

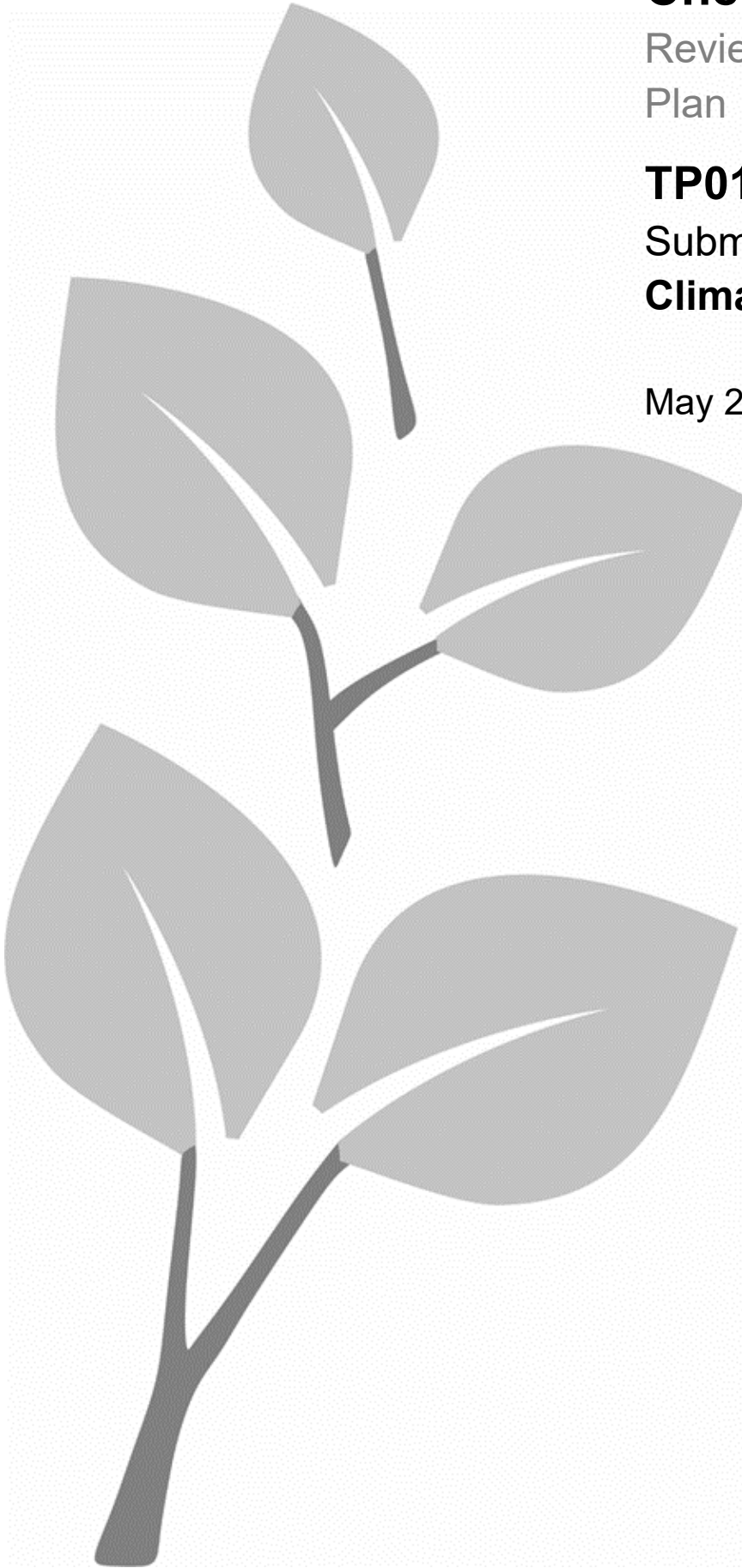
# Chelmsford Local Plan

Review of the adopted Local  
Plan

## TP011

Submission Topic Paper  
**Climate Change**

May 2026



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## 1. Purpose

- 1.1. This Topic Paper is one of a number produced by Chelmsford City Council (CCC) to provide background information and context of how the Local Plan has been formulated. This topic paper covers Climate Change and how the Local Plan will seek to provide a development strategy which seeks to support the transition to a low carbon future. It includes implementation of Section 19(1A) of the Planning and Compulsory Purchase Act, which requires the inclusion of policies that contribute to the mitigation of, and adaptation to, climate change, the Climate Change Act and the Council's Climate and Ecological Emergency Action Plan, and policy proposals to assist in combating climate change.
- 1.2. Topic papers have been refreshed and updated during Local Plan Review process to ensure the latest information/position is available. This topic paper updates the Pre-Submission Climate Change Topic Paper ahead of submission following:
  - An analysis of the Pre-Submission Local Plan consultation responses
  - Publication of the Focused Consultation Additional Sites Document and analysis of the consultation responses
  - Finalisation and updating of evidence base documents
  - Outcomes of ongoing cooperation and work to address any outstanding potential cross boundary impacts.
- 1.3. This Topic Paper also reflects suggested additional changes to the Local Plan as set out in the 'Schedule of Proposed Modifications, May 2026' (SD005). These changes do not affect the soundness of the Local Plan and are in response to comments made to the Pre-Submission Local Plan and Focused Consultation Additional Sites Document. They are also proposed to ensure that the submitted Local Plan reflects the latest position and is consistent.
- 1.4. The main issues covered by this Topic Paper are:
  - Strategic Priority 1 – Addressing the Climate and Ecological Emergency
  - Strategic Priority S2 – Addressing Climate Change and Flood Risk
  - Relevant Development Management Policies including DM31 Net Zero Carbon Development (in Operation).
- 1.5. This paper covers how climate change has been considered when preparing the Local Plan and how the Plan seeks to provide a development strategy which seeks to support the transition to a low carbon future. It includes implementation of the Climate Change Act and the Council's Climate and Ecological Emergency Action Plan, and policy proposals to assist in combating climate change.
- 1.6. This Topic Paper supersedes the Pre-Submission Climate Change Topic Paper published in February 2025 (TP003), which included versions published at Issues and Options, and Preferred Options as Appendices.

## 2. Introduction

- 2.1. The review of the adopted Chelmsford Local Plan commenced in Winter 2021 and following consultations in 2022 and 2024, the Pre-Submission (Regulation 19) version was published for consultation in Spring 2025. A further focused stage of consultation on proposed additional sites to add to the Pre-Submission (Regulation 19) Local Plan ran from late November 2025 to early January 2026. This further consultation was undertaken to ensure sufficient land for new housing and employment development is identified particularly in the first 5 years of the plan's adoption.
- 2.2. The Local Plan submitted for examination comprises the Pre-Submission (Regulation 19) Consultation Document and the Focused Consultation Additional Sites (Regulation 19) Document. If found sound following the examination, the documents will be incorporated together in a single new Local Plan before being finalised for adoption.

## 3. Background

### The Climate Change Act 2008 (as amended)

- 3.1. The Climate Change Act 2008 (CC Act 2008) sets the UK statutory target for reducing greenhouse gas emissions to at least 100% lower than 1990 levels by 2050. This is known as the 2050 UK Net Zero target.
- 3.2. As part of the duties set out in the CC Act 2008, the Government must set carbon budgets for five year periods taking into account advice from the Climate Change Committee. The latest, Sixth Carbon Budget<sup>1</sup>, sets a target of a 78% reduction in emissions by 2035. Furthermore, the most immediate net zero aligned target for the UK is the commitment made under the Paris Agreement to reduce emissions in 2030 by 68% compared to 1990 levels, this is known as the UK's Nationally Determined Contribution (NDC).
- 3.3. The Government is required to make annual reports to Parliament on the progress made towards meeting the NDC, the carbon budgets and 2050 Net Zero target, and it must report on the impact of climate change.
- 3.4. The Climate Change Committee<sup>2</sup> warned in 2022 that the UK was off target and that rapid and deep cuts to emissions must be made in all sectors. The most recent Climate Change Committee Progress Report to Parliament (July 2024)<sup>3</sup> found that urgent action is needed to get on track for the UK's 2030 target despite emissions reductions in 2023.
- 3.5. The Climate Change Committee's assessment concluded that there were only credible plans to cover a third of the emissions reductions required to achieve the 2030 target and only a quarter of those needed to meet the Sixth Carbon Budget. In particular, the Climate Change Committee found that missing or incomplete policies included those on energy efficiency in buildings.

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<sup>1</sup> Carbon Budget order 2021 - <https://www.gov.uk/guidance/carbon-budgets#setting-of-the-sixth-carbon-budget-2033-2037>

<sup>2</sup> <https://www.theccc.org.uk/wp-content/uploads/2022/06/Progress-in-reducing-emissions-2022-Report-to-Parliament.pdf>

<sup>3</sup> <https://www.theccc.org.uk/wp-content/uploads/2024/07/Progress-in-reducing-emissions-2024-Report-to-Parliament-Web.pdf>

- 3.6. It is therefore imperative that the built environment sector plays its full role in tackling climate change, and the new build sector must not delay action and add to the problem by increasing emissions unnecessarily. Evidence<sup>4</sup> prepared for Essex shows that delivering net zero energy and carbon homes and buildings now is technically feasible and financially viable.

#### The Planning & Compulsory Purchase Act 2004 (as amended)

- 3.7. Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 (P&CP Act 2004) requires that development plan documents must include policies designed to secure that development of land in the local authority's area '*contribute to the mitigation of, and adaptation to, climate change.*'
- 3.8. There is a statutory obligation on Local Plans to therefore contribute to the national climate targets set out in the Carbon Budgets and the 2050 Net Zero target.
- 3.9. The Essex Open Legal Advice <sup>5</sup>(EOLA) explains that the obligation in section 19(1A) falls both on the local planning authorities bringing forward the plans and, on the Inspectors, examining them. Given the nature of this duty, against the background of the Climate Change Act 2008 net zero obligation, local authorities have the power to bring forward local plan policies which secure the mitigation of climate change needed to contribute to meeting the NDC (nationally defined contribution), the carbon budgets and the 2050 target. This gives a firm legislative footing for local planning authorities to include in their draft local plans, and Inspectors to find sound, policies which go beyond current Building Regulations (paragraphs 66-67, EOLA May 2025).

#### Chelmsford City Council's Climate and Ecological Emergency Declaration

- 3.10. The Council declared a Climate and Ecological Emergency on 16 July 2019. Essentially this declaration represents a commitment to take appropriate action to make the Council's activities net-zero carbon by 2030. In January 2020 the Council agreed a Climate and Ecological Emergency Action Plan with an initial focus on fifteen key areas of activity. It is aimed at:
- reducing carbon emissions
  - lowering energy consumption
  - reducing waste and pollution
  - improving air quality
  - greening Chelmsford
  - increasing biodiversity
  - encouraging more sustainable travel choices.
- 3.11. Progress is being made across Essex. In Chelmsford, this includes extensive tree planting to improvements to the cycle networks, but we can do so much more and the sooner we do the

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<sup>4</sup> <https://www.essexdesignguide.co.uk/climate-change/essex-energy-carbon-evidence/>

<sup>5</sup> [essex-open-legal-advice-a-updated-may-2025-energy-policy-in-plans-and-building-regulations.pdf](#) and [addendum-to-essex-open-advices-20th-october-2025.pdf](#)

better to avoid the worst effects. The responsibility doesn't just lie with the national and local government but with parish councils, businesses, voluntary groups as well as individuals.

## 4. Policy Context

- 4.1. All policies in the Local Plan must be positively prepared, justified, effective and consistent with national policy. The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework, supported by the National Planning Practice Guidance (PPG).
- 4.2. The adopted Local Plan was examined under the 2012 NPPF. There have subsequently been updates to the NPPF and the Review of the Local Plan has been considered against the requirements of more recent national planning policy and guidance, including the December 2023 NPPF.
- 4.3. Notwithstanding the provisions set out in the P&CP Act 2004, the NPPF (December 2023) also recognises that the duties under the Climate Change Act 2008 are relevant to the planning system. It states that:

*“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.” (Para 157, NPPF December 2023)*

- 4.4. And that:

*“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures<sup>56</sup>. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts..” (Para 158 NPPF December 2023)*

*“Footnote 56: In line with the objectives and provisions of the Climate Change Act 2008.”*

- 4.5. Footnote 56 makes it clear that the proactive approach to mitigating and adapting to climate change must be in line with the objectives and provisions of the Climate Change Act 2008.
- 4.6. Whilst the Local Plan is being examined under the 2023 NPPF it is worth noting that the December 2024 NPPF introduced specific reference to the net zero target, further emphasising the requirement for plans to support the transition to net zero by 2050. The NPPF also expands the reference to climate impacts to be taken into account to cover ‘all climate impacts’ (Paragraph 161, NPPF December 2024). Energy efficiency and ‘net zero’ policies address both mitigation and adaptation and are therefore strongly supported.

- 4.7 Further detail on these key changes for consideration are set out in the table below, included under the section 'NPPF December 2023 Checklist'.

### National policy context

- 4.5. Paragraphs 001 Reference ID: 6-001-20140306 to 012 Reference ID: 6-012-20190315 of the PPG set out the relevant climate change evidence base required to support plan making and decision taking in full. The following is a summary of the points for consideration.
- 4.6. Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. To be found sound, Local Plans will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008 and co-operate to deliver strategic priorities which include climate change.
- 4.7. In addition to the statutory requirement to take the Framework into account in the preparation of Local Plans, there is a statutory duty on local planning authorities (Section 19 (1A) of the Planning & Compulsory Purchase Act 2004) to include policies in their Local Plan designed to tackle climate change and its impacts.
- 4.8. The PPG includes the following as examples of how the challenges of climate change could be addressed through a Local Plan:

Examples of mitigating climate change by reducing emissions:

- Reducing the need to travel and providing for sustainable transport
- Providing opportunities for renewable and low carbon energy technologies
- Providing opportunities for decentralised energy and heating
- Promoting low carbon design approaches to reduce energy consumption in buildings, such as passive solar design.

Examples of adapting to a changing climate:

- Considering future climate risks when allocating development sites to ensure risks are understood over the development's lifetime
- Considering the impact of and promoting design responses to flood risk and coastal change for the lifetime of the development
- Considering availability of water and water infrastructure for the lifetime of the development and design responses to promote water efficiency and protect water quality
- Promoting adaptation approaches in design policies for developments and the public realm.

- 4.9. When preparing Local Plans local planning authorities should pay particular attention to integrating adaptation and mitigation approaches and looking for 'win-win' solutions that will support sustainable development. The PPG offers examples that could achieve this:

- by maximising summer cooling through natural ventilation in buildings and avoiding solar gain;
- through district heating networks that include tri-generation (combined cooling, heat and power); or
- through the provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding and help species adapt to climate change – as well as contributing to a pleasant environment which encourages people to walk and cycle.

4.10. The PPG advises the impact of climate change needs to be taken into account in a realistic way so Local Plans should consider:

- identifying no or low cost responses to climate risks that also deliver other benefits, such as green infrastructure that improves adaptation, biodiversity and amenity
- building in flexibility to allow future adaptation if it is needed, such as setting back new development from rivers so that it does not make it harder to improve flood defences in future
- the potential vulnerability of a development to climate change risk over its whole lifetime.

4.11. The Local Plan's evidence base should include information on climate change risks, such as the Strategic Flood Risk Assessment and Water Resource Management Plan and Water Cycle Studies.

4.12. The National Planning Policy Framework December 2023 (Para 159) recognises that new development can help reduce greenhouse gas emissions such as through its location, orientation and design. It suggests that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Local requirements will need to be based on robust and credible evidence and consider viability.

4.13. It should however be recognised that the PPG was last updated in March 2019, so is out of date, with other legislation and policy statements. The PPG is yet to be updated to reflect revised Building Regulations 2021 (which have raised the baseline above Code 4), the NPPF and has not been updated to reflect the Written Ministerial Statement (WMS) 2015 being superseded by the 2023 WMS. The implications for which are discussed further below.

4.14. The Essex Open Legal Advice (EOLA) (Updated 6<sup>th</sup> May 2025 plus Addendum 20<sup>th</sup> October 2025) explains that there are two legislative routes through which local planning authorities can choose to act when setting policies that mitigate and adapt to climate change, including setting energy efficiency standards that are better than the national baseline. These are Section 19(1A) of the Planning & Compulsory Purchase Act 2004 (PCPA 2004) as referred to above, and Section 1 of the Planning and Energy Act 2008 (PEA 2008).

4.15. Section 1 of the PEA 2008 provides that:

- (1) A Local planning authority in England may in their development plan documents, ....., include policies imposing reasonable requirements for –*
- (a) A proportion of energy used in development in their area to be energy from renewable sources in the locality of the development;*

- (b) *A proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development;*
- (c) *Development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations.*

(4) *The power conferred by subsection (1) has effect subject to subsections (5) to (7) and to*

–

*(a) section 19 of the Planning and Compulsory Purchase Act 2004 (c.5), in the case of a local planning authority in England;*

*(5) Policies included in development plan documents by virtue of subsection (1) must not be inconsistent with relevant national policies in England.”<sup>6</sup>*

- 4.16. As explained in paragraph 90 (Essex Open Legal Advice 6th May 2025) and Para 13 (Addendum, 20<sup>th</sup> October 2025) the PEA 2008 confirms that local planning authorities (LPAs) can bring forward policies that go beyond current Building Regulations standards, and confirms one way in which LPAs’ pre-existing powers can be exercised: it supports authorities bringing forward policies using energy efficiency standards set out or endorsed in national policies or guidance (such as those focused on reducing regulated carbon emissions and any energy efficiency standard recognised as part of an assessment of whole life energy costs or whole life-cycle carbon assessments) that go beyond current Building Regulations standards.
- 4.17. The EOLA goes on to confirm that “The PEA 2008 is not the only power on which LPAs can rely, nor does it circumscribe other powers or foreclose other legislative routes by which LPAs are obliged or empowered to act (such as those inserted into the PCPA 2004 by the Planning Act 2008). Quite the opposite, as the debate at the time the PEA 2008 was put into place shows, it was always recognised that climate-related legislative amendments might result in provisions providing such powers.” (paragraph 91, EOLA, May 2025).
- 4.18. The February 2024 EOLA<sup>7</sup> clearly analysed why the Deregulation Act 2015 and the now superseded 2015 WMS did not undermine local planning authorities’ powers to set energy efficiency standards at a local level which go beyond national Building Regulation standards.
- 4.19. The current Essex Open Legal Advice<sup>8</sup> (updated 6<sup>th</sup> May 2025, plus Addendum 20<sup>th</sup> October 2025<sup>9</sup>) addresses the 2023 WMS and sets out the robust legal justification as to why the 2023 WMS does not undermine LPA powers. As part of this, the May 2025 EOLA highlights nine case studies which illustrate that a range of LPAs have successfully included energy efficiency and/or other emissions reduction requirements beyond those of the Building Regulations in development plan documents which have passed examination. The October 2025 EOLA Addendum highlights a further two examples, including Uttlesford in Essex. In paragraphs 114 – 115 the Essex Open Legal Advice (6<sup>th</sup> May 2025) concludes that:

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<sup>6</sup> Planning and Energy Act 2008 [Planning and Energy Act 2008 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

<sup>7</sup> Para 50 to 60 [Essex Open Legal Advice – Energy Policy and Building Regulations | Essex Design Guide](#)

<sup>8</sup> Para 92 to 115 - Essex Open Legal Advice (Updated 6th May 2025) [Essex Open Legal Advice – Energy Policy and Building Regulations | Essex Design Guide](#)

<sup>9</sup> [addendum-to-essex-open-advices-20th-october-2025.pdf](#)

*“The PEA 2008 confirms one way in which LPAs’ pre-existing powers can be exercised to set higher targets for energy performance standards for development in their area than the national baseline. There are other legislative routes by which LPAs have different or more ambitious powers, such as the general power flowing from the duty in section 19(1A) of the PCPA 2004, that development plan documents must, taken as a whole, “include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.”*

*This position has not been changed by the 2023 WMS. The correct position in law is that LPAs and Inspectors have to treat the trenchant language in which the 2023 WMS is written with circumspection. LPAs and planning inspectors cannot lawfully interpret the 2023 WMS in a way that removes or frustrates the effective operation of the power that LPAs still have, via sections 1-5 of the PEA 2008. Nor can it be read to remove or frustrate section 19(1A) of the 2004 Act. Nor can the 2023 WMS be treated as though it is a legal rule. This means that the 2023 WMS cannot be interpreted to prevent LPAs from putting forward, and planning inspectors from finding sound, policies which are justified and evidenced and which use metrics other than the TER metric and/or do not require calculation by SAP, such as the Essex net zero evidence base and model policy. Additionally, local decision-makers are also free to rely on local or exceptional circumstances to depart from the 2023 WMS.”*

- 4.20. The legal advice is very clear that LPAs have statutory authority to set energy efficiency targets that exceed the baseline in national Building Regulations and there is also no restriction on how the policy is expressed, including the metrics used in a policy and how these are calculated. The key matter is that LPAs remain under the strong statutory duty in section 19(1A) of the PCPA 2004 to ensure their development plan documents include policies designed to secure that development mitigates climate change impacts. This is amplified by the requirements in the NPPF that plans must take a proactive approach to mitigating and adapting to climate change and plan making must support the transition to net zero by 2050, including through securing radical reductions in greenhouse gas emissions (Para 143, EOLA 6<sup>th</sup> May 2025).
- 4.21. Therefore, it is entirely reasonable and legally justified to progress the evidence-led energy metrics policy approach to achieving net zero energy and carbon homes and buildings in Greater Essex, including Chelmsford. This approach also aligns with local and national climate targets and delivers wider benefits to communities.
- 4.22. All relevant national planning policy and guidance have been considered in the Local Plan.

## Local Policy context

### Current policy

- 4.23. The adopted Local Plan includes a variety of policies which seek to support the transition to a low carbon future. However, it does not include a specific strategic priority to address this issue and it is not specifically covered within the ‘Vision’. It is, however, a thread which runs through the adopted Plan in the following ways:
- **Strategic Policy S1 (Spatial Principles)** – includes a requirement to locate development to avoid or manage flood risk

- **Strategic Policy S2 (Addressing climate change and flood risk)** - encourages development to provide opportunities for green infrastructure and new habitat creation. Requires all development to have appropriate flood mitigation measures in place
- **Site allocation policies** – where relevant, require developments to provide conserve and enhance nearby designations such as Local Wildlife Sites, create a net gain in biodiversity, habitat mitigation and enhancement/protection, ensure appropriate surface water management and SUDs are provided, improved GI network, including tree planting/protection. enhanced and additional sustainable modes of transport (cycle, pedestrian, public transport, car clubs), all of which contribute to a transition to a low carbon future
- **Development Management Policies** – **DM18** requires all development to be safe from flooding. Major development is required to incorporate appropriate water management measures to reduce surface water run-off and volumes as far as is reasonably practical. **DM19** supports the provision of renewable and low carbon energy development subject to relevant criteria being met. **DM23** seeks to ensure all development is built to a high quality. This includes minimising the use of natural resources. **DM25** sets out the expectation for all new buildings to meet specific sustainability criteria, including water efficiency criteria, EV charging points and build criteria for non-residential buildings. **DM30** deals with contamination and pollution and seeks to ensure developments in or adjacent to an Air Quality Management Area, or where an air quality impact assessment has been provided, that appropriate mitigation is put in place so the development will not have an unacceptable impact on air quality and the health and wellbeing of people.

4.24. The adopted [Making Places Supplementary Planning Document](#) (SPD) and its [Self Build and Custom Design Code Template](#) (January 2021) seek to promote and secure high-quality sustainable new development. It is aimed at all forms of development, from large strategic developments, public spaces and places, to small extensions to individual homes. It sets out detailed guidance for the implementation of the policy requirements set out in the adopted Local Plan and provides practical advice to help with schemes from single house extensions to strategic sites and their masterplans. It also provides good practice examples on how development can go beyond planning policy requirements to create the most sustainable and environmentally friendly development possible.

4.25. The SPD offers further detailed guidance on principles to consider in respect of sustainable design and construction. It covers ways to reduce water consumption, BREEAM, reducing carbon dioxide and nitrogen emissions, and recycling and waste requirements. Following this guidance will help to secure high quality, well designed sustainable development, future proof new development to allow for fast changing technology and building standards, as well as reduce the use of non-renewable resources and carbon emissions from new buildings. It will also ensure appropriate recycling and waste requirements are provided to all developments.

4.26. The Council consulted on an updated draft Planning Obligations Supplementary Planning Document alongside the Pre-Submission (Regulation 19) Local Plan Document. This SPD was revised to reflect changes to national planning policy guidance, proposed modifications

to the Local Plan and new local strategies and policy guidance. It refers to the latest published Infrastructure Delivery Plan which sets out what infrastructure is required to support the Local Plan. Representations on the Draft Planning Obligations SPD were reviewed at Chelmsford Policy Board in January 2026 and modifications to the document incorporated in the revised evidence base document ([INF011 Planning Obligations Supplementary Planning Documents \(January 2026\)](#)).

- 4.27. Of relevance to this topic is the need for possible Section 106 Planning contributions towards flood protection and water management, active and sustainable transport modes, as well as Environmental Mitigation measures, which include tree and new woodland planting to assist in the challenge to tackle climate change. The SPD also seeks to secure net-zero carbon homes in accordance with Policy DM31.
- 4.28. The Council also has an adopted [Solar Farm Development SPD](#). This SPD gives guidance on how to prepare and submit planning proposals for solar farms, and how we assess them. It considers and applies advice from a number of sources, including the requirements of National Planning Policy and Guidance, local planning policies and other relevant strategies, including the Essex Desing Guide – Solar Farm Guiding Principles.
- 4.29. Collectively these seek to mitigate and adapt development to assist in meeting the climate change challenge.
- 4.30. In addition to changes in national planning policy and guidance, the review of the adopted Local Plan has considered the achievability and effectiveness of climate change policies in decision making in the adopted Local Plan (2020), as well as new corporate priorities and strategies of the Council and other relevant plans and guidance. In addition to the Local Plan, there are a number of other local and regional strategies or guidance that inform this topic area.
- 4.31. [Our Chelmsford: Our Plan](#) sets out the Council's priorities which will improve the lives of residents. There are four themes; a fairer and inclusive Chelmsford; a safer and greener place; healthy, active and enjoyable lives and connected Chelmsford. Strategy priorities include to lower energy consumption, carbon and greenhouse gas emissions, and creating a more sustainable approach to growth, development and everyday living.
- 4.32. The City Council declared a [Climate and Ecological Emergency](#) on 16 July 2019. Essentially this Declaration represents a commitment to take appropriate action to make the Council's activities net-zero carbon by 2030.
- 4.33. In January 2020 a [Climate and Ecological Emergency Action Plan](#) with an initial focus on fifteen key areas of activity was agreed by the Council. It is aimed at:
- reducing carbon emissions
  - lowering energy consumption
  - reducing waste and pollution
  - improving air quality
  - greening Chelmsford
  - increasing biodiversity

- encouraging more sustainable travel choices.

- 4.34. The Essex Climate Action Commission (ECAC) was formed in 2020. It is an independent, voluntary, cross-party body. The [Net Zero: Making Essex Carbon Neutral \(Essex Climate Action Commission, July 2021\)](#) report sets out key steps for how to reach zero carbon by 2050 and recommendations within six core themes; land use and green infrastructure, energy, built environment, transport, waste and community engagement. The ECAC recommendations were endorsed by Essex County Council (ECC) in November 2021 and form the basis of the [Essex Climate Action Plan \(2021 – 2025\)](#) and inform emerging ECC policies and strategies. ECC has been recognised as a global leader in climate action, securing a top-level 'A' rating from the CDP (formerly Carbon Disclosure Project) for four consecutive years (2022-2025).
- 4.35. The [South East Inshore Marine Management Plan](#) also forms part of the Statutory Development Plan. It has been adopted since the adoption of the Chelmsford Local Plan. This includes policies to help enhance and protect the marine environment and achieve sustainable economic growth while respecting local communities both within and adjacent to the marine plan area, which includes the coast within Chelmsford's administrative area.
- 4.36. Local Cycling and Walking Infrastructure Plans (LCWIPs), as set out in the Government's Cycling and Walking Investment Strategy, are a strategic approach to identifying potential cycling and walking improvements required and agreed at the local level. The [Chelmsford Local Cycling and Walking Infrastructure Plan](#) was published in September 2024 and an [Essex Wide LCWIP](#) in August 2025. The Essex Wide LCWIP considers cross boundary corridors to ensure separate related LCWIPs are aligned to ensure connectivity between more rural areas and connecting cities and towns across the whole of Essex. New development should look to either provide contributions to deliver sections of these routes if they are in the vicinity, or provide active travel connections to them. As well as assisting in providing better accessibility these will help to reduce the need for motorised transportation on the roads, helping to reduce emissions. Work is progressing to prioritise schemes for development along the new cycling and walking routes and to continue to explore and apply for as many funding opportunities as possible to enable new schemes to come forward for development.
- 4.37. The Essex [Minerals Local Plan](#) and [Waste Local Plan](#) set out further detailed policies and guidance regarding the re-use and recycling of materials on sites. The Minerals Local Plan is undergoing a review to take the plan period to 2040 and was subject to public consultation in February/March and re-run May/June 2024 to take into account an omitted site. A further Regulation 18 consultation will be undertaken in Summer 2026 on a Preferred Approach. Proposed Policy S3 - Climate Change requires minerals development (including extensions to existing sites) to incorporate effective measures to minimise greenhouse gas emissions in line with local and national climate targets, and to ensure effective adaptation and resilience to future climatic changes, for the lifetime of the development (including restoration and aftercare) through the submission of a Climate Change Statement. The Chelmsford Local Plan identifies those site allocations where a mineral resource assessment will be required in order to prevent the sterilisation of mineral resources, and where possible it will be required to use any extracted mineral on site thereby minimising travel movements.

## Co-operation with Key Stakeholders

- 4.38. The Council is committed to co-operating with other bodies on strategic planning matters. The Duty to Co-operate Strategy was reviewed and adopted in January 2022.
- 4.39. The Duty to Co-operate (DtC) was introduced through the Localism Act 2011, and until recently set out in the [2024 National Planning Policy Framework \(NPPF\)](#) (from Paragraph 24). However, this formal duty was removed from 25 March 2026 following introduction of the [Levelling-up and Regeneration Act 2023 \(Commencement No. 11 and Saving and Transitional Provisions\) Regulations 2026](#).
- 4.40. The Council has made every effort to seek co-operation on cross-boundary and strategic planning matters in a focused, positive and structured way throughout the plan-making process. These discussions have helped to formulate the Local Plan, and we will continue to engage positively with key stakeholders as the Plan progresses through its examination and on its implementation once adopted. Evidence of engagement work carried out is set out in Statements of Common Ground and the Statement of Cooperation (SD004) (Available online via [Local Plan Review](#)).
- 4.41. The strategic matters for the Review of the Adopted Local Plan are identified as follows:
- Delivering homes for all including Gypsy and Traveller and Travelling Showpeople accommodation
  - Jobs and economy including green employment and regeneration
  - Retail, leisure, and cultural development
  - Sustainable transport, highways and active travel
  - Climate change action and mitigation including flood risk and zero carbon
  - Natural and historic environment including increased biodiversity and green/blue/wild spaces and connectivity of ecological networks
  - Community infrastructure including education, health and community facilities
  - Utility infrastructure including communications, waste, water and energy
  - London Stansted Airport future airspace redesign.
- 4.42. The following issues raised by key bodies have been taken into account in formulating the policy approach towards Climate Change in the Local Plan.
- 4.43. We have approached other LPAs, the Lead Local Flood Authority (LLFA) and the Environment Agency for relevant information to support our Strategic Flood Risk Assessment (SFRA) update. The [SFRA \(Level 1\)](#) and [SFRA \(Level 2\)](#) provide comprehensive and robust evidence base on flood risk issues to support the review and update of the Chelmsford Local Plan and associated Planning Policy documents using the best available information. Since the original SFRA Level 2 was published, some site tables and maps for relevant sites in the Focused Consultation Additional Sites (Regulation 19) Document have also been published. A [Level 2 SFRA Addendum](#) was published in October 2025 in response to new data from the Environment Agency. This information can be used to inform decisions on the location of future development and the preparation of sustainable policies for the long-term management of flood risk.

- 4.44. The Environment Agency has fully engaged with the Council on the development of the Council's SFRA. This has led to several wording changes for example in relation to the application of the Sequential and Exception Test. The references to Chelmsford Flood Alleviation scheme in the SFRA Level 1 has been updated with references to the revised project. This will comprise multiple interventions including natural flood management measures, on-line storage, and flood defences. The LLFA has also engaged with the Council and provided comments to the SFRA Level 1 report which led to some changes e.g. regarding guidance about runoff rates and the incorporation of updated references to SuDS guidance documents.
- 4.45. We have engaged with Essex County Council on a new 'model policy' relating to embodied carbon emissions from new development. However, the Policy and its supporting evidence base, were not available at an appropriate time to test and include as an additional policy in the Local Plan.
- 4.46. Minor additions are proposed in the Schedule of Proposed Modifications to respond to representation made by the Environment Agency and Essex County Council in respect of the Climate Change policies within the Plan. These generally cover additional references to further guidance to assist developers in providing suitable SuDS, other flood resilience measures, land contamination remediation. Agreement to these proposed modifications are set out in the following Statements of Common Ground:
- Statement of Common Ground with the Environment Agency (SOCG018)
  - Statement of Common Ground with Essex County Council (SOCG021)

## Integrated Impact Assessment (IIA)

- 4.47. The Council has carried out an ongoing Integrated Impact Assessment (IIA) as the Local Plan has developed. The IIA assesses the following aspects of sustainable development:
- Sustainability Appraisal (SA)
  - Strategic Environmental Assessment (SEA)
  - Habitats Regulations Assessment (HRA)
  - Health Impact Assessment (HIA)
  - Equality Impact Assessment (EqIA).
- 4.48. The SA, SEA and HRA are a requirement of national policy. The HIA and EqIA are voluntary, but the Council believes they will help to provide a complete picture of the sustainability of the Review of the Local Plan.

## Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)

- 4.49. The IIA identifies the key sustainability issues for the Review of the Local Plan, which feed into a framework of 14 objectives against which proposals are assessed. It covers the

potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives. It has been used at each stage of the Review, and been subject to separate consultation, as follows:

- Scoping Report – Spring 2022
- Issues and Options – Summer/Autumn 2022
- Preferred Options – Spring 2024
- Pre-Submission – Spring 2025
- Additional Sites – Winter 2025.

4.50. The key sustainability issues and Appraisal Framework Objectives relating to this Topic Paper are:

Appraisal Framework Objective	Key Sustainability Issue
<b>4. Sustainable Living and Revitalisation: To promote urban renaissance and support the vitality of rural centres, tackle deprivation and promote sustainable living</b>	Population Human Health
<b>8. Water: To conserve and enhance water quality and resources</b>	Water
<b>9. Flood Risk: To reduce the risk of flooding to people and property, taking into account the effects of climate change</b>	Climatic Factors Water
<b>10. Air: To improve air quality</b>	Air Human health Biodiversity, Fauna and Flora
<b>11. Climate Change: To minimise greenhouse gas emissions and adapt to the effects of climate change</b>	Climatic Factors
<b>12. Waste and Natural Resources: To promote the waste hierarchy (reduce, reuse, recycle, recover) and ensure the sustainable use of natural resources</b>	Material Assets

4.51. The main IIA report for the Local Plan is the Pre-Submission IIA (January 2025), which:

- provides baseline information for the key sustainability issues
- sets out the assessment framework and methodology
- contains the detailed assessment of the Local Plan requirements, allocations and policies
- sets out an assessment of alternatives
- reviews cumulative effects.

4.52. This was supplemented for the Additional Sites consultation with an IIA Addendum (November 2025), focusing on the proposed changes including the allocation of new and enlarged sites, and consequential amendments to Strategic Policies S6 and S7.

4.53. The two documents should be read together to provide full assessment outcomes for the Local Plan. However, it should be noted that in specific areas the figures quoted in the Pre-

Submission IIA will have been superseded by those in the IIA Addendum, such as the increased requirements for housing and employment development.

- 4.54. Chapter 7 of the Pre-Submission IIA presents the appraisal of the cumulative effects of the Pre-Submission Local Plan. The appraisal (Table 7.1) highlights that the majority of the IIA objectives will experience positive effects as a result of the implementation of the policies and proposals contained in the Pre-Submission Local Plan.
- 4.55. Chapter 8 of the Pre-Submission IIA sets out significant positive effects of the Local Plan on housing, economy, health and well-being and townscape enhancement.
- 4.56. In terms of housing, development proposals are careful to ensure that homes, jobs and infrastructure are delivered in a co-ordinated fashion to help limit excess in or out commuting and ensure a degree of self-containment.
- 4.57. In terms of employment, the Local Plan will support economic growth across Chelmsford, delivering jobs and supporting regeneration and investment, with the potential to deliver benefits across a number of IIA objectives.
- 4.58. Mixed positive and negative effects are indicated for biodiversity, cultural heritage, flood risk, land use and resource use, with some uncertainty in respect of air quality and climate change. Water resource use is an issue, reflecting regional and local supply deficits. The negative (and uncertain) effects such as the permanent loss of greenfield land to development will need to be balanced with opportunities for green infrastructure provision and biodiversity enhancement. These likely effects have been considered in the Local Plan policies.
- 4.59. Overall, the Pre-Submission IIA report notes that the Local Plan was assessed as having a cumulative significant positive effect on Sustainable Living and Revitalisation (IIA Objective 4).
- 4.60. In relation to Water (IIA Objective 8) the Plan has been assessed as having a cumulative mixed positive and negative effect. However, it is noted in the Pre-Submission IIA that any anticipated potential effects on water from development could be lessened through the application of the proposed Local Plan policies and through mitigation measures agreed at the individual planning application stage.
- 4.61. In addition, the policies of the Plan promote sustainable design (which is expected to help minimise the consumption of water at new developments), seek to protect existing utilities infrastructure and will help ensure that there is sufficient infrastructure capacity to accommodate growth. Hanningfield Reservoir Treatment Works, a major site containing water treatment facilities, is also designated as a Special Policy Area. Through these provisions, the Local Plan is expected to help lessen the adverse effects of development on water resources.
- 4.62. In relation to Flood Risk (IIA Objective 9) the Pre-Submission IIA notes that a number of proposed site allocations are located partially within areas of flood risk. However, the policies of the Local Plan seek to minimise flood risk and ensure that development does not give rise

to flood risk elsewhere, in accordance with a sequential, risk-based approach. In particular, Policy S9 (Infrastructure Requirements) stipulates that planning permissions for all types of development will only be granted where it can be demonstrated that the site is safe from all types of flooding and it does not worsen flood risk elsewhere. In addition, all major development, through Strategic Growth Site and Growth Site Policies, will be required to incorporate water management measures to reduce surface water run-off and ensure that it does not increase flood risk elsewhere. In consequence, it is anticipated that the potential for significant adverse effects on flood risk will be reduced. Through the Plan's emphasis on green infrastructure provision there may also be opportunities to enhance flood storage and reduce surface water run-off. Overall, the Local Plan has been assessed as having a cumulative mixed positive and negative effect on IIA Objective 9.

- 4.63. In relation to Air (IIA Objective 10) growth over the plan period will result in increased emissions to air during both the construction of new development and once development is complete. However, the concentration of new residential and employment development in and adjacent to urban areas, the promotion of strategic mixed use sustainable urban extensions that reflect Garden Community principles and the delivery of strategic improvements to the walking/cycling network (including through the Green Wedge) are all likely to reduce the need to travel by car and associated emissions to air. Investment in transportation infrastructure may also help to address air quality issues.
- 4.64. Policy DM30 (Contamination and Pollution) of the Local Plan stipulates that for developments where an air quality impact assessment has been provided, permission will only be granted where the Council is satisfied that (after selection of appropriate mitigation) the development will not have an unacceptable significant impact on air quality, health and wellbeing. Overall, the Local Plan has been assessed as having a cumulative mixed positive and negative effect on IIA Objective 10.
- 4.65. In relation to Climate Change (IIA Objective 11) the Pre-Submission IIA notes that new development will result in increased energy use and associated greenhouse gas emissions. However, the concentration of new residential and employment development in and adjacent to urban areas, the promotion of strategic mixed use sustainable urban extensions that reflect Garden Community principles and the delivery of strategic improvements to the walking/cycling network (including through the Green Wedge) are all likely to reduce the need to travel by car and associated emissions of greenhouse gases.
- 4.66. The Local Plan also provides a strong policy framework that seeks to minimise energy use and greenhouse gas emissions and promote climate change adaptation through the siting and design of development. Policy DM31 (Net Zero Carbon Development) sets out standards expected of new development to ensure that wider aspirations for zero carbon targets are met over the longer term. Overall, the Local Plan has been assessed as having a cumulative mixed positive and negative effect on objective 11.
- 4.67. Regarding Waste and Natural Resources (IIA Objective 12) the Pre-Submission IIA notes that the construction of new development will require raw materials (such as aggregates, steel and timber) which may place pressure on local mineral assets. However, the volume of materials required is not expected to be significant (in a regional or national context). Further, it is anticipated that there would be opportunities to utilise recycled and sustainably

sourced construction materials as part of new developments and in this regard, the policies contained in the Local Plan promote the sustainable use of natural resources. Growth will also generate waste, although it is anticipated that a proportion of arisings would be reused or recycled.

4.68. Several of the proposed site allocations are located within Minerals Safeguarding Areas and in consequence, there is the potential for significant negative effects on this objective due to sterilisation of the mineral resource. However, it is anticipated that the policies of the Local Plan will help to avoid significant adverse impacts in some cases (through the requirements for Minerals Resource Assessment). On balance, the Local Plan has been assessed as having a cumulative mixed positive and negative effect on IIA Objective 12, although some uncertainty remains.

4.69. Section 5 and Appendix H of the Pre-Submission IIA Report assesses Local Plan policies. Findings in relation to IIA Objectives 4 (Sustainable Living and Revitalisation), 8 (Water), 9 (Flood Risk and Coastal Erosion), 10 (Air), 11 (Climate Change), and 12 (Waste and Natural Resources) include:

- Overall, the Spatial Principles, Policy S1, and Strategic Policies S2-S5 and S14-S15 have a significant positive effect on all six objectives
- The Spatial Strategy is likely to have a mixed significant positive and negative effect on objective 4, and a mixed positive and negative effect on objective 8, 9, and 10, with a positive effect on objective 11
- Policy DM17 (Trees, Woodland and Landscape Features) has been assessed as having a significant positive effect on objective 4, and a positive effect on objectives 8, 9, 10, and 11
- Policy DM25 (Sustainable Buildings) has been assessed as having a neutral effect on objective 4, 9, a significant positive effect on objective 8, 11 and 12, and a positive effect on objective 10
- Policy DM31 (Net Zero Carbon Development (in Operation)) has been assessed as having a significant positive effect on objective 4, 11 and 12, and neutral effect on objective 8, 9, and a positive effect on objective 10.

4.70. The following table summarises the IIA findings (Paragraph 8.8 of the Pre-Submission IIA) and the Council's response including how the IIA has informed the Local Plan.

<b>IIA Recommendation</b>	<b>CCC Comment/Action</b>
Consider fuller cross referencing to key development management policies	Any application should comply with all relevant policies of the Local Plan
Demonstrate how the spatial principles and policies will contribute to the declared climate and ecological emergency, focus on health and wellbeing, and secure the enhancement and extension of the City's Green Infrastructure Resource	Text amended to incorporate this in Section 4 (Our Vision and Spatial Strategies) and Section 8 (Protecting and Securing Important Assets)
Include reference to how the aspirations of Strategic Policy S14 Health and Wellbeing will be measured	Covered within the Monitoring Framework, and in Section 5 (Creating Sustainable Development)

<b>IIA Recommendation</b>	<b>CCC Comment/Action</b>
Ensure that there is a direct link between Implementation of 10% Biodiversity Net Gain requirement and progress to responding to the biodiversity emergency	Text amended to incorporate this in Strategic Policy S4
Ensure that the long-term management of existing and new habitats is in place	Covered within text relating to the Green Infrastructure Strategic Plan including Strategic Policy S1, and stewardship requirements for Garden Communities (Strategic Growth Site Policies 6 and 16a)
A need to work collaboratively with partners to implement and monitor Policy DM31 Net Zero Carbon Development (In Operation)	CCC is working collaboratively with ECC as implementation lead and other partners
Identify measures to address the effects of inconsistent delivery on specific sites (especially on large extensions)	Covered within the development trajectory and monitoring. Text amended for clarity in Section 6 (How will future development growth be accommodated?)
Make reference to the aspiration for regeneration schemes to benefit existing residents	This principle is central to Strategic Growth Site 1cc Andrews Place, and will be considered for other sites where applicable
Suggest monitoring the degree of self-containment in large extensions so that residents and vulnerable groups are not disadvantaged in access to basic services	Will be addressed through the masterplanning process and S106 agreements
Address the requirements for site developers in respect of sustainable design and construction, including a Construction Environmental Management Plan (CEMP)	Text amended to incorporate this in Section 9 (Making High Quality Places)
Monitor the balance between housing and jobs provision to maintain a balance between in and out commuting, for long term sustainability	Current allocations aim to achieve this balance
Work with public and private sector partners to facilitate behavioural change in matters such as travel choices, attitudes to health and well-being, water use and recycling patterns.	This is a focus for spatial planning, including engagement activity with partners, and having regard to external strategies and guidance, such as the Essex Design Guide (2018), Essex Local Transport Plan (2011) and its successor LTP4, Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy 2018-2038, Chelmsford Surface Water Management Plan (2014), Make Space for Girls 2025-2028

4.71. The proposed additional sites have been assessed through the IIA Addendum and the findings are presented in Appendix C of the Addendum, which have in-turn been informed by the RAG scores for the sites presented in Appendix D and the RAG scores presented in Appendix M of the Pre-Submission IIA.

4.72. The IIA Addendum concludes that proposed new and expanded sites do not change the overall earlier assessment of cumulative effects in IIA terms, reflecting the fact that they are part of the existing spatial strategy. In addition, both individually and collectively, they are not

of a scale to affect specific aspects of the plan (for example in respect of biodiversity or resource use).

- 4.73. The proposed amendments to Strategic Policies S6 and S7 are considered to be minor in nature (see Additional Sites (Regulation 19) Document) and reflect the need to adjust the approach to short-term housing delivery. Consequently, no changes to the assessment presented in the Pre-Submission IIA have been identified.

### Habitats Regulations Assessment (HRA)

- 4.74. Overall, the HRA has concluded that most aspects of the Local Plan will have no significant effects on any European sites, alone or in combination due to the absence of effect pathways.
- 4.75. Appropriate assessments have been undertaken for 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), taking into account specific and cross-cutting policy-based mitigation and avoidance measures that have been incorporated into the plan. These appropriate assessments have employed additional analyses and data to resolve uncertainties present at the initial screening, and have concluded that (as currently drafted) the Local Plan will have no adverse effects on the integrity of any European sites, alone or in combination.
- 4.76. The HRA Report Addendum (as part of the IIA) considered the proposed changes in the Additional Sites Document. The Addendum found that the proposed changes to the Local Plan do not affect the findings of the earlier HRA work and that the position remains that the Local Plan will not have adverse effects on any European sites either alone or in combination.

### Equality Impact Assessment (EqIA)

- 4.77. The EqIA results suggest that policies will help to secure development that will contribute to a range of positive effects across the topics considered in the EqIA (notably in relation to housing, service, employment and greenspace provision).
- 4.78. The proposed changes in the Additional Sites Consultation are not considered to require any changes to be made to the EqIA. This reflects the proposed continuation of the existing spatial strategy which was found to have beneficial effects in respect of EqIA, as well as the limited scale of the proposed allocations (comprising small scale site extensions and new sites) which neither individually nor together will influence the findings of these assessments.

### Health Impact Assessment (HIA)

- 4.79. The HIA results suggest that Local Plan policies will help to secure development that will contribute to a range of positive effects across the topics considered in the HIA.
- 4.80. The proposed changes in the Additional Sites Consultation are not considered to require any changes to be made to the HIA. This reflects the proposed continuation of the existing

spatial strategy which was found to have beneficial effects in respect of HIA, as well as the limited scale of the proposed allocations (comprising small scale site extensions and new sites) which neither individually nor together will influence the findings of these assessments.

## Evidence base

- 4.81. In accordance with the requirements of the NPPF, policies and their requirements should be based on up-to-date evidence.
- 4.82. In addition to the IIA, the following documents are of particular relevance to Climate Change and support the Review of the Local Plan. Evidence base documents are available online via [Local Plan Review](#).

Document	Summary
<p><b>Integrated Impact Assessment</b>  <a href="#">IIA001 Integrated Impact Assessment Scoping Report 2022</a></p> <p><a href="#">IIA002: Integrated Impact Assessment Issues and Options 2022</a></p> <p><a href="#">IIA004: Integrated Impact Assessment Feedback Report Issues and Options 2023</a></p> <p><a href="#">IIA005: Integrated Impact Assessment Preferred Options (May 2024)</a></p> <p><a href="#">IIA006: Integrated Impact Assessment Preferred Options Feedback Report 2024</a></p> <p><a href="#">IIA007: Integrated Impact Assessment Pre-Submission 2024</a></p> <p><a href="#">IIA009: Integrated Impact Assessment Pre-Submission Feedback Report</a></p> <p><a href="#">IIA010: Integrated Impact Assessment (IIA): Focused Consultation Additional Sites (Regulation 19) Addendum</a></p> <p><a href="#">IIA012: Chelmsford HRA Addendum August 2025</a></p> <p><a href="#">IIA013: Integrated Impact Assessment: Additional Sites (Regulation 19) Addendum Feedback Report</a></p>	<p>The Integrated Impact Assessment (IIA) brings together a Sustainability Appraisal (SA), a Strategic Environmental Assessment (SEA), a Health Impact Assessment (HIA), an Equalities Impact Assessment (EqIA) and a Habitats Regulations Assessment (HRA) to assess the socio-economic and environmental effects of the Local Plan. The first stage involved consultation on a Scoping Report on the proposed approach to the assessment of the Local Plan. The Issues and Options, Preferred Options, Pre-Submission and Additional Sites stages of the Local Plan were accompanied by IIA Reports. The findings of the IIA Reports, together with consultation responses published in Feedback Reports, were used to help refine further Local Plan stages.</p>

Document	Summary
<p><b>Regulation 22 Consultation Statement</b> SD003: Regulation 22 Consultation Statement (Available online via <a href="#">Local Plan Review</a>)</p>	<p>This statement details how the community and stakeholders were consulted during the process of preparing the Review of the Local Plan. It details who was consulted and when this happened, the main issues raised in the responses and how these have been considered.</p>
<p><b>PAS Toolkits:</b> <a href="#">OSP001 Toolkit Part 1 - Local Plan Review Assessment</a></p> <p>OSP011 Toolkit Part 2 - Submission Local Plan Form and Contents Checklist (Available online via <a href="#">Local Plan Review</a>)</p> <p>OSP012 Toolkit Part 3 - Submission Local Plan Process Requirements Checklist (Available online via <a href="#">Local Plan Review</a>)</p> <p>OSP013 Toolkit Part 4 - Submission Local Plan Soundness Quality Assessment (Available online via <a href="#">Local Plan Review</a>)</p>	<p>The Planning Advisory Service (PAS) produces a number of Toolkits to assist Local Authorities in the review of their Local Plans.</p> <p>This suite of documents have been considered through the preparation of the Local Plan to help understand which policies require updating against the 2023 NPPF, that the correct process has been followed in undertaking the review, and that the Plan being submitted for Examination is sound.</p>
<p><b>Strategic Flood Risk Assessment</b> <a href="#">CC001 Strategic Flood Risk Assessment 2024 (Level 1)</a></p> <p><a href="#">CC010 Chelmsford Level 2 Strategic Flood Risk Assessment (SFRA) May 2024</a> (Updated October 2025)</p> <p><a href="#">CC018 Additional Sites – Level 2 Strategic Flood Risk Assessment Addendum (October 2025)</a></p>	<p>Provides a comprehensive and robust evidence based on flood risk issues to support the plan review. It assesses land promoted for potential development, changes to the proposed development sites within the city, and changes in national planning policy and guidance. It also builds on identified risks from the Level 1 assessment for proposed development sites, to provide a greater understanding of fluvial, surface water, groundwater, and reservoir related flooding risks for sites most at risk.</p> <p>The new and updated information has been used to inform decisions on the location of future development and flood risk policies, reflecting the implications of the August 2022 changes to the Planning Practice Guidance. They have also informed site allocation boundaries on the Policies Map for the Pre-Submission Local Plan, the Additional Site boundaries and the Sequential and Exception Test Focused Update.</p> <p>The National Flood Risk Assessment was released in 2025 and maps flood risk from fluvial, tidal and surface water sources both now and in the future using the latest improvements in data, technology and modelling. The Strategic Flood Risk Assessment was updated in 2025 to refer to this data.</p>
<p><b>Sequential and Exception Tests</b> <a href="#">CC011 Sequential and Exception Tests Published December 2017</a></p>	<p>Flood Sequential and Exception tests used to inform each stage of the Local Plan preparation. The reports reflect the information and updates made through the Level 2 SFRA.</p>

Document	Summary
<p><a href="#">CC012 Sequential and Exception Tests of Preferred Options Site Allocations (May 2024)</a></p> <p><a href="#">CC013 Sequential and Exception Test Focused Update 2024</a></p> <p><a href="#">CC019 Additional Sites – Sequential and Exception Test (October 2025)</a></p> <p>CC021 Sequential and Exception Test Update (May 2026) (Available online via <a href="#">Local Plan Review</a>)</p>	
<p><b>Water Cycle Study</b>  <a href="#">CC002 Water Cycle Study, Scoping 2024</a></p> <p><a href="#">CC003 Water Cycle Study, Stage 2 Detailed Study 2024</a></p> <p><a href="#">CC017 Additional Sites - Chelmsford Council Detailed Water Cycle Study Addendum (October 2025)</a></p>	<p>Provides an assessment of the spatial strategy proposed in the Local Plan for the plan period up to 2041, against a preliminary assessment of the baseline conditions.</p>
<p><b>Surface Water Management Plan</b>  <a href="#">CC009-A Chelmsford Surface Water Management Plan 2014 (EB104A)</a></p> <p><a href="#">CC009-B Chelmsford Surface Water Management Plan 2014 - Appendix A - SWMP Action Plan (EB104B)</a></p> <p><a href="#">CC009-C Chelmsford Surface Water Management Plan 2014 - Appendix B - Modelling Details (EB104C)</a></p> <p><a href="#">CC009-D Chelmsford Surface Water Management Plan 2014 - Appendix C - Maps and Figures (EB104D)</a></p> <p><a href="#">CC009-E Chelmsford Surface Water Management Plan 2014 - Appendix D - CDA Prioritisation (EB104E)</a></p> <p><a href="#">CC009-F Chelmsford Surface Water Management Plan 2014 - Appendix E - Conceptual Options Assessment (EB104F)</a></p>	<p>Outlines the preferred surface water management strategy for Chelmsford. The study area was selected to focus on the area of highest surface water flood risk – the city of Chelmsford and a number of surrounding settlements. In this context surface water flooding describes flooding from sewers, drains, groundwater, and runoff from land, small watercourses and ditches that occurs as a result of heavy rainfall.</p> <p>It includes an Action Plan, Modelling details with Maps and Figures, as well as Critical Drainage Area (CDA) Prioritisation and Options for those CDAs.</p> <p>This has informed site allocations and site policy requirements. This has informed site allocations and site policy requirements. The modelling for the SWMP was reviewed in 2022.</p>
<p><b>Water Strategy for Essex 2024</b>  <a href="#">CC008 ECC Water Strategy for Essex 2024</a></p>	<p>Explains why Essex is vulnerable to water shortages, how the county is performing in relation to national targets for consumption and leakage control, and what steps should be taken to address the issues raised. This supports the approach taken in Policy DM25 re water efficiency standards.</p>

Document	Summary
<p><b>Air Quality Impact Assessment</b>  <a href="#">CC014 Review of the Chelmsford Local Plan – Air Quality Impact Assessment (December 2024)</a></p> <p><a href="#">CC016 Additional Sites – Review of Air Quality Impact Assessment (September 2025)</a></p>	<p>Considers the impact of the proposed development sites on local air quality now and in the future. Overall, the assessment concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.</p>
<p><b>Chelmsford Local Plan Viability Assessment</b>  <a href="#">V001 Chelmsford Local Plan Viability Update</a></p> <p><a href="#">V002 Chelmsford Local Plan Viability Update Note (November 2024)</a></p> <p>V003 Chelmsford Local Plan Viability Update Note (Available online via <a href="#">Local Plan Review</a>)</p>	<p>This viability work assesses the cumulative impact of policies on planned development (including DM25 and DM31). The assessments model various levels of policy requirements on several different typologies of development and have been updated through the preparation of the Local Plan to reflect latest available costs. They include sensitivity tests for changes in build values and costs.</p>
<p><b>Essex Open Legal Advice</b>  <a href="#">CC004: Essex Open Legal Advice – Energy policy and Building Regulations 2024</a></p> <p><a href="#">CC004-A Essex Open Legal Advice A (Updated May 2025) – Energy policy in plans and Building Regulations (May 2025)</a></p> <p><a href="#">CC004-B Addendum to Essex Open Advice (October 2025)</a></p>	<p>Legal advice regarding the ability of local planning authorities to set local plan policies that require development to achieve energy efficiency standards above Building Regulations. Supports Local Authorities having statutory powers to set planning policies which require energy efficiency standards that are better than Building Regulations as long as these are evidenced and justified, and policies can be expressed using energy metrics if they are supported by an evidence base that justifies their viability. This supports the approach taken in Policy DM31.</p>
<p><b>Essex Net Zero Policy Technical Evidence</b>  <a href="#">CC005: Report 1: Essex Net Zero Policy – Technical Evidence Base 2023</a></p> <p><a href="#">CC005-A Report 1 Essex Net Zero Policy Study – Technical Evidence Base July 2023 (September 2025 update)</a></p> <p><a href="#">CC005-B Update Report - Essex Energy Offsetting Tariff (September 2025)</a></p>	<p>Considers the technical and cost implications of delivering net zero buildings and the implications for owners, occupiers, developers and local planning authorities to inform and develop a consistent approach to emerging planning policy across Essex. This has informed the CCC Viability testing and demonstrates that the requirements of Policy DM31 are viable for developments within CCC. This supports the approach taken in Policy DM31.</p>
<p><b>Essex Net Zero Implementation Guidance</b>  <a href="#">CC006: Report 2: Essex Net Zero Policy – Summary of Policy, Evidence and Validation Requirements 2023</a></p>	<p>Gives a high-level summary of the proposed Net Zero policy requirements, evidence and validation requirements for different planning applications, monitoring guidance and high-level design guidance for two different domestic typologies. This supports the approach taken in Policy DM31.</p>

Document	Summary
<a href="#">CC006-A Report 2 Essex Net Zero Policy Study – Summary of Policy, Evidence and Validation Requirements July 2023 (September 2025 update)</a>	
<p><b>Essex Net Zero Viability Report</b>  <a href="#">CC007-A Net Zero Carbon Viability Study for Essex – Summary report 2022</a></p> <p><a href="#">CC007-B Net Zero Carbon Viability Study for Essex – Main report 2022</a></p> <p><a href="#">CC007-C Net Zero Carbon Viability Study for Essex – Technical Appendix 2022</a></p>	<p>Discusses the findings from the research undertaken to meet Essex Climate Action Commission’s project objectives. It includes a high-level assessment of the viability of different development types. This has informed the CCC Viability testing and demonstrates that the requirements of Policy DM31 are viable for developments within CCC. This supports the approach taken in Policy DM31</p>
<p><b>Essex net Zero on-line Guidance</b>  <a href="#">CC015 Essex Net Zero Implementation</a></p>	<p>Online resource page containing advice, tools and guidance for applicants and local authority officers on the implementation of the Essex-wide ‘model’ Operational Energy and Carbon (Net Zero) in Homes and Buildings Policy (DM31).</p>
<p><b>Essex Net Zero Specifications Guidance</b>  <a href="#">CC020-A Essex Net Zero Specifications Guidance – Main Document (September 2025)</a></p> <p><a href="#">CC020-B Essex Net Zero Specifications Guidance - Supporting Document (September 2025)</a></p>	<p>The Specification Guidance provides technical information to support the delivery of healthy, efficient, climate resilient homes in Greater Essex which align with the approach taken in Policy DM31. The guidance contains outline packaged solutions that meet the requirements of Policy DM31. For each housing typology there are fabric and system options and best practice design guidance.</p> <p>The Supporting Document includes background information on topics, such as aesthetics, low cost design and high level advice on meeting the requirements of policy DM31. The document also examines materials, skills and supply chains in Greater Essex.</p>

## Consultation Feedback

4.83. The Review of the Local Plan has been prepared following four public consultations - Issues and Options in 2022, Preferred Options in 2024, Pre-Submission in 2025 and Additional Sites in 2025. Full details of engagement that has taken place and a summary of the main issues raised in the responses and Council response is set out in the Regulation 22 Consultation Statement (SD003) available online via [Local Plan Review](#). Main issues raised in responses to the four consultations include:

- General support for the Strategic Priorities and Policies to address Climate Change
- Support for the need to reduce water use through policies
- Representations calling for a need to ensure the policy requirements set out (net zero carbon, new tree planting, and greater water efficiency), alongside all other development requirements, are fully evidenced and financially viable

- Concern that going beyond Building Regulations, in relation to net zero carbon requirements, goes against a written Ministerial Statement, the NPPF and Planning Policy Guidance and will impact house building timeframes and viability
- There is no justification to go beyond the December 13<sup>th</sup> 2023 Written Ministerial Statement, Building Regulations, or national policy and guidance in respect of net zero carbon requirements
- There is no evidence to justify the approach towards net zero operational and the use of on-site renewables to provide all (regulated and unregulated) operational energy in Policy DM31
- For the Council to require standards above those set out in Building Regulations they must be expressed as a percentage of the target emission rate and not as an energy use target in respect of Policy DM31
- Requirement 4 of DM31 provides no flexibility in the delivery of renewable energy and essentially mandates roof top solar PV energy regardless of whether this remains the most effective form of renewable energy generation over the plan period. Alternative forms of sustainable energy generation that could result in equivalent benefit or carbon saving should be considered
- Policy DM31 should require a development to be net zero rather than for individual homes as some, such as terrace houses and flats, are more intrinsically energy efficient and emit less carbon compared to detached homes and bungalows
- The new Essex evidence-led 'model policy' to address embodied carbon emissions from new development, and its supporting evidence base, should be included as an additional policy
- Main issues raised to the Additional Sites Consultation related to site specific requirements but not in relation to the wider Climate Change agenda and policies set out in the Plan.

## Local Plan Approach

4.84. The approach in the Local Plan takes account of a number of considerations including national planning policy and guidance, new corporate priorities, an updated evidence base and comments received to the Issues and Options, Preferred Options, Pre-Submission and Additional Sites consultations. The Local Plan approach and key changes are described below.

### Strategic policies

4.85. The Spatial Principles set out in Strategic Policy S1 guide how the Strategic Priorities and Vision in the Plan will be achieved. They will underpin spatial planning decisions and ensure that the Local Plan focuses growth in the most sustainable locations. They contribute to delivering the Council's response to the declared climate and ecological emergency by introducing greater emphasis on the natural environment and reducing carbon emissions.

4.86. Strategic Policy S2 – Addressing Climate Change and Flood Risk was amended at the Preferred Options stage to introduce the move to a 'net zero carbon' future and introduces further enhancements to the Plan regarding addressing Climate Change, including:

- Development that results in net zero carbon emissions and exceeds Building Regulations Parts F and L in accordance with Policy DM31
- A greater emphasis on providing active transport to support development
- Introducing the need to minimise over-heating from development
- Expanding the policy to protect and provide well-connected multifunctional green infrastructure, including new woodland creation and tree planting.

4.87. The Pre-Submission Plan saw minor amendments made to Policy S2 and its Reasoned Justification referencing integrated water management techniques, and reference to latest technical guidance including the Environment Agency's and the Construction Industry Research and Information Association (CIRIA).

4.88. Following the Pre-Submission consultation minor additions to Strategic Policy S2 are set out in the Proposed Schedule of Modifications to include reference to additional SuDs guidance and reference to Policy DM16 being the mechanism to deliver Biodiversity Net Gain.

4.89. No further modifications are proposed following the Focused Consultation on Additional Sites.

#### Net zero carbon emissions on all development

4.90. Policy DM31 forms part of the Chelmsford Local Plan's positive and proactive approach towards mitigating and adapting to climate change and addresses the need for increasing renewable energy generation and improving energy efficiency. The policy takes account of all the energy used in a home or building (including both regulated and unregulated energy uses) and the carbon emissions that come from the operational use of a home or building.

4.91. Comments received to the Preferred Options and Pre-Submission consultations generally supported the principle of this policy but raised queries relating to the need for such a policy to be in line with Building Regulations, and whether going beyond Building Regulations in terms of energy efficiency was allowed as it appeared to potentially go against a Written Ministerial Statement, the NPPF and Planning Policy Guidance. Queries were also raised on the impact of this policy on the viability and deliverability of residential development within the plan. Concern was also raised that the policy sought the use of predictive energy modelling software to assess performance rather than the Standard Assessment Procedure (SAP) software.

4.92. The Policy is a key part of Chelmsford Local Plan's proactive approach to mitigating and adapting to climate change, and it also helps ensure communities and infrastructure are more resilient to climate impacts as required by the NPPF. It also forms an integral part of the most cost effective and energy efficient pathway to net zero in 2050 set out in the Essex Local Area Energy Plan (December 2025) and aligns with the Government's Clean Power 2030 Action Plan (Dec 2024).

4.93. The policy is necessary to ensure that new homes and buildings in Chelmsford align with local and national climate targets and contribute to wider energy system objectives (such as increased energy security and improved energy efficiency and decarbonisation of the grid). The policy will also deliver significant other benefits, for example:

- By helping to alleviate current and future fuel poverty for residents due to the significantly lower energy needed for space heating than a standard Building Regulations (or proposed Future Homes Standard) home.
- By delivering homes and buildings that are adapted and more resilient to a changing climate than standard Building Regulations (or proposed Future Homes/Buildings Standard) homes or buildings, which benefits the health, comfort and well-being of occupiers.
- By helping to stimulate supply chains and skills development that are necessary to support both new build net zero carbon development and retrofitting existing buildings.

4.94. The policy also responds to growing consumer demand<sup>10</sup> for highly energy efficient, comfortable, climate resilient homes and buildings.

4.95. By ensuring new homes and buildings are net zero carbon in operation from the outset and are built to a robust net zero standard accounting for all a buildings energy use (known as regulated and unregulated energy), then the Council will be able to demonstrate, partly through Policy DM31, that it is fulfilling its legal duty and contributing to national statutory climate targets. In addition, the policy also helps contribute to locally set targets which the City Council has committed to through its Climate Emergency declaration and subsequent Action Plan.

4.96. Setting the energy efficiency standards included in Policy DM31 is consistent with the duties of the Climate Change Act 2008 and the Planning and Compulsory Purchase Act 2004 and aligns with the NPPF.

4.97. Policy DM31 supports the Chelmsford Climate Emergency declaration and target to make the City Council's activities net zero carbon by 2030. It also aligns with the Essex Climate Action Commission recommendations for new build development, including the target for all planning permissions granted for new development to be net zero carbon in operation by 2025.

4.98. Policy DM31 is based on a comprehensive evidence base that has been collaboratively established between the Essex Climate Action Commission, Essex County Council and the local planning authorities of Greater Essex. The aim of the evidence base is to provide a clearly defined, consistent planning policy approach to net zero operational energy and carbon homes and buildings in Greater Essex providing certainty and clarity to the development industry and other stakeholders.

4.99. The evidence-led, Essex-wide 'model' planning policy developed for net zero operational energy and carbon homes and buildings was first published on the Essex Design Guide<sup>11</sup> in 2023 and has been refined and updated to take into account additional evidence, consultation feedback, scrutiny at examinations, Inspectors reports and other case law. It has been re-published in the ['Operational Energy & Carbon \(Net Zero\) Planning Policy](#)

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<sup>10</sup> Paras 54-56 [Essex Open Legal Advice \(Updated 6<sup>th</sup> May 2025\)](#)

<sup>11</sup> [net-zero-carbon-planning-policy-for-greater-essex-november-2023.pdf \(essexdesignguide.co.uk\)](#)

[Statement \(October 2025\)](#). The policy is based on the ‘energy metrics’ approach which aligns with best practice advocated by leading industry bodies and experts<sup>12</sup> and the Net Zero Hubs (linked to the Department of Energy Security and Net Zero)<sup>13</sup> and aligns with the ‘net zero’ energy metrics policies embedded in other plans in Essex (Uttlesford Local Plan Inspectors Report<sup>14</sup> has found the Essex ‘model’ policy sound subject to modifications<sup>15</sup>) and adopted by other local authorities in England. The approach also aligns with the advice of the Climate Change Committee<sup>16</sup> who advised in 2019 that:

*“new homes should deliver ultra high levels of energy efficiency as soon as possible and by 2025 at the latest, consistent with a space heat demand of 15-20 kWh/m<sup>2</sup>/yr. Designing in these features from the start is around one-fifth of the cost of retrofitting to the same quality and standard.”* (Page 14, UK Housing: Fit for the Future Report 2019).

- 4.100. The Energy and Carbon (‘Net Zero’) evidence base established for Essex includes a Net Zero Carbon Viability Study by Three Dragons consultants which provided a high-level financial viability assessment of building to higher energy efficiency standards (similar to Passivhaus) and incorporating non fossil fuel heating and renewable energy technology. The Study findings indicated that it was viable to build to this standard for most development types assessed in the majority of Essex.
- 4.101. The ‘Net Zero Policy Study for Essex’ first published in July 2023 and updated in September 2025 by Introba, Etude and Currie & Brown progressed the recommendations of the Three Dragons study and explored the technical feasibility of building to a clearly defined net zero carbon in operation standard that aligned with climate targets and addressed both regulated and unregulated energy uses of a building. The Study included detailed costings of the policy approach recommended. These costings have been used in the Chelmsford Local Plan Viability Study. The costings in the updated Net Zero Policy Study for Essex (September 2025) are based on Quarter 3 2025 prices and are slightly higher than those presented in the 2023 Study. However, the percentage cost uplift still falls within the range tested in the Chelmsford Local Plan Viability Study.
- 4.102. The Essex energy and carbon (net zero) evidence base, supplemented by the Chelmsford Viability Study, demonstrates that Policy DM31 is technically feasible, financially viable and legally justified. The policy is underpinned by robust evidence, including a reasoned and robustly costed rationale, and is therefore considered reasonable and justified and consistent with national policy on climate change mitigation, adaptation and the net zero obligation.
- 4.103. Policy DM31 will help ensure that new homes and buildings are designed and built so that energy demand is minimised; where energy is needed it is used as efficiently as possible; and opportunities for on-site renewable energy generation are maximised. It uses the best practice, measurable, clearly defined, absolute, energy metrics approach of setting space

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<sup>12</sup> For example: [LETI](#), [UKGBC](#), [RIBA](#), [UK Net Zero Carbon Building Standard](#), [Good Homes Alliance](#),

<sup>13</sup> South West Net Zero Hub [West of England Net Zero New Build Policy Evidence - South West Net Zero Hub \(swnetzerohub.org.uk\)](#)  
Greater South East Net Zero Hub [HubGuide12-PlanningNetZero-PG0.1-Feb2021.pdf \(gsenetzerohub.org.uk\)](#)

<sup>14</sup> [https://www.uttlesford.gov.uk/media/14064/Local-Plan-Inspectors-Report/pdf/Uttlesford\\_Local\\_Plan\\_2021-2041\\_Examination\\_Report.pdf?m=1768841792443](https://www.uttlesford.gov.uk/media/14064/Local-Plan-Inspectors-Report/pdf/Uttlesford_Local_Plan_2021-2041_Examination_Report.pdf?m=1768841792443)

<sup>15</sup> [https://www.uttlesford.gov.uk/media/14065/Local-Plan-Inspectors-Report-Main-Modifications-Appendix/pdf/Uttlesford\\_Local\\_Plan\\_Examination\\_-\\_Main\\_Modification\\_Schedule.pdf?m=1768842140037](https://www.uttlesford.gov.uk/media/14065/Local-Plan-Inspectors-Report-Main-Modifications-Appendix/pdf/Uttlesford_Local_Plan_Examination_-_Main_Modification_Schedule.pdf?m=1768842140037)

<sup>16</sup> [UK housing: Fit for the future? - Climate Change Committee \(theccc.org.uk\)](#)

heating and energy use intensity limits and a target for renewable energy generation on-site (incorporating an energy offsetting mechanism which will deliver off-site renewables in order to provide flexibility for instances where the on-site target is not technically possible).

- 4.104. By achieving these measures, homes and buildings will be more resilient to a changing climate; highly energy efficient and generate renewable energy to achieve an operational energy balance on site over the course of a year (for both regulated and unregulated energy use); truly net zero carbon in operation from the outset; and align with local and national climate targets.
- 4.105. The policy is necessary to address the shortcomings within the Building Regulations 2021 and the anticipated Future Homes/Buildings Standard 2025. These do not adequately address operational energy and carbon emissions from new development as they only cover a proportion of energy use of a building, namely regulated energy use. In addition, because the compliance models are a relative improvement over a 'notional' building then a key element of energy efficient design – the building form – is not rewarded. Performance gap issues and the use of rapidly out of date carbon factors – also make it difficult to compare the performance of buildings constructed at different times.
- 4.106. Using the energy metrics approach in Policy DM31 addresses these issues and ensures that the policy is 'future proofed' by continuing to incentivise and drive forward energy efficiency improvements and renewable energy generation even when the electricity grid is fully decarbonised.
- 4.107. The policy received some criticism for not relying on the 'Standard Assessment Procedure' (SAP) software for predicting the energy performance of a building, in the Preferred Options consultation. It is however, widely acknowledged by industry that the 'Standard Assessment Procedure' (SAP) software is not an accurate software for predicting the energy performance of a building. It was never intended to be, it is a compliance software only. The former Government recognised this issue and began consulting upon the introduction of new software to replace SAP – known as the Home Energy Model. However, this has not progressed further yet. It is therefore reasonable to require major developments to use existing and well-established reliable and accurate predictive energy modelling software to demonstrate policy compliance. Minor developments may follow the 'minimum fabric specifications approach' to provide some flexibility to smaller developers who may not wish to invest in predictive energy modelling software. This is set out in the Reasoned Justification for Policy DM31. In addition, as part of the wider Essex Authorities work on supporting the implementation of the net zero policy, a 'SAP conversion tool' (known as the 'Essex Energy Tool') which can be used on smaller developments to demonstrate policy compliance using SAP outputs has been created. It is available on the Essex Design Guide<sup>17</sup> and is suggested for use on developments of under 100 dwellings providing pragmatic flexibility for small/medium developers who may have not invested in energy modelling software. Reference to the Essex Energy Tool was added to the Reasoned Justification at the Pre-Submission consultation stage.

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<sup>17</sup> [Essex Policy Implementation | Essex Design Guide](#)

- 4.108. A Policy DM31 is based on the Greater Essex-wide policy GE1 set out in the '[Operational Energy & Carbon \(Net Zero\) Planning Policy Statement \(October 2025\)](#)' which was prepared in collaboration with the Greater Essex local planning authorities based on evidence commissioned and led by the Climate and Planning Unit at Essex County Council.
- 4.109. The evidence base to support this approach is set out above. It is open source and is available on the Essex Energy and Carbon (Net Zero) Evidence page<sup>18</sup> of the Essex Design Guide (EDG). It is supplemented by each Essex LPA's own local plan evidence base, particularly with regard to local plan viability. The Essex wide viability reports which support the policy requirements have fed into CCC Local Plan Viability testing, with the costs identified in Report 1 of the Essex Net Zero Policy Study – Technical Evidence (July 2023) being used to update the latest CCC Local Plan Viability Report and are shown to be viable. As noted above, the costings in the Essex Net Zero Policy Study were updated in the Report 1 updated in September 2025. However, the costs still fall within the range tested in the Chelmsford Local Plan Viability Study.
- 4.110. To complement this evidence, practical design advice is provided (and being added to) on the Essex Design Guide focusing on how to design developments (of all scales and types) to meet the net zero carbon and energy standards, mitigate potential overheating risk and to address other inter-related sustainability issues. The aim is to ensure new development mitigates, adapts and is resilient to a changing climate.
- 4.111. The Essex Net Zero Specification Guidance has also been developed to provide detailed technical information that can be used by applicants to support the delivery of development that aligns with the planning policy approach towards reducing operational energy use and carbon emissions from new development in Essex (DM31). It covers things like fabric and system options, mechanical ventilation and heat recovery (MVHR) design and thermal bridging. The Supporting Document addresses wider issues such as the aesthetics of net zero, and material and skills supply chains in Essex.
- 4.112. Energy performance targets incorporated into planning policy also align with evidence from industry bodies and government agencies including the UK Green Building Council<sup>19</sup>, the Low Energy Transformation Initiative<sup>20</sup>, the South West Net Zero Hub<sup>21</sup> (together with the Greater South East Net Zero Hub – guidance note<sup>22</sup>) and the Government Property Agency<sup>23</sup> and the Climate Change Committee<sup>24</sup>.
- 4.113. Comments to the Preferred Options consultation suggested that technologies for on-site renewable energy generation in requirement 4 of Policy DM31 should not be limited to Solar

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<sup>18</sup> [Essex Energy & Carbon Evidence | Essex Design Guide](#)

<sup>19</sup> Net Zero Carbon Buildings: A Framework Definition, UKGBC, 2019 [Net-Zero-Carbon-Buildings-A-framework-definition.pdf \(ukgbc.org\)](#); The Commercial New Build Policy Playbook, UKGBC, 2021 [Commercial Playbook | UKGBC](#)

<sup>20</sup> LETI Climate Emergency Design Guide, LETI, 2020 [Climate Emergency Design Guide | LETI](#)

<sup>21</sup> Net Zero New Buildings: Evidence and guidance to inform planning policy, South West Energy Hub, 2021 [West of England Net Zero New Build Policy Evidence - South West Net Zero Hub \(swnetzerohub.org.uk\)](#)

<sup>22</sup> Greater South East Net Zero Hub – Planning Net Zero Guide 2021 [HubGuide12-PlanningNetZero-PG0.1-Feb2021.pdf \(gsenetzerohub.org.uk\)](#)

<sup>23</sup> Sustainability and Net Zero: Design Guide – Sustainability Annex, Government Property Agency, 2022 [Microsoft Word - Sustainability & Net Zero Annex - MARCH 2022.docx \(publishing.service.gov.uk\)](#)

<sup>24</sup> UK housing: Fit for the future?, Climate Change Committee, 2019 [UK housing: Fit for the future? - Climate Change Committee \(theccc.org.uk\)](#)

PV. Solar PV was selected to be modelled in the evidence base to demonstrate net zero because it is the cheapest, and most mature and commonly available renewable energy technology that is suitable for buildings to incorporate. Consideration has been given to the request to replace solar PV with renewable energy generation. However, as the Evidence is based on solar PV it is not considered that wider technologies can be justified for inclusion. Reference to 'rooftop' before solar PV was added to this policy requirement as part of the Pre-Submission consultation stage to make this clear as it is what the evidence justifies the policy requiring. The matter was raised again at Pre-submission consultation, but as no evidence to indicate that there is a more suitable, productive and cost effective method of renewable energy generation currently available was provided in representations, then no further modification is proposed.

- 4.114. In addition to this amendment to the Policy, the table relating to 'Minimum Standards Approach Fabric Specifications (Domestic)' also saw some minor amendments at the Pre-Submission stage. This was to improve clarity and was a reflection of changes to the revised Essex 'model policy'. The Table is proposed to be further refined from the Pre-Submission stage, again to reflect the republication of the Essex 'model policy' in October 2025. This is set out in the Proposed Schedule of Modifications (SD005).
- 4.115. Furthermore, since the Pre-submission consultation, additional changes to Policy DM31 and consequential changes to the Reasoned Justification are also proposed in the Proposed Schedule of Modifications (SD005). The changes are proposed in response to comments on the Pre-submission consultation, the availability of new and updated evidence, scrutiny at local plan examinations (including Uttlesford in Essex) and recently published Inspector's Reports. The changes reflect those made to the Essex 'model' policy. The key proposed changes to Policy DM31 are explained below.
- 4.116. Under Requirement 3, an additional clause is proposed to be inserted (3ii) which allows, larger sites to meet, in exceptional circumstances, the Energy Use Intensity (EUI) limit as a 'site-wide' residential average for an individual development phase rather than on every single dwelling. A 'back stop' EUI limit of 45 kWh/m<sup>2</sup>/yr is included in order to protect individual dwellings from being built to a higher EUI (such as 60 kWh/m<sup>2</sup>/yr) which would potentially allow developers to exploit the clause and install the least efficient heating and hot water systems, unfairly increasing energy costs for those residents. The inclusion of a 'site average' exceptions clause has been advocated by the House Builders Federation in the Chelmsford Pre-Submission consultation and through other local plans to provide flexibility within the policy. Additional evidence commissioned by Essex County Council and prepared by Etude (May 2025) for the Uttlesford local plan examination (see page 28-40 [ECC Hearing Statement Matter 4](#)) assessed the implications of the 'site average' approach. The evidence supports the suggested 'site average' clause proposed to be included in Policy DM31 as it would allow flexibility within the policy and by having the backstop EUI set at 45 kWh/m<sup>2</sup>/yr it would guard against the worst potential impacts of the clause.
- 4.117. Requirement 4 of Policy DM31 is proposed to be amended in response to consultation feedback, further scrutiny at the Uttlesford local plan examination and subsequent updates to the Essex Net Zero Policy Study in September 2025. The amendment simplifies how the amount of renewable energy to be generated on site is calculated and keeps it to the principle of meeting the needs of the development itself. The amount of renewable energy

generated should therefore, as a minimum, equal annual predicted energy use. This proposed amendment makes the policy less onerous to developers and so brings in additional flexibility into the policy.

- 4.118. The renewable energy offsetting tariff price has increased since Policy DM31 was drafted. It is therefore proposed to be modified to reflect the latest, most up to date figure in the Essex evidence – the Essex Net Zero Policy Study and the Essex Offsetting Report both published on the Essex Design Guide in September 2025. The updated costs set out in the Essex Net Zero Policy Study (which includes the updated tariff price) all fall within the range tested in the Chelmsford Local Plan viability assessment.
- 4.119. A clause under ‘Alternative routes to meeting policy requirements’ is proposed to be inserted to clarify in the DM31 policy wording that minor residential development proposals that follow the ‘minimum standards approach’ are deemed to have met Requirements 1 and 3 of the policy. This had previously been only explained in the Reasoned Justification. The new clause proposed directly reflects the equivalent text set out in the reasoned justification.
- 4.120. In addition to the proposed modifications to the policy it should be noted that Report 2<sup>25</sup> of the Essex Net Zero Policy Study (July 2023, updated September 2025) by Introba (et al) supports LPAs and applicants with the implementation of the recommended policy approach through the development management process by setting out the information that needs to be submitted with planning applications. The report also includes design guidance and evidence checklists.
- 4.121. To supplement Report 2 and to provide clarity to local planning authorities and other stakeholders, detailed Implementation and Monitoring Guidance is being developed by the Essex Climate and Planning Unit (CaPU) and an online ‘[Essex net zero implementation](#)’ resource page has been established to support applicants and local authority officers implement the Greater Essex Policy GE1 set out in the ‘Operational Energy & Carbon (Net Zero) Planning Policy Statement (October 2025)’<sup>26</sup>. This resource page includes supporting documents, such as the Renewable Energy Offsetting Framework (December 2025), the Essex Energy Reporting Spreadsheet (1 and 2) and the Essex Energy Tool (SAP Conversion). The resource page will be developed further to include validation checklist requirements, simple checklists for planners in assessing energy strategies, planning conditions, s106 clauses, and monitoring templates at various stages of the planning process. The Reasoned Justification for Policy DM31 is proposed to be modified, as set out in the Proposed Schedule of Modifications (SD005), to reflect these latest guidance updates.
- 4.122. Policies similar to Policy DM31 which set energy efficiency standards beyond Building Regulations are already in place in eleven local planning authorities (LPAs) or areas in England (including 2 in Essex) having been subject to examination, recommended for approval by an Independent Inspector and either adopted or about to be adopted in their development plan documents. A similar approach is also being progressed by a number of

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<sup>25</sup> Introba Report 2 – Summary of Policy, Evidence and Validation Requirements <https://www.essexdesignguide.co.uk/media/3174/report-2-enzps-summary-policy-evidence-validation-requirements-updated-sept-25.pdf>

<sup>26</sup> Policy GE1 - Operational Energy and Carbon (Net Zero) Planning Policy Statement for Greater Essex – October 2025 [ge1\\_operationalenergyandcarbon-net-zero- planning-policy-statement-october-2025.pdf](#)

other LPAs and are at various stages of the Local Plan process, including a further 5 in Greater Essex.

- 4.123. The only decision that had been an anomaly to the above was the West Oxfordshire Salt Cross Area Action Plan where the Inspectors' report (1 March 2023) found the net zero policy to be unsound. However, the lawfulness of the Inspector's decision was successfully challenged in R (Rights: Community: Action Ltd) v SSLUHC [2024] EWHC 359 (Admin) and the decision quashed in the judgement handed down on 20 February 2024. The examination was re-opened and the net zero carbon development policy examined on 30 June 2025. Using the evidence produced for Essex, West Oxfordshire District Council successfully argued amongst other points, that it was empowered to bring forward the policy under the duty in Section 19(1A) of the Planning and Compulsory Purchase Act 2004. The Inspector concluded that the approach was consistent with national policy and found the policy sound. The October 2025 Addendum to the Essex Open Legal Advice<sup>27</sup> (May 2025) covers the Salt Cross examination in paragraphs 22 to 32.

### Embodied Carbon

- 4.124. Essex County Council have also been preparing an evidence-led 'model policy' to address embodied carbon emissions from new development, and its supporting evidence base. However, the Policy and its supporting evidence base, were not available at an appropriate time to test and include as an additional policy in the Local Plan.

### Carbon neutrality of the Local Plan

- 4.125. Suggestions have been made that there should be a whole Plan carbon assessment carried out, the findings of which could be used to help steer the spatial strategy in a way which responds to the stated priorities on climate and ecological emergency and that demonstrate alignment with local and national climate targets.
- 4.126. As part of the preparation of the IIA the consultants considered how the Local Plan and the IIA in its appraisal of the Local Plan address carbon neutrality.
- 4.127. This is set out in full in section 5.8 of the Pre-Submission IIA ,but essentially the proposed approach towards addressing carbon neutrality is centred on Policy DM31 (Net Zero Carbon Development (in Operation)) which in turn is supported by references throughout the Pre-Submission Local Plan, and commitments made in respect of the carbon performance of strategic growth areas, which together present the basis for long-term transition.
- 4.128. The majority of the Strategic Priorities that guide the approach of the Local Plan, are relevant to the potential to meet net zero carbon. The Strategic Priorities set out the detail of how the Strategic Priorities will be achieved, and a number of these also have the potential to impact the achievement of net zero.
- 4.129. In light of this any further carbon assessment of the Local Plan was not considered necessary.

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<sup>27</sup> Addendum to Essex Open Legal Advices (October 2025) [addendum-to-essex-open-advices-20th-october-2025.pdf](#)

## Water efficiency

- 4.130. Policy DM25 (Sustainable Buildings) was amended following the Preferred Options consultation, to increase the water efficiency to require all new dwellings to meet the tighter standard of 90 litres/person/day from the 110 litres/person/day in the adopted Local Plan. This is in line with the Government's Environment Improvement Plan and Plan for Water, and is supported by Essex County Council's [Essex Water Strategy \(2024\)](#), which explains why Essex is vulnerable to water shortages, how the county is performing in relation to national targets for consumption and leakage control, and what steps should be taken to address the issues raised.
- 4.131. At the Pre-Submission consultation stage Essex County Council requested the water efficiency standard in DM25 be increased further to meet the tighter standard of 80 litres/person/day. However, after further consideration both parties agreed that there was insufficient evidence to support increasing this further and the standard of 90 litres/person/day has been retained in the policy. This position has been agreed in the Statement of Common Ground with Essex County Council (SOCG021 refers).
- 4.132. Policy DM25 also adds a new policy requirement for new dwellings to provide rainwater harvesting on site. The policy requirements reflect the [Water Cycle Study Report 2024](#), which recommends rainwater harvesting for water re-use. This policy also reflects Essex and Suffolk Water's latest draft Water Resources Management Plan 2024, the [Essex County Council SuDS Design Guide](#).
- 4.133. These policy requirements have been tested and are supported by the Local Plan Viability Update, May 2026 (V003) available online via [Local Plan Review](#).

## Tree planting

- 4.134. Policy DM17 (Trees, Woodland and Landscape features) introduces the policy requirements for three new trees to be planted per net new dwelling for all new housing development.
- 4.135. The Preferred Options consultation also included a requirement for new strategic scale employment and infrastructure development (defined as development of 1,000 sqm or more) to plant a significant number of new trees in addition to the normal landscaping requirements. Following feedback to the Preferred Options consultation this requirement was amended in the Pre-Submission Local Plan, to require a significant number of new trees as part of landscaping requirements for such developments.
- 4.136. In both cases, such planting may include the creation of tree lined streets as set out in the NPPF. These requirements will assist in tackling the Climate and Ecological Emergency declared by the Council, and its subsequent Action Plan.
- 4.137. Policy requirements have been tested and are supported by the Local Plan Viability Update (V003).

## Renewable/low carbon energy production

- 4.138. The two new Garden Community site policies (Strategic Growth Sites 6 and 16a) encourage the appropriate development of renewable, low carbon and decentralised energy schemes on site together with mass waste collection systems where appropriate.
- 4.139. The Council has considered the need to allocate specific sites for renewable energy production in the Plan. However, it concluded that this was not necessary as the suite of policies within the Plan allow for such developments to come forward. A number of planning applications for such large-scale development, including a large DCO for 'Longfield Solar Farm' have been approved in the Council's administrative area, demonstrating that the policies are sufficient to allow for such development to come forward and that there is no specific need to allocate sites.

## Air Quality

- 4.140. Air Quality Management Areas (AQMA) are declared by local authorities when air quality objectives are not being achieved in a certain area. Chelmsford City Council previously declared two AQMAs, which were reflected in the adopted Local Plan; one at and around the Army and Navy roundabout in Chelmsford and one at a short stretch at the A414 Maldon Road in Danbury. The Army Navy AQMA was first declared in 2005 (and amended in 2012). The Danbury AQMA was declared in 2018. The pollutants that were being exceeded in both locations was Nitrogen Dioxide (NO<sub>2</sub>) measured as an annual mean.
- 4.141. DEFRA technical guidance TG.22 sets out the process for how local authorities must determine if AQMAs are to be amended or revoked.
- 4.142. Where there have been no exceedances over the previous 5 years, local authorities must make plans to revoke the AQMA. Revoking an AQMA should also be considered if 3 consecutive years of compliance with levels has been demonstrated (10% below the borderline threshold of the relevant objective).
- 4.143. Taking this into account, a full report was sent to DEFRA setting out the rationale behind revocation of the two AQMAs, including information on results of air quality monitoring at both the Army and Navy AQMA and the A414 Maldon Road, Danbury AQMA. As a result, the two AQMAs were officially revoked on 14 March 2024 and are therefore not carried forward in the Plan.

## Alternative Policy Approaches

- 4.144. The Local Plan review has considered a number of alternative policy approaches and options including different development quanta and spatial strategy options. Each policy in the Preferred Options Local Plan Consultation Document included 'Alternatives considered' which were tested in the Preferred Options Integrated Impact Assessment (IIA), alongside the proposed policies, to help ensure that the final version of the plan is justified and an appropriate strategy, when considered against the alternatives and other available and proportionate evidence.

- 4.145. Alternative spatial strategy options have also been tested in other evidence base reports such as the Water Cycle Study Scoping Report and Preferred Options Traffic Modelling Report. Both the Pre-Submission IIA and Additional Sites IIA Addendum consider different spatial strategy and development site options for growth. More detail is set out in each evidence base report and the Submission Spatial Strategy and Strategic Sites Topic Paper (TP010) available online via [Local Plan Review](#).
- 4.146. In summary, key alternatives considered during the plan review in relation to Climate Change include:
- **No policy for net zero energy and carbon emissions and rely on NPPF and Building regulations** - The NPPF sees the transition to a low carbon, energy efficient future and mitigating and adapting to climate change as core planning principles. However, it does not provide detailed guidance on the Council's expectations for new development. It is considered that a policy is required to give clarity to developers and local communities. Building regulations do not yet see new buildings as net zero energy and carbon. The Council's priorities are to move towards a net zero energy and carbon environment as soon as possible.
  - **No policy for new tree planting and rely on the NPPF** - This would not reflect local policy priorities for tree planting.
  - **No policy requirement for optional Building Regulations requirement for water efficiency or rainwater harvesting** – This would not cover additional sustainable features which are at the forefront of climate change and are a key issue for the Plan period.

## Draft Policies Map

- 4.147. There are no proposed changes to the Draft Policies Map of relevance to this topic.

## NPPF December 2023 Checklist

- 4.148. The Local Plan submitted for examination will comprise the Pre-Submission (Regulation 19) Local Plan) and Focused Consultation Additional Sites (Regulation 19) Document. The Council has therefore reviewed these together against the requirements of the December 2023 NPPF.
- 4.149. The table below shows that the Local Plan largely meets all the requirements in respect to climate change. The full Local Plan Form and Contents Checklist updated in May 2026 (OSP11) is available online via [Local Plan Review](#). Please note that the following table supersedes the version presented in the Pre-Submission Topic Paper.

**Commentary key:**

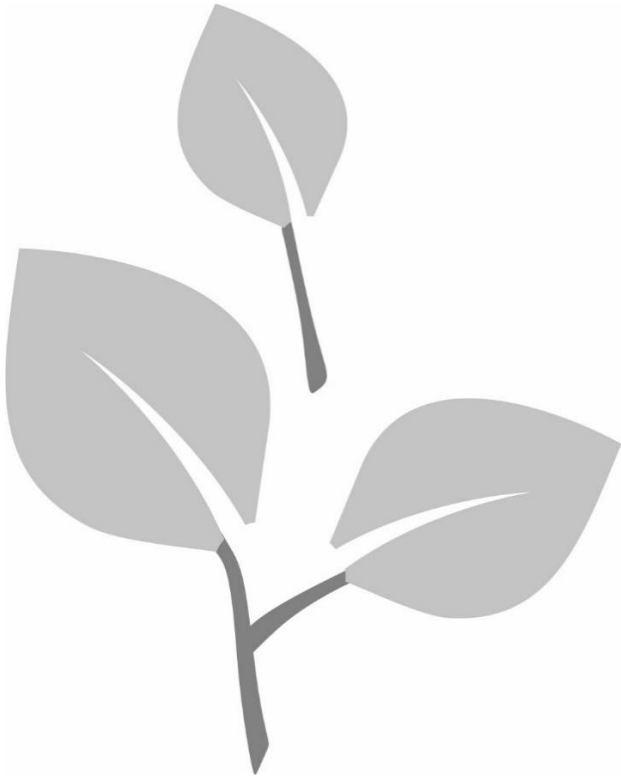
Meets December 2023 NPPF requirement
Partially meets December 2023 NPPF requirement
Does not meet December 2023 NPPF requirement

NPPF Requirement	NPPF Paragraph	Approach in the Local Plan
<i>Climate change, flooding and coastal change</i>		
Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	158	Set out in plan through Strategic Priority 1 and various policies including Strategic Policy S2, DM16, DM18, DM19, DM25 and DM31. Making Places SPD further supports this.
<p>Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.</p> <p>Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.</p> <p>(Parliamentary Statement on Planning – Local Energy Efficiency Standards Update on 13 December 2023 states that the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. Any planning policies that propose to go beyond should ensure that amongst other considerations that development remains viable and that the additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate calculated using a specified version of the Standard Assessment Procedure).</p>	158, 159	<p>Measures to ensure the future resilience of communities and infrastructure to climate change impacts are set out in the plan through Strategic Priority 1 and various policies including Strategic Policy S2, DM16, DM18, DM19, DM25 and DM31. The Making Places SPD further supports this.</p> <p>DM31 sets a local standard for net zero carbon development (in operation) which goes beyond building regulations. The principle for this policy is supported by the plan evidence base including the Local Plan Viability Study and Essex Net Zero Policy – Technical Evidence Base (July 2023, updated September 2025) and the Essex Open Legal Advice – Energy Policy and Building Regulations (Updated May 2025) and Addendum (October 2025). There is a wide body of evidence and consensus around the approach set out in the policy based on energy metrics to deliver truly net zero carbon and net zero energy homes and buildings. To support the transition of small / medium developers who may have not yet invested in predictive energy modelling software, the Essex Energy Tool has been developed as an interim measure. This tool can accommodate the outputs of the Building Regulations compliance software (known as SAP – Standard Assessment Procedure) and turn them into an appropriate format to indicate whether compliance with the policy requirements has been achieved. It is available to download from the Essex Design Guide. Further</p>

NPPF Requirement	NPPF Paragraph	Approach in the Local Plan
		information is set out in this Submission Climate Change Topic Paper.
<p>Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, consider identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.</p> <p>In determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic.</p>	160, 164	<p>The plan provides a positive strategy for renewable and low carbon energy through various policies including Strategic Policy S2, Policies DM19 and DM31 and site allocation policies including SGS6 and SGS16a. Making Places SPD further supports this. It is not considered necessary to identify specific site allocations for renewable and low carbon energy sources – more details are set out in this Submission Climate Change Topic Paper.</p> <p>Policy DM31 Part B provides support for the energy efficiency and low carbon heating improvements to existing buildings.</p>
<p>Manage flood risk from all sources and apply a sequential, risk based approach to the location of development.</p>	166, 167	<p>Set out in the plan through various policies including Strategic Policies S1, S2 and S9, Policy DM18 and site allocation policies. The plan is supported by updated evidence base reports including Strategic Flood Risk Assessments Level 1 and 2, Water Cycle Studies and Sequential and Exception Testing.</p>
<p>Steer new development to those areas with the lowest risk of flooding from any source. If this is not possible, the exception test may have to be applied, informed by the potential vulnerability of the site and of the development proposed. Where this is the case, sites needs to demonstrate that the development would provide wider sustainability benefits outweighing the flood risk and that the development would be safe for its lifetime without increasing flood risk elsewhere (and where possible will reduce flood risk overall).</p>	168 - 170	<p>Set out in the plan through various policies including Strategic Policies S1, S2 and S9, Policy DM18 and site allocation policies. The plan is supported by updated evidence base reports including Strategic Flood Risk Assessments Level 1 and 2, Water Cycle Studies and Sequential and Exception Testing.</p>
<p>Avoid inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.</p>	177	<p>Set out in the plan through various including Strategic Policies S1, S2 and S9, Policy DM18 and site allocation policies. The plan is supported by updated evidence base reports including Strategic Flood Risk Assessments Level 1 and 2, Water Cycle Studies and Sequential and Exception Testing.</p>

## 5. Conclusion

- 5.1. The rationale for the City Council's approach to Climate Change to support the Local Plan is clear, consistent and compliant with national policy and well informed.
- 5.2. The relevant supporting evidence base studies and documents set out that while Chelmsford faces some constraints there are suitable means to support the transition to a low carbon future alongside providing the required development in the Local Plan. The Council's approach is to:
- Locate development to avoid or manage flood risk
  - Ensure greater energy and water efficiency in developments
  - Reduce carbon emissions
  - Protect air quality
  - Development that results in net zero carbon emissions and exceeds Building Regulations Parts F and L
  - A greater emphasis on providing active transport to support development
  - Introducing the need to minimise over-heating from development
  - Protect and provide well-connected multifunctional green infrastructure, including new woodland creation and tree planting.



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