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Chelmsford City Council

Chelmsford Local Plan Review: HRA Addendum August 2025





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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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