



# Chelmsford Local Plan

## Review of the adopted Local Plan Statement of Common Ground with Natural England

December 2024

**Review of the Chelmsford Local Plan  
Statement of Common Ground between Chelmsford City Council and Natural England  
December 2024**

**Introduction**

Chelmsford City Council is currently reviewing the Chelmsford Local Plan adopted in 2020. This is at Regulation 19 (Pre-Submission) stage, following two Regulation 18 consultations on issues and options in 2022 and preferred options in 2024.

The consultation responses alongside collected evidence and national planning policy and guidance have been used to develop the Pre-Submission plan.

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

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 both Regulation 18 stages of consultation together with its accompanying Integrated Impact Assessment (IIA).

This Statement of Common Ground (SOCG) identifies areas of common ground (Table 1) between Natural England and Chelmsford City Council (CCC) in relation to Natural England's representations to the Review of the Chelmsford Local Plan and Integrated Impact Assessment.

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.

Proposed plan changes are shown in Table 2. Proposed new text is shown in underline. Proposed deleted text is shown as ~~strikethrough~~.

**Table 1 – Areas of Common Ground**

Rep No	Local Plan Ref	Summary of Representation	Agreed resolution/ change
PO24-9629, PO24-9633, PO24-9636, PO24-9637	Strategic Objectives – paras. 2.14, 2.38, 2.39 and 2.42	<ul style="list-style-type: none"> <li>Plan should address impacts on and opportunities for the natural environment, take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity.</li> <li>The Essex LNRS could be referenced in section 2.</li> <li>New green and blue infrastructure should accord with Natural England's Green Infrastructure Framework.</li> </ul>	<ul style="list-style-type: none"> <li>The Plan appropriately addresses opportunities, impacts and provides for biodiversity net gain. <b>No change required to the Plan.</b></li> <li>The Plan includes several references to the Essex LNRS including Strategic Policy S4. As Section 2 is 'About Chelmsford', it is not considered a relevant section for reference to Essex LNRS. <b>No change required to the Plan.</b></li> <li><b>Amendment proposed to Para. 3.15 - see Table 2.</b></li> </ul>
PO24-9638	Strategic Priority 1	<ul style="list-style-type: none"> <li>The Local Plan should consider climate change and the role the natural environment to help reduce the effects of climate change.</li> <li>Reference could be made to the role of Essex LNRS.</li> </ul>	<ul style="list-style-type: none"> <li>The impact of climate change and measures to reduce its effects is a strategic priority that runs through the Local Plan – see Preferred Options Topic Paper: Climate Change. <b>No change required to the Plan.</b></li> <li>There are number of policies that include natural environment measures to reduce climate change and to protect to natural environment including Strategic Policy S2, Strategic Policy S4, Policies DM16, Policy DM17, DM18, DM20, DM23, DM24. <b>Amendment proposed to Para. 3.5 to refer to the Essex LNRS in SP1 - see Table 2.</b></li> </ul>

Rep No	Local Plan Ref	Summary of Representation	Agreed resolution/ change
PO24-9642	Para. 3.5 (Strategic Priority 1)	<ul style="list-style-type: none"> <li>Para. 3.5 should make reference to the expected role of nature-based solutions and the whole catchment approach to managing water resources, i.e. Essex Water Strategy.</li> </ul>	<ul style="list-style-type: none"> <li><b>Amendment proposed to Para. 3.5 - see Table 2.</b></li> </ul>
PO24-9643	Strategic Priority 3 (Paras. 3.12-3.17)	<ul style="list-style-type: none"> <li>The Local Plan should be underpinned by up-to-date environmental evidence, including an assessment of existing and potential components of local ecological networks. This should inform the Sustainability Appraisal.</li> <li>Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.</li> <li>Biodiversity gains could be enhanced if developments take into account the principles set out in the Nature Recovery Handbook and respond to the Essex LNRS.</li> <li>The Local Plan should give appropriate weight to the roles performed by the area's soils. Development decisions should take full account of the impact on soils, their intrinsic character and the</li> </ul>	<ul style="list-style-type: none"> <li>Agreed. A partial review of the LOWs is being undertaken to inform the Pre-Submission Document and the Pre-Submission IIA. The Plan takes account of a range of ecological evidence base and guidance including the Nature Recovery Strategy. <b>No change required to the Plan.</b></li> <li>Agreed. Policies S4 and DM16 require on-site ecological enhancements. <b>No change required to the Plan.</b></li> <li>Policies S4 and DM16 require developments to take account of the LNRS. <b>No change required to the Plan.</b> However, it is proposed to consider a reference to the Nature Recovery Handbook and to respond to the Essex LNRS in the emerging CCC BNG guidance note as this is detailed implementation information.</li> <li>It is recognised that geology and soils are key sustainability issues and have been</li> </ul>

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		<p>sustainability of the many ecosystem services they deliver.</p> <ul style="list-style-type: none"> <li>The Plan should safeguard the long term capability of best and most versatile agricultural land.</li> </ul>	<p>taken into account in the Preferred Options IIA. <b>No change required to the Plan.</b></p> <ul style="list-style-type: none"> <li>The Plan does this. <b>No change required to the Plan.</b></li> </ul>
PO24-9644	Strategic Policy S1	<ul style="list-style-type: none"> <li>Brownfield land may have high value for invertebrates. Ecological surveys should be carried out to inform planning decisions and enable development to be located in the most sustainable locations.</li> </ul>	<ul style="list-style-type: none"> <li>The requirement to submit ecological surveys, even on brownfield sites, is set out in the Council's Local Validation List. <b>No change required to the Plan.</b></li> </ul>
PO24-9645	Strategic Policy S2	<ul style="list-style-type: none"> <li>Would be beneficial to see direct reference to Natural England's Green Infrastructure Framework and recognition of Green Infrastructure's role in strengthening climate change resilience.</li> <li>Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation.</li> </ul>	<ul style="list-style-type: none"> <li><b>Reference proposed to Green Infrastructure Framework at para. 3.15. See Table 2 below.</b></li> <li>There are number of policies that include natural environment measures to reduce climate change and to protect to natural environment, (Strategic Policy S2, Strategic Policy S4, Policies DM16, Policy DM17, DM18, DM20, DM23, DM24). <b>Amendment proposed to Para. 3.5 to refer to nature-based solutions.</b></li> </ul>
PO24-9648	Strategic Policy S4	<ul style="list-style-type: none"> <li>The provision of accessible on-site greenspace may also be required in addition to RAMS contributions.</li> </ul>	<ul style="list-style-type: none"> <li><b>Amendment proposed to S4 - See Table 2 below.</b></li> </ul>

Rep No	Local Plan Ref	Summary of Representation	Agreed resolution/ change
		<ul style="list-style-type: none"> <li>Contributions are now not required to be secured towards recreational mitigation measures at Hatfield Forest SSSI/NNR.</li> </ul>	<ul style="list-style-type: none"> <li><b>Amendment proposed to S4 - See Table 2 below.</b></li> </ul>
PO24-9691 & PO24-9722	Strategic Policy S9	<ul style="list-style-type: none"> <li>Green Infrastructure (GI) should be incorporated into the plan as a strategic policy area, supported by policies. The policy should include urban greening and the urban greening factor.</li> <li>Paragraph 6.85 is misleading as it implies RAMS contribution is an either/or option which is not the case for larger developments.</li> </ul>	<ul style="list-style-type: none"> <li>The provision of GI runs through the Local Plan including in Strategic Policies S9 and site allocation policies within urban and rural areas. Open Space, Green Wedges, Areas for SuDS, biodiversity and recreation are also identified on the Policies Map. <b>No change required to the Plan.</b></li> <li>The RAMS Supplementary Planning Document (SPD) enables applicants to provide bespoke mitigation measures as an alternative to paying the RAMS tariff. <b>Amendment proposed to para. 6.85 in Table 2.</b></li> </ul>
PO24-9693	Strategic Policy S10	<ul style="list-style-type: none"> <li>We are happy to comment on the Council's Infrastructure Delivery Plan (IDP) if required.</li> </ul>	<ul style="list-style-type: none"> <li>Offer is noted. An updated IDP will be published later this year and will be available to comment on during the forthcoming Pre-Submission Plan consultation. <b>No change required to the Plan.</b></li> </ul>
PO24-9694	Strategic Growth Site Policy 6	<ul style="list-style-type: none"> <li>There needs to be an assessment of what is being provided as suitable</li> </ul>	<ul style="list-style-type: none"> <li><b>See table of changes below for proposed wording on SANG added to DM16.</b></li> </ul>

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		alternative natural greenspace (SANG) as this will not be able to count towards biodiversity net gain (para 7.232).	
PO24-9698, PO24-9705, PO24-9707	Strategic Growth Site Policies 7a - 7c – Great Leighs	<ul style="list-style-type: none"> <li>The policy does not mention that the area falls within the Essex Coast RAMS Zol. There needs to be an assessment of what is being provided as suitable alternative natural greenspace (SANG) as this will not be able to count towards biodiversity net gain.</li> </ul>	<ul style="list-style-type: none"> <li>CCC has removed reference to RAMS under each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set in policies S4 and DM16. <b>See table of changes below for proposed wording on SANG added to DM16.</b></li> </ul>
PO24-9708	Strategic Growth Site Policy 16a	<ul style="list-style-type: none"> <li>Recommend a new policy to address the cumulative recreational pressure on Blakes Wood and Lingwood Common SSSI, Woodham Walter Common SSSI, Danbury Common SSSI and other wildlife sites from increased levels of recreational pressure arising from the new residents at Growth Sites 16a, 3a and 13.</li> <li>The policy does not mention that the area falls within the Essex Coast RAMS Zol. There needs to be an assessment of what is being provided as suitable alternative natural greenspace (SANG) as this will not be able to count towards biodiversity net gain.</li> </ul>	<ul style="list-style-type: none"> <li>Natural England have subsequently confirmed that this is no longer required in an email dated 24.0.24: <i>“Upon further consideration, we would be happy for you to consider an alternative option of having additional wording within the policies relating to 3a, 16a and 13 for example, ‘provision of (1) high quality semi-natural greenspace that meets NE’s 8ha/1000 new population metric and (2) a 2.3-2.5km circular dog-walking route on or off site, making use of existing PRoW and/or highways’. In the case of 16a, greenspace could be delivered as a series of green spaces with no individual space being less than 12ha. For all three site-specific policies, a sentence must be included that requires each development to contribute to mitigation measures on the SSSIs to be</i></li> </ul>

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			<p><i>agreed by a working group. These measures will be costed over the full lifetime of the developments, i.e. in perpetuity (taken to be 80 years), rather than the plan period. Each site-specific policy must include a sentence to the effect that Natural England must be consulted at the pre-application stage on the design of the high quality semi-natural greenspaces, to ensure that these provide an effective alternative space for recreation to the SSSIs."</i></p> <p><b>– see table of changes below for additional wording to site policies 3a, 3c-d, 16a and 13.</b></p> <ul style="list-style-type: none"> <li>• CCC has removed reference to RAMS under each qualifying allocation in the LP Review to avoid repetition. Explanatory text is set in policies S4 and DM16. <b>See table of changes below for proposed wording on SANG added to DM16.</b></li> </ul>
PO24-9714	Strategic Growth Site Policy 10	<ul style="list-style-type: none"> <li>• Unsure if the South East (Inshore) Marine Plan has been taken into account for this location.</li> <li>• The Habitats Regulation Assessment required by the policy should consider all impacts taken alone or in</li> </ul>	<ul style="list-style-type: none"> <li>• The Marine Management Organisation was consulted as part of the Plan Review and South East (Inshore) Marine Plan has been considered as set out in the Plan Introduction. <b>No change required to the Plan.</b></li> </ul>



Rep No	Local Plan Ref	Summary of Representation	Agreed resolution/ change
		<p>combination, including recreational disturbance.</p> <ul style="list-style-type: none"> <li>A Marine Conservation Zone (MCZ) assessment may need to be undertaken.</li> </ul>	<ul style="list-style-type: none"> <li>Noted. <b>No change required to the Plan.</b></li> <li>Given the location of the allocation, a MCZ is not necessary. <b>No change required to the Plan.</b></li> </ul>
PO24-9715-9717	Growth Site Policies 11a - 11c	<ul style="list-style-type: none"> <li>The cumulative effect on Thrift Wood SSSI of the Bicknacre sites should be taken into account.</li> </ul>	<ul style="list-style-type: none"> <li><b>See table of changes below for sites 11b-c. Site 11a is deleted from the plan.</b></li> </ul>
PO24-10495	Growth Site Policy 12	<ul style="list-style-type: none"> <li>The cumulative effect on Thrift Wood SSSI of the Bicknacre sites should be taken into account.</li> </ul>	<ul style="list-style-type: none"> <li>Natural England have subsequently confirmed that this is not required in an email dated 24.9.24 as the residents of the proposed specialist residential accommodation are not likely to contribute to additional recreational pressure. <i>"We agree that 11b and 11c could also place pressure on Thrift Wood as they are within walking distance of the SSSI and we support including them in the same policy requirement for 11a. With regard to Growth Site 12, we agree that residents of specialist residential accommodation are not likely to contribute to additional recreational pressure."</i> <b>No change required to the Plan.</b></li> </ul>
PO24-9718	Growth Site Policy 13	<ul style="list-style-type: none"> <li>Recommend a new policy to address the cumulative recreational pressure on Blakes Wood and Lingwood Common</li> </ul>	<ul style="list-style-type: none"> <li>Natural England have subsequently confirmed that this is no longer required in an email dated 24.0.24: <i>"Upon further</i></li> </ul>

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		SSSI, Woodham Walter Common SSSI, Danbury Common SSSI and other wildlife sites from increased levels of recreational pressure arising from the new residents at Growth Sites 16a, 3a and 13.	<p><i>consideration, we would be happy for you to consider an alternative option of having additional wording within the policies relating to 3a, 16a and 13 for example, 'provision of (1) high quality semi-natural greenspace that meets NE's 8ha/1000 new population metric and (2) a 2.3-2.5km circular dog-walking route on or off site, making use of existing PRow and/or highways'. In the case of 16a, greenspace could be delivered as a series of green spaces with no individual space being less than 12ha. For all three site-specific policies, a sentence must be included that requires each development to contribute to mitigation measures on the SSSIs to be agreed by a working group. These measures will be costed over the full lifetime of the developments, i.e. in perpetuity (taken to be 80 years), rather than the plan period. Each site-specific policy must include a sentence to the effect that Natural England must be consulted at the pre-application stage on the design of the high quality semi-natural greenspaces, to ensure that these provide an effective alternative space for recreation to the SSSIs."</i></p> <p><b>– see table of changes below for additional wording to site policies 3a, 3c-d, 16a and 13.</b></p>

Rep No	Local Plan Ref	Summary of Representation	Agreed resolution/ change
PO24-9720	Policy SPA3	<ul style="list-style-type: none"> <li>• Would be pleased to comment early in the application process on the details of avoidance and mitigation measures.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. <b>No change required to the Plan.</b></li> </ul>
PO24-9721	Policy DM16	<ul style="list-style-type: none"> <li>• Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites.</li> <li>• All relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites should be included on the Policies Map.</li> </ul>	<ul style="list-style-type: none"> <li>• Policy DM16 does this. <b>No change required to the Plan.</b></li> <li>• Protected sites are identified on the Policies Map. <b>No change required to the Plan.</b></li> </ul>
PO24-9721	Policy DM16	<ul style="list-style-type: none"> <li>• It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. <b>No change required to the Plan.</b></li> <li>• Development proposals will be required to assess the potential impact on designated sites in their totality, i.e. even where they continue outside of the Council's administrative area. <b>No change required to the Plan.</b></li> </ul>

Rep No	Local Plan Ref	Summary of Representation	Agreed resolution/ change
		<ul style="list-style-type: none"> <li>It may be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.</li> </ul>	
PO24-9724	Policy DM17	<ul style="list-style-type: none"> <li>New development should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF.</li> <li>Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. This advice should be considered by when determining planning applications.</li> </ul>	<ul style="list-style-type: none"> <li>Consideration of the impact to preserved woodlands and ancient woodlands is addressed at Policy DM17. <b>No change required to the Plan.</b></li> <li>CCC currently gives consideration to this standing advice. <b>No change required to the Plan.</b></li> </ul>
POIIA33	Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) - Para. 1.7.2	<ul style="list-style-type: none"> <li>The SA Report should include objectives to protect and improve access to the natural environment and include indicators to improve the provision of natural greenspace, recommending the use of ANGSt and Green Infrastructure Standards where appropriate.</li> <li>The SA Report should consider the Essex LNRS and the green infrastructure network and its</li> </ul>	<ul style="list-style-type: none"> <li>Addressed in the IPO IIA Feedback Report <a href="#"><u>local-plan-preferred-options-integrated-impact-assessment-feedback-report-october-2024.pdf</u></a>. <b>No change required to the Plan.</b></li> </ul>

Rep No	Local Plan Ref	Summary of Representation	Agreed resolution/ change
		<p>protection/enhancement through appropriate objectives and/or indicators.</p> <ul style="list-style-type: none"> <li>• Impacts on soils should be assessed in the SA report.</li> <li>• The SA Report should include measures to avoid/minimise impacts, particularly in areas of best and most versatile agricultural land</li> <li>• The SA should consider alternatives, particularly in areas where development on best and most versatile land cannot be avoided.</li> </ul>	
POIIA34	Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) – Section 3.3	<ul style="list-style-type: none"> <li>• Any policies or proposals that will have a likely significant effect on a European site and/or an adverse effect on the integrity of a European site should be removed from the plan or modified to prevent such effects.</li> <li>• Cumulative impacts should be adequately addressed and alternatives should be assessed.</li> <li>• Local Sites should be addressed and given appropriate weight. There should be a criterion to test policies and</li> </ul>	<ul style="list-style-type: none"> <li>• Addressed in the IPO IIA Feedback Report <a href="#"><u>local-plan-preferred-options-integrated-impact-assessment-feedback-report-october-2024.pdf</u></a>. <b>No change required to the Plan.</b></li> </ul>

Rep No	Local Plan Ref	Summary of Representation	Agreed resolution/ change
		proposals for adverse effects on Local Sites.	
POIIA35	Habitats Regulations Assessment	<ul style="list-style-type: none"> <li>The Non-Technical Summary (NTS) is missing from the report</li> <li>Payment of the RAMS tariff does not automatically account for impacts from new development, additional mitigation measures may be required. Larger developments will be required to adhere to the (SANG) guidelines in relation to greenspace provision.</li> <li>Refer to our '<i>Designated Sites View</i>' for information on sensitivity to pressures and seasonality.</li> </ul>	<ul style="list-style-type: none"> <li>Addressed in the IPO IIA Feedback Report <a href="#">local-plan-preferred-options-integrated-impact-assessment-feedback-report-october-2024.pdf</a>. <b>No change required to the Plan.</b></li> <li><b>See DM16 in the Table 2 which clarifies this where additional mitigation for 'alone' impacts may be required.</b></li> <li><b>Noted. No change required to the Plan.</b></li> </ul>

**Table 2 – Table of changes**

No.	Page	Policy/Paragraph	Change
1	37	3.5	Flood risk management <u>which supports climate resilience</u> will need to keep pace with projections of climate change. The Local Plan has been subject to a Strategic Flood Risk Assessment (SFRA). Some sites in areas of existing flood risk have also been subject to a more detailed assessment, including sequential and exception tests. <u>Nature based solutions such as SuDS and tree planting</u> will form a key part of mitigation, to provide a dual role in water storage and delivering multi-functional benefits for the built, natural and historic environment. <u>In addition, the Essex Local Nature Recovery Strategy will provide priorities and identify areas for nature recovery to help address the ecological emergency and climate change.</u> The Council has made a commitment to a 10 year tree planting campaign which aims to plant one tree for every resident and at least three for every new home built, with a target of 175,000 new trees

No.	Page	Policy/Paragraph	Change
			including for woodland expansion. Street trees are also encouraged in new developments to help met this target.
2	38	3.15	The Local Plan will also protect and enhance local distinctiveness and plan positively for the creation, protection, enhancement and management of multi-functional green/blue infrastructure networks and habitats to ensure a net gain for biodiversity and green infrastructure in line with the Council's Green Infrastructure Strategic Plan <u>and Natural England's Green Infrastructure Framework.</u>
3	62	Policy S4	<p>Delete last para of policy and 5.56:</p> <p><b><del>Where appropriate, contributions from proposed residential developments will be secured towards recreational mitigation measures at Hatfield Forest Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR).</del></b></p> <p>Delete Para. 5.56:</p> <p><del>Natural England and the National Trust is formulating a package of on-site Strategic Access Management and Mitigation Strategy (SAMMS) for the Hatfield Forest Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR). The SAMMS will describe a range of mitigation measures available to offset the recreational impacts from proposed new housing development within the Hatfield Forest Zone of Influence. Ahead of the SAMMS being finalised, financial contributions may be sought towards mitigation measures on residential development proposals in consultation with Natural England and the National Trust. At this stage, a small area in the north-west of the Council's administrative area falls within the Zone of Influence. None of the residential site allocations allocated within the Local Plan are within this Zone of Influence</del></p> <p>Amend Para. 5.55:</p>

No.	Page	Policy/Paragraph	Change
			The Essex Coast RAMS identifies a detailed programme of strategic avoidance and mitigation measures which are to be funded by developer contributions from all qualifying residential development within the Zones of Influence as defined in the adopted RAMS or, in exceptional circumstances, identify and implement bespoke mitigation measures to ensure compliance with the Habitats Regulations. <u>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 8.130 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.</u>
4	93	6.85 (Policy S9)	<p>6.84 Residential developments proposed within the Local Plan have the potential to result in a significant increase in recreational disturbance to the Essex Estuaries Special Area of Conservation (SAC) and Crouch and Roach Estuaries Special Protection Areas (SPA). Measures required to mitigate the impacts of recreational disturbance on European Sites will be delivered as detailed in the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS).</p> <p>6.85 Any residential development that is <del>likely to affect the integrity of</del> <u>within the Zone of Influence of the Essex coast</u> European Sites will be required to either contribute financially towards mitigation measures <del>identified in accordance with the adopted RAMS (or subsequent) and Supplementary Planning Document, or subsequent revisions,</del> or in exceptional circumstances, identify and implement bespoke mitigation measures to ensure compliance with the Habitats Regulations. <u>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 8.130 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.</u></p>
5	152	SGS3a	Insert new bullet point after first bullet under Historic and Natural Environment to read:



No.	Page	Policy/Paragraph	Change
			<ul style="list-style-type: none"> <li>• <u>Provide necessary mitigation to address the cumulative recreational pressure on SSSIs in proximity to the site by providing high quality alternative semi-natural greenspace for Location 3 in the form of a Country Park</u></li> </ul> <p>Add additional bullet point under Site Infrastructure Requirements to read:</p> <ul style="list-style-type: none"> <li>• <u>Contributions towards addressing cumulative recreational pressure on SSSIs in proximity to the site</u></li> </ul> <p>Amend 1<sup>st</sup> bullet under 'Supporting on-site Development' to read:</p> <ul style="list-style-type: none"> <li>• A new Country Park <u>to be primarily informal and natural in character</u></li> </ul> <p>Insert new second sentence in 7.130 to read:</p> <p><u>This will include high quality semi-natural greenspace to be used in conjunction with the existing Public Rights of Way network to provide circular dog-walking routes of at least 2.3km. Natural England must be consulted during the planning application process on the design of the high quality semi-natural greenspaces, to ensure that these provide an effective alternative space for recreation to the SSSIs.</u></p> <p>Add new para after 7.130 to read:</p> <p><u>Even with onsite provision of the Country Park, the development will have the potential to result in an increase in recreational pressure on Blakes Wood, Danbury Common, and Lingwood Common SSSI, which are in close proximity to the site. 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 the SSSIs. Any costs incurred will be covered by the developers of the site. These measures will be costed over the full lifetime of the development, i.e. in perpetuity (taken to be 80 years), rather than the plan period.</u></p>

No.	Page	Policy/Paragraph	Change
6	158	SGS3c	<p>Insert new bullet point after fourth bullet under Historic and Natural Environment to read:</p> <ul style="list-style-type: none"> <li><u>Provide necessary mitigation to address the cumulative recreational pressure on SSSIs in proximity to the site</u></li> </ul> <p>Add additional bullet point under Site Infrastructure Requirements to read:</p> <ul style="list-style-type: none"> <li><u>Contributions towards addressing cumulative recreational pressure on SSSIs in proximity to the site</u></li> </ul> <p>Add new para after 7.166 to read:</p> <p><u>Through the provision of the Country Park at Strategic Growth Site 3a, a high quality semi-natural greenspace will be provided 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. Even with 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, Danbury Common, and Lingwood Common SSSI, which are in close proximity to the site. 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. Any costs incurred will be covered by the developers of the site. These measures will be costed over the full lifetime of the development, i.e. in perpetuity (taken to be 80 years), rather than the plan period.</u></p>
7	161	SGS3d	<p>Insert new bullet point after fourth bullet under Historic and Natural Environment to read:</p> <ul style="list-style-type: none"> <li><u>Provide necessary mitigation to address the cumulative recreational pressure on SSSIs in proximity to the site</u></li> </ul>

No.	Page	Policy/Paragraph	Change
			<p>Add additional bullet point under Site Infrastructure Requirements to read:</p> <ul style="list-style-type: none"> <li><u>Contributions towards addressing cumulative recreational pressure on SSSIs in proximity to the site</u></li> </ul> <p>Add new para after 7.166 to read:</p> <p><u>Through the provision of the Country Park at Strategic Growth Site 3a, a high quality semi-natural greenspace will be provided 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. Even with 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, Danbury Common, and Lingwood Common SSSIs, which are in proximity to the site. 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. Any costs incurred will be covered by the developers of the site. These measures will be costed over the full lifetime of the development, i.e. in perpetuity (taken to be 80 years), rather than the plan period.</u></p>
8	205	SGS16a	<p>Policy changes:</p> <p>Amend 1<sup>st</sup> bullet under 'Supporting on-site Development'</p> <ul style="list-style-type: none"> <li><u>A new Country Park to be primarily informal and natural in character</u></li> </ul> <p>Amend bullet point 9 under Historic and Natural Environment to read:</p> <ul style="list-style-type: none"> <li><u>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</u></li> </ul>

No.	Page	Policy/Paragraph	Change
			<p><u>Reserve, and Long Spring Wood and Hall Wood ancient woodlands, and Blakes Wood, Danbury Common, and Lingwood Common SSSIs</u></p> <p>Add additional bullet point under Historic and Natural Environment under bullet point 9 to read:</p> <ul style="list-style-type: none"> <li>• <u>Provide necessary mitigation to address the cumulative recreational pressure on SSSIs in proximity to the site</u></li> </ul> <p>Add additional bullet point under Site Infrastructure Requirements to read:</p> <ul style="list-style-type: none"> <li>• <u>Contributions towards addressing cumulative recreational pressure on SSSIs in proximity to the site</u></li> </ul> <p>Reasoned Justification Changes:</p> <p>Expand 7.376:</p> <p><u>The area to the east of Sandon Brook notated on the Policies Map for Future Recreation/SuDS/Biodiversity should, due to its location, focus on informal recreation, natural and semi-natural green infrastructure uses rather than formal sports recreation requiring floodlighting or significant servicing, or SUDS.</u></p> <p>Amend/expand 7.377:</p> <p>The development will be required to provide appropriate habitat mitigation and creation, and appropriate buffers to avoid adverse impact on the adjacent 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>Danbury Common</u>, and Lingwood Common SSSI, which lie within or immediately adjacent to the site. <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</u></p>

No.	Page	Policy/Paragraph	Change
			<p><u>provide the necessary mitigation measures for SSSIs. Any costs incurred will be covered by the developers of the site. These measures will be costed over the full lifetime of the development, i.e. in perpetuity (taken to be 80 years), rather than the plan period. Natural England must be consulted at the pre-application stage on the design of the high quality semi-natural greenspaces, to ensure that these provide an effective alternative space for recreation to the SSSIs.</u></p> <p>New para after above para:</p> <p><u>Through the provision of the Country Park and the series of green spaces throughout the development, high quality semi-natural greenspace of at least 12ha each will be provided 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 Right of Way and/or highways. The precise uses of the multifunctional green and blue infrastructure will be defined through the masterplanning process which will include delineating specific areas where wildlife and ecological networks are prioritised.</u></p>
9	225	GS11b	<p>Add additional bullet point under Historic and Natural Environment:</p> <ul style="list-style-type: none"> <li>• <u>Assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI</u></li> </ul> <p>Add new para in Reasoned Justification:</p> <p><u>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></p>
10	227	GS11c	<p>Add additional bullet point under Historic and Natural Environment:</p> <ul style="list-style-type: none"> <li>• <u>Assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI</u></li> </ul>

No.	Page	Policy/Paragraph	Change
			<p>Add new para in Reasoned Justification:</p> <p><u>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></p>
11	229	SGS13	<p>Insert 'Site Infrastructure Requirements; sub-section and add the following bullet point:</p> <ul style="list-style-type: none"> <li>• <u>Contributions towards addressing cumulative recreational pressure on SSSIs in proximity to the site</u></li> </ul> <p>Amend last sentence of 7.447 to read:</p> <p><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. Any costs incurred will be covered by the developers of the site. These measures will be costed over the full lifetime of the development, i.e. in perpetuity (taken to be 80 years), rather than the plan period.</u></p>
12	280	8.130 (Policy DM16)	<p>Expand paragraph:</p> <p>Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats unless the need for and benefits of the development in that location clearly outweigh the loss, or appropriate mitigation measures can be put in place. On Internationally Designated Sites mitigation may involve providing or contributing towards a combination of the following measures:</p> <ul style="list-style-type: none"> <li>• Access and visitor management measures within a site Improvement of existing greenspace and recreational routes</li> <li>• Provision of <u>suitable alternative natural greenspace (SANG) in accordance with Natural England SANG standards which includes 8ha/1000 new population</u></li> </ul>

No.	Page	Policy/Paragraph	Change
			<ul style="list-style-type: none"> <li>• <u>Provision of high quality semi-natural accessible greenspace in accordance with Natural England standards which includes 8ha/1000 new population</u></li> <li>• Provision of recreational routes</li> <li>• Monitoring of the impacts of new development on the site to inform the necessary mitigation requirements and future refinement of any mitigation measures</li> <li>• Insert other potential mitigation measures to address air pollution impacts e.g. emission reduction measures and on site management measures.</li> </ul>
13	280	8.131 (Policy DM16)	<p>Expand paragraph:</p> <p>The Essex Recreational disturbance Avoidance and Mitigation Strategy Document (RAMS) was adopted in 2019 and the SPD was adopted in 2020. The Essex Coast RAMS, which has the brand name Bird Aware Essex Coast, 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. The Essex Coast RAMS identifies a detailed programme of strategic avoidance and mitigation measures which are to be funded by developer contributions from all qualifying residential development within the Zones of Influence as defined in the adopted RAMS. <u>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 8.130 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.</u></p>
14	281	8.138 (Policy DM16)	<p>New text at end of paragraph:</p> <p><u>Public open space requirements or the provision of SANG(s) 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.</u></p>


### **Governance and on-going cooperation**

CCC will continue to work collaboratively with Natural England to address strategic matters that, in addition to those above, arise through the plan review process or require a resolution where there is yet to be an agreed matter. This will occur on an ongoing basis.

This SOCG will be reviewed following the Pre-Submission Local Plan consultation and ahead of submission of the plan for Independent Examination (anticipated in June 2025). The aim will be to resolve any outstanding matters where cross-boundary strategic matters will be addressed by email and/or Duty to Co-operate meetings.

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**

<b>Signed on behalf of Chelmsford City Council</b>    <b>Jeremy Potter</b> <b>Spatial Planning Services Manager</b>  <b>Date: 11.12.24</b>	<b>Signed on behalf of Natural England</b>  <i>Fiona Martin</i> <i>Senior Officer</i>  <b>Date: 11.12.2024</b>
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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.





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