Proposals for student accommodation in Chelmsford will have a de minimis effect. Unlike Colchester and Southend, Chelmsford only has a small area of Habitats sites in the far south-eastern part of its administrative area. Purpose built student accommodation generally includes restrictions preventing students from owning a car or a pet. These restrictions will make it extremely unlikely that a student will visit a Habitats site, owing to the difficulty in accessing Essex coast Habitats sites from Chelmsford by public transport. Consequently, proposals for purpose-built student accommodation in Chelmsford will not lead to likely significant effects on Habitats sites from increased recreational disturbance. Therefore, for the avoidance of any doubt, the RAMS tariff does not apply to student accommodation in Chelmsford.

---

<sup>9</sup> 2020/21 tariff



This publication is available in alternative formats including large print, audio and other languages.

If required, please contact:

Place Services  
Essex County Council  
County Hall  
Chelmsford  
Essex  
CM1 1QH

Email: [ecology.placeservices@essex.gov.uk](mailto:ecology.placeservices@essex.gov.uk)  
Telephone: 03330 322130  
Weblink: <https://consultations.essex.gov.uk/place-services/the-essex-coast-rams-spd>

Document published by © Place Services 2019



# Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Supplementary Planning Document (SPD)

## Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA) Screening Report – June 2020





# Contents

<b>1.</b>	<b>Introduction</b>	<b>1</b>
1.1	The Purpose of this Report	1
1.2	The Essex Coast RAMS Planning Context	1
<b>2.</b>	<b>Legislative Background</b>	<b>4</b>
2.1	Strategic Environmental Assessment (SEA)	4
2.2	Habitats Regulations Assessment (HRA)	5
<b>3.</b>	<b>SEA Screening</b>	<b>6</b>
3.1	When is SEA Required?	6
3.2	Likely Significant Effects on the Environment resulting from the SPD	8
<b>4.</b>	<b>HRA Screening</b>	<b>19</b>
4.1	Introduction	19
4.2	Consideration of whether the SPD requires HRA Screening	20
<b>5.</b>	<b>Conclusions</b>	<b>22</b>
5.1	Strategic Environmental Assessment (SEA) Screening	22
5.2	Habitats Regulations Assessment (HRA)	22
	<b>Appendix 1: Habitats (European) sites covered by the RAMS</b>	<b>23</b>
	<b>Appendix 2: Broad illustration of the Zone of Influence for the RAMS</b>	<b>24</b>
	<b>Appendix 3: Consultation Comments</b>	<b>25</b>
A3.1	Consultation with Statutory Consultees	25



# List of Tables

Table 1: Exploring whether the Principle of the SPD would warrant SEA .....	6
Table 2: Assessment of Likely Significant Effects on the Environment .....	9
Table 3: Consultation comments from the statutory consultees and resulting actions .....	25



# 1. Introduction

## 1.1 The Purpose of this Report

---

This Screening Report is an assessment of whether or not the contents of the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (the 'RAMS') Supplementary Planning Document (SPD) require a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/ EC and associated Environmental Assessment of Plans and Programmes Regulations. A SEA is required if a SPD is deemed to have a likely significant effect on the environment.

This report will also discuss whether the SPD requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) and (4) of the EU Habitats Directive and with Regulation 61 of the Conservation of Habitats and Species Regulations 2017. A HRA is required when it is deemed that likely significant effects may occur on protected Habitats (European) Sites (Natura 2000 sites) as a result of the implementation of a plan or project. Please note that this screening report takes account of the legal ruling *People over Wind, Peter Sweetman v Coillte Teoranta*.

This SEA/HRA screening report is based on the SPD which is being consulted upon and the report itself will be subject to statutory consultation.

## 1.2 The Essex Coast RAMS Planning Context

---

### 1.2.1 The duties of Local Planning Authorities (LPAs)

LPAs have the duty, by virtue of being defined as 'competent authorities' under the Habitats Regulations, to ensure that planning application decisions comply with the Habitats Regulations. If the requirements of the Habitats Regulations are not met and impacts on Habitats sites are not mitigated, then development must not be permitted.

Where a Habitats site could be affected by a plan, such as a Local Plan, or any project, such as a new hospital/housing/retail development, then Habitats Regulations Assessment (HRA) screening must be undertaken. If this cannot rule out any possible likely significant effect either alone or in combination on the Habitats site prior to the implementation of mitigation, then an Appropriate Assessment (AA) must be undertaken. The AA identifies the interest features of the site (such as birds, plants or coastal habitats), how they could be harmed, assesses whether the proposed plan or project could have an adverse effect on the integrity of the Habitats site (either alone or in combination), and finally how this could be mitigated.

### 1.2.2 Growth in Essex and the need for strategic mitigation

The majority of the HRAs produced by Essex LPAs as part of the production of their respective Local or Strategic Plans identified that the level of planned housing growth may lead to disturbance of birds in coastal Habitats (European) sites within and beyond each individual LPA boundary.

The published Habitats Regulations Assessments (HRAs) for the 12 relevant LPAs within Essex



have identified recreational disturbance as an issue for all of the Essex coastal Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsars (wetland sites designated to be of international importance under the Ramsar Convention)<sup>1</sup>. These LPAs are:

The 12 LPAs which are partners in and responsible for the delivery of the RAMS are listed below:

- Basildon Borough Council
- Braintree District Council
- Brentwood Borough Council
- Castle Point Borough Council
- Chelmsford City Council
- Colchester Borough Council
- Maldon District Council
- Rochford District Council
- Southend Borough Council
- Tendring District Council
- Thurrock Borough Council
- Uttlesford District Council

Mitigation measures have been identified in the HRA (screening and/or Appropriate Assessments) for many of the above LPAs' Local Plans; either adopted or emerging. There are similarities in the mitigation measures proposed, reflecting the identification of 'in-combination' effects resulting from planned and un-planned growth across all of the LPA areas. In recognition of this, Natural England recommended a strategic approach to mitigation along the Essex coast.

Furthermore, each Habitats site or complex of sites in England has a Site Improvement Plan (SIP), developed by Natural England and recreational disturbance is identified as an issue for all ten of the Habitats sites considered in this strategy.

Mitigation measures are therefore necessary to avoid these likely significant effects in-combination with other plans and projects on the integrity of the Habitats sites. Mitigation at this scale, and across a number of LPAs, is best tackled strategically and through a partnership approach. This ensures maximum effectiveness of conservation outcomes and cost efficiency.

Some housing schemes, particularly those located close to a Habitats site boundary or large-scale developments, may need to provide mitigation measures to avoid likely significant effects from the development alone, in addition to the mitigation required in-combination and secured for delivery through the RAMS. This would need to be assessed and, where appropriate, mitigated through a separate project level Habitats Regulations Assessment (HRA) (including AA where necessary). The local planning authority, in consultation with Natural England, would advise on applicable cases.

Other housing schemes, particularly again those located close to a Habitat site boundary or large-scale developments, may need to provide mitigation measures to address site-specific impacts over and above the mitigation required through the RAMS. This would also be assessed and, where appropriate, mitigated through the project level Habitats Regulations Assessment (HRA). The local planning authority, in consultation with Natural England, would advise on these cases.

---

<sup>1</sup> The Habitats Sites to which this SPD applies are: Essex Estuaries SAC; Stour and Orwell Estuaries SPA and Ramsar; Hamford Water SPA and Ramsar; Colne Estuary SPA and Ramsar; Blackwater Estuary SPA and Ramsar; Dengie SPA and Ramsar; Crouch and Roach Estuaries SPA and Ramsar; Foulness Estuary SPA and Ramsar; Benfleet and Southend Marshes SPA and Ramsar; and Thames Estuary and Marshes SPA and Ramsar.



## 1.2.3 Summaries of the RAMS and the SPD

### 1.2.3.1 The RAMS

The Essex coast RAMS aims to deliver the mitigation necessary to enable the conclusion of 'no adverse 'in-combination' effects' to be made of residential development that is anticipated across Essex; thus protecting the integrity of Habitats sites on the Essex coast. The RAMS identifies a detailed programme of strategic mitigation measures which would be funded by contributions from residential development schemes. This strategic approach has the following advantages:

- It is endorsed by Natural England and has been used to protect other Habitats sites across England;
- It is pragmatic: a simple and effective way of protecting and enhancing the internationally important wildlife of the Essex coast and will help to reduce the time taken to reach planning decisions;
- It provides an evidence based and fair mechanism to fund the mitigation measures required as a result of the planned residential growth; and
- It provides developers, agents and planning authorities with a comprehensive, consistent and efficient way to ensure that appropriate mitigation for residential schemes within the Zone of Influence is provided in an effective and timely manner.

The RAMS approach seeks to mitigate the additional recreational pressure in a way that ensures that those responsible for it pay to mitigate it at a level consistent with the level of potential harm. It also obeys the 'precautionary principle'. Existing visitor pressure at Habitats sites would be mitigated through alternative means and any pressure that would arise from different types of development would be addressed through the project-level HRA.

### 1.2.3.2 The SPD

The SPD applies to new residential dwellings that will be built in the Zone of Influence (Zol) of the Habitats sites. Residential development will need to include a mitigation package which would incorporate a contribution to the RAMS to mitigate the 'in-combination' effects. This is secured through a tariff for all developments where there is a net increase in dwelling numbers, regardless of size. This would include, for example, the conversion of existing large townhouses into smaller flats, or the change of use of other buildings to dwellings. It excludes replacement dwellings (where there is no net gain in dwelling numbers) and extensions to existing dwellings including residential annexes.

In order to arrive at a per dwelling contribution figure, the strategic mitigation package cost was divided by the total number of dwellings which will be built in the Zol over the Local Plan periods until 2038. This includes dwellings which have not received Full/Reserved matters consent. Any houses already consented in the Plan period are not included in this calculation. The SPD proposes that applicants secure this mitigation through a direct payment or a Section 106 agreement and the tariff per dwelling is £125.58 (as of 2020-21).



## 2. Legislative Background

### 2.1 Strategic Environmental Assessment (SEA)

Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment states that,

*'Environmental assessment is an important tool for integrating environmental considerations into the preparation and adoption of certain plans and programmes which are likely to have significant effects on the environment.'*

*(10) All plans and programmes which are prepared for a number of sectors and which set a framework for future development consent of projects listed in Annexes I and II to Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment(7), and all plans and programmes which have been determined to require assessment pursuant to Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild flora and fauna(8), are likely to have significant effects on the environment, and should as a rule be made subject to systematic environmental assessment. When they determine the use of small areas at local level or are minor modifications to the above plans or programmes, they should be assessed only where Member States determine that they are likely to have significant effects on the environment.'*

*(11) Other plans and programmes which set the framework for future development consent of projects may not have significant effects on the environment in all cases and should be assessed only where Member States determine that they are likely to have such effects.'*

SEA incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment.

The SPD may influence frameworks for future development, or become ancillary to those plans and programmes that do set such a framework, and as such it has been determined that the principle of the SPD should be screened for the necessary application of the SEA Directive.

The Report from the Commission to The Council, The European Parliament, The European Economic and Social Committee and the Committee of the Regions states, on the application and effectiveness of the Directive on Strategic Environmental Assessment (Directive 2001/42/EC), that

*'the following P&P, and modifications to them, are covered when prepared and/or adopted by an authority[2] and required pursuant to legislative, regulatory or administrative provisions:*

- P&P prepared for certain sectors and which set the framework for future development consent in respect of projects under the Environmental Impact Assessment-EIA-Directive.*
- P&P requiring an assessment under the Habitats Directive (92/43/EEC).*
- P&P setting the framework for development consent in respect of projects (not limited to those listed in the EIA Directive; see above) and determined by "screening" as being likely to have significant environmental effects.'*



This report represents this screening process in regard to the content and influence of the SPD.

## 2.2 Habitats Regulations Assessment (HRA)

---

Under the provisions of the EU Habitats Directive and translated into English law by the Habitats Regulations (*The Conservation of Habitats and Species (Amendment) Regulations 2017*), a competent authority must carry out an assessment of whether a plan or project will significantly affect the integrity of any European Site (also referred to as Habitats Sites in the National Planning Policy Framework), in terms of impacting the site's conservation objectives. The assessment of effects is carried out through an "appropriate assessment (AA)".

HRA is a screening assessment of the impacts of a land use proposal against the conservation objectives of Habitats (European) sites, in order to identify whether effects are likely so as to require a full appropriate assessment. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would potentially damage the internationally designated features of that site. European sites are also known as Natura 2000 sites. A brief explanation of Habitats sites is offered below.

Plans, including SPDs, should be screened for effects as set out above. The SPD and the RAMS have been developed in accordance with the findings and recommendations of numerous AAs undertaken by the 12 LPAs as the competent authorities. This report discusses the implications of the SPD in regard to the procedural need for HRA (screening).

## 3. SEA Screening

### 3.1 When is SEA Required?

SEA is a tool used at the *plan-making stage* to assess the likely effects of the plan when judged against reasonable alternatives.

SEA for an SPD alone can be required, but usually only in exceptional situations. This is usually only applicable to SPDs which themselves could cause significant environmental effects that have not been previously considered.

Planning Practice Guidance – Strategic environmental assessment and sustainability appraisal (Paragraph: 008 Reference ID: 11-008-20140306) states that,

*‘Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already been assessed during the preparation of the Local Plan.*

*A strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004), unless it is considered that there are likely to be significant environmental effects.’*

Articles 2 and 3 of the SEA Directive set out the circumstances in which an SEA is required. Table 1 sets out the assessment of whether the SPD will require a full SEA.

**Table 1: Exploring whether the Principle of the SPD would warrant SEA**

Q	Criteria	Response	Outcome	Commentary
1	Is the Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through legislative procedure by Parliament or Government	Yes	Go to question 2	The SPD has been subject to preparation and/or adoption by a national, regional or local authority.
2	Is the Plan required by legislative, regulatory or administrative provision <sup>2</sup>	Yes	Go to question 3	The SPD would be considered as falling within the category of an ‘administrative provision’.

<sup>2</sup> Typical characteristics of "administrative provisions" are that they are publicly available, prepared in a formal way, probably involving consultation with interested parties. The administrative provision must have sufficient formality such

Q	Criteria	Response	Outcome	Commentary
		No	DOES NOT REQUIRE SEA	
3	Is the Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	Yes to both criteria	Go to question 5	The SPD has been prepared for town and country planning and contributes to wider frameworks for future development consent.
		No to either criteria	Go to question 4	
4	Will the Plan, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	Yes	Go to question 5	The Plan's likely effect on sites and requirement for an assessment under Article 6 or 7 of the Habitats Directive is explored in Section 4 of this Report.
		No	Go to question 6	
5	Does the Plan determine the use of small areas at local level, OR is it a minor modification of a Plan likely to require assessment under the Habitats Directive?	Yes to either criteria	Go to question 8	The SPD can be considered to affect the determination of the use of small areas at the local level commensurate to its status in determining planning applications in the 12 LPA areas.
		No to both criteria	Go to question 7	
6	Does the Plan set the framework for future development consent of projects (not just projects in the Annexes of the EIA Directive)?	Yes	Go to question 8	The SPD has been prepared for town and country planning and contributes to wider frameworks for future development consent.
		No	DOES NOT REQUIRE SEA	
7	Is the Plans sole purpose to serve national defence or civil emergency, OR is it a financial or budget Plan, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7	Yes to any criteria	DOES NOT REQUIRE SEA	The SPD does not serve a purpose related to national defence or civil emergency, a financial or budget Plan. The SPD is not co-financed by structural funds or EAGGF programmes 2000 to 2006/7.
		No to all criteria	REQUIRES SEA	
8		Yes	REQUIRES SEA	Likely significant effects are explored in more detail in

that it counts as a "provision" and it must also use language that plainly requires rather than just encourages a Plan to be prepared.



Q	Criteria	Response	Outcome	Commentary
	Is it likely to have a significant effect on the environment?	No	DOES NOT REQUIRE SEA	Section 3.2 of this Screening Report. The 'conclusions' section of the Report outlines whether the SPD requires SEA or not due to having a significant effect on the environment.

The following section looks at the identified effects of the SPD in line with the criteria for assessing effects as per Article 3(5) of Directive 2001/42/EC (the SEA Directive). Crucially, it will determine whether there are any likely significant effects on the environment.

## 3.2 Likely Significant Effects on the Environment resulting from the SPD

---

The following assessment will consider the likelihood of the SPD (at the time of writing) to have significant effects on the environment. The table below will explore the likelihood of effects on the following required themes, as included within Annex I of the SEA Directive (2001/42/EC):

- Biodiversity;
- Population;
- Human health;
- Fauna;
- Flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural heritage including architectural and archaeological heritage;
- Landscape; and
- The interrelationship between the above factors.

**Table 2: Assessment of Likely Significant Effects on the Environment**

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>	<p>The purpose of the SPD focuses on the mitigation that is necessary to protect the wildlife of the Essex coast from the increased visitor pressure associated with new residential housing development in combination with other plans and project, and how this mitigation will be funded.</p> <p>The level of planned growth within the Zol is outlined in the 12 LPAs' Local Plans (adopted or emerging) within those plan periods. These Local Plans have all been subject to SA and HRA mandatorily, which explores the environmental effects of growth in LPA areas and the land-use allocations with those Plans.</p> <p>The degree to which the SPD sets a framework for projects is therefore relatively low; the SPD relates to the level of developer contributions being sought for strategic mitigation and how and when applicants should make contributions to provide the mitigation needed as a result of growth within the Zol across the 12 LPA areas.</p>
<p>The degree to which the plan or programme influences other plans or programmes including those in a hierarchy.</p>	<p>Adopted and emerging Local Plans will set the requirements of development in the 12 LPA areas. The SPD provides greater detail and clarity on the level of developer contributions being sought for strategic mitigation and how and when applicants should make contributions, but is not a standalone document and must be read in conjunction with other Local Plan policies. The degree to which the SPD influences other programmes is therefore moderate.</p>
<p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>The primary aim of the SPD is to ensure that sustainable outcomes can be forthcoming in the form of the provision of strategic mitigation for recreational disturbance on Habitats sites related to the Essex coast.</p> <p>The RAMS provides developers, agents and planning authorities with a comprehensive, consistent and efficient way to ensure that appropriate mitigation for residential schemes within the Zol is provided in an effective and timely manner. The SPD provides greater detail and clarity on the level of developer contributions being sought for strategic mitigation and how and when applicants should make contributions. In short, the SPD sets out how each LPA will deliver the RAMS through the planning process. The SPD is therefore relevant to the integration of environmental considerations in particular with a view to promoting sustainable development.</p>
<p>Environmental problems relevant to the plan.</p>	<p>The SPD relates to a large area covering much of the 12 LPA areas across Essex and the content serves to address environmental issues. The policy content of adopted and emerging Local Plans will additionally apply to forthcoming development proposals which</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>include numerous thematic policies related to environmental protection. All Local Plan policies have been subject to Sustainability Appraisal within the context of the preparation of Local Plans at the individual LPA level, as well as HRA/AA that also incorporates in-combination effects. This Screening Report focuses on those (direct / indirect) environmental problems or sources of potential problems relevant to the SPD specifically, as identified within HRA/AAs and the RAMS document:</p> <ul style="list-style-type: none"> <li>• Most of the Essex coast is designated under the UK Conservation of Habitats and Species Regulations 2017 (the ‘Habitats Regulations’) as part of the European Natura 2000 network a series of these sites across Europe.</li> <li>• The Essex coast also provides opportunities for recreation. Housing and consequent population growth in Essex is likely to increase the number of visitors to these sensitive coastal areas, creating the potential for impacts from increased recreational disturbance of the birds (both breeding and overwintering) and their habitats, unless adequately managed.</li> <li>• The 12 LPAs are aiming to deliver approximately 80,000 new homes in the next 20 years according to growth set out in current and emerging Local Plans. This will potentially result in around 190,000 new residents in this area between 2018 and 2038 (based on a 2.4 person per household average household occupancy).</li> <li>• Recreational pressure adds to the stresses of defending a territory, laying eggs and rearing chicks, and overwintering which means that SPA birds are often more vulnerable, and although effects are all-year-round, levels of public access to breeding areas can rise in the summer months.</li> <li>• The Habitats sites in Essex relevant to the RAMS (and SPD) are:             <ul style="list-style-type: none"> <li>- Essex Estuaries SAC</li> <li>- Hamford Water SAC, SPA and Ramsar</li> <li>- Stour and Orwell Estuaries SPA and Ramsar</li> <li>- Colne Estuary SPA and Ramsar</li> <li>- Blackwater Estuary SPA and Ramsar</li> <li>- Dengie SPA and Ramsar</li> <li>- Crouch and Roach Estuaries SPA and Ramsar</li> <li>- Foulness Estuary SPA and Ramsar</li> <li>- Benfleet and Southend Marshes SPA and Ramsar</li> <li>- Thames Estuary and marshes SPA and Ramsar</li> </ul> </li> </ul>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<ul style="list-style-type: none"> <li>• Key breeding roosts are known on particular estuaries/shorelines and in specific locations where habitat and conditions enable territories to become established. Discussion with the Royal Society for the Protection of Birds (RSPB) on data available on key bird roost locations which are sensitive to disturbance has identified 20 key sites.</li> <li>• Walkers and dogs as well as other recreational activities can have a major impact on not just UK breeding birds but overwintering birds of far higher numbers during a vulnerable time when they are already at risk of cold and starvation.</li> <li>• Functionally Linked Land (FLL) also needs to be protected from disturbance e.g. key areas of farmland and grassland for Brent geese.</li> </ul> <p>The RAMS identifies the following potential for disturbance of birds (by increased visitor access), for each of the Habitats sites:</p> <p><u>Stour Estuary SPA &amp; Ramsar</u></p> <ul style="list-style-type: none"> <li>• Percentage of mudflat within 60m of the shore are mostly quite low, though WeBS<sup>3</sup> sector at Mistley relatively high suggesting shoreline access here has potential to affect a high proportion of open mud feeding areas.</li> <li>• Shoreline near Manningtree and Harwich has high levels of local housing suggesting access levels could be potentially high at access points creating hotspots for recreation.</li> <li>• There are paths all along southern shore but high path densities around the eastern and western ends, suggesting more current access around Harwich and Manningtree.</li> </ul> <p><u>Hamford Water SAC, SPA and Ramsar</u></p> <ul style="list-style-type: none"> <li>• Garnham Island and Horsey Island have highest average percentage values from WeBS for Hamford Water, suggesting these areas are particularly important.</li> <li>• Large and important gull colonies.</li> <li>• Breeding Little Tern and Ringed Plover at a range of beaches around the site.</li> <li>• Percentage of mudflat within 60m of the shore for WeBS sectors near Walton and Great Oakley relatively high, suggesting shoreline access in these areas has potential to affect a high proportion of open mud feeding areas.</li> <li>• Some of the shoreline near the south-east of the site is identified as having no access and also has some higher values for local housing, suggesting high numbers of local residents within 'visiting' range.</li> </ul>

<sup>3</sup> WeBs: 'Wetland Bird Survey'



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p><u>Colne Estuary SPA and Ramsar (including Essex Estuaries SAC)</u></p> <ul style="list-style-type: none"> <li>Percentage of mudflat within 60m of the shore values are moderate, suggesting a relatively high proportion of mudflat is close to shoreline areas.</li> <li>Western shoreline and to some extent northern parts with little or no paths (including large area owned by MOD).</li> <li>Development at Robinson Road will impact site.</li> </ul> <p><u>Dengie SPA and Ramsar</u></p> <ul style="list-style-type: none"> <li>All WeBS sectors with relatively high average percentages suggesting relatively high importance across site.</li> <li>Very little existing paths.</li> <li>No parking identified.</li> </ul> <p><u>Blackwater Estuary SPA and Ramsar</u></p> <ul style="list-style-type: none"> <li>Gull colony and breeding Ringed Plovers on Peewit Island</li> <li>Important concentration of breeding birds around Old Hall Marshes.</li> <li>Sectors near Maldon coast, Mayland and St Lawrence have relatively high percentages of mudflat within 60m of the shore, indicating access in these areas has potential to affect higher proportion of open mudflat.</li> <li>Weighted housing values are high around Maldon suggesting higher levels of access here.</li> <li>RSPB Old Hall Marshes shown to be particularly important from average WeBS values.</li> </ul> <p><u>Crouch and Roach Estuaries SPA and Ramsar</u></p> <ul style="list-style-type: none"> <li>Central part of site has highest average WeBS values.</li> <li>WeBS sectors around Wallasea have relatively high percentage of mudflat within 60m of the shore, indicating access in these areas has potential to affect higher proportion of open mudflat.</li> <li>High weighted housing values for South Woodham Ferrers, Hullbridge and around Burnham on Crouch, suggesting access levels higher in these areas.</li> <li>Some parts of north shore seem to have limited or little paths.</li> </ul> <p><u>Foulness SPA and Ramsar</u></p> <ul style="list-style-type: none"> <li>Central part of site has highest average WeBS values.</li> <li>WeBS sectors around Wallasea have relatively high percentage of mudflat within 60m of the shore, indicating</li> </ul>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>access in these areas has potential to affect higher proportion of open mudflat.</p> <ul style="list-style-type: none"> <li>• High weighted housing values for South Woodham Ferrers, Hullbridge and around Burnham on Crouch, suggesting access levels higher in these areas.</li> <li>• Path network variable, with some areas with high density of paths (suggesting good current access provision and use), particularly around the settlements and for much of shoreline continuous routes. Some parts of north shore seem to have limited or little paths</li> </ul> <p><u>Benfleet and Southend Marshes SPA and Ramsar</u></p> <ul style="list-style-type: none"> <li>• North side of Canvey Island has highest average WeBS values.</li> <li>• Very high path density around most of shoreline particularly at Southend which experiences over 7 million day visitors a year to its tourist facilities centred on the coast which displaces local residents.</li> <li>• Weighted housing values all high, particularly around north side of Canvey, suggesting these areas have high levels of current access.</li> <li>• Car-parking relatively evenly spread around shore</li> </ul> <p><u>Thames Estuary &amp; Marshes SPA and Ramsar</u></p> <ul style="list-style-type: none"> <li>• No variation in average WeBS values and all moderately high.</li> <li>• WeBS sector near Thurrock has high percentage of mudflat within 60m of the shore, suggesting little mudflat is away from shoreline areas.</li> <li>• Relatively low path density for whole area.</li> <li>• Limited parking.</li> </ul> <p>Other more general disturbance includes:</p> <ul style="list-style-type: none"> <li>• Motorbike, horseriding and fishing.</li> <li>• Community walk disturbance.</li> <li>• Unauthorised access.</li> <li>• Illegal off-roading.</li> <li>• Boat-landing.</li> <li>• Vehicles damaging saltmarsh.</li> <li>• Trampling of saltmarsh.</li> <li>• High access if Country Park location.</li> <li>• Access damaging important habitat.</li> </ul>



Criteria for determining the likely significance of effects (Annex II SEA Directive)		Likelihood and summary of significant effects
		<ul style="list-style-type: none"> <li>• Dog-walking.</li> </ul>
The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).		The content of the SPD is not in conflict with those relevant planning documents within the wider district and county area related to waste management or water protection.
The probability, duration, frequency and reversibility of the effects on the following factors:		The following impacts have been identified within this Screening Assessment:
Sustainability Theme	- Biodiversity	<p>The RAMS and the SPD have been devised in order to ensure strategic mitigation required from recreational disturbance on Habitats sites is suitable and can be delivered. The need for mitigation has been identified from the HRA / AA work done for the 12 LPAs Local Plans, is reflective of growth numbers and this work has included the assessment of in-combination effects.</p> <p>It is important to acknowledge that the SPD and the RAMS are focused solely on recreational impacts on the Essex coast Habitats sites. Section 3.4 of the RAMS states that, <i>‘the Essex Coast RAMS Strategy does not provide:</i></p> <ul style="list-style-type: none"> <li>• <i>A mechanism to deliver mitigation for recreational impacts from individual residential developments <u>alone</u>; this must be provided on/near the development site;</i></li> <li>• <i>A mechanism for measures necessary to avoid likely significant effects from non-recreational impacts e.g. air or water quality, identified through project level HRAs prepared for individual planning application;</i></li> <li>• <i>Any mitigation needed to reduce or avoid existing impacts from recreational or other activities identified by Natural England in the SIPs for each Habitats site along the Essex coast.’</i></li> </ul> <p>The SPD specifically has not been identified as having any effects on biodiversity, in so far as it responds to a need to provide a planning context to the RAMS in the form of a tariff per net increase of residential dwellings. The RAMS in itself exists to ensure no effects related to recreational disturbance are experienced on Habitats sites within Local Plan periods.</p>
	- Population	Strategic mitigation in the forms espoused in the RAMS are unlikely to offer any wider benefits to new and existing communities, however negative effects can be expected to be avoided at the non-strategic



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>level through localised recreation and open space provision to serve new development. The SPD in itself will not have any effects related to population as it provides a mechanism for which the RAMS can be implemented.</p>
<p>- Human health</p>	<p>Strategic mitigation in the forms espoused in the RAMS are unlikely to offer any wider benefits regarding human health, however negative effects can be expected to be neutralised at the non-strategic level through localised recreation and open space provision to serve new development. The SPD in itself will not have any effects related to human health as it provides a mechanism for which the RAMS can be implemented.</p>
<p>- Fauna</p>	<p>The primary aim of the RAMS is to seek strategic mitigation regarding recreational disturbance on Habitats sites emanating from increased growth in the 12 LPA areas. Habitats sites relate to SPAs and SACs, which are both designated for wild fauna, and also Ramsar sites which are wetlands of international importance and provide habitats for wild birds. Strategic mitigation as identified within the RAMS ensures that a significant step is being taken to protect fauna and ensure no likely significant effects will be experienced. The SPD in itself will not have any effects related to fauna as it provides a mechanism for which the RAMS can be implemented.</p>
<p>- Flora</p>	<p>The primary aim of the RAMS is to seek strategic mitigation regarding recreational disturbance on Habitats sites emanating from increased growth in the 12 LPA areas. Habitats sites relate to SACs, which are designated for wild fauna and flora, and also SPAs and Ramsar sites which are designated for wild birds and wetlands of international importance. Strategic mitigation as identified within the RAMS ensures that a significant step is being taken to protect flora (either directly or as habitats for fauna) and ensure no likely significant effects will be experienced. The SPD in itself will not have any effects related to flora as it provides a mechanism for which the RAMS can be implemented.</p>
<p>- Soil</p>	<p>The SPD in itself will not have any effects related to soil quality or the loss of the best and most versatile agricultural land as it provides a mechanism for which the RAMS can be implemented.</p>
<p>- Water</p>	<p>The RAMS is related to recreational disturbance only, and does not regard any mitigation that might be needed regarding water quality that may have a significant effect on Habitats sites as a result of development within the ZoI.</p> <p>All development within the ZoI will still be required to undergo the process of project-level HRA to determine other effects (such as</p>



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
- Air	<p>regarding water quality) on Habitats sites. These effects are outside the scope of the RAMS and the SPD. The SPD in itself will not have any effects related to water as it provides a mechanism for which the RAMS can be implemented.</p> <p>The RAMS is related to recreational disturbance only, and does not regard any mitigation that might be needed regarding air quality that may have a significant effect on Habitats sites as a result of development within the Zol.</p> <p>All development within Zols will still be required to undergo the process of project-level HRA to determine other effects (such as regarding air quality) on Habitats sites. These effects are outside the scope of the RAMS and the SPD. The SPD in itself will not have any effects related to air quality as it provides a mechanism for which the RAMS can be implemented.</p>
- Climatic factors	<p>The SPD in itself will not have any effects related to climatic factors as it only relates to a mechanism for which the RAMS can be implemented.</p>
- Material assets <sup>4</sup>	<p>The RAMS is not considered to have any negative implications regarding material assets, as there is no identified need for any built development as a result of the mitigation proposals (water recreation restrictions, access restrictions and new 'Ranger' provision in key locations). The SPD in itself will not have any effects related to material assets as it only relates to a mechanism for which the RAMS can be implemented.</p>
- Cultural heritage	<p>The RAMS is not considered to have any negative implications regarding cultural heritage, as there is no identified need for any built development as a result of the mitigation proposals (water recreation restrictions, access restrictions and new 'Ranger' provision in key locations). The SPD in itself will not have any effects related to cultural heritage as it only relates to a mechanism for which the RAMS can be implemented.</p>
- Landscape	<p>The RAMS is not considered to have any negative implications regarding landscape, as there is no identified need for any built development as a result of the mitigation proposals (water recreation restrictions, access restrictions and new 'Ranger' provision in key locations). The SPD in itself will not have any effects related to</p>

<sup>4</sup> Examples of 'material assets' include: *built assets* such as infrastructure and housing; and *natural assets* such as minerals, watercourses supporting natural drainage and flood prevention processes, forestry and woodland.



Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	landscape as it only relates to a mechanism for which the RAMS can be implemented.
The cumulative nature of the effects against the (above) Sustainability Themes.	In line with the above considerations that explore the possible individual effects of the Plan's content, no significant cumulative effects are considered to be likely to warrant the requirement for the application of the SEA Directive and the formulation of a SEA Environmental Report.
The trans-boundary nature of the effects.	Relevant to the scope of the RAMS and SPD regarding recreational impacts on Habitats sites, the nature of strategic mitigation responds directly to addressing possible trans-boundary effects, as identified in the Local Plan AAs of the 12 LPAs. Regarding other environmental considerations, as addressed above, no significant trans-boundary effects are considered to be likely to warrant the requirement for the application of the SEA Directive and the formulation of a SEA Environmental Report.
The risks to human health or the environment (e.g. due to accidents).	There is limited risk to human health or the environment as a result of the RAMS mitigation proposals which are unlikely to give rise to any accidents that can be considered to have a significant risk to human health or the environment. The SPD in itself will not have any effects related to accidents as it only relates to a mechanism for which the RAMS can be implemented.
The magnitude spatial extent of the effects (geographical area and size of the population likely to be affected).	The RAMS relates to a large area however seeks positive outcomes on Habitats sites as a result of planned growth. The SPD in itself will not have any effects related to any environmental themes as outlined above as it only relates to a mechanism for which the RAMS can be implemented. As such, no significant effects are identified within this Screening Report.
The value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> <li>• special natural characteristics or cultural heritage</li> <li>• exceeded environmental quality standards</li> <li>• intensive land use</li> </ul>	As highlighted above in the screening of the SPD per sustainability theme, the SPD has been assessed as having no potential for significant effects that would warrant further assessment through SEA.
The effects on areas or landscapes which have a recognised national,	The RAMS is not considered to have any negative implications regarding landscape, as there is no identified need for any built development as a result of the mitigation proposals (water recreation



<b>Criteria for determining the likely significance of effects (Annex II SEA Directive)</b>	<b>Likelihood and summary of significant effects</b>
community or international protection status.	restrictions, access restrictions and new 'Ranger' provision in key locations). The SPD in itself will not have any effects related to landscape as it only relates to a mechanism for which the RAMS can be implemented.



## 4. HRA Screening

### 4.1 Introduction

---

Under the provisions of the EU Habitats Directive and translated into English law by the Habitats Regulations (The Conservation of Habitats and Species (Amendment) Regulations 2017), a competent authority must carry out an assessment of whether a *plan or project* will significantly affect the integrity of any European Site, in terms of impacting the site's conservation objectives.

Habitats Regulations Assessment (HRA) as required by Regulation 63 of The Conservation of Habitats and Species Regulations 2017. Regulation 63 states that,

63.—(1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—

*(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and*

*(b) is not directly connected with or necessary to the management of that site,*

*must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.*

HRA is the first stage of the process and involves a screening assessment of the impacts of a land use proposal against the conservation objectives of Habitats (European) sites to establish whether likely significant effects would arise. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would potentially damage the internationally designated features of that site. Habitats (European) sites are also known as Natura 2000 sites and are made up of Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites.

#### 4.1.1 Explanation of SPAs, SACs and Ramsar sites

##### **Special Protection Areas (SPAs)**

SPAs are areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within EU countries. Example: Stour and Orwell Estuaries is internationally important for wintering waterfowl. *Legislation: EU Birds Directive.*

##### **Special Areas of Conservation (SACs)**

SACs are areas designated to protect habitat types that are in danger of disappearance, have a small natural range, or are highly characteristic of the region; and to protect species that are endangered, vulnerable, rare, or endemic. Example: Essex Estuaries SAC has Atlantic salt meadows, mudflats and sandflats. *Legislation: EU Habitats Directive.*

##### **Wetlands of International Importance (Ramsar Sites)**



Ramsar Sites are designated to protect the biological and physical features of wetlands, especially for waterfowl habitats. For example, Colne Estuary (Mid-Essex Coast Phase 2) Ramsar site is important due to the extent and diversity of saltmarsh and the site supports 12 species of nationally scarce plants and at least 38 Red Data Book invertebrate species. Ramsar sites often overlap with SACs and SPAs and UK planning policy determines that they should be accorded the same importance when developments are proposed. *Legislation: Ramsar Convention (1971) – Wetlands of International Importance.*

## 4.2 Consideration of whether the SPD requires HRA Screening

---

The SPD focuses on the mitigation that is necessary to enable the conclusion of no adverse effect on the integrity of the Habitats sites on the Essex coast arising from recreational disturbance, and how this mitigation will be funded. It accompanies the strategic approach to mitigation which is set out in the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (the 'RAMS'). The RAMS provides a mechanism for Local Planning Authorities (LPAs) to comply with their responsibilities to protect habitats and species in accordance with the UK Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations').

The published Habitats Regulations Assessments (HRAs) for the relevant emerging Local Plans have identified recreational disturbance as an issue for all of the Essex coastal SPAs, SACs and Ramsar sites. Mitigation measures have been identified in the HRAs (screening and/or Appropriate Assessments) for many of the Local Plans. There are similarities in the mitigation measures proposed, reflecting the identification of 'in-combination' effects resulting from planned and unplanned growth in LPA areas. In recognition of this, Natural England recommended a strategic approach to mitigation along the Essex coast.

It is important to note that the role of the SPD is to provide a framework to assist the implementation of the RAMS and in turn allow the recommendations of the HRA/AAs to be incorporated into Local Plans and ensure their soundness. Neither the RAMS nor the SPD allocates land for development; the RAMS' proposed mitigation options regard water recreation restrictions and restricted access to the coast in some locations, as well as the provision of new Rangers. In consideration of this, and of themselves, the RAMS and the SPD can not have any negative effects.

It is further important to acknowledge that the RAMS and SPD will not take the place of the duties of the Essex Authorities under the Habitats Regulations and Habitats Directive. In particular, it will not replace screening or appropriate assessment which will still be required of new development proposals within the Zol. Some housing schemes, particularly those located close to a Habitats site boundary or large-scale developments may need to provide mitigation measures to avoid likely significant effects from the development alone, in addition to the mitigation required in-combination and secured for delivery through the RAMS. This would need to be assessed and, where appropriate, mitigated through a separate project-level HRA (including AA where necessary). The LPAs, in consultation with Natural England, would advise on applicable cases.

The RAMS and SPD do not relate to other effects on Habitats sites, such as land take by development, impacts on protected species outside the protected sites, and water quantity and quality. Instead, the scope of the RAMS and SPD:

- a) establish an in-principle decision that certain types of development within the Zol of the Essex Coast RAMS will be likely to have a significant effect on the Habitats sites within



scope,

- b) establish that without mitigation those types of development will give rise to recreational pressure which will adversely affect the integrity of the Habitats Site/s in question,
- c) provide for a strategy which will provide for the mitigation measures necessary to prevent those impacts, and
- d) set out a tariff regime which will apportion the costs of those measures according to the amount of development proposed.

As a result, and in consideration of its emergence in ensuring that HRA outcomes and AA recommendations are forthcoming, the screening of the SPD in regards to HRA is not considered to be needed.



## 5. Conclusions

### 5.1 Strategic Environmental Assessment (SEA) Screening

---

The SPD has been prepared for town and country planning purposes. Planning Practice Guidance – Strategic environmental assessment and sustainability appraisal (Paragraph: 008 Reference ID: 11-008-20140306) states that,

*‘Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the Local Plan.*

*A strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004), unless it is considered that there are likely to be significant environmental effects.’*

This Screening Report determines that there would be no significant effects on the environment resulting from the SPD. The SPD is solely focused on strategic mitigation as espoused in the RAMS, and sets out a tariff regime which will apportion the costs of those measures according to the amount of development proposed. No development is proposed in either the RAMS or the SPD that could give rise to environmental effects.

The SPD can therefore be **screened out** for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC.

### 5.2 Habitats Regulations Assessment (HRA)

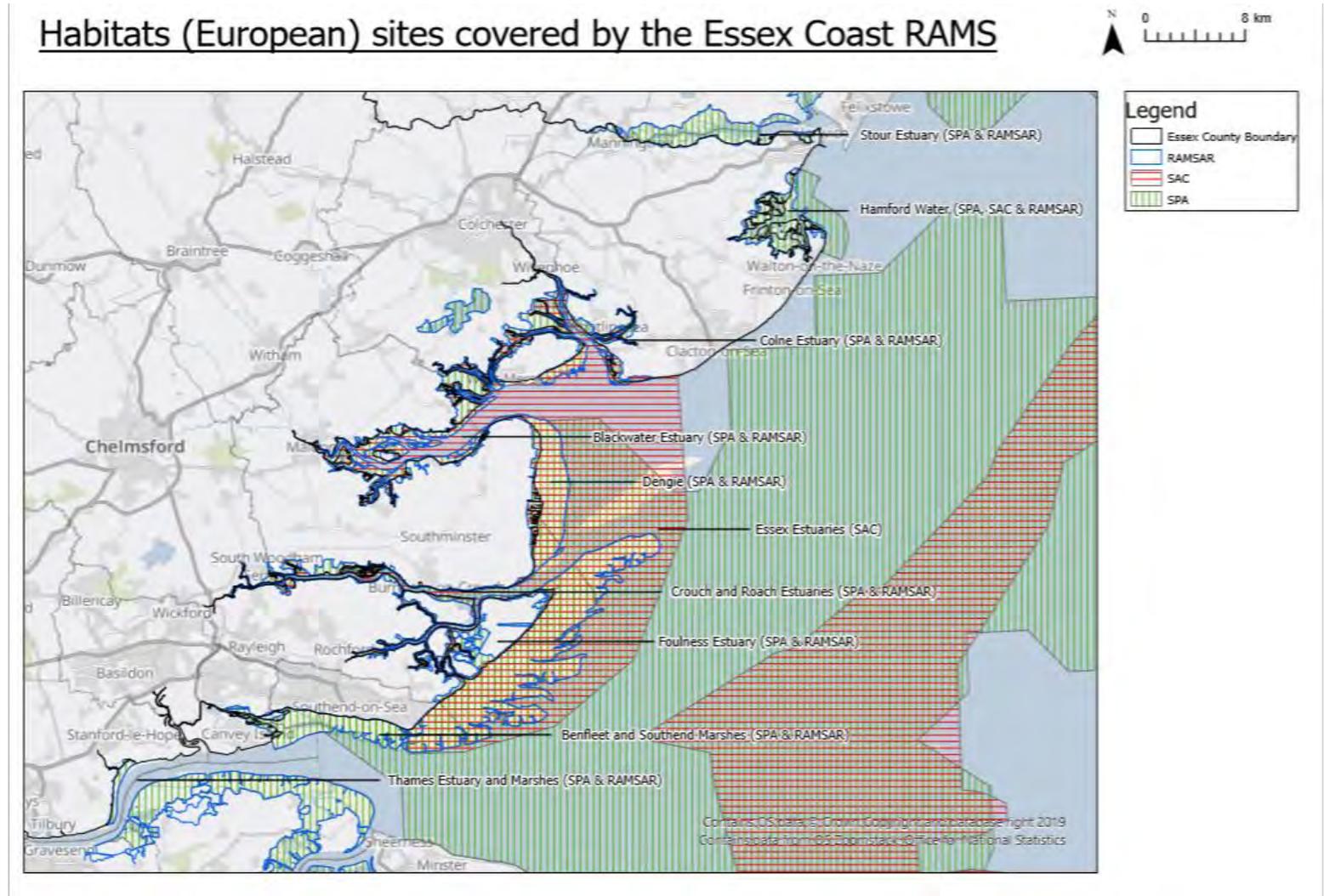
---

The role of the draft SPD is to provide a framework to assist the implementation of the RAMS and in turn allow the recommendations of the HRA/AAs to be incorporated into Local Plans and ensure their soundness. Neither the RAMS nor the SPD allocates land for development; the RAMS’ proposed mitigation options regard water recreation restrictions and restricted access to the coast in some locations, as well as the provision of new Rangers. In consideration of this, and of themselves, the RAMS and the SPD can not have any negative effects.

The requirement for the SPD to undertake further assessment under the Habitats Regulations 2017 is therefore not considered necessary and as a result can be **screened out**.



# Appendix 1: Habitats (European) sites covered by the RAMS





## Appendix 3: Consultation Comments

### A3.1 Consultation with Statutory Consultees

A five-week consultation on a draft version of the Essex Coast RAMS SPD SEA / HRA Screening Report was undertaken with the statutory consultees of the Environment Agency, Historic England and Natural England in October – November 2019, as required by the SEA regulations.

The comments from this consultation, and the actions undertaken in response within this Screening Report, are outlined in the following table.

**Table 3: Consultation comments from the statutory consultees and resulting actions**

Consultee	Comments	Actions
Environment Agency	There is reference to recreational activities having impact on breeding birds in SPAs but nothing on impacts to overwintering birds. Research on the Stour and Orwell estuaries SPA and elsewhere in the UK has shown that walkers and dogs as well as other recreational activities can have a major impact on not just UK breeding birds but overwintering birds of far higher numbers during a vulnerable time when they are already at risk of cold and starvation. If proposed mitigation gives the impression that the breeding season is the main risk time this could unwittingly cause a relaxation in attitude during the winter when there is 'nothing there out in the middle of nowhere on the mud' and letting dogs run free (a major problem close to mudflats in winter) and other recreational activities could actually make the problem worse at this critical time. In this case any ill-informed and incomplete mitigation could perversely exacerbate the situation and cause a significant effect on the over wintering waders and wildfowl.	The mitigation package of the RAMS includes provisions for overwintering birds. This was erroneously not included within this SEA / HRA Screening Report and has been inserted as an 'environmental problem relevant to the plan' in Table 2 of this report. This Screening Report focuses on the SPD itself, which predominantly sets out the funding mechanism to pay for the mitigation of the RAMS. As such, the SPD screens out the need for the full application of SEA. The RAMS itself has been derived from the AAs of multiple LPAs in producing their Local Plans, and all-year-round effects regarding recreational impacts are covered in that document.
	The document includes an appraisal of WEBS counts along existing paths on SPAs & SACs and discussion of vulnerable areas of disturbance from existing paths but by the time the	The mitigation package (the RAMS), states that, 'The Essex Coast RAMS Strategy does not provide Mitigation for the England Coast Path (ECP). This is a Natural England project, which aims to



Consultee	Comments	Actions
	<p>residents have moved into these new houses in the ZOI there will be a wider network of public paths near the shore with the new England Coast Path. This appears to be an obvious omission that has not been considered and will need to be assessed during the mitigation planning.</p>	<p>create a new National Trail around the entirety of England’s coast. For each section of the ECP, Natural England undertakes an “Access and Sensitive Features Appraisal” (ASFA) which contains a bespoke HRA to mitigate for the effects of the Coast Path.’ The ECP can therefore be expected to mitigate its own effects, per stretch, and it is not reasonable for the Essex Coast RAMS (and SPD) to seek the mitigation of effects not relevant to Local Plan growth in the 12 LPA areas.</p>
<p>Natural England</p>	<p>As agreed with the Steering Group, Natural England’s comments on this SEA / HRA Screening Report will follow in due course as part of the wider consultation on the SPD itself.</p>	
<p>Historic England</p>	<p>Did not respond.</p>	<p>N/A</p>





## Place Services

Essex County Council

County Hall, Chelmsford, Essex CM1 1QH

T: +44 (0)333 013 6840

E: [enquiries@placeservices.co.uk](mailto:enquiries@placeservices.co.uk)

[www.placeservices.co.uk](http://www.placeservices.co.uk)

June 2020



**CHELMSFORD CITY COUNCIL ADOPTION STATEMENT**

**Notice of the adoption of the Essex Coastal Recreational disturbance Avoidance and Mitigation Strategy Supplementary Planning Document**

in accordance with

**The Planning and Compulsory Purchase Act 2004 (as amended)**

**The Town and Country Planning Act (Local Planning) (England) Regulations 2012 (as amended)**

Notice is hereby given that (in accordance with above-mentioned legislation) Chelmsford City Council formally adopted the Essex Coastal Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Supplementary Planning Document (SPD) on (*insert date*).

The RAMS SPD focuses on the mitigation that is necessary to protect the wildlife of the Essex coast from the increased visitor pressure associated with new residential development in combination with other plans and projects, and how this mitigation will be funded. The RAMS SPD sets out the guidance to be followed in the determination of planning applications and formalises the arrangements for securing the developer contributions for new qualifying residential development.

The draft RAMS SPD was published for public consultation between 10 January 2020 and 21 February 2020 in accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). A number of modifications have been made to the RAMS SPD in response to the consultation and to ensure that the adopted SPD is up to date. The modifications include:

- A glossary and list of acronyms and a description of what they mean is now included at the beginning of the SPD;
- A clearer description of how overheads and other costs have been identified within the RAMS mitigation package;
- The first paragraph of the SPD will be amended to state 'birds and their habitats' rather than 'Wildlife' to make it clearer from the outset as to what type of wildlife the RAMS and the SPD is primarily seeking to protect;
- More recognition of the South East Marine Plan and the East Inshore and East Offshore Marine Plans which, when adopted, will become part of the statutory Development Plan for the relevant Councils
- An amendment to include reference to fishing / bait digging to paragraph 2.2 is proposed;
- Reference to the 'Outer Thames Estuary SPA' rather than the 'Thames Estuary SPA' is proposed;
- Previous maps replaced with higher resolution images;
- Additional clarification within Paragraph 3.7 making the SPD more explicit regarding proposals for single dwellings being subject to the RAMS tariff;

- More explanation of requirements of development proposals in regard to statutory HRA procedures and on-site mitigation, and that the specific effects the RAMS will mitigate in accordance with Regulation 122 of the CIL Regulations;
- More justification for the inclusion of C2 Residential Institutions and C2A Secure Residential Institutions as being liable for tariff payments;
- Inclusion of the National Planning Policy Framework (NPPF) within the 'useful links' section;
- Clarification that non-residential proposals are exempt from the tariff;
- Amendments to the map in Appendix 2 of the Essex Coast RAMS SPD SEA/HRA Screening Report be amended to reflect the Outer Thames SPA designation;
- Clarification on the requirements for project-level Habitat Regulations Assessment (HRA) and Appropriate Assessment (AA) of development proposals which will explore the hierarchy of avoidance and mitigation, and that the SPD is relevant to 'in-combination' recreational effects only;
- Clear explanation that the intention of Essex Coast RAMS mitigation is to enable the conclusion of no adverse effect on the integrity of the international designated sites;
- Removal, from the relevant map in the SPD and RAMS Strategy, all areas of Suffolk from the Zone of Influence;
- Clearer explanation of the relationship between the effects of a population increase resulting from net new dwelling increases;
- Clarification that ways of paying the tariff contributions varies between partner Councils;
- Reference to the governance arrangements for the RAMS including the Project Board and Essex Coastal Forum;
- Clarification that the RAMS monitoring framework will be agreed on appointment of the project Delivery Officer; and
- Clarification the RAMS tariff does not apply to student accommodation in Chelmsford.

More details on the modification made to the SPD can be found in the 'You Said, We Did' Feedback Report available at [www.chelmsford.gov.uk/\(insert link\)](http://www.chelmsford.gov.uk/(insert link))

Any person with sufficient interest in the decision to adopt the RAMS SPD may apply to the High Court for permission to apply for judicial review of that decision.

**Any such application to the High Court must be made not later than 3 months after the date of which the RAMS SPD was adopted (i.e. 3 months from (*insert date*) – being the day after adoption).**

In accordance with Regulation 14 of the 2012 Regulations the RAMS SPD and this Adoption Statement have been made available to view on the Council's website at [www.chelmsford.gov.uk/\(insert link\)](http://www.chelmsford.gov.uk/(insert link)). Paper copies will be made available as soon as practicable once the following locations are re-opened. Please note that some of the following locations are currently closed, in line with the latest government advice regarding Coronavirus, and normal opening hours of these locations may be subject to change once they reopen. You are advised to check the weblinks below to see the latest status regarding opening hours.

- Chelmsford City Council Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE. Open Monday to Friday 10am to 4pm (Please note that on the last Wednesday of each month, we open at 10am to allow for training. We are closed on bank holidays). For latest opening restrictions please visit <https://www.chelmsford.gov.uk/coronavirus/>
- Paper copies are also available at the following libraries (for latest opening restrictions please visit <https://libraries.essex.gov.uk/>):

Broomfield Library, 180 Main Road	13.00-17.00 Mon & Thurs; 09:00-13:00 Wed & Sat
Chelmsford Library, County Hall, Market Road	09.00-18.30 Mon to Fri; 09.00-17.30 Sat; 13.00-16.00 Sun
Danbury Library, Main Road	13.00-17.00 Wed & Fri; 09.00-13.00 Thurs & Sat
Galleywood Library, Watchouse Road	13.00-17.00 Tues & Fri; 09.00-13.00 Thurs & Sat
Great Baddow Library, 27 High Street	09.00-17.30 Mon, Weds, Thurs & Sat
North Melbourne Library, Dickens Place, Copperfield Road	09.00-17.00 Tues, Fri & Sat
South Woodham Ferrers Library, Trinity Square	09.00-19.00 Tues; 09.00-13.00 Weds; 09.00-18.00 Thurs & Fri; 09.00-17.00 Sat
Springfield Library, St Augustine's Way	10:00-16:00 Mon, Tues, Thurs, Fri and Sat
Stock Library, Swan Lane	14.00-18.00 Tues; 09.00-12.00 and 14.00-18.00 Thurs; 09.00-12.00 Sat
Writtle Library, 45 The Green	09.00-17.00 Mon & Tues; 09.00-13.00 Weds & Sat; 13.00-17.00 Thurs; 09.00-17.00 Fri
Billericay Library, 143 High Street	09:00-17:00 Mon to Sat
Braintree Library, Fairfield Road	09:00-17:00 Mon to Sat
Hatfield Peverel Library, The Street	13:00-17:00 Tues & Thurs; 09:00-13:00 Weds & Sat
Ingatstone Library, High Street	13:00-17:00 Mon & Thurs; 09:00-13:00 Weds & Sat
Wickford Library, Market Road	09:00-17:00 Mon to Sat
A copy will also be available in the mobile library vehicle that covers Chelmsford City Area	

Note: Opening hours at Springfield and Writtle Library are dependent on availability of volunteers.

Paper copies are available to purchase on request.

A copy of this Adoption Statement will be sent to all parties who have asked to be notified of the adoption of the RAMS SPD.

For further information please refer to the Council's website: [www.chelmsford.gov.uk/\(insert link\)](http://www.chelmsford.gov.uk/(insert link)) or contact Spatial Planning Services by telephoning 01245 606330 or by e-mailing [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)

**David Green**  
**Director of Sustainable Communities**  
*(insert date)*



---

## Chelmsford City Council Policy Board

16 July 2020

---

## Review of the Council's Statement of Community Involvement

---

### Report by:

Director for Sustainable Communities

---

### Officer Contact:

Jenny Robinson, Senior Planning Officer, [jenny.robinson@chelmsford.gov.uk](mailto:jenny.robinson@chelmsford.gov.uk), 01245 606265

---

### Purpose

To present the revised draft Statement of Community Involvement (SCI) and seek the Board's approval to publish the draft document for public consultation.

### Recommendations

- 1 That the Board approve the draft SCI for public consultation.
  - 2 Any subsequent changes to the draft SCI and finalising of all consultation material is delegated to the Director of Sustainable Communities, in consultation with the Cabinet Member for Sustainable Development.
- 

## 1. Introduction

- 1.1 This report outlines the review of the Council's Statement of Community Involvement (SCI). The revised draft SCI is attached at **Appendix 1**, and it is recommended that this draft be published for four weeks consultation as soon as practicable after this Board meeting.

## 2. Background

- 2.1 The Statement of Community Involvement (SCI) sets out our strategy for effectively involving the community, interested organisations and statutory stakeholders in planning and development matters which affect them. It covers both planning policy and development management functions and complements Council-wide engagement commitments set out in the *Consultation and Engagement Strategy* and *Our Chelmsford, Our Plan*.
- 2.2 The requirement for Planning Authorities to publish an SCI is set out in Section 18 of the Planning and Compulsory Purchase Act 2004.

## 3. Timing of the review

- 3.1. The current version of the SCI was published in 2016. The legislation states that an SCI should be reviewed within five years of publication, i.e. by March 2021. The intention was to review the SCI later this year, following the adoption of the Local Plan, alongside an update of the Local Development Scheme outlining the timetable for production of future planning documents.
- 3.2. Additionally, due to the coronavirus situation, the Council is unable to meet some of its commitments in the SCI such as holding face to face meetings and placing documents on deposit in public locations. A temporary explanatory note was added to the current SCI in April 2020 to address this.
- 3.3. Recognising the wider impact of the inability of Councils to meet commitments of their SCI, the Government issued updated advice on 13 May. It advises that an immediate review is made of current SCI so that consultation policies can be updated to allow plan-making to continue.

## 4. Preparation of the draft SCI

- 4.1. The content of the SCI has not changed significantly, as the legislation prescribes what should be included such as how we will consult on Local Plan and other planning policy documents including Neighbourhood Plans, and how we will involve people in consideration of planning applications.
- 4.2. However, the opportunity will be taken to update information to reflect the new Local Plan, include the updated Masterplanning procedure agreed by Cabinet in October 2019, update web links, and to reference how our commitments might be altered in

line with Government advice in exceptional circumstances where the commitments cannot be met.

- 4.3. The new provisions of the SCI ensure that a site notice(s) is posted to notify neighbours and the general public for every planning application. This removes the need to produce and post notification letters to individual neighbours allowing budgetary and resource savings.
- 4.4. We also propose to update the types of consultation activity we will run, including greater use of social media, and digital access to documents. It is also proposed to simplify the format and language to ensure clarity and accessibility.
- 4.5. The document is currently in a text only format, which would be formatted first as an interactive version for the Council's website, and secondly as a print document.

## 5. Consultation on the draft SCI

- 5.1. Unlike other local development documents, there is no requirement to consult on the review of an SCI. However, it has always been our practice to consult on versions of the SCI (2005, 2010, 2013, 2016) and it is considered as best practice to do so.
- 5.2. It is proposed to bring the SCI forward as follows:  
Chelmsford Policy Board, 16 July – seek approval to consult  
Focused consultation – July/August  
Cabinet, 8 September – consider consultation feedback and seek approval of final document.
- 5.3. The focused consultation would target statutory stakeholders, duty to co-operate and other interested bodies, developers and planning agents. For the public, the consultation would comprise consultees on the planning policy consultation database, and website publicity, media releases and social media channels in an attempt to consult people not already involved with the planning process.

## 6. Conclusions

- 6.1 The revised draft SCI updates key information on how we will consult on planning matters and meets Government guidance on the timing of revision of SCI documents.
- 6.2 The draft SCI document attached at Appendix 1 is recommended to be published for public consultation.

List of appendices:

Appendix 1 Statement of Community Involvement – Consultation Draft

Background papers:

None.

---

Corporate Implications

Legal/Constitutional:

The SCI will be subject to consultation in accordance with the Planning and Compulsory Purchase Act 2004.

Financial:

There are no cost implications arising directly from this report.

Potential impact on climate change and the environment:

None.

Contribution toward achieving a net zero carbon position by 2030:

None.

Personnel:

There are no personnel issues arising directly from this report

Risk Management:

None.

Equality and Diversity:

The SCI will provide a framework for effectively involving the whole community, interested organisations and statutory stakeholders in planning and development matters which affect them.

Health and Safety:

There are no Health & Safety issues arising directly from this report.

Digital:

There are no IT issues arising directly from this report.

Other:

The document will contribute to priorities in the Council's Our Chelmsford, Our Plan 2020: A Fairer and Inclusive Chelmsford, A Safer and Greener Place, Healthy, Enjoyable and Active Lives and A Better Connected Chelmsford.

---

#### Consultees:

CCC – Development Management

CCC – Marketing, Events and Engagement team

CCC – Legal and Democratic Services

---

#### Relevant Policies and Strategies:

This report takes into account the following policies and strategies of the City Council:

Local Plan 2013-2036

Our Chelmsford, Our Plan, January 2020

Consultation and Engagement Strategy, 2014

---

#### Our Chelmsford, Our Plan

The above report relates to the following priorities in the Corporate Plan:

Promoting sustainable and environmentally responsible growth to stimulate a vibrant, balanced economy, a fairer society and provide more housing of all types.

Making Chelmsford a more attractive place, promoting Chelmsford's green credentials, ensuring communities are safe and creating a distinctive sense of place.

Encouraging people to live well, promoting healthy, active lifestyles and reducing social isolation, making Chelmsford a more enjoyable place in which to live, work and play.

Bringing people together, empowering local people and working in partnership to build community capacity, stronger communities and secure investment in the city.



# Statement of Community Involvement (SCI)

Consultation Draft

Consultation version: July 2020



## Contents

1	Introduction .....	2
	What is a Statement of Community Involvement? .....	2
	Our Policy on engagement.....	2
	What is the planning system?.....	3
	What is the role of the Council in planning?.....	3
	How will you monitor the SCI?.....	4
	Keeping services running .....	4
2	Get Involved with Planning Policy.....	5
	Who will we involve? .....	5
	Who are the statutory consultees? .....	5
	Which other interested organisations do you consult?.....	5
	I’m a local resident – how do I get involved? .....	5
	How will you consult people? .....	6
	Awareness.....	6
	Information .....	6
	Consultation.....	7
	Engagement .....	7
	Feedback .....	7
	What about accessibility? .....	8
3	When will you consult people on Planning Policy? .....	9
	A) Preparing a Local Plan .....	9
	B) Preparing a Supplementary Planning Document .....	12
	C) Community-Led Planning Consultation .....	13
	D) Masterplans Consultation .....	17
4	Get Involved with Development Management .....	21
	A) Pre-application consultation .....	21
	B) Planning application consultation .....	21
	<b>How we make decisions</b> .....	23
	C) Planning appeal consultation .....	23
	Other engagement.....	24
	Appendix 1 .....	25
	Specific consultation bodies: .....	25
	Duty to Co-operate bodies.....	25
	General consultation bodies .....	26

# 1 Introduction

## What is a Statement of Community Involvement?

This Statement of Community Involvement (SCI) sets out our strategy for effectively involving you in planning matters.

Planning affects most people in some way – the homes we live in, the open spaces we enjoy, the leisure facilities we use, and how we travel around.

We are committed to ensuring that we involve the community, interested organisations and statutory stakeholders in planning and development matters which affect them. We want to make it as easy as possible for you to find out how to get involved.

## Our Policy on engagement

We have Council-wide policies on how people can stay informed and contribute to the decisions we make about the services we provide.

- Our Consultation and Engagement Strategy sets out our approach to how we will involve residents in a consistent and co-ordinated way, our corporate standards, and the types of approach we use.
- Our Chelmsford, Our Plan sets out our priorities for Chelmsford for the next few years. One of the four themes is 'Connected Chelmsford' - bringing people together, empowering local people and working in partnership to build community capacity, stronger communities and to secure investment in the city.

This SCI focuses specifically on planning and how we will ensure the wider policy commitments are included in everything we do.

While we must meet minimum standards for community involvement which are set out in Planning legislation, we want to go further to engage with people and enable the local community to get involved with influencing planning decisions.

We will meet the following principles when we consult and engage with you:

- Ensure our consultation is accessible to all regardless of age, gender, faith, race, disability as well as knowledge and experience.
- Explain what we are and are not consulting on and ask for your views as early as possible, and throughout the process, where we can.
- Consult in ways which relate to the stage of the planning process, the issues being discussed, the people and groups involved, and the resources available to us.
- Use clear, concise and straightforward language and materials in our consultations.
- We will use digital ways of getting in touch such as use of technology and social media to make consultation easier, quicker and more cost effective, alongside traditional ways of consultation so those without internet access or skills are fully included

- Listen to everyone's views and take them into account, and give feedback on how consultation has been used.

### What is the planning system?

Development is influenced by national and local policies.

The National Planning Policy Framework (NPPF) sets out the Government's national planning policy. It includes things like use of land, sustainability, good design and managing flood risk.

The Local Plan is our long-term strategy to ensure Chelmsford can meet local needs for new homes, employment, shops, open space and infrastructure like roads and schools. It also includes policies which are used to decide planning applications. It is prepared taking national policy into account.

We also publish additional information on how some of these policies will be used, in Supplementary Planning Documents. At an even more local level, some parishes and communities are preparing Neighbourhood Plans to add detail to Local Plan policies and influence what happens in their area.

Planning applications are needed for most types of development, such as building a house or an extension, or changing the use of land or buildings. We need to approve these planning applications before work can start. They must take all national and local policy into account.

### What is the role of the Council in planning?

Council staff and elected Councillors are involved in making planning decisions. We work together in a fair and positive way to secure good development which is sustainable.

#### **Spatial Planning**

This team provides the planning framework for Chelmsford through the Local Plan. They develop the Local Plan through significant consultation and engagement with local communities, organisations and statutory stakeholders. This also includes consultation and engagement on Supplementary Planning Documents, strategic masterplans and helping parishes and communities to develop their Neighbourhood Plans.

#### **Development Management**

This team receives, considers and decides planning applications. The team deals with thousands of applications every year ranging from extensions to houses right up to large new housing estates and business buildings.

We assess all planning applications against national policy set out in the NPPF and the Local Plan. Specialists within the team advise on listed buildings and conservation, tree preservation and landscaping. We also consult external organisations on technical aspects of an application such as flooding, traffic, and parking.

Although a lot of what we do is required by planning legislation, we try to go further to make sure people can have their say and get involved with planning in their area.

### **Councillors**

Our elected Councillors have a key role to play in the planning process:

### **Representation**

- Listening to and representing the views and concerns of residents on planning applications.

### **Committees**

- Developing policies and monitoring their delivery
- Making decisions on about 3% of planning applications made to us
- These include planning applications for changes to buildings that we own, applications made by our Councillors or employees, or applications where Councillors have asked for a wider discussion.

### How will you monitor the SCI?

We want this SCI to be flexible so we can make helpful changes to the way we involve the local community and stakeholders in planning decisions, particularly in relation to greater use of technology. We will monitor this SCI regularly, and if it becomes out of date, we will review it.

Any comments we receive on the way we consult and engage will be considered, and where we can they will be used to improve what we do in future.

### Keeping services running

There may be times when we cannot meet all of our commitments due to exceptional circumstances, even though we have listed them in this document. We will always be committed to keeping essential services running but the way we deliver some services may change.

For example, during the coronavirus pandemic in 2020 we were not able to display print copies of the document at the Customer Service Centres because it was closed. We were not able to make site visits and put up site notices, but we asked applicants to put up the notices themselves. There may be other exceptional circumstances in the future which prevent us from doing what we have said we will. We will always follow the latest Government advice on how to protect the community and our staff. In the meantime, we will try to use our website and social media more, and conduct virtual meetings and conversations where that is possible.

## 2 Get Involved with Planning Policy

We produce a number of planning policy documents, all of which involve wide community and stakeholder engagement.

We adopted the Local Plan 2013-2036 in May 2020. The Local Plan is the Council's long-term strategy for Chelmsford ensuring new homes, employment, shops, open space and infrastructure are provided in a sustainable way. It also seeks to protect existing open spaces, heritage, the Green Belt and rural area from unwelcome development - and contains the policies used for deciding planning applications. We consulted on three draft versions using a variety of techniques to capture people's views.

Local Plans must be reviewed every five years, so we anticipate beginning a review of the Local Plan in 2022. We also consult on new Supplementary Planning Documents and Neighbourhood Plans as they are developed. We will set out the timetable for these consultations in a Local Development Scheme being prepared in late 2020.

### Who will we involve?

We want to involve as many people as possible in developing planning policy. We try to consult and engage with a cross-section of the local community, who are aware of important local issues. There are also specific groups called statutory consultees and other interested organisations whose views are vital to us when we are developing our policies.

### Who are the statutory consultees?

Government legislation tells us that we must consult certain organisations including Essex County Council, neighbouring councils, local parish and town councils, utility companies, health, environmental and transport bodies. We also engage constructively with other councils and interested organisations on strategic matters contained in the Local Plan, under what is called 'the duty to co-operate'. These strategic matters are those where the actions of different councils may impact on others, such as meeting the needs for housing or jobs, or transport infrastructure. We have included a more detailed list of consultees at Appendix 1 of this document.

### Which other interested organisations do you consult?

We also consult with other organisations that have an interest in our policies and who can help us with information and ideas. These include business and sports organisations, planning professionals and developers, and voluntary and community groups. We have included a more detailed list at Appendix 1 of this document.

### I'm a local resident – how do I get involved?

We have a database of people and organisations who want to be kept informed when we consult and take decisions on planning policy documents. This is called the consultation portal. You can sign up here: <https://consult.chelmsford.gov.uk/portal/>

If you are already registered, you can change your login details or preferences on the consultation portal.

### How will you consult people?

There are a number of ways you can get involved with planning policy discussions and decisions. The type of consultation will depend on the topic, who we want to consult, and the timing. Some of the ways we consult people and organisations on specific topics are listed in Section 3.

#### Awareness

This means letting you know about the work we are doing and how you will be able to get involved. This might include the dates and locations for engagement events, how to find documents and more information, and how to make your comments.

#### **We will**

- Write to statutory consultees and other consultation bodies by e-mail or post
- Write to you by e-mail or post if you are registered on our consultation database
- Where legislation tells us to, place a public notice in a local newspaper publicising the consultation or adoption of a planning document

#### **We may also**

- Put up posters and flyers in public places
- Advertise in community newsletters
- Promote consultations in our Council newsletter City Life, which is delivered to homes and organisations
- Issue a media release to local print and broadcast media
- Add information on social networking sites including Facebook, Twitter, and RSS feeds

#### Information

We want to provide the information you need so you can decide if you want to make any comments.

#### **We will**

- Publish planning documents for consultation on our website
- Where there are evidence base documents and feedback reports, publish them on our website too
- Look for innovative ways of providing information using digital versions of documents or summaries of them
- Make a print copy of relevant documents available at our Customer Service Centre during opening hours

## Consultation

We will ask for your views on planning policy matters and provide different ways that you can do this. When we carry out formal consultation, we follow the legislation which tells us what we should do. Sometimes we carry out informal consultation and engagement where we can be a bit more flexible.

Formal consultation is normally for four or six weeks. The minimum period depends on the type of document, and is set out in legislation. If the consultation falls over a holiday period, such as Christmas, we will try to extend the period so that people have more time to have their say.

### **We will**

- Publicise consultation information such as how to comment and when by on our website, with links to important information
- Provide surveys, questionnaires, and feedback forms to make it easy for you to give your views
- Invite your comments via the consultation portal, e-mail or post

## Engagement

Sometimes we want to discuss issues with you in more detail, so we can provide extra information, answer your questions, and get important feedback from you.

### **We may**

- Hold exhibitions in local venues such as shopping centres, village halls, community centres, staffed where we can to enable face-to-face discussion
- Arrange presentations to interested groups such as parish councils, youth groups, residents' groups and civic panels
- Run focused workshops for discussion on specific topics during development of a planning document, such as transport or landscape

## Feedback

All the feedback we receive is recorded and carefully reviewed so that we can identify the main issues from consultation and consider how we can use that to shape our documents.

### **We will**

- Publish a feedback report setting out:
  - Who we consulted
  - How we consulted
  - The number of comments
  - A summary of the main issues raised
  - How the issues have been taken into account

- Present the feedback report along with the updated document at different stages of preparation to show how the document has continually taken the comments into consideration
- If you made a comment, we will let you know when the feedback report has been published and where you can read it

### What about accessibility?

We will always do our best to make sure that documents are written clearly and avoid or explain technical language. Documents will be published on our website where many browsers will enable you to increase the size of the text. There is also a Readspeak service which will read the text of any web page. This can help if you have a visual impairment, have difficulty reading for any reason, or if English is not your first or favoured language. The 'Listen' button appears at the top of every page on the Council's website. We can also provide documents in an alternative format such as audio, large print or Braille.

If you have a poor internet connection or would like help to view documents online, you can contact our Customer Service Centre where our staff will be able to help you. You might also be able to visit your local library or parish council office to see documents online, but do contact them before visiting so they can let you know how they can help.

Printed copies of documents can be sent to you on request, but we will make a charge to cover the cost of printing and postage.

Please call 01245 606606 or contact us online <https://www.chelmsford.gov.uk/your-council/contacting-us/contact-customer-services/> for more information on accessibility.

### 3 When will you consult people on Planning Policy?

We will consult you when we are:

- A) preparing a Local Plan
- B) preparing a Supplementary Planning Document
- C) helping a local community to prepare a Neighbourhood Plan
- D) working with a developer on a masterplan.

We will set out a timetable for these in an updated Local Development Scheme.

Although there are certain things we will do for each type of consultation to make sure we comply with legislation, there are other things we may do depending on the subject, timing and who we are consulting to raise awareness and give more people a chance to get involved. These are set out for the different types of consultation below.

#### A) Preparing a Local Plan

We adopted the Local Plan in May 2020. This followed the six stages set out below which we carried out between 2015 and 2018. The Local Plan allocates sites for development to meet Chelmsford's needs until 2036.

When we are developing our Local Plan, we also have to assess the plan's impact on the environment, economy and society. This is called the Sustainability Appraisal, which also covers habitats regulations. We update this at key stages of preparing the Local Plan, and we will consult on the updated versions at the same time as we consult on the Local Plan.

Although the Local Plan is a new document, we plan to review it every 5 years to meet legislation. The review will take some time to do as we will again follow the stages of preparation and engagement below, so we anticipate beginning the process in 2022.

#### **Stage 1 Evidence gathering**

**This involves** reviewing and developing a range of evidence to inform the Local Plan review including national policy

#### **We will**

- Engage with specified stakeholders and duty to co-operate bodies
- Invite comments

#### **We may also**

- Arrange focused meetings with interest groups

## **Stage 2                      Preparation**

**This involves** debate and information gathering on content of the reviewed Local Plan. This may involve one or two preparation stage consultations (referred to as ‘Regulation 18’).

### **We will**

- Prepare and consult on a Sustainability Appraisal
- Gain Council approval of consultation documents
- Invite comments

### **We may also**

- Arrange presentations for local interest groups
- Hold public exhibitions

## **Stage 3                      Draft Local Plan Publication**

**This involves** drafting a final version of the Local Plan taking comments, evidence and national policy into account (referred to as ‘Regulation 19’). This includes a Policies Map to show all the policies and the areas they cover.

### **We will**

- Gain Council approval of consultation documents
- Update and consult on the Sustainability Appraisal
- Collate all comments received into a Consultation Statement
- Invite comments on soundness and legal compliance only

### **We may also**

- Publish feedback on the results of the Stage 2 consultation and how it has been used
- Arrange presentations for local interest groups
- Hold public exhibitions

## **Stage 4                      Submission**

**This involves** sending the Local Plan, supporting documents, the evidence base, and all comments received from public consultation to the Secretary of State.

### **We will**

- Publish all documents on our website
- Notify the specified stakeholders and duty to co-operate bodies
- Notify other people who have said they want to be notified
- Make a print copy available at our Customer Service Centre

### **We may also**

- Publish feedback the results of the Stage 3 consultation and how it has been used

### **Stage 5 Examination**

**This involves** a public examination by an independent Planning Inspector on the Local Plan and all the comments received on it.

#### **We will**

- Publish the details of the Examination and the matters to be discussed
- Invite people who made a comment to attend and speak at the examination
- Keep the website up to date with any new documents
- If the Inspector recommends 'main modifications' before the Local Plan can be adopted, we will consult on those too

### **Stage 6 Adoption**

**This involves** considering the recommendations in the Inspector's Report, and reporting to Full Council to gain adoption of the Local Plan.

#### **We will**

- Publish the Inspector's Report on our website and make a print copy available at the Customer Service centre
- Notify people who have made a comment that we have received the Inspector's Report
- Adopt the Local Plan at a Full Council meeting
- Publish the adopted Local Plan and its Adoption Statement, and final Sustainability Appraisal and its Adoption Statement, on our website and make a print copy available at our Customer Service Centre
- Send the Local Plan Adoption Statement to people who have made a comment, or asked to be notified
- Publish the Local Plan Adoption Statement in a local newspaper

### **We may also**

- Issue a media release
- Add information to social media feeds

## B) Preparing a Supplementary Planning Document

We produce Supplementary Planning Documents (SPD) to give additional information on how some of our Local Plan policies will be used in making planning decisions. We are planning to consult on two new SPD:

- The Making Places SPD outlines measures to promote high-quality sustainable development. In it we set out development standards and design guidance.
- The Planning Obligations SPD sets out our approach to seeking planning obligations which are needed to support new development, dependent on the type and scale of development.

These consultations, and any other SPD that come forwards, will follow the process set out below.

### **Stage 1 Evidence gathering**

**This involves** developing a range of evidence to inform the SPD including national policy.

#### **We will**

- Prepare a scope of the issues to be addressed with the input of other Council services and Councillors

### **Stage 2 SPD Preparation**

**This involves** using the evidence and identified issues about the content of the new SPD and using it to produce a draft document for consultation.

#### **We will**

- Gain Council approval of consultation documents
- Invite comments

#### **We may also**

- Arrange presentations for local interest groups
- Public exhibitions

### **Stage 3 Adoption**

**This involves** drafting the final version of the SPD taking comments, evidence and national policy into account.

#### **We will**

- Collate all comments received into a Consultation Statement
- Adopt the document at a public meeting of the Council or one of its committees

- Publish the adopted SPD and an Adoption Statement on our website and make a print copy available at our Customer Service Centre
- Send the Adoption Statement to people who have made a comment, or asked to be notified

### **We may also**

- Issue a media release
- Add information to social media feeds

## C) Community-Led Planning Consultation

Community-led planning gives rights and powers for communities to get more involved in planning for their areas. It is optional, and is led by a town or parish council, or a community organisation. We will give help at key stages.

The most commonly used right is to produce a **Neighbourhood Development Plan**. This is a planning document which sets out policies for development and use of land in a neighbourhood. It is referred to simply as a Neighbourhood Plan.

Community groups can also produce the following:

### **Neighbourhood Development Order**

- Groups can grant permission for certain types of development without people applying to us for planning permission.

### **Community Right to Build Order**

- Enables small scale development in neighbourhoods such as housing for local needs or community facilities.

The process for these is similar to the process for Neighbourhood Plans. Groups should contact us for more information before starting any work.

Other community-led planning initiatives might be more appropriate for your area such as a conservation area appraisal, village design statement or parish plan, or informal projects and partnerships.

All community-led plans must be in general conformity with national policy set out in the National Planning Policy Framework and the Local Plan. They should be positive planning documents and support the strategic development needs of the whole City Council area, rather than trying to prevent or reduce them.

There are a number of very good online resources for more information on all the different types of community-led planning.

**Locality** offers a wide range of support, including guides and toolkits. It also manages Government grant funding for plans, which can allow groups to get technical support and pay for key elements of developing their plan. [neighbourhoodplanning.org](http://neighbourhoodplanning.org)

**The Rural Community Council for Essex** offers a wide range of advice, guidance documents, and one to one support for groups. <https://www.essexrcc.org.uk/>

You can **contact us** for advice and guidance, and for further details of what we can do to help you. [Planning.design@chelmsford.gov.uk](mailto:Planning.design@chelmsford.gov.uk)

The process for developing Neighbourhood Plans is set out below, outlining the responsibilities of the community group and what we will do to help. Some of the actions are set out in the legislation and are listed below as actions that the group or we must do. There could be other things that we may do, if appropriate.

## **Stage 1                      Group formation**

**This involves** setting up the group, known as the qualifying body, to develop the plan.

- Where there is a Parish Council, they are the ‘qualifying body’, so they do not need to apply to form the group.
- Where there is no Parish Council, a Neighbourhood Forum can be set up. A proposed forum should have 21 members living or working in the neighbourhood, which should include City Council Members. It must prepare a written constitution.

### **The group will**

- Apply to us for designation, providing the forum name, written constitution, name of the area and map, contact details, and conditions statement.

### **We will**

- Publish the forum application and supporting information on our website
- Invite comments
- Take comments into account and decide whether to designate the forum
- Publish the decision and supporting information on our website

## **Stage 2                      Area designation**

**This involves** agreeing the area that the Neighbourhood Plan will cover.

- Where there is a Parish Council, the area will usually follow the Parish boundary. Parish Councils should consult with neighbouring Councils before deciding on the area. The area can be part of a Parish or more than one Parish.
- Where there is no Parish Council, a Neighbourhood Forum will normally decide the area before applying to designate the forum group. It might cover an area with similar characteristics or a single ward or multiple wards of the City area.

### **The group will**

- Send us a statement of why the area is appropriate, that they are a relevant body, the name of the area, and a map.

### **We will**

- For an area following a single parish boundary – decide the application under delegated powers
- For all other areas – publicise the application on our website and invite comments
- Take comments into account and decide whether to designate the forum
- Publish the decision and supporting information on our website

### **We may also**

- Issue a media release
- Add information to social media feeds

## **Stage 3                      Plan development**

**This involves** the group/forum setting up a steering group, agreeing things like a timeline and budget, reviewing existing evidence, engaging with the community, and drafting a plan.

### **The group will**

- Agree a work programme which will depend on the size of the community and the scope of the plan
- Engage with local people, businesses, and other interested organisations on an ongoing basis during the plan development. The plan should be based on evidence which includes the community's priorities and ideas.

### **We will**

Offer support including the following:

- Provide a central point of communication
- Assess questionnaires to ensure all relevant issues are included
- Share data and existing evidence base documents
- Share information on key contacts and stakeholders
- Provide technical mapping support
- Advise on compliance with national and local planning policy
- Provide links to group/forum information on our website

### **We cannot**

- Fund any additional evidence studies needed
- Prepare or fund any consultation documents or activities, although we can offer advice
- Prepare or submit bids for grant funding

#### **Stage 4                      Draft Plan**

**This involves** the group finalising its draft plan and consulting with the local community and specified stakeholders (referred to as 'Regulation 14').

##### **The group will**

- Publicise the draft plan
- Invite comments
- Consult specified stakeholders
- Send us a copy of the draft plan
- Review the comments and make any updates to the draft plan

##### **We will**

- Make comments on the draft plan as a consultee
- Add information about the consultation to our website

#### **Stage 5                      Submission Plan**

**This involves** the group updating its final plan taking comments, evidence and national policy into account. It then submits the plan to us to carry out formal consultation (referred to as 'Regulation 16').

##### **The group will**

Submit to us:

- The draft plan and a map of the area it covers
- A consultation statement explaining how people have been consulted, a summary of the comments received, and how comments have been used
- A statement of how the plan meets the legislation requirements

##### **We will**

- Publish all submitted documents on our website
- Notify any specified stakeholders who made previous comments that the plan has been submitted
- Invite comments

#### **Stage 6                      Examination**

**This involves** an independent examiner carrying out an examination of the plan. This will make sure that the proper legal process has been followed and that the plan meets prescribed basic conditions. This is usually, but not always, done in writing rather than a formal hearing.

## **We will**

- Appoint an independent examiner
- Send all the submission documents and comments received to the examiner
- When the examiner sends their report, decide how to action any recommendations and what modifications should be made to the plan
- Publicise the decision and reasons for it, along with the examiner's report

## **Stage 7                      Referendum and adoption**

**This involves** holding a public referendum in the Neighbourhood Area covered by the plan. If more than 50% vote yes, we will adopt the plan. This is known as a 'made' plan.

## **We will**

- Organise, manage and finance the referendum
- Publicise the results of the referendum
- If a yes vote, adopt the plan as part of the Local Plan
- Publicise the adoption of the plan

## **We may also**

- Issue a media release
- Add information to social media feeds

## **D) Masterplans Consultation**

Masterplans are high level documents that set out what we expect from new development. They are a key stage between us adopting our Local Plan and planning applications being submitted by developers. They are separate from the planning application process, which follows afterwards with more detail on things like architecture, detailed landscape, and building materials.

We want to make this a meaningful process for residents and community groups to engage with the process. We use Masterplans to help shape excellent places to live, work and enjoy. They help us to make sure developments deliver what the area needs, while giving developers some flexibility.

### **What are Masterplans?**

The Local Plan allocates the major growth sites and sets out policies for what must be provided on the site. Masterplans are prepared by site developers for the major growth sites allocated in the Local Plan. They may also be completed for other long-term projects proposing a number of linked developments for different time scales.

We work with the developers to make sure the Masterplans meet the policy we have set and to allow local communities to get involved.





### **Stage 3**

### **Formal approval**

**This involves** feeding back on the results of the consultation, approval of the final Masterplan and gaining agreement for it to be used when planning applications are considered.

#### **We will**

- Decide whether the changes need a second consultation – usually only one consultation will be needed, but if significant changes are made following the first consultation, we may repeat Stage 2 to allow people to make further comments
- Write a consultation report including how many responses we received, the topics and issues raised, and how the comments have been used to update the Masterplan
- Report the consultation report and updated Masterplan to a Council meeting
- Approve the Masterplan at a Council meeting as approved guidance

## 4 Get Involved with Development Management

We consult with the community and key stakeholders at the following different stages of development

- A) Pre-application
- B) Planning applications
- C) Planning Appeals.

Whilst there are certain things we must do to make sure we comply with legislation, these are the minimum requirements for publicising and consulting the community and stakeholders on planning applications. There are additional things we may do depending on the subject, timing and who we are consulting to raise awareness and give more people a chance to get involved. The legislation does change from time to time, so if the legislation changes, we will follow what it says. This might be different from what is set out for the different stages of development below, but we will publicise any changes on our website.

### A) Pre-application consultation

**This involves** consultation which may be carried out before a planning application is made. This is usually carried out by the developers themselves for larger scale or potentially contentious development. It provides a good opportunity for applicants to find out how local residents feel about planning proposals, and allows people to make suggestions which the developer can include in their planning application. This helps to make sure that planning applications are high quality.

#### **We will**

- Encourage developers to carry out pre-application consultation
- Ask them to make sure that local people, the town or parish council, and other affected organisations know about the proposals and can make their comments. They may do this through exhibitions, focused workshops and websites
- Advise developers on ways of consulting and who to consult
- After the consultation, we ask developers to include details of how they have consulted and how comments have been used, alongside their planning application. This means that we can see what issues have been raised and how they have been dealt with, before making a decision on the planning application

### B) Planning application consultation

**This involves** publishing planning applications with their supporting documents, inviting comments within set timeframes, and deciding planning applications taking national and local policy and all the comments received into account.

## **We will**

- Publish details of all planning applications on our website
- Display a site notice at or near to the application site with details of the application, where you can view it, and the date you should make your comments by
- Acknowledge your comments and publish them on our website
- Follow any other legislation currently in force

## **You can**

- View planning applications on our website, where you can:
  - Sign up to be notified of applications by e-mail
  - Choose which applications you want to be notified about
  - Follow the progress of an application
  - View supporting plans and documents
  - See other related plans such as previous applications and property history
  - Search a weekly list, or by an address, or by a reference number
  - Submit comments electronically via Public Access, an efficient and easy to use system which also includes maps and advanced search information
  - Register on Public Access to track applications and be notified when they are being progressed
  - If you are using a phone or tablet you can make comments via our online form
  - Read the officer's report and decision notice
  - See if any planning appeals have been made and read decisions on them
  - Find enforcement cases

## **You should**

- Make sure you send us your comments by the closing date
- Provide your name and address – otherwise we cannot consider your comments
- Not make inappropriate comments including any that are racist, inflammatory or derogatory
- Limit your comments to material planning matters. These include:
  - the size and scale of the proposal
  - potential loss of light
  - the design and appearance of the proposal
  - potential loss of privacy or increased overlooking
  - the impact on traffic and parking
  - potential for additional noise and disturbance
  - the impact on trees, landscape or existing buildings

Planning matters do not include:

- property value
- the loss of a view
- land ownership disputes
- preference for an alternative development
- competition for existing business

- the personal circumstance of the applicant

## How we make decisions

Most decisions on planning applications – about 97% - are made by planning officers under delegated powers. We have targets for the time taken to make planning decisions. At the moment these are 13 weeks for major applications, 16 weeks where a major application needs an Environmental Impact Assessment, and 8 weeks for all others. Sometimes the time can be extended if necessary. If the legislation changes, we will follow what it says.

For large complex applications, we may agree a longer timetable with the applicant to make sure everything can be fully considered. This is called a planning performance agreement, which will include how the community will be consulted on the proposal.

The remaining 3% of planning applications are decided by the Planning Committee. These are usually planning applications for changes to buildings that we own, applications made by our Councillors or employees, or applications where local Councillors have asked for a wider discussion.

We present a written report and an officer recommendation, taking account of all the comments received, to Planning Committee. At the meeting, Councillors discuss and decide on the application. You can attend a Planning Committee to give your views on a planning application or ask questions during time that is set aside at the beginning of the meeting. You can find out more about this on our website.

## We will

- Publish the decision on the planning application on our website
- Publish the officer report and decision notice
- Include any conditions the planning permission must comply with
- Include the reasons for an application which is refused planning permission

## C) Planning appeal consultation

An applicant can appeal if:

- we have refused planning permission
- we have included conditions that they feel are not acceptable
- if we have not decided the application within the time limits.

If you have made comments to a planning application, we will notify you if an appeal is made.

A planning inspector will decide if the appeal can be allowed or dismissed. The type of hearing depends on the application. This may be carried out in writing, or at an informal hearing, or at a public inquiry.

For appeals on applications made by householders, you are not able to make any further comments and your original comments will be taken into consideration. For other appeals you can submit more written comments.

For appeals decided by an informal hearing or a public inquiry, you can also ask to appear at the hearing or inquiry to make your comments in person.

The Inspector will decide if our planning decision was correct, and the decision is binding on the Council. The Inspector will send us a decision notice which we will publish on our website.

### Other engagement

We sometimes arrange forum meetings with stakeholders to let them know about new initiatives and updates on the way we engage and consult on planning policy, planning applications, appeals and enforcement. These groups usually include Parish Councils, planning agents and major developers, and we may invite other stakeholders depending on the topic.

## Appendix 1

### Specific consultation bodies:

In accordance with government regulations the following specific consultation bodies must be consulted where the Council considers that they may have an interest in the subject of the planning document:

- The Coal Authority
- The Environment Agency
- Historic England
- Marine Management Organisation
- Natural England
- Network Rail
- Highways England
- A relevant authority any part of whose area is in or adjoins the local planning authority's area:
  - Adjoining local planning authorities – Braintree District Council, Maldon District Council, Rochford District Council, Basildon Council, Brentwood Borough Council, Epping Forest District Council and Uttlesford District Council
  - Essex County Council
  - Parish and Town Councils within and adjoining Chelmsford City Council's area
  - Essex Police, Fire and Crime Commissioner
- Electronic communications companies who own or control apparatus situated in Chelmsford City Council
- Relevant utility and infrastructure providers (including transport network, water, sewerage, energy [electricity and gas] and telecom)
- Anglian Water
- Essex and Suffolk Water
- NHS Mid Essex Clinical Commissioning Group
- Homes England

### Duty to Co-operate bodies

The Localism Act 2011 introduced a Duty to Co-operate, which is designed to ensure that all organisations involved in planning work together on issues that are of a bigger than local significance.

The authorities and agencies that the City Council will co-operate with is specified in Regulation 4 of the Town and Country Planning (Local Development) (England) Regulations 2012. The following bodies are designed as Duty to Co-operate stakeholders (this is not an exhaustive list):

- The Environment Agency
- Historic England
- Natural England

- The Mayor of London
- The Civil Aviation Authority
- Homes England
- Mid Essex Clinical Commissioning Group
- The Office of Rail Regulation
- Transport for London
- Integrated Transport Authorities
- Highways England and Essex County Council as the local Highway Authority
- The Marine Management Organisation
- South East Local Enterprise Partnership SELEP

### General consultation bodies

We also consult with other organisations that have an interest in our policies and who can help us with information and ideas.

- Neighbouring and nearby Local Planning Authorities
  - Essex County Council
  - Within the Housing Market Area (HMA) – Braintree District Council, Colchester Borough Council and Tendring District Council
  - Other adjoining authorities – Maldon District Council, Rochford District Council, Basildon Council, Brentwood Borough Council, Epping Forest District Council and Uttlesford District Council
  - Non-adjoining authorities – Castle Point District Council, Southend-on-Sea Borough Council, Harlow District Council and East Herts District Council
- South East Local Enterprise Partnership (SELEP)
- Essex Police, Essex Fire and Rescue
- Network Rail
- Sport England
- Essex Bridleways Association
- Relevant educational bodies (such as Writtle University College and Anglia Ruskin University)
- Voluntary bodies some of all of whose activities benefit any part of the administrative areas (such as YMCA)
- Bodies which represent the interest of different racial, ethnic or national groups within the administrative area (such as Essex Racial Equality Council)
- Bodies which represent the interests of the different religious groups within the administrative area
- Bodies which represent the interests of disabled persons within the administrative area
- Bodies which represent the interests of person carrying on business within the administrative area (such as Chelmsford Business Forum)
- Bodies which represent the interest of environmental groups within the administrative area (such as Essex Wildlife Trust in lieu of a Local Nature Partnership)



This publication is available in alternative formats including large print, audio and other languages.

Please call 01245 606330

Planning Policy  
Directorate for Sustainable Communities  
Chelmsford City Council  
Civic Centre  
Duke Street  
Chelmsford  
Essex  
CM1 1JE

Telephone 01245 606330  
[planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)  
[www.chelmsford.gov.uk](http://www.chelmsford.gov.uk)

Document published by Planning Policy  
Copyright Chelmsford City Council





---

## Chelmsford City Council Policy Board

16 July 2020

---

## Neighbourhood Plans Update

---

### Report by:

Director for Sustainable Communities

---

### Officer Contact:

Jenny Robinson, Senior Planning Officer, [jenny.robinson@chelmsford.gov.uk](mailto:jenny.robinson@chelmsford.gov.uk), 01245 606265

---

### Purpose

The purpose of this report is to update Members on current progress on Neighbourhood Plans in the City Council's administrative area.

### Recommendation

That Members note the report.

---

## 1. Introduction

- 1.1 The Localism Act 2011 introduced new powers for communities to have greater control over development and planning, through a number of community-led planning initiatives including Neighbourhood Plans. The Regulations are contained in The Neighbourhood Planning (General) Regulations 2012.

- 1.2 A Neighbourhood Plan is a statutory planning document which establishes general policies for development and use of land in a neighbourhood, including the location of new homes and offices, and what they should look like.
- 1.3 Neighbourhood Plans should be used positively to plan for future development and support growth, reflect and build on the strategic needs set out in the Local Plan, and be in conformity with the National Planning Policy Framework.
- 1.4 It is not a process that can be used to prevent development or promote a lower level of development than is set out in a local plan. Once it has been agreed by a local referendum, a Neighbourhood Plan attains the same legal status as the Local Plan.
- 1.5 Across England there are now more than 1,000 adopted ('made') plans and a further 1,800 in progress.
- 1.6 This report provides an update on Neighbourhood Plan activity in the Council's administrative area.

## 2. Designated Neighbourhood Plan areas

- 2.1 In a parished area the Parish Council is the only group which can bring forward a Neighbourhood Plan. There are eight Neighbourhood Plans in progress. The areas for Neighbourhood Plans in Chelmsford align with their respective parish boundaries, although it is possible to prepare a plan for part of a parish, or for more than one parish working together.
- 2.2 The first stage in the process was for groups to apply to the Council to designate the areas to be covered by the Neighbourhood Plan. The groups and their designation dates are listed below.

South Woodham Ferrers	14 January 2016
Danbury	9 March 2016
Broomfield	22 March 2016
Writtle	3 January 2017
Little Baddow	6 January 2017
Boreham	11 January 2017
Sandon	21 October 2017
East Hanningfield	24 September 2019

- 2.3 In the unparished area, communities can set up a formal body called a Neighbourhood Forum by applying to the Council, along with an application for the area they wish it to cover. There are no Neighbourhood Forums in Chelmsford.

### 3. Neighbourhood Plans progress

3.1 Preparing a Neighbourhood Plan is entirely voluntary and relies on Parish Council members working with people from their local community to bring plans forwards. The Neighbourhood Plan group sets up a steering group and structure for reporting to the main Parish Council, agrees a timeline and budget, reviews and gathers evidence, engages with the community, and drafts the Neighbourhood Plan.

3.2 The City Council's role is to support Neighbourhood Plan groups by advising on the process, sharing data and evidence documents, identifying key stakeholders, providing technical support such as mapping, screening emerging plans for environmental impacts, and advising on compliance with national and local planning policy.

3.3 The Council has provided a high level of support to Neighbourhood Plan groups via a dedicated officer as part of a wider role. This has included:

- Advising parishes on preparation of Neighbourhood Plans and alternative community-led planning approaches
- Attending annual Parish meetings and other public meetings to introduce the concept to local communities
- Providing advice and information updates on best practice and new legislation
- Preparing and consulting on Strategic Environmental Assessment/Habitats Regulations Assessment screening reports
- Attending a County-wide officer forum and representing the Council on a national learning group
- Giving detailed feedback on draft Neighbourhood Plans and policies.

3.4 The formal steps for progressing a Neighbourhood Plan once the group has finalised the draft version are as follows:

- The group itself consults on the draft plan – referred to as Regulation 14 consultation
- The group refines the plan taking consultation responses into account, before it is submitted to the Council
- The Council consults on the draft plan – referred to as Regulation 16 consultation
- The group finalises the plan taking consultation responses into account
- The Council arranges for an independent examination, leading to a referendum in the area covered by the plan, before formal adoption.

3.5 Some issues identified by the Neighbourhood Plan consultation process fall outside of planning matters, and most Neighbourhood Plans will also include actions to address these as community aspirations or projects. Examples include traffic and transport improvements, enhanced community facilities, and public realm work.

3.6 The Neighbourhood Plan process is set out in greater detail in the draft review of the Statement of Community Involvement, being reported to this meeting of the Policy Board.

3.7 The progress made so far by the active Neighbourhood Plan groups, and the ongoing support provided by the Council, is summarised below.

### 3.8 **South Woodham Ferrers**

- Neighbourhood Plan visioning event 2017  
Public consultation including exhibitions and questionnaire 2019
- Business and landowner workshop 2019
- Emerging ideas consultation 2019
- Regulation 14 consultation in February and March 2020. The group has used consultation responses to refine the plan, for anticipated submission to the Council in July 2020 for a Regulation 16 consultation.

Council support:

The Council will hold a Regulation 16 consultation, liaise with the group on the process, feed back on the consultation results, and work with the group to make any further necessary changes before proceeding with the further formal steps as outlined at 3.3 above. The Council will consider how to carry out effective consultation if this is impacted by the current coronavirus restrictions.

### 3.9 **Danbury**

Chelmsford's Local Plan allocates around 100 new homes in Danbury, with the location/s to be decided through the Neighbourhood Plan. The group has carried out a range of engagement events including:

- Vision workshop 2017
- Public consultation including vision, objectives and potential sites 2018
- Exhibition on feedback received 2018
- Call for sites 2019 to give a further opportunity for landowners within the parish to submit land for consideration for development.

The group is currently finalising selection of its preferred sites, taking previous consultation responses and a wide range of evidence into account. It anticipates a further consultation exercise on the preferred site selection before finalising the draft plan for a Regulation 14 consultation.

Council support:

The Council is currently assisting with development of detailed evidence relating to the site allocations and will advise on the draft plan as it develops

### 3.10 **Broomfield**

- Residents' questionnaire 2017
- Stakeholders' survey 2017, including businesses and community groups
- Commissioned evidence base documents - Landscape Appraisal 2018, Housing Needs Assessment 2109
- Site assessment 2019/20 to assess whether any small-scale proposals might be justified in terms of community benefit

Policy drafting is now underway. When drafted, an informal public consultation is proposed, followed by the formal stages set out at 3.3 above with anticipated adoption before the end of 2021.

Council support:

The Council is monitoring progress and will advise on the draft plan as it develops.

### 3.11 **Writtle**

- Community exhibition and questionnaire 2018
- Business questionnaire 2018
- Focus groups and community group meetings 2018-2020
- Production of Writtle Parish Design Guide March 2020 (with AECOM)

The group recently sent the Council a draft version of the plan for review prior to finalising it for a Regulation 14 consultation later this year.

Council support:

The Council has sent detailed comments to the group which are currently being reviewed prior to amending the draft plan. The Council will liaise with the group on how to carry out effective consultation if this is impacted by the current coronavirus restrictions.

### 3.12 **Little Baddow**

- YouTube video introducing the plan and its importance to the parish 2017
- Promotion of plan and feedback gathering 2017
- Initial engagement event 2017
- Residents', business and clubs/societies' surveys 2017 and 2018
- Policy engagement event 2019

The group recently sent the Council its draft policies for the plan, for review prior to finalising it for further community feedback followed by a Regulation 14 consultation later this year.

Council support:

The Council has sent detailed comments on the draft policies to the group which are currently being reviewed prior to amending the draft plan. The Council will liaise with the group on how to carry out effective consultation if this is impacted by the current coronavirus restrictions.

### 3.13 **Boreham**

- Initial consultation meeting 2017
- Circulated a questionnaire to gain an overall view of local residents on key topics 2020
- A new website will be launched soon to host all Neighbourhood Plan information.

Council support:

The Council will be able to assist with access to relevant evidence base information, and will advise on the draft plan as it develops.

### 3.14 **Sandon**

- Video introducing the plan and its importance to the parish 2018
- Circulated a public consultation questionnaire 2018
- Business questionnaire and school survey 2019
- Vision, objectives and policies workshop 2019

The group recently sent the Council a draft version of the plan for review prior to developing the plan further.

Council support:

The Council has sent detailed comments to the group which are currently being reviewed prior to amending the draft plan.

### 3.15 **East Hanningfield**

In the early stages of preparing to produce a plan

Council support:

The Council will be able to assist with access to relevant evidence base information, and will advise on the draft plan as it develops.

## 4. Conclusion

- 4.1 Neighbourhood planning activity is progressing at a different pace in each of the designated areas.
- 4.2 The amount of work required by a group to bring a Neighbourhood Plan forwards requires a range of skills, and significant time and energy. The commitment by the Neighbourhood Plan groups to create meaningful plans which reflect local concerns is to be commended.
- 4.3 The Council will continue to support existing and future Neighbourhood Plan groups through offering informal advice, encouragement and co-operation, and by arranging the formal consultation and adoption stages.

### List of appendices:

None

### Background papers:

The Neighbourhood Planning (General) Regulations 2012.

---

## Corporate Implications

### Legal/Constitutional:

Neighbourhood Planning activity within the Council is carried out with regard legislation and guidance set out in the Localism Act 2011 and The Neighbourhood Planning (General) Regulations 2012.

### Financial:

There is a cost to the Council of arranging Regulation 16 consultation, Neighbourhood Plan examinations and referendums, however this is reimbursed via Government grants.

### Potential impact on climate change and the environment:

Neighbourhood Plans align with the Local Plan and taken together they promote sustainable development through policies to mitigate and adapt to climate change and protect the environment.

### Contribution toward achieving a net zero carbon position by 2030:

Neighbourhood Plans align with the Local Plan and taken together they promote sustainable development and measures to reduced carbon emissions.

Personnel:

There are no personnel issues arising directly from this report as staff resources are in place to support the Neighbourhood Plan process.

Risk Management:

There may be a risk if Neighbourhood Plans do not come forward in a timely manner, although the decision-maker should revert to the Local Plan in this situation.

Equality and Diversity:

An Equality Impact Assessment is a requirement for meeting the basic conditions for a Neighbourhood Plan, to comply with Section 149 of the Equality Act 2010. This sets out the Public Sector Duty (Equality Duty), on all public bodies, to consider the impact on equalities in all policy and decision making.

Health and Safety:

There are no Health & Safety issues arising directly from this report

Digital:

There are no IT issues arising directly from this report

Other:

Neighbourhood Plans will become part of the Local Plan once adopted ('made') and contribute to priorities in the Council's Our Chelmsford, Our Plan 2020: A Fairer and Inclusive Chelmsford, A Safer and Greener Place, Healthy, Enjoyable and Active Lives and A Better Connected Chelmsford.

---

Consultees:

CCC - Legal and Democratic Services

---

Relevant Policies and Strategies:

This report takes into account the following policies and strategies of the City Council:

Local Plan 2013-2036

Statement of Community Involvement 2017

Draft Review of Statement of Community Involvement, June 2020

Our Chelmsford, Our Plan, January 2020

## Our Chelmsford, Our Plan

The above report relates to the following priorities in the Corporate Plan:

Promoting sustainable and environmentally responsible growth to stimulate a vibrant, balanced economy, a fairer society and provide more housing of all types.

Making Chelmsford a more attractive place, promoting Chelmsford's green credentials, ensuring communities are safe and creating a distinctive sense of place.

Encouraging people to live well, promoting healthy, active lifestyles and reducing social isolation, making Chelmsford a more enjoyable place in which to live, work and play.

Bringing people together, empowering local people and working in partnership to build community capacity, stronger communities and secure investment in the city.

## CHELMSFORD POLICY BOARD WORK PROGRAMME

4 June 2020

### AGENDA ITEM 10

Date of Meeting	Report Subject
1 October 2020	<p><b>Review of Local Development Scheme (LDS)</b>  <i>To consider update to LDS to set out timetable for review of Local Plan</i></p> <p><b>Masterplan – Land at North of South Woodham Ferrers</b>                      (provisional date)  <i>To consider final masterplan of site allocated in Local Plan ahead of consideration by Cabinet.</i></p> <p><b>Chelmsford Garden Community Development Framework Document (masterplan) Update</b>  <i>To update Policy Board on progress</i></p> <p><b>Consultation Response to Government’s Planning Policy Paper</b>  <i>Government has indicated that this will be published late July so item’s inclusion dependent on length of consultation period</i></p>
5 November 2020	<p><b>Planning Obligations Supplementary Planning Document</b>  <i>To consider consultation responses and recommendation for Cabinet</i></p> <p><b>Making Places Supplementary Planning Document</b>  <i>To consider consultation responses and recommendation for Cabinet</i></p> <p><b>Authority Monitoring Report</b>  <i>To note the contents of the Annual Monitoring Report for 2019/20</i></p> <p><b>Masterplans – Land at East Chelmsford</b>                      (provisional date)  <i>To consider final masterplan of site allocated in Local Plan ahead of consideration by Cabinet.</i></p> <p><b>Essex Minerals Local Plan consultation</b>                      (ECC publication date not yet confirmed)  <i>To consider representations to ECC Mineral Local Plan</i></p> <p><b>Improving Movement Around the City</b>  <i>To consider the initial findings of the Working Group</i></p>

14 January 2021	<p><b>Masterplans – Land at Great Leighs</b> (provisional date) <i>To consider final masterplan of site allocated in Local Plan ahead of consideration by Cabinet.</i></p> <p><b>Health and Wellbeing Working Group</b> <i>To consider a report from the Working Group on the implementation of the Health and Wellbeing Plan adopted by the Council in November 2019, including any proposed changes in the focus of the Plan</i></p>
4 March 2021	<p><b>Chelmsford Garden Community Development Framework Document (masterplan) Update</b> <i>To update Policy Board on progress</i></p>

## CHELMSFORD POLICY BOARD WORK PROGRAMME

4 June 2020

### AGENDA ITEM 10

Date of Meeting	Report Subject
1 October 2020	<p><b>Review of Local Development Scheme (LDS)</b>  <i>To consider update to LDS to set out timetable for review of Local Plan</i></p> <p><b>Masterplan – Land at North of South Woodham Ferrers</b>                      (provisional date)  <i>To consider final masterplan of site allocated in Local Plan ahead of consideration by Cabinet.</i></p> <p><b>Chelmsford Garden Community Development Framework Document (masterplan) Update</b>  <i>To update Policy Board on progress</i></p> <p><b>Consultation Response to Government’s Planning Policy Paper</b>  <i>Government has indicated that this will be published late July so item’s inclusion dependent on length of consultation period</i></p>
5 November 2020	<p><b>Planning Obligations Supplementary Planning Document</b>  <i>To consider consultation responses and recommendation for Cabinet</i></p> <p><b>Making Places Supplementary Planning Document</b>  <i>To consider consultation responses and recommendation for Cabinet</i></p> <p><b>Authority Monitoring Report</b>  <i>To note the contents of the Annual Monitoring Report for 2019/20</i></p> <p><b>Masterplans – Land at East Chelmsford</b>                      (provisional date)  <i>To consider final masterplan of site allocated in Local Plan ahead of consideration by Cabinet.</i></p> <p><b>Essex Minerals Local Plan consultation</b>                      (ECC publication date not yet confirmed)  <i>To consider representations to ECC Mineral Local Plan</i></p> <p><b>Improving Movement Around the City</b>  <i>To consider the initial findings of the Working Group</i></p>

14 January 2021	<p><b>Masterplans – Land at Great Leighs</b> (provisional date) <i>To consider final masterplan of site allocated in Local Plan ahead of consideration by Cabinet.</i></p> <p><b>Health and Wellbeing Working Group</b> <i>To consider a report from the Working Group on the implementation of the Health and Wellbeing Plan adopted by the Council in November 2019, including any proposed changes in the focus of the Plan</i></p>
4 March 2021	<p><b>Chelmsford Garden Community Development Framework Document (masterplan) Update</b> <i>To update Policy Board on progress</i></p>