



SOCG014

Chelmsford Local Plan

Statement of Common Ground with Natural England

March 2026

Review of the Chelmsford Local Plan Updated Statement of Common Ground between Chelmsford City Council and Natural England

Introduction

Chelmsford City Council (CCC) is currently reviewing the Chelmsford Local Plan adopted in 2020. We are at Examination stage (Regulation 22) following consultation on the Pre-Submission (Regulation 19) Local Plan in February-March 2025 and Focused Consultation Additional Sites (Regulation 19) Document in November 2025-January 2026.

This updated Statement of Common Ground (SOCG) has been prepared to assist the examination of the Chelmsford Local Plan. Table 1 establishes areas of agreement between Natural England and CCC in relation to Natural England's representations on the Pre-Submission (Regulation 19) Local Plan, Focused Consultation Additional Sites (Regulation 19) Document and their associated Integrated Impact Assessments (IIAs). This SOCG also sets out agreed proposed modifications to the Pre-Submission Plan and/or the Additional Sites Document following engagement between CCC and Natural England after the close of the consultations. **There are no areas of uncommon ground.**

For the avoidance of doubt none of the proposed modifications are considered necessary to address soundness issues and instead provide factual updates, clarifications and helpful detail to the Local Plan.

A map of CCC's administrative area in context with its neighbouring districts and county councils is attached at **Appendix A**.

A Habitats Regulations Assessment Addendum is attached at **Appendix B**.

CCC has fully engaged with Natural England on the development of the Council's review of the adopted Local Plan from the outset. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, Natural England has been formally consulted at all Regulation 18 and 19 stages of consultation together with their accompanying Integrated Impact Assessment (IIA).

It is agreed that both parties have actively co-operated (and continue to do so) on the Review of the Chelmsford Local Plan and natural environment issues.

Table 1 – Areas of Common Ground

Proposed new text is shown in underline. Proposed deleted text is shown as ~~striketrough~~.

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
Pre-Submission Local Plan and IIA				
PSQ25-6239	Para 1.1	11	The Local Plan is 'sound' with regards to our remit. We have suggested some additional minor wording amendments which do not fundamentally alter our conclusions on the tests of soundness.	Noted. See other entries in this table for specific proposed modifications.
PSQ25-6240	Para 2.14	25	Refer to the natural environment in the key strategic objectives Ensuring High-Quality Outcomes.	The key strategic objectives are taken from the Braintree, Colchester and Tendring Councils shared strategic plan which form a joint Part 1 of their relevant Local Plans for the period to 2033. The joint Part 1 plans have been adopted and are outside the scope of CCC to amend/update. No modification required to the Plan.
PSQ25-6241	Strategic Priority 1	37	We are pleased to see reference to nature-based solutions and the Essex Local Nature Recovery Strategy.	Noted. No modification required to the Plan.
PSQ25-6454	Strategic Priority 3	38	We are pleased to see protection of national and locally designated sites, wildlife habitats and woodlands and multi-functional green/blue infrastructure in line with Natural England's Green Infrastructure Framework.	Noted. No modification required to the Plan.
PSQ25-6242	Strategic Policy S2	51	We welcome the reference to South East (Inshore) Marine Plan (section 5.14)	Noted. No modification required to the Plan.

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
PSQ25-6243	Strategic Policy S4	61	<p>Add additional wording to the last paragraph of the policy:</p> <p>Contributions from qualifying residential developments within the Zones of Influence <u>and any other mitigation measures</u>, as defined in the adopted <u>or future iterations of the</u> Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS), will be secured towards mitigation measures identified in the RAMS.</p>	Modification agreed to S4.
PSQ25-6244	Strategic Policy S9	86	<ul style="list-style-type: none"> • Add additional wording to the 5th bullet under 'Green Infrastructure and Natural Environment': Contributions towards recreation disturbance avoidance and mitigation measures for European designated sites as identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy <u>and any future iterations</u>. • For clarity adherence with Natural England SANG Guidelines 2021 may be required. 	<ul style="list-style-type: none"> • Modification agreed to 5th bullet. It is accepted that RAMS only addresses recreational impacts, so it is not appropriate to refer to 'other measures' • Noted. No modification required to the Plan.
PSQ25-6245 PSQ25-6246	Site1a Site 1w	111 115	New residential development will need to rely on the existing open space provision in Chelmsford. Some assessment of the carrying capacity of these existing greenspaces needs to be made. We would also expect to see the provision of leaflets	Noted. No modification required to the Plan.

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
			etc. to new residents advising them of local walks, open spaces etc.	
PSQ25-6247	Site 3a	148	We are pleased to see that necessary mitigation will be provided to address the cumulative recreational pressure on SSSIs in proximity to the site and are happy to work closely with relevant stakeholders to ensure no adverse impacts. The mitigation for impacts on international coastal sites will need to be considered separately from impacts on nearby SSSIs (please note that the names of the SSSIs are Blakes Wood & Lingwood Common SSSI, Danbury Common SSSI and Woodham Walter Common SSSI).	Noted. Modify description of SSSIs in para 7.135: The residential developments in East Chelmsford (SGS3a, SGS3c and SGS3d), East Chelmsford Garden Community (SGS16a) and Danbury (SGS13) have the potential to result in an increase in recreational pressure on <u>Blakes Wood & Lingwood Common SSSI</u> , <u>Danbury Common SSSI</u> , and <u>Woodham Walter Common SSSIs</u> , which are in proximity to the site.
PSQ25-6248	Site 3c	155	We are pleased to see that necessary mitigation will be provided to address the cumulative recreational pressure on SSSIs and other wildlife sites in proximity to the site and are happy to work closely with relevant stakeholders to ensure no adverse impacts. The mitigation for impacts on international coastal sites will need to be considered separately from impacts on nearby SSSIs (please note that the names of the SSSIs are Blakes Wood & Lingwood Common SSSI, Danbury Common SSSI and Woodham Walter Common SSSI). We are pleased to see the requirement to provide high quality semi-natural greenspace	Noted. Modify description of SSSIs in para 7.172: The residential developments in East Chelmsford (SGS3a, SGS3c and SGS3d), East Chelmsford Garden Community (SGS16a) and Danbury (SGS13) have the potential to result in an increase in recreational pressure on <u>Blakes Wood & Lingwood Common SSSI</u> , <u>Danbury Common SSSI</u> , and <u>Woodham Walter Common SSSIs</u> , which are in proximity to the site. Modify description of SSSIs in para 7.185 (Reasoned Justification for Site Policy 3d):

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
			<p>of at least 12ha to meet Natural England's 8ha/1000 new population metric and minimum circular dog-walking route on or off site of 2.3km which make use of existing Public Rights of Way and/or highways (para 7.377).</p>	<p>The residential developments in East Chelmsford (SGS3a, SGS3c and SGS3d), East Chelmsford Garden Community (SGS16a) and Danbury (SGS13) have the potential to result in an increase in recreational pressure on Blakes Wood & <u>Lingwood Common SSSI</u>, Danbury Common <u>SSSI</u>, and <u>Woodham Walter Common SSSIs</u>, which are in proximity to the site.</p>
PSQ25-6253	Site 16a	200	<p>We are pleased to see that necessary mitigation will be provided to address the cumulative recreational pressure on SSSIs and other wildlife sites in proximity to the site and are happy to work closely with relevant stakeholders to ensure no adverse impacts. The mitigation for impacts on international coastal sites will need to be considered separately from impacts on nearby SSSIs (please note that the names of the SSSIs are Blakes Wood & Lingwood Common SSSI, Danbury Common SSSI and Woodham Walter Common SSSI).</p> <p>We are pleased to see the requirement to provide high quality semi-natural greenspace of at least 12ha to meet Natural England's 8ha/1000 new population metric and minimum circular dog-walking route on or off site of 2.3km which make use of existing</p>	<p>Noted. Modify description of SSSIs bullet 12 under Historic and Natural Environment in Site Policy 16a:</p> <p>Conserve and enhance biodiversity and avoid adverse effects on the River Chelmer, and Old Hare Wood local wildlife sites, Waterhall Meadows Essex Wildlife Trust Nature Reserve, and Long Spring Wood and Hall Wood ancient woodlands, and Blakes Wood & <u>Lingwood Common SSSI</u>, Danbury Common <u>SSSI</u>, and <u>Woodham Walter Common SSSI</u></p> <p>Modify description of SSSIs in para 7.376:</p> <p>The development will be required to provide appropriate habitat mitigation and creation, and appropriate buffers to avoid adverse impact on the adjacent</p>

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
			Public Rights of Way and/or highways (para 7.377).	local wildlife sites River Chelmer and Old Hare Wood, Waterhall Meadows Essex Wildlife Trust Nature Reserve, the ancient woodlands of Long Spring Wood and Hall Wood, and Blakes Wood & <u>Lingwood Common SSSI</u> , Danbury Common <u>SSSI</u> , and <u>Woodham Walter Common SSSI</u> , which lie within or immediately adjacent to the site.
PSQ25-6249 PSQ25-6250 PSQ25-6251 PSQ25-6252	Site 6 Site 7a Site 7b Site 7c	167 177 181 184	We note that policy wording changes have been made to S4, S9 and DM16 which will address the requirement for this development to provide suitable alternative natural greenspace to provide mitigation in part for increased recreational impacts on international coastal designated sites under Essex Coast RAMS.	Noted. No modification required to the Plan.
PSQ25-6254	Site 10	214	We are pleased to see that the requirement for a Habitats Regulations Assessment (HRA) is mentioned in the policy and supporting text. However, note that the requirement for HRA is not confined to this Growth Site but will be required for all residential applications within the Essex Coast RAMS and other proposed developments which may have a likely significant effect on international sites.	Noted. No modification required to the Plan.
PSQ25-6255 PSQ25-6256 PSQ25-6257	Site 11b Site 11c Site 12	220 221 223	We welcome the policy requirement to assess, and where appropriate mitigate, the	Noted. No modification required to the Plan.

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
			potential cumulative effect on the designated features of Thrift Wood SSSI.	It is noted that the Pre-Submission Local Plan did not include Site 11a. This was removed following the Preferred Options consultation.
PSQ25-6258	Site 13	224	We welcome requirements to conserve and enhance SSSIs in and around Danbury and to provide contributions towards addressing cumulative recreational pressure on nearby SSSIs. We are pleased to see that the supporting text advocates partnership working with managers of the SSSIs and other key stakeholders, including Natural England.	Noted. Modify description of SSSIs in para 7.445: There are significant tracts of protected woodland and commons in and around the Danbury Ridge which represent important valued landscapes. These include a cluster of protected Sites of Special Scientific Interest (SSSI) which are Danbury Common, Blake's Wood and Lingwood Common, and Woodham Walter Common.
PSQ25-6259	SPA3	230	We would be pleased to comment early in the application process on the details of avoidance and mitigation measures deemed necessary for proposed developments that may impact on Hanningfield Reservoir SSSI, particularly through recreational disturbance and effects on water quality.	Noted. No modification required to the Plan.
PSQ25-6260	DM16	272	We are pleased to see a policy to protect and promote biodiversity through the protection of international, national and locally designated wildlife sites, and the enhancement of the network of priority habitats and species. We welcome the mitigation measures for impacts on	Noted. No modification required to the Plan.

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			internationally designated sites (para 8.139 – 8.140). We note references to Chelmsford Green Infrastructure Strategic Plan, Essex Local Nature Recovery Strategy (LNRS), and the Essex Green Infrastructure Strategy for nationally designated sites and we advise that these strategies should be taken into account for development affecting locally designated sites as well.	
No NE rep. This is in response to PS25-257 from Wates and Hammonds Farm Ltd	DM16 Paragraph 8.147	272	Planning applications must be supported by a <u>draft</u> Biodiversity Net Gain Plan and supporting reports with information to demonstrate how a minimum of 10% biodiversity net gain (or 20% for sites SGS6 and SGS16a) will be achieved, implemented, managed and maintained. These should <u>must</u> be carried out by suitably qualified professionals and use the most up-to-date Department of Environment, Farming and Rural Affairs (DEFRA) Biodiversity Metric Calculators, in order for the level of biodiversity value before and after a development takes place to be clearly measured. All development proposals, including those for biodiversity enhancements, will be required to demonstrate the application of the mitigation hierarchy to ensure harm is avoided in the first instance. Loss or damage to irreplaceable habitats cannot be offset to	Modification agreed to confirm when mitigation measures for protected sites (including SANG) can count towards BNG requirements.

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			<p>achieve a net gain. Public open space requirements or the provision of SANGs are separate to biodiversity net gain and will not be considered as an alternative to or a replacement for net gain provisions. Where possible, the provision of both on-site should be segregated to ensure the quality of the habitat for wildlife is maximised. Mitigation measures for protected sites (including SANG) can count towards BNG requirements as long as at least 10% of the biodiversity units come from additional activities other than mitigation and compensation. SANG provision must also demonstrate how through appropriate design and implementation that suitable habitats will be achieved to secure a genuine biodiversity uplift beyond Natural England's minimum SANG standards. Any additional features provided for BNG purposes should not conflict, and ideally complement, with the principal purpose of the SANG.</p>	
PSQ25-6261	DM17	276	<p>Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland; it has recently been updated for Essex.</p>	<p>Noted. No modification required to the Plan.</p>
IIA-49	Sustainability Appraisal (SA) and Strategic	-	<p>We agree with the Biodiversity and Green Infrastructure, key sustainability issues although note that biodiversity net gain is mandatory for all developments (with certain</p>	<p>Comments on and support for the IIA are noted. Suggestions for additional wording to Objective 1 are noted. The IIA has been subject to multiple rounds</p>

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	Environmental Assessment (SEA)		<p>exceptions). We agree with the Land Use, Geology and Soils key sustainability issues although note that previously developed land may have biodiversity (invertebrate) interest which needs to be taken into account by development. We agree with the Landscape and Townscape key sustainability issues.</p> <p>We support the criteria to test the plan's policies and proposals for negative impacts on European sites, SSSIs, local sites, ancient woodland etc.</p> <p>We are happy with the criterion to conserve and enhance the Marine Conservation Zone under Objective 14. Landscape and Townscape. However, we suggest that the following wording is added to Objective 1. Biodiversity and Geodiversity: <u>Will it preserve and enhance the local marine environment through the Blackwater, Crouch, Roach and Colne Estuary Marine Conservation Zone (MCZ)?</u></p> <p>We note the conclusion that there are mixed positive and negative effects in respect of biodiversity and land use (section 8.2.8) and we agree that 'There will be pressures on biodiversity, land use, resource use and climate change, challenging policy and site-</p>	<p>of consultation are considered appropriate. No modification required to the SA/SEA in the IIA.</p>

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
			<p>specific proposals to employ best practice sustainable measures' (section 8.2.9). We support the conclusion that 'The uncertainties and negative effects recorded emphasise the importance of the monitoring of the performance of sustainability indicators to help implement mitigation measures which would help improve the performance of all approaches, notably in respect of air quality, biodiversity, climate change and health and well-being'(section 8.2.11). We support the proposed IIA monitoring indicators for objectives 1, 7 and 14.</p>	
IIA-50	Habitats Regulations Assessment (HRA)	-	<p>We disagree with the statement in para 4.2.15 that none of the Pre-Submission allocations will have significant effects alone with the exception of Land North of South Woodham Ferrers and allocations that may affect functionally linked land (FLL). We consider that major developments within the recreational disturbance ZOI established by Essex Coast RAMS, particularly the Garden Communities and those with over 100 dwellings, will have a likely significant effect taken alone. However, we consider that standard measures as detailed in our Suitable Alternative Natural Greenspace (SANG) Guidelines can provide suitable mitigation to address 'alone' impacts.</p>	<p>It is acknowledged that further clarity regarding the weighting given to project level measures designed to minimise the contribution of schemes 'alone' to overall recreational pressure would be helpful and an HRA Addendum has been agreed to provide detail on this aspect. This agreed addendum is attached at Appendix 2.</p> <p>We acknowledge recommendations relating to Strategic Policies S4 – Conserving and enhancing the natural environment and S9 – Infrastructure requirements. The recommended minor changes to wording reference 'other</p>

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			<p>We agree that the allocation at South Woodham Ferrers requires consideration under the Habitats Regulations due to its large size and proximity to a European site. However, all site allocations within the recreational disturbance ZOI established by the Essex Coast RAMS require consideration under the Habitats Regulations.</p> <p>With regard to FLL, we agree with the international sites that have been screened in (Table 4-10). We agree that windfall developments that may be located on FLL can be determined at a project-level (section 5.5.7). However, note that any windfall development with suitable habitat that has the potential to affect FLL due to its proximity to coastal sites, should provide sufficient evidence to determine whether the application site constitutes FLL or not.</p> <p>We agree with the screening summary (section 4.4). With regard to 'Recreational Pressure/Urbanisation' (sections 5.2, 6.2, 7.2), we consider that more weight should be given in the HRA under 'Incorporated Mitigation' to bespoke scheme-level measures (e.g. the provision of sufficient</p>	<p>mitigation' beyond payment under RAMS and the need to adopt the approach progressed under future iterations of the Essex Coast RAMS SPD (current version dated 2020) and an HRA addendum is agreed to address this.</p> <p>HRA Addendum to the IIA at Appendix 2 is agreed.</p>

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
			<p>accessible on-site green infrastructure and circular walks) that may be required by CCC for some developments, in addition to payments under the RAMS (paras 5.2.12, 6.2.7, 7.2.9).</p> <p>Subject to the provision of sufficient high quality accessible natural greenspace to mitigate alone impacts of larger developments, we agree with the conclusion that the Pre-Submission Local Plan will have no adverse effects on the integrity of the Essex Coast Habitats Sites due to recreational pressure or urbanisation effects, alone or in combination. Depending on the size of the proposal and its distance from the coast, adherence with all of the criteria in the NE SANG Guidelines 2021 may be required to fully mitigate alone impacts. In such cases, payment of the RAMS tariff is to mitigate for residual impacts, as the provision of greenspace will never fully prevent visits to the coast, nor is that the aim of such greenspace.</p> <p>We agree with the policies requiring provision of wastewater treatment capacity that require sufficient wastewater treatment to be available and effective for new development in advance of occupation. We</p>	

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			<p>note the particular reference to Great Leighs in this respect.</p> <p>As noted in the HRA, the impacts of the CCC Local Plan will not be substantive enough to prevent the achievement or maintenance of favourable conservation status at Epping Forest SAC, if the mitigation plans outlined in Local Plans adjacent to the SAC are delivered as proposed. Consequently, based on the available data including recent air quality modelling from other LPAs, it is considered that the Pre-Submission draft Local Plan will have no adverse effects on the integrity of Epping Forest SAC, alone or in combination</p>	
Additional Sites Document Local Plan and IIA				
AS-1108, AS-1109, AS-1110, AS-1118, AS-1111, AS-1112, AS-1113, AS-1114, AS-1115, AS-1116, AS-1117	Strategic Growth Sites 1dd 7b 17c 17d 18a 19 Growth Sites 9b 9c 14b 17e	16 25 44 47 20 22 33 35 38 50	<p>Most of the new allocations fall within the zone of influence (Zoi) of the Essex coast SPA Recreational disturbance Avoidance and Mitigation Strategy (RAMS). Requirements should be included within relevant allocation policies to ensure that RAMS tariff payments and any other mitigation measures, as defined in the adopted or future iterations of the Essex RAMS and updated Supplementary Planning Document (SPD), will be secured towards mitigation measures identified in the RAMS</p>	<p>CCC removed reference to RAMS under each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024. The references to project level Habitats Regulations Assessment (HRA) in site allocation policies SGS20, GS21a and GS21b are due to their proximity to the Crouch and Roach Estuary SPA and Ramsar site Due to the proximity of the site to the Crouch and Roach Estuary</p>

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
			and that this will need to be set out in an HRA Appropriate Assessment.	SPA and Ramsar site in order to address all impacts of the development taken alone or in combination with other development. No modification required to the Plan.
AS-1107	Section 1 - Introduction	5	<p>With reference to green infrastructure (GI), Natural England's previous comments remain relevant, and we wish to reiterate and/or add the following:</p> <ul style="list-style-type: none"> • High quality GI provision should be sufficient to meet people's needs, create sustainable places and protect sensitive sites in Essex. • We support policy requiring 'sustainable multifunctional GI'. • Greenspaces should be integral to initial design and available at first occupation – this is critical to mitigating recreational pressure impacts on more sensitive sites. • We welcome requirements for developers to assess recreational pressure and to engage with Natural England on mitigation strategies. • We are aware that the Garden Communities are delivering 20% biodiversity net gain (BNG). The higher target is welcome given the scale of those schemes and this should help to deliver additional greenspace for those developments. 	Noted. No modification required to the Plan.

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
AS-1111	Strategic Growth Site 7b	25	Location 7 - Great Leighs Natural England supports the policy requirement to protect and enhance the River Ter Site of Special Scientific Interest (SSSI) to the south of the site ensuring new development provides any required mitigation measures.	Noted. No modification required to the Plan.
AS-1112, AS-1113	Growth Sites 9b 9c	33 35	Location 9 – Boreham: Allocations 9b and 9c are adjacent to an Important Invertebrate Area, supporting some of Britain’s rarest species and possessing unique assemblages of invertebrates. We recommend that site design should aim to protect and enhance habitat features for invertebrates. BugLife has produced a general guidance note on practical measures to achieve this and is developing site-specific profiles. Reference to this information could be usefully included in the policy wording or supporting text and/or within Policy EN3: Biodiversity and Geodiversity.	Noted. Policy S4 and DM16 already provide adequate protection and enhancement for ecology, species, habitat, nature and biodiversity designated sites from development proposals (both statutory and non-statutory, including priority habitats and species) of international, national and local importance, to incorporate measures and features into the design of new buildings, extensions or renovations to increase biodiversity, and to avoid negative impacts on biodiversity and geodiversity, adequately mitigate unavoidable impacts and as a last resort compensate for residual impacts. This will allow specific site considerations to be addressed at masterplan and planning application stage. It is not considered necessary to specifically refer to BugLife in the plan and the profiles are still being ‘developed’. No modification required to the Plan.

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
AS-1115	Strategic Growth Site 11c	41	<p>Location 11 – Bicknacre: Allocation 11c is within the zone of influence of several SSSIs including Thrift Wood, Danbury Common, Woodham Walter Common and Blake’s Wood and Lingwood Common, for recreational pressure impacts. Strengthen the policy requirement to develop appropriate mitigation strategies in liaison with site managers to ensure the protection and enhancement of this suite of SSSIs and supporting habitat.</p>	<p>Noted. Modify para 2.125 in the Additional Sites Document: The development will be required to assess, and where appropriate mitigate, the potential cumulative effect from sites 11b and 11c on the designated features of Thrift Wood SSSI. <u>Developers will work closely with relevant local stakeholders, such as Natural England and the SSSI site managers (National Trust and Essex Wildlife Trust) to assess recreational pressure and provide the necessary mitigation measures for SSSIs.</u></p> <p>For consistency, also modify para. 7.432 (the Reasoned Justification for GS11b Land at Kingsgate, Bicknacre Road, Bicknacre) in the of the Pre-Submission Local Plan: The development will be required to assess, and where appropriate mitigate, the potential cumulative effect from sites 11b and 11c on the designated features of Thrift Wood SSSI. <u>Developers will work closely with relevant local stakeholders, such as Natural England and the SSSI site managers (National Trust and Essex Wildlife Trust) to assess recreational pressure and provide the</u></p>

Rep No	Local Plan Ref	Local Plan page	Summary of Representation	Agreed position/ proposed modification
				<u>necessary mitigation measures for SSSIs.</u>
AS IIA-47	Appendix F HRA Addendum	-	We note that the HRA Addendum concludes that the proposed changes to the Local Plan do not affect the findings of the previous HRA work (presented in Appendix N of the Pre-Submission IIA Report) and that the Local Plan will not have adverse effects on any European sites either alone or in combination. Natural England will be able to support this conclusion once all the additional site allocations with the Zol for Essex RAMS have been acknowledged and appropriate requirements included within the relevant site allocation policies, in line with our advice above.	Reference to RAMS has been removed under each qualifying allocation in the Local Plan to avoid repetition. Explanatory text is set in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024. Natural England can confirm that they support the HRA Addendum conclusion that the proposed changes to the Local Plan do not affect the findings of the previous HRA work. No modification required to the Plan.

Governance and on-going cooperation

CCC will continue to work collaboratively with Natural England to address strategic matters that, in addition to those above, may arise through Examination in Public. This will occur on an ongoing basis.

This SOCG will be reviewed as necessary during the Examination in Public.

It is agreed that CCC is working collaboratively with Natural England to ensure that cross-boundary strategic issues are properly considered and where appropriate reflected in the review of the Local Plan and effective and on-going joint working has and will continue to be undertaken.

Signatories

<p>Signed on behalf of Chelmsford City Council</p> <p><i>Jeremy Potter</i></p> <p>Jeremy Potter Spatial Planning Services Manager</p> <p>Date: 5th of March 2026</p>	<p>Signed on behalf of Natural England</p> <p><i>Joanna Gamble</i></p> <p>Joanna Gamble Higher Officer – Sustainable Development West Anglia Team, Natural England</p> <p>Date: 4th March 2026</p>
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Appendix A – Map of Chelmsford City Council’s administrative area in context with its neighbouring districts and county councils

Chelmsford City Council is adjoined by seven local planning authorities. Essex County Council is the local Highways and Transportation Authority and Education Authority. It is also responsible for the Minerals and Waste Local Plans with Southend-on-Sea Unitary Authority.



Appendix B - Habitats Regulations Assessment Addendum



Chelmsford City Council

Chelmsford Local Plan Review: HRA Addendum August 2025





Chelmsford City Council

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Introduction

Background

Chelmsford City Council (the Council) is carrying out a review of the Chelmsford Local Plan. Once adopted, the revised Local Plan will replace the Adopted Local Plan (Chelmsford Local Plan 2013-2036)¹, setting out how much new development will be accommodated in the Council's administrative area (the 'City Area') to 2041, along with where this growth will be located. This Local Plan will also establish the policy framework for managing development proposals, containing planning policies which support the proposed vision: *"Guiding Chelmsford's growth towards a greener, fairer and more connected community."*

An integrated impact assessment (IIA)² has been completed to inform the review of the Chelmsford Local Plan, with report iterations drawing upon feedback received during consultation. The IIA incorporates a Habitats Regulations Assessment (HRA) report considering potential effects on all Habitats sites within 15km of the Council's administrative area; any additional sites that may be hydrologically linked to the Local Plan's Zone of Influence; and any additional sites identified by Natural England following the Preferred Options consultation.

Habitats Regulations Assessment

The HRA report submitted as part of the Pre-Submission (Regulation 19) Local Plan Consultation concluded, in summary, that:

- Nine European sites might be exposed to 'significant' effects from the Local Plan, alone or in combination: Essex Estuaries SAC: Crouch and Roach Estuaries (Mid-Essex Coast Phase 3) SPA: Crouch and Roach Estuaries (Mid-Essex Coast Phase 3) Ramsar: Blackwater Estuary (Mid-Essex Coast Phase 4) SPA: Blackwater Estuary (Mid-Essex Coast Phase 4) Ramsar: Dengie (Mid-Essex Coast Phase 1) SPA: Dengie (Mid-Essex Coast Phase 1) Ramsar: Outer Thames Estuary SPA: and Epping Forest SAC.
- Following appropriate assessments, taking into account those aspects where effect pathways are present (in combination water quality, air quality and visitor pressure effects, and effects on species away from the sites), and considering specific and cross-cutting policy-based mitigation and avoidance measures that have been incorporated into the plan that the Pre-Submission (Regulation 19) Local Plan (as currently drafted) will have no adverse effects on the integrity of any European sites, alone or in combination.

In response to the Pre-Submission (Regulation 19) Local Plan Consultation, Natural England confirmed that they consider the Local Plan 'sound' with regard to aspects relevant to their Natural Environment remit, notably requirements under the Habitats Regulations. Chelmsford City Council has provided an IIA feedback report reviewing consultation

¹ <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/adopted-local-plan/>

² [pre-submission-integrated-impact-assessment-ia.pdf](#)



feedback including that from Natural England³, this addendum provides additional information specific to the HRA component of the IIA.

Purpose and Structure of the HRA Report Addendum

This addendum provides clarification in response to matters raised by Natural England (Response Ref: PS11A-50), specifically:

- Recommended policy wording updates; and
- Mitigation to be incorporated at the project level, and the weighting given to these measures in the HRA.

³ <https://www.chelmsford.gov.uk/media/mdwpvowe/pre-submission-regulation-19-integrated-impact-assessment-feedback-report-july-2025.pdf>

Further clarification

Recommended amendment to Strategic Policies S4 and S9

Strategic Policy S4 sets out the strategic approach to conserving and enhancing the natural environment in Chelmsford. As included in the Pre-Submission (Regulation 19) Chelmsford Local Plan, it requires:

Contributions from qualifying residential developments within the Zones of Influence, as defined in the adopted Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS), will be secured towards mitigation measures identified in the RAMS.

The Reasoned Justification sets out the background to the RAMS, which aims to deliver the mitigation necessary to avoid adverse effects on the integrity of Habitats sites from the in-combination impacts of residential development in Essex. Furthermore, it notes that *'Major developments (defined as sites of 10 or more dwellings) may also be required to provide or contribute towards additional recreational mitigation measures to address alone impacts of the proposal as identified in paragraph 8.139 of DM16. This will be informed by a review of the RAMS and SPD which is expected to be complete in late 2025 and/or project level HRAs.'*

The current Pre-Submission (Regulation 19) Local Plan wording is compatible with Natural England's suggested wording for Strategic Policy S4 in their Regulation 19 representation (PS11A-50):

Contributions from qualifying residential developments within the Zones of Influence and any other mitigation measures, as defined in the adopted or future iterations of the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS), will be secured towards mitigation measures identified in the RAMS.

As is the case, with respect to Strategic Policy S9 – Infrastructure requirements:

Contributions towards recreation disturbance avoidance and mitigation measures for European designated sites as identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy and other measures outlined in any future iterations.

The Essex Coast RAMS spans the period 2018 to 2038 and the HRA has been prepared on the basis that strategic mitigation would apply throughout the Local Plan period to 2041.

Incorporated Mitigation

In line with Strategic Policy S4, the HRA has been prepared on the basis that project level measures (mitigation) will be incorporated into future, individual projects to provide for recreational use and meet regulatory requirements⁴.

Further detail is provided in the reasoning for Policy DM16, Protection and Promotion of Ecology, Nature and Biodiversity, that *'mitigation may involve providing or contributing towards a combination of the following measures:*

- *Access and visitor management measures within a site*
- *Improvement of existing greenspace and recreational routes*
- *Provision of suitable alternative natural greenspace (SANG) in accordance with Natural England SANG standards which includes 8ha/1000 new population...*
- *Provision of recreational routes*
- *Monitoring of the impacts of new development on the site to inform the necessary mitigation requirements and future refinement of any mitigation measures...*

This approach is consistent with the Regulation 19 consultation comment from Natural England (PS11A-50) that *'standard measures as detailed in our Suitable Alternative Natural Greenspace (SANG) Guidelines can provide suitable mitigation to address 'alone' impacts.'*

It is also consistent with the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (SPD)⁵ and future iterations, that will apply throughout the plan period. The SPD specifies at paragraph 2.23 that *'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.'*

The final, submission HRA will seek to clarify this consistent approach in response to the further comment from Natural England that *'more weight should be given in the HRA under 'Incorporated Mitigation' to bespoke scheme-level measures' that may be required by CCC for some developments, in addition to payments under the RAMS (para 5.2.12, 6.2.7, 7.2.9).'*

This will necessarily focus on the plan level allocations and strategic growth within the Zone of Influence for Habitats sites as defined by the Essex Coast RAMS, demonstrating feasibility for project level mitigation. Further detail would be developed at the project level

⁴ At this stage the HRA is not a formal HRA screening or Appropriate Assessment, and as there is no statutory requirement for HRA to be undertaken on draft plans or similar developmental stages (e.g. issues and options, preferred options) it functions as part of an iterative assessment process.

⁵ CCC (May 2010). Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document. Available: <https://www.chelmsford.gov.uk/media/0fznrja3/essex-coast-rams-supplementary-planning-document.pdf>



as proposals come forward, to satisfy regulatory requirements. It is therefore clear that at each stage, plan and project level assessment ensures that there would be no adverse effect on site integrity.





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