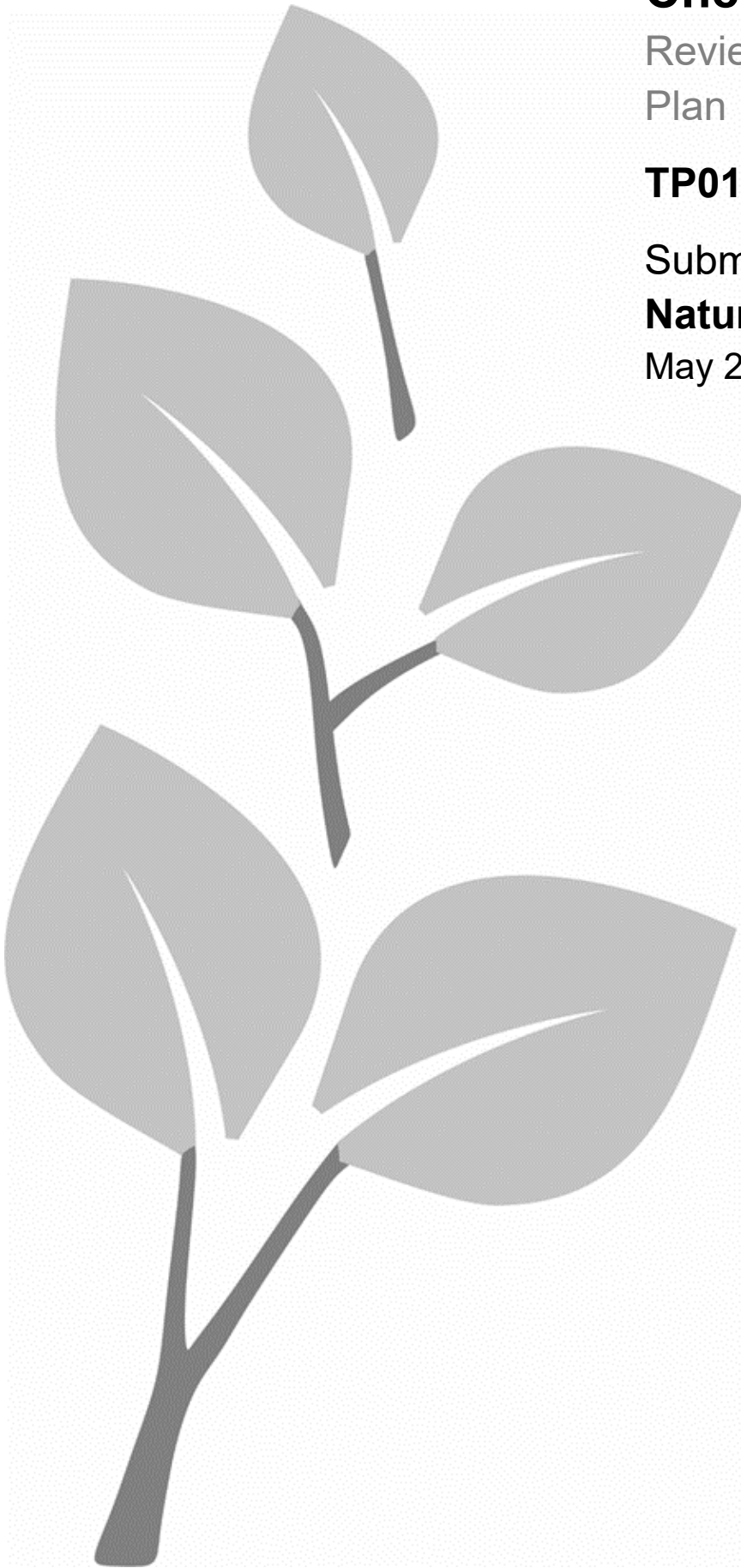


Chelmsford Local Plan

Review of the adopted Local
Plan

TP017

Submission Topic Paper:
Natural Environment
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. It covers the natural environment and how the Local Plan will ensure the protection, enhancement and recovery of the natural environment, including biodiversity, green infrastructure and ecological networks, while supporting a development strategy that responds to the climate and ecological emergency.
- 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 Preferred Options Natural Environment 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 3 – Protecting and enhancing the Natural and Historic Environment, and support an increase in biodiversity and ecological networks
 - Strategic Policy S2 – Addressing Climate Change and Flood Risk
 - Strategic Policy S4 – Conserving and Enhancing the Natural Environment
 - Strategic Policy S11 – The Role of the Countryside
 - Development Management Policies related to the natural environment.
- 1.5. This paper covers how the natural environment has been considered in preparing the Local Plan and how the Plan seeks to protect, enhance and restore the natural environment while accommodating sustainable growth. It includes the implementation of relevant national policy and legislation, including the Environment Act, alongside local strategies, and sets out policy proposals to conserve biodiversity, strengthen green infrastructure, and support nature recovery and ecological resilience.
- 1.6. This Topic Paper supersedes the Preferred Options Natural Environment Topic Paper published in May 2024, which is published online at [here](#).

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 five years of the Plan's adoption.
- 2.2. The Local Plan submitted for examination comprises the Pre-Submission (Regulation 19) Consultation Document, February 2025 (SD001) and the Focused Consultation Additional Sites (Regulation 19) Document, November 2025 (SD002). If found sound following the examination, these documents will be incorporated together in a single new Local Plan before being finalised for adoption.

3. Background

- 3.1. In relation to the Local Plan, the natural environment concerns green, blue and wild infrastructure, ecosystems, biodiversity, water quality, pollution, farming landscapes, and climate change adaptation.
- 3.2. Chelmsford enjoys a very high-quality environment with 700 hectares of recreational space, including 17 Green Flag accredited parks, complemented by an extensive network of the Green Wedge, gardens and nature reserves. The Green Wedge covers 3% of the land in the whole of the Chelmsford area. Many major cities in the UK have an area of open land around their built-up area which is designated as Green Belt. This is designed to prevent the unrestricted sprawl of these cities. The Green Belt in Chelmsford is part of London's Green Belt often referred to as the Metropolitan Green Belt. There are four main rivers (Rivers Chelmer, Can, Wid and Crouch) that flow through the Chelmsford City Council area and a range of habitats and high levels of biodiversity including sites of local, national and European importance. The Green Belt covers almost 34% of the land in the south and west of Chelmsford.
- 3.3. Chelmsford has a range of sites designated for their habitat and conservation value of international, national and local importance. This includes three European sites namely Crouch and Roach Estuaries Special Protection Area (SPA), Crouch and Roach Estuaries Ramsar, and the Essex Estuaries Special Area of Conservation (SAC). There are also eight sites of Special Scientific Interest (SSSIs), six Local Nature Reserves (Admirals Park, Marconi Ponds, Chelmer Valley Riverside, Galleywood Common, Fenn Washland, and Frankland Fields), 171 Local Wildlife Sites as well as ancient woodlands. See also Figure 1 below taken from the Review of the Chelmsford Adopted Local Plan: Pre-Submission Integrated Impact Assessment (SD008).

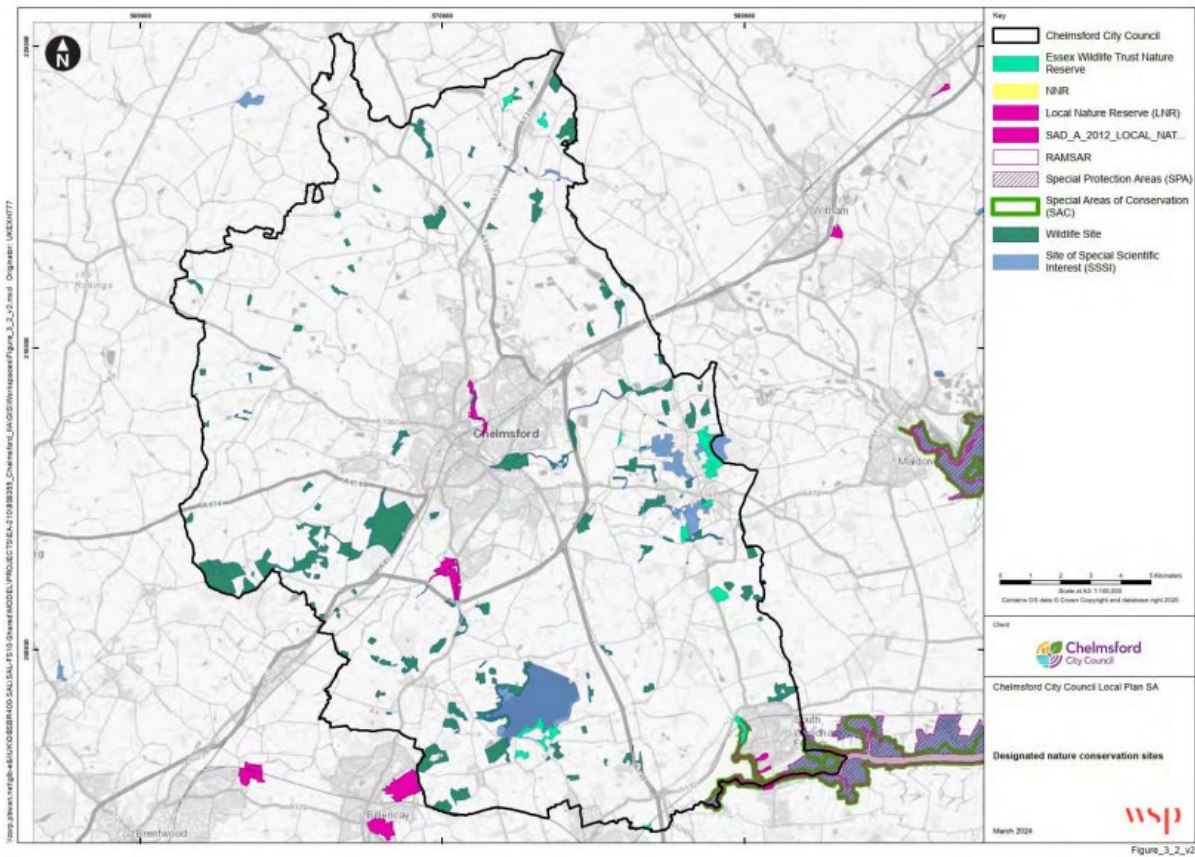


Figure 1: Designated Nature Conservation Sites – Pre-submission Integrated Impact Assessment

3.4. The map demonstrates the extensive network of designated nature conservation sites across Chelmsford and highlights the need to balance their protection and enhancement with the delivery of planned growth. These assets form a fundamental component of sustainable development, and the policies and site allocations within the Local Plan seek to ensure that new development is delivered in a way that minimises adverse effects on the natural environment and, where possible, secures measurable improvements.

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. In addition, the Plan has been informed by other relevant national policy and legislative changes, including the Environment Act 2021 and the introduction of mandatory Biodiversity Net Gain, the Government’s 25 Year Environment Plan, emerging Local Nature Recovery

Strategies, and national guidance on green infrastructure. These have collectively strengthened the emphasis on protecting and enhancing the natural environment, improving biodiversity, and delivering nature recovery alongside sustainable growth.

- 4.4. Further detail on these key changes for consideration is included under the section 'Local Plan Approach'.

National policy context

- 4.5. All relevant national planning policy and guidance has been considered in the review of the Local Plan.
- 4.6. The most relevant national policy is set out in Section 15 of the National Planning Policy Framework (December 2023), which addresses conserving and enhancing the natural environment. In particular, paragraph 180 sets out that planning policies and decisions should contribute to and enhance the natural and local environment by:
- (a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - (c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - (e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
 - (f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 4.7. Paragraph 181 goes on to state that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value where consistent with other policies; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- 4.8. Subsequent paragraphs in Section 15 also emphasise the need to conserve, restore and enhance biodiversity, protect irreplaceable habitats, and secure measurable net gains for biodiversity through the planning system.
- 4.9. Application of the NPPF and relevant legislation is further explored in the [Natural environment PPG](#). Paragraphs 001 (Reference ID: 8-001-20190721) to 048 (8-048-

20250219) set out the key considerations in respect of the natural environment as summarised in the table below:

<p>Agricultural land, soil and brownfield land of environmental value</p>	<ul style="list-style-type: none"> • Planning should take into account the quality of agricultural land using the Agricultural Land Classification. There are five grades, with the best and most versatile land being Grades 1, 2 and 3a. • Some previously developed land may be of high environmental value which should be taken into account.
<p>Green infrastructure</p>	<ul style="list-style-type: none"> • Green infrastructure can provide multiple benefits for the economy, good design, healthy communities, climate change mitigation, conservation and enhancement • Evidence-based strategies and those delivered with partners can inform the approach • Green infrastructure should be considered at an early stage as an integral part of development.
<p>Biodiversity, geodiversity and ecosystems</p>	<ul style="list-style-type: none"> • The statutory background for seeking to conserve and enhance biodiversity (Section 40 of Natural Environment and Rural Communities Act 2006, as amended by the Environment Act 2021) • The need for identifying and mapping local ecological networks, including Local Wildlife Sites (with criteria), and their links to the Nature Recovery Network, a Government commitment to creating a connected network of wildlife-rich habitats across England • Consideration of potential impacts of development on protected and priority species and ecosystems • Plans and strategic policies can be used to set out a suitable approach to the biodiversity net gain requirement introduced by the Environment Act 2021, to deliver at least 10% net gain • Considerations for policies relating to trees.
<p>Local Nature Recovery</p>	<ul style="list-style-type: none"> • Local Nature Recovery Strategies (LNRS) provide a spatial framework for identifying priorities and opportunities for habitat creation, restoration and enhancement • They support the delivery of a Nature Recovery Network, contributing to a connected network of wildlife-rich habitats across England • Local Plans should have regard to LNRS and identify opportunities for delivering biodiversity net gain and wider environmental enhancement, including at a strategic scale • LNRS can help inform the location of off-site biodiversity net gain and support long-term ecological connectivity and resilience.
<p>Landscape</p>	<ul style="list-style-type: none"> • Recognition of the intrinsic character and beauty of the countryside, and landscape conservation and enhancement • The need to identify special characteristics of the landscape through assessment, including potential cumulative impacts, of sensitivity and capacity.

Other Relevant Legislation

Biodiversity Net Gain & Nature Recovery Networks

- 4.10. Biodiversity net gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand.
- 4.11. Under the Environment Act 2021, all developments that have obtained planning permission will have to achieve at least 10% biodiversity net gain (BNG). The mandatory requirement came into force from 12 February 2024 for major development, and from 2 April 2024 for small sites, under the Town and Country Planning Act (subject to specified exemptions). It will be calculated using DEFRA [biodiversity metric](#).
- 4.12. BNG delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. It will be delivered onsite or offsite, with a preference for delivery as close as possible to the development site and within the local area where feasible. Where this is not possible, statutory biodiversity credits are available as a last resort.
- 4.13. The Environment Act 2021 also introduced a requirement for Local Nature Recovery Strategies, which support the delivery of a broader Nature Recovery Network across England. The intention is for these to be implemented at a local level across the country. A Local Nature Partnership (LNP) covering Essex, Southend and Thurrock (Greater Essex) has been established and in June 2025 prepared a [Local Nature Recovery Strategy](#) covering Greater Essex.

National Design Guide

- 4.14. The [National Design Guide](#) focuses on the natural environment in the following section:

Nature	Well-designed places: <ul style="list-style-type: none"> • integrate existing, and incorporate new natural features into a multifunctional network that supports quality of place, biodiversity and water management, and addresses climate change mitigation and resilience • prioritise nature so that diverse ecosystems can flourish to ensure a healthy natural environment that supports and enhances biodiversity • provide attractive open spaces in locations that are easy to access, with activities for all to enjoy, such as play, food production, recreation and sport, so as to encourage physical activity and promote health, well-being and social inclusion.
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Voluntary national accreditation schemes

BREEAM

- 4.15. BREEAM is an international certification system for the built environment that covers a range of issues including management, health and wellbeing, energy, transport, water, materials, waste, land use and ecology and pollution. The Council requires non-residential developments above a threshold to achieve a Very Good BREEAM rating (see the Local Policy section below). Credits are awarded for a range of issues which for land use and ecology includes site selection, minimising impacts on ecology, ecological change and enhancement and long-term ecological management. Assessments are made at design and post construction stage to ensure compliance.

Building with Nature

- 4.16. [Building with Nature](#) (BwN) is the UK's first green infrastructure benchmark and was launched in November 2020. It is a voluntary accreditation scheme at three levels. There are 12 BwN Standards for placemaking and place-keeping, divided into four themes; Core Standards, Wellbeing, Water, and Wildlife. A summary of the scheme is available in the [Essex Design Guide](#).

Local Policy context

Current policy

- 4.17. A key component of the Spatial Strategy (Strategic Policy 7) is to balance the need to accommodate future growth requirements with the need to minimise the effects on the environment, through sustainable development. It seeks to plan positively for the creation, protection and enhancement of networks to ensure a net gain for biodiversity and green infrastructure. Key natural environment priorities and policies within the adopted Local Plan are:
- **Strategic Priorities 1, 3, 7, and 8** – These seek to ensure sustainable patterns of development, protect and enhance the natural environment, and create well-designed and attractive places including new green infrastructure.
 - **The Local Plan Vision** – Includes making the most of the area's assets and opportunities such as its river valleys, and improving the built and natural environment.
 - **Strategic Policy S1 (Spatial Principles)** – Includes locating development to avoid flood risk, respecting the character and appearance of landscapes, and preserving or enhancing biodiversity.
 - **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.
 - **Strategic Policy S4 (Conserving and enhancing the natural environment)** – Seeks out a commitment to conservation of the natural environment through protection of designated sites while planning positively for biodiversity networks and minimising pollution; with management, mitigation and compensation measures.
 - **Strategic Policy S7 (Spatial Strategy)** - to balance the need to accommodate future growth requirements with the need to minimise the effect on the environment, through sustainable development.

- **Strategic Policy S9 (Infrastructure requirements)** – Lists supporting infrastructure expected from new development including flood risk management, and green infrastructure such as open space and biodiversity enhancement.
- **Strategic Policy S11 (The role of the countryside)** – Ensuring development does not have an adverse impact on the roles and character and beauty of the countryside, and the function of the Green Wedge in providing wildlife capacity.
- **Site allocation policies** – All site allocation policies set out the specific requirements necessary to protect and enhance the natural environment for each allocation site.

Development Management Policies – Set out the requirements for decision-making on planning applications in respect of the natural environment.

- Policies **DM6, DM7, DM8, DM9, DM10, and DM11** cover the Green Belt, Green Wedge and the rural area. They seek to protect the countryside from inappropriate development, and retain openness, green networks for wildlife, and the role and function of rural landscapes. Rural area policies also focus on preventing or minimising the impact on the character and beauty of the countryside.
- Policy **DM16** seeks to protect the natural environment including internationally designated sites, nationally designated sites (SSSIs), and locally designated sites. It also sets out a requirement for all development proposals to conserve and enhance habitats, avoid negative impacts on biodiversity and geodiversity, and where possible deliver a net gain. It also sets out the requirement for developments to contribute to the Essex recreational disturbance Avoidance and Mitigation Strategy (RAMS).
- Policy **DM17** seeks to protect trees and woodland including preserved trees and ancient woodland, and natural landscape features that are important to the character and appearance of an area.
- Policy **DM18** sets out criteria for demonstrating measures to ensure safety of development from flooding, manage water run-off, and incorporate water management measures including multi-functional Sustainable Drainage Systems (SuDS).
- Policy **DM19** requires that proposals for renewable and low carbon energy should have no adverse effect on the natural environment, or an unacceptable visual impact which harms the character of an area.
- Policy **DM24** requires all major new developments to respect the historic and natural environment of biodiversity and amenity interest through the provision of a range of green spaces. All new major developments shall also provide public open space and contribute to green infrastructure, retain existing trees and other landscape features where appropriate and explore opportunities for new tree planting.
- Policy **DM25** expects all dwellings and non-residential buildings to incorporate sustainable design features to reduce carbon dioxide emissions and nitrogen dioxide emissions and the use of natural resources. All new non-residential buildings with a floor area of over 500sqm shall achieve a minimum BREEAM rating (or its successor) of Very Good.
- Policy **DM29** addresses living and working environments and measures to ensure the development proposals avoid causing pollution including noise, light, smell, fumes, or vibrations; and Policy **DM30** seeks to ensure there will be no impact on ground or

surface water from development around hazardous substances sites or contaminated land, or on air quality management areas.

- **Policy DM31** – Net Zero Carbon Development (In Operation) forms part of the 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. The policy sets out standards expected of new development to ensure that wider aspirations for zero carbon targets are met over the longer term. See more information in the Submission Climate Change Topic Paper (TP011).

4.18. In addition to changes in national planning policy and guidance, the review of the adopted Local Plan has considered the achievability and effectiveness of the natural environment policies in decision making in the adopted Local Plan (2020), as well as new corporate priorities and strategies of the Council. These are described in the following paragraphs.

4.19. The Pre-Submission Local Plan considers policy performance issues through the latest [Authority Monitoring Report](#) (LDS019) published in November 2025. Relevant policies for the natural environment include S2, S4, DM16, DM17, DM18 and DM19. There is no contingency / action required at this stage against any of the policies relating to protecting the natural environment.

4.20. The Council’s [Our Chelmsford Our Plan](#) was updated in 2023. Strategic priorities include to protect, expand and improve the quality and accessibility of green spaces, improving habitat value and increasing biodiversity and everyday living, and to improve the environmental quality, attractiveness, safety, leisure and recreational potential of public spaces, green areas, rivers and waterways.

4.21. The adopted [Making Places Supplementary Planning Document](#) (SPD) (January 2021) (PL019) seeks to promote and secure high-quality sustainable new development. It provides advice on good practice examples on achieving biodiversity net gain, green infrastructure, flooding/SuDS, trees and tree planting and much more.

4.22. The Council consulted on an updated draft Planning Obligations Supplementary Planning Document (SPD) 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 (INF012) 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) [Chelmsford Local Plan Consultation Draft Planning Obligations Supplementary Planning Documents \(January 2026\)](#). The Council intends to adopt this document in advance of the submission of the Local Plan.

4.23. A [Plan for Improving the Rivers and Waterways in and around Chelmsford](#) (PL021) was endorsed and approved by the Council in July 2022 (item 7 of Chelmsford Policy Board).

The Plan sets out options and opportunities to improve the appearance, attractiveness and recreational use of the rivers and waterways in and around Chelmsford and to promote schemes and activities that enhance their habitat, ecological and biodiversity.

- 4.24. [The Essex Design Guide](#) is produced by Essex County Council. It is an on-line tool regularly reviewed and aimed to be used as a reference guide to help create high quality places with an identity specific to Essex. There are a number of sections in this design guide relevant to the natural environment including Landscape and Green Spaces, SuDS and Climate Change, and Building with Nature.
- 4.25. [The Essex Biodiversity Net Gain \(BNG\) Guidance Pack](#) has been produced by the Essex Local Nature Partnership. The purpose of the guidance pack is to provide an overview of the facts and guidance so far on BNG. The BNG guidance pack covers everything from 'How does BNG work?' to the 'National Register and Statutory Credits Scheme', providing a holistic outline of BNG. The guidance pack is aimed at a wide audience and is suitable for Local Planning Authorities, developers and landowners. Further information is available on the Council's website on to [BNG in relation to submitting planning applications](#).
- 4.26. Essex County Council has produced an [Essex Green Infrastructure Strategy](#) (BG006). This strategy raises the importance of developing quality green infrastructure and green spaces across Essex to accompany planned growth in the county over the next 20 years. The purpose of the strategy is to take a positive approach to enhance, protect and create an inclusive and integrated network of high-quality green infrastructure in Greater Essex, to create a county-wide understanding of green infrastructure – its functions and values, and to identify opportunities for implementing green infrastructure.
- 4.27. Essex County Council has also produced [Essex Green Infrastructure Standards](#). The standards were published in 2022 and outline nine principles and standards for the protection, enhancement, creation, and management of GI in Essex. The application of these principles and standards through development management and planning policy will ensure the delivery of multifunctional, accessible high-quality GI. They are based on several key policy documents including HM Government's 25 Year Environment Plan, the Environment Act (2021) and the National Planning Policy Framework (NPPF).
- 4.28. [The Essex Local Nature Recovery Strategy](#) (LNRS) (BG007) was published in June 2025. It sets out a long-term, strategic approach to restoring and enhancing nature across Essex, Southend and Thurrock. It identifies priority habitats and species, maps areas of existing ecological importance, and highlights opportunities for habitat creation, restoration and improved connectivity to support a coherent Nature Recovery Network. The strategy aims to guide investment, land management and planning decisions by establishing where environmental improvements will deliver the greatest benefits, supporting biodiversity net gain and strengthening the resilience of the natural environment at a landscape scale.
- 4.29. The [Essex Coast RAMS \(Recreational disturbance Avoidance and Mitigation Strategy\)](#) (BG008), and [Supplementary Planning Document \(SPD\)](#) (BG009) were adopted in May 2020. RAMS is a county-wide initiative that seeks to lessen the impact of local housing development on protected birds along the Essex coast. Developers pay a contribution towards the RAMS for each new dwelling within a 'zone of influence' around the designated

sites on the Essex coast including the Crouch and Roach Estuaries SPA and Ramsar site around South Woodham Ferrers.

4.30. In July 2019, [Chelmsford City Council declared a Climate and Ecological Emergency](#). An [Action Plan](#) (CC022) was agreed the following year with an initial focus of 15 key areas of activity including reducing carbon emissions, greening Chelmsford and increasing biodiversity. A key action is to undertake a greening programme to significantly increase the amount of woodland and the proportion of tree cover in Chelmsford through a sustained medium-term 'mass tree planting' campaign. Targets include:

- Increase tree cover to at least 20% in the Chelmsford area, i.e., to be the best in Essex
- Plant 175,000 additional trees creating an additional 53 hectares of woodland and tree cover using native species
- Plant at least three new trees for every new home in the Local Plan growth sites estimated to add a further 30,000 additional trees.

4.31. The Council has developed a [Green Infrastructure Strategic Plan](#) (BG004) which sets out the aspirations and opportunities to establish a green infrastructure network across the City and to promote city greening. This includes both green and blue spaces (such as, hedgerows, woodlands, parks, rivers and water courses). Objectives, standards and guidelines for its implementation aim for a City which is more ecologically diverse and robust, better connected and can meet the needs and expectations of its residents, workers and visitors.

4.32. The [Council's Parks, Green Spaces and Waterways Strategy](#) was agreed in April 2022. The main focus of the strategy, supported by an improvement plan and site-specific managements plans is to ensure that:

- a) A network of attractive, high quality green spaces is provided that are clean, safe and easily accessible to all
- b) People can connect with the natural environment through the active use of parks, green spaces and waterways, enjoying positive experiences whilst using them
- c) Wildlife, habitats, and landscapes in and around Chelmsford are protected and enhanced
- d) Parks, green spaces and waterways are planned and managed in a sustainable way, reducing unnecessary waste and helping to preserve natural resources.

4.33. The [South East Inshore Marine Management Plan](#) (OSP010) 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.

Co-operation with Key Stakeholders

4.34. The Council is committed to co-operating with other bodies on strategic planning matters. The Duty to Co-operate Strategy (DTC003) was reviewed and adopted in January 2022.

- 4.35. 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](#).
- 4.36. 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 Co-operation (SD004).
- 4.37. 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.
- 4.38. The Council has engaged proactively, actively and on an ongoing basis with a range of prescribed bodies and other relevant organisations in preparing the Local Plan in relation to natural environment matters.
- 4.39. Engagement has included, in particular, Natural England, the Environment Agency and Essex County Council, alongside neighbouring local authorities and other stakeholders. These discussions have informed the development of the Local Plan's approach to biodiversity, green infrastructure, water environment, flood risk and ecological mitigation. The Statements of Common Ground prepared with Natural England (SOCG014) and the Environment Agency (SOCG018) confirm that there are no outstanding areas of disagreement, and that both organisations are satisfied that the Local Plan has been positively prepared in relation to matters within their respective remits.
- 4.40. Constructive engagement has led to a number of proposed modifications to the Local Plan. In particular:
- Amendments to Strategic Policy S4 to reflect up-to-date wording on the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS), ensuring contributions from qualifying development towards mitigation of impacts on European designated sites.

- The inclusion of additional supporting text and references to green infrastructure frameworks and standards, including those promoted by Essex County Council, across policies S4, S11 and DM16.
- Updates to Policy S2 and DM18 to strengthen requirements relating to sustainable drainage systems (SuDS), including reference to relevant guidance such as the CIRIA SuDS Manual and Essex County Council standards, following engagement with both the Environment Agency and Essex County Council.
- Amendments to Policy DM19 to include reference to Environment Agency guidance on ground source heat pumps, ensuring clarity on regulatory requirements.
- Clarifications to policy wording to ensure that the Local Plan fully reflects best practice in relation to flood risk management, water quality and environmental protection, including appropriate use of technical guidance and evidence.

4.41. Through engagement with Natural England, the Local Plan has also been refined to ensure that it provides a robust framework for addressing recreational disturbance impacts, habitat protection and ecological mitigation, including the application of RAMS, Suitable Alternative Natural Greenspace (SANG), and project-level Habitats Regulations Assessment where required. The agreed position confirms that, subject to the implementation of these measures, the Plan will not have adverse effects on the integrity of European designated sites.

4.42. Ongoing engagement has also supported the integration of wider environmental initiatives, including references to the Essex Local Nature Recovery Strategy, the Natural England Green Infrastructure Framework, and the delivery of biodiversity net gain and ecological networks.

4.43. The Council will continue to work collaboratively with relevant organisations through the examination process and beyond to ensure that strategic cross-boundary environmental issues are appropriately addressed and that the Local Plan is implemented effectively.

Integrated Impact Assessment (IIA)

4.44. 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)
- Equality Impact Assessment (EqIA)
- Health Impact Assessment (HIA)

4.45. 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)

4.46. 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

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

Appraisal Framework Objective	Key Sustainability Issue
1. Biodiversity and Geodiversity: enhance biodiversity and geodiversity and promote improvements to the multifunctional green infrastructure network	Biodiversity, Fauna and Flora Human Health
7. Land Use and Soils: To encourage the efficient use of land and conserve and enhance soils	Material Assets Soil
8. Water: To conserve and enhance water quality and resources	Water
9. Flood Risk: To reduce the risk of flooding to people and property, taking into account the effects of climate change	Climatic Factors Water
10. Air: To improve air quality	Air Human health Biodiversity, Fauna and Flora
11. Climate Change: To minimise greenhouse gas emissions and adapt to the effects of climate change	Climatic Factors
12. Waste and Natural Resources: To promote the waste hierarchy (reduce, reuse, recycle, recover) and ensure the sustainable use of natural resources	Material Assets

4.48. 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.

- 4.49. 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.
- 4.50. 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.
- 4.51. 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.
- 4.52. 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.
- 4.53. 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.
- 4.54. 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.
- 4.55. 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.
- 4.56. In particular reference to the Natural Environment, the Pre-Submission IIA notes that there are a number of ongoing initiatives and projects that together will help to conserve and enhance biodiversity and which would be expected to continue without the Local Plan. These include the delivery of the Chelmsford Biodiversity Action Plan (BAP) and the Local Nature Recovery Network. With specific regard to green infrastructure, the Council's Parks and Green Spaces Strategy sets out a collective vision for improved green spaces and which includes an objective to support the Chelmsford BAP. It is reasonable to assume that without the Review of the Adopted Local Plan, existing trends would continue. National planning policy contained in the NPPF and existing Development Plan policy (such as Strategic Policy S4 – Conserving and Enhancing the Natural Environment) would help to ensure that new development protects and enhances biodiversity.

4.57. The Pre-Submission IIA also summaries the key sustainability issues for this topic area.

These include:

- The need to conserve and enhance biodiversity including sites designated for their nature conservation value
- The need to provide net gains in biodiversity where possible
- The need to maintain, restore and expand Biodiversity Action Plan habitats
- The need to safeguard existing green infrastructure assets
- The need to enhance the multifunctional green infrastructure network, addressing deficiencies and gaps, improving accessibility for all users and encouraging multiple uses where appropriate.

4.58. In terms of protecting the natural environment, para 5.7.33 of the Pre-Submission IIA notes that this subsection makes a positive contribution to a number of the IIA objectives. Policy DM16 seeks to ensure that biodiversity assets are promoted and conserved by protecting them from harm and encouraging biodiversity enhancement. The policy requires that new development (unless exempt) provides for a minimum 10% biodiversity net gain above the existing ecological baseline value of the site. Policy DM17 seeks the conservation of protected trees and woodland. This has been assessed as having a significant positive effect on biodiversity (IIA Objective 1) as well as on cultural heritage (IIA Objective 13) and landscape and townscape (IIA Objective 14). The implementation of Policy DM18 will help to ensure that development does not take place in areas of flood risk whilst Policy DM19 will support the development of appropriate low carbon and renewable technologies. Cumulatively, the policies have therefore been assessed as having a significant positive effect on flood risk (IIA Objective 9) and climate change (IIA Objective 11).

4.59. The Pre-Submission IIA also notes that the policies have been assessed as having minor positive effects on health and wellbeing (IIA Objective 5), water (IIA Objective 8), air quality (IIA Objective 10) and waste and resources (IIA Objective 12). No significant negative effects have been identified in respect of the policies contained in this subsection. The policies have been assessed as having minor negative effects in relation to housing (IIA Objective 2), as the policies may constrain housing delivery, whilst cumulatively mixed positive and negative effects have been identified in relation to the economy (IIA Objective 3).

4.60. The Additional Sites IIA Addendum builds on the findings of the Pre-Submission IIA and applies the same assessment framework to the proposed additional sites. In relation to the natural environment, the Addendum identifies that the additional site allocations are likely to result in predominantly positive effects, particularly where development is supported by the protection and enhancement of green infrastructure, the application of biodiversity net gain, and the strengthening of ecological networks. However, the assessment recognises that, without appropriate mitigation, development could result in localised adverse effects on biodiversity, habitats and landscape character. These effects are expected to be addressed through the application of the Local Plan's policy framework, including Strategic Policy S4 and relevant development management policies, together with project-level mitigation measures. Overall, the Addendum concludes that the Local Plan continues to deliver significant positive cumulative effects for the natural environment, subject to the effective implementation of mitigation and enhancement measures.

4.61. 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.

IIA Recommendation	CCC Comment/Action
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)
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,

IIA Recommendation	CCC Comment/Action
	Chelmsford Surface Water Management Plan (2014), Make Space for Girls 2025-2028

- 4.62. 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 the Pre-Submission IIA at Appendix D and Appendix M.
- 4.63. 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).
- 4.64. 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)

- 4.65. 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.
- 4.66. 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.
- 4.67. 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)

- 4.68. 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).

4.69. 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)

4.70. 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.

4.71. 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

4.72. In accordance with the requirements of the NPPF, policies and their requirements should be based on up-to-date evidence.

4.73. In addition to the IIA, the following documents are of particular relevance to the natural environment and support the Review of the Local Plan. Evidence base documents are available online via [Local Plan Review](#).

Document	Summary
Infrastructure Delivery Plan: INF012: Chelmsford City Council Infrastructure Delivery Plan (March-2026) INF005: Chelmsford City Council IDP Stage 2 Report (November 2024) INF001: Infrastructure Delivery Plan Stage 1 Report (February 2024)	The IDP provides a high-level assessment of the infrastructure issues and requirements associated with the spatial strategy and proposed site allocations. An initial baseline report has been updated to include further analysis of the infrastructure required to support the preferred spatial strategy in the Local Plan.
Authority Monitoring Report: Authority Monitoring Report (April 2024 – March 2025) Authority Monitoring Report (April 2023 – March 2024) Authority Monitoring Report (April 2022 – March 2023)	The Authority Monitoring Report is published on an annual basis and monitors the production of the Council's Local Plan Documents against the Local Development Scheme, as well as the performance and effectiveness of the Council's planning policies in delivering the key objectives of the Local Plan.
PAS Toolkits:	The Planning Advisory Service (PAS) produces a number of

<p>OSP001 Toolkit Part 1 - Local Plan Review Assessment</p> <p>OSP011 Toolkit Part 2 - Submission Local Plan Form and Contents Checklist (Available online via Local Plan Review)</p> <p>OSP012 Toolkit Part 3 - Submission Local Plan Process Requirements Checklist (Available online via Local Plan Review)</p> <p>OSP013 Toolkit Part 4 - Submission Local Plan Soundness Quality Assessment (Available online via Local Plan Review)</p>	<p>Toolkits to assist Local Authorities in the review of their Local Plans. 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>Water Strategy for Essex 2024 CC008 ECC Water Strategy for Essex 2024</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>
<p>Air Quality Impact Assessment CC014 Review of the Chelmsford Local Plan – Air Quality Impact Assessment (December 2024)</p> <p>CC016 Additional Sites – Review of Air Quality Impact Assessment (September 2025)</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>Essex Net Zero Policy Technical Evidence CC005: Report 1: Essex Net Zero Policy – Technical Evidence Base 2023</p> <p>CC005-A Report 1 Essex Net Zero Policy Study – Technical Evidence Base July 2023 (September 2025 update)</p> <p>CC005-B Update Report - Essex Energy Offsetting Tariff (September 2025)</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>Integrated Impact Assessment IIA001 Integrated Impact Assessment Scoping Report 2022</p> <p>IIA002: Integrated Impact Assessment Issues and Options 2022</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</p>

<p>IIA004: Integrated Impact Assessment Feedback Report Issues and Options 2023</p> <p>IIA005: Integrated Impact Assessment Preferred Options (May 2024)</p> <p>IIA006: Integrated Impact Assessment Preferred Options Feedback Report 2024</p> <p>IIA007: Integrated Impact Assessment Pre-Submission 2024</p> <p>IIA009: Integrated Impact Assessment Pre-Submission Feedback Report</p> <p>IIA010: Integrated Impact Assessment (IIA): Focused Consultation Additional Sites (Regulation 19) Addendum</p> <p>IIA012: Chelmsford HRA Addendum August 2025</p> <p>IIA013: Integrated Impact Assessment: Additional Sites (Regulation 19) Addendum Feedback Report</p>	<p>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>
<p>Regulation 22 Consultation Statement SD003: Regulation 22 Consultation Statement (Available online via Local Plan Review)</p>	<p>This statement details how the community and stakeholders were consulted during the process of preparing the Local Plan. For each consultation stage, it details who was consulted and when this happened, the main issues raised in the responses and how these have been considered.</p>
<p>Making Places Supplementary Planning Document PL019: The adopted Making Places Supplementary Planning Document (SPD) (January 2021)</p>	<p>This document seeks to promote and secure high-quality sustainable new development. It provides advice on good practice examples on achieving biodiversity net gain, Green Infrastructure, flooding/SuDS, trees and tree planting and much more.</p>
<p>Chelmsford Waterways PL021: A 'Plan for Improving the Rivers and Waterways in and around Chelmsford'</p>	<p>A plan endorsed and approved by the Council in July 2022 (item 7 of Chelmsford Policy Board). The Plan sets out options and opportunities to improve the appearance, attractiveness and recreational use of the rivers and waterways in and around Chelmsford and to promote schemes and activities that enhance their habitat, ecological and biodiversity.</p>
<p>Green Infrastructure BG006: Essex Green Infrastructure Strategy</p>	<p>BG006 - This strategy raises the importance of developing</p>

<p>BG004: Green Infrastructure Strategic Plan</p>	<p>quality green infrastructure and green spaces across Essex to accompany planned growth in the county over the next twenty years. The purpose of the strategy is to take a positive approach to enhance, protect and create an inclusive and integrated network of high-quality green infrastructure in Greater Essex, to create a county-wide understanding of green infrastructure – its functions and values, and to identify opportunities for implementing green infrastructure.</p> <p>BG004 - which sets out the aspirations and opportunities to establish a green infrastructure network across the City and to promote city greening. This includes both green and blue spaces (such as, hedgerows, woodlands, parks, rivers and water courses). Objectives, standards and guidelines for its implementation aim for a City which is more ecologically diverse and robust, better connected and can meet the needs and expectations of its residents, workers and visitors.</p>
<p>Local Nature Recovery Strategy BG007: The Essex Local Nature Recovery Strategy</p>	<p>It sets out a long-term, strategic approach to restoring and enhancing nature across Essex, Southend and Thurrock. It identifies priority habitats and species, maps areas of existing ecological importance, and highlights opportunities for habitat creation, restoration and improved connectivity to support a coherent Nature Recovery Network. The strategy aims to guide investment, land management and planning decisions by establishing where environmental improvements will deliver the greatest benefits, supporting biodiversity net gain and strengthening the resilience of the natural environment at a landscape scale.</p>
<p>Essex Coast RAMS BG009: Essex Coast RAMS (Recreational Disturbance Avoidance and Mitigation Strategy)</p>	<p>It is a county-wide initiative that seeks to lessen the impact of local housing development on</p>

	<p>protected birds along the Essex coast. Developers pay a contribution towards the RAMS for each new dwelling within a 'zone of influence' around the designated sites on the Essex coast including the Crouch and Roach Estuaries SPA and Ramsar site around South Woodham Ferrers.</p>
<p>Climate Action Plan CC022: Chelmsford City Council declared a Climate and Ecological Emergency Action Plan</p>	<p>In July 2019 the Council declared a climate and ecological emergency. An action plan was agreed the following year identifying 15 key areas of activity. A key action is to undertake a greening programme to significantly increase the amount of woodland and the proportion of tree cover in Chelmsford through a sustained medium-term 'mass tree planting' campaign.</p>
<p>Marine Management OSP010: South East Inshore Marine Management Plan</p>	<p>This plan 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.</p>

Consultation Feedback

4.74. 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 www.chelmsford.gov.uk/lp-review

Main issues raised in responses across the four consultations include:

- General support for Strategic Priority 3 and Strategic Policy S4 – Conserving and Enhancing the Natural Environment, including the focus on protecting and enhancing biodiversity, ecological networks and environmental quality.
- Support for strengthening the policy approach to biodiversity and ecological networks, including maximising opportunities for the preservation, restoration, enhancement and connectivity of habitats.
- General support for the requirement for 10% Biodiversity Net Gain (BNG), with some support for a higher target (e.g. 20%) where justified by evidence, though concerns

were raised regarding the deliverability of higher BNG levels, particularly on larger greenfield sites.

- Support for minimising the loss of agricultural land and protecting natural resources.
- Representations encouraging increased tree planting and wider habitat creation measures.
- Requests to review Green Wedge policies and wider environmental protection policies to ensure they remain effective and up to date.
- Support for ensuring that the Local Plan takes greater account of the impacts of climate change on the natural environment, and clearly identifies the role of development in securing environmental improvements.
- Support for referencing and aligning with relevant strategies and evidence, including the Local Nature Recovery Strategy and Nature Recovery Networks, the South East Inshore Marine Plan, and Local Biodiversity Action Plans.
- Representations relating to recreational pressure on designated sites, including comments on the need for, and scope of, mitigation measures associated with Hatfield Forest SSSI.
- Main issues raised to the Additional Sites Consultation related to site specific requirements but not in relation to the wider natural environment agenda and policies set out in the Plan.

Local Plan Approach

4.75. The adopted natural environment policies are broadly consistent with the NPPF, and monitoring indicates that they have been effective in protecting and enhancing environmental assets. Through the Local Plan Review, policies have been strengthened and updated to reflect the updated Plan Vision, Strategic Priorities, evidence base, new legislation and consultation responses. The submission Local Plan includes the following key changes:

- Strategic priorities have been updated to strengthen the focus on the natural environment, including enhancing biodiversity, ecological networks and green infrastructure, and recognising the role of the natural environment in responding to climate change. Strategic Priority 1 includes the Council's commitment to tree planting, including a target of planting at least three new trees for every new home and encouraging street tree provision within developments.
- Strategic Policy S4 (Conserving and Enhancing the Natural Environment) and Development Management Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) have been strengthened to require qualifying development to deliver a minimum of 10% Biodiversity Net Gain (BNG), in accordance with national requirements, and to encourage higher levels of net gain where viable.
- Higher biodiversity net gain requirements are supported within the strategic growth locations, including the Garden Communities, where 20% BNG is sought, supported by the Local Plan Viability Update.
- Policies S4, S11 and DM16 have been updated to reflect local priorities and strategic frameworks, including the emerging Essex Local Nature Recovery Strategy, and to strengthen requirements for the protection, enhancement and delivery of multifunctional green infrastructure, including reference to relevant standards and guidance.

- Requirements relating to recreational disturbance mitigation have been updated, including the need for qualifying development to contribute to the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) to avoid adverse effects on European designated sites. The requirement relating to mitigation at Hatfield Forest has been removed following agreement with Natural England.
- Tree planting and landscape protection have been strengthened through Policy DM17, including requirements for new development to deliver significant tree planting in addition to standard landscaping, supporting biodiversity, climate resilience and placemaking objectives.
- Policy updates and consultation responses have informed site allocation policies, which now include enhanced requirements for biodiversity protection, habitat creation, green and blue infrastructure networks and landscape mitigation. This includes, for example:
 - the East Chelmsford Garden Community (Site 16a), which requires a comprehensive network of green and blue infrastructure, habitat creation and mitigation, and landscape enhancement, alongside amendments to the developable area to protect flood zones, heritage assets and areas of ecological value;
 - Land adjacent to A12 Junction 18 (Site 16b), which requires the delivery of multifunctional green infrastructure and landscape buffers; and
 - Bicknacre sites (Sites 11b and 11c), which require assessment and mitigation of potential cumulative effects on Thrift Wood SSSI.
- Additional updates have been made through engagement with statutory bodies, including strengthening requirements relating to sustainable drainage systems (SuDS), green infrastructure standards and environmental protection, ensuring consistency with national guidance and best practice.

4.76. Although not mutually exclusive of one another, issues specifically surrounding climate change and zero carbon are covered more widely in the Submission Climate Change Topic Paper (TP011).

Alternative Policy Approaches

4.77. 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.

4.78. Alternative spatial strategy options have also been tested in other evidence base reports such as the Water Cycle Study Scoping Report (CC002) and Transport Impact Appraisal of Spatial Approaches (T001). Both the Pre-Submission IIA and Additional Sites IIA Addendum consider different spatial strategy and development site options for growth.

4.79. In summary, key alternatives considered during the plan review in relation to the natural environment include:

- **Policy S4** - No Policy, rely on NPPF. The policy follows the requirements of the NPPF and also includes specific reference to the role of water management in reducing pollution locally
- **Policy DM16** - No policy, rely on NPPF. The NPPF does not go into the level of detail as to how applications should aim to conserve and enhance biodiversity. This policy and its reasoned justification provides greater clarity. This option is therefore not a reasonable alternative. Require at least 20% Biodiversity Net Gain for all major developments. There is no current evidence to demonstrate that exceeding the statutory minimum will be deliverable in all circumstances
- **Policy DM17** - No policy, rely on NPPF. This would not cover local landscape features which are of important to the character and appearance of the local area and would not pick up on local policies for tree planting.

Draft Policies Map

4.80. The following amendments to the Policies Map are identified:

- **Local Nature Reserves**
 - Inclusion of two designations:
 - Galleywood Common (designated October 2024)
 - John Shennan Playing Field (designated 1993; currently omitted)
- **Local Wildlife Sites**
 - Amendments to site boundaries to reflect updates arising from the latest evidence base review
- **Areas for Conservation / Strategic Landscape Enhancement**
 - Extension of designation to include site SGS16a
- **Proposed Country Park**
 - Inclusion of site SGS16a
- **Land Allocated for Future Recreation Use and/or SuDS and/or Biodiversity**
 - Amendments to existing allocation SGS3c
 - New allocations to include: GS11b, SGS16a, and GS17b
- **Open Space**
 - Amendments to reflect changes identified in the Open Space Evidence Base Review Update (December 2024)

NPPF December 2023 Checklist

4.81. 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.

4.82. The table below shows that the Local Plan partially meets/meets all the requirements in respect to natural environment. The full Local Plan Form and Contents Checklist updated in May 2026 is available at [Local Plan Review](#). Please note that the following table supersedes the version presented in the Pre-Submission Topic Paper.

Commentary key:

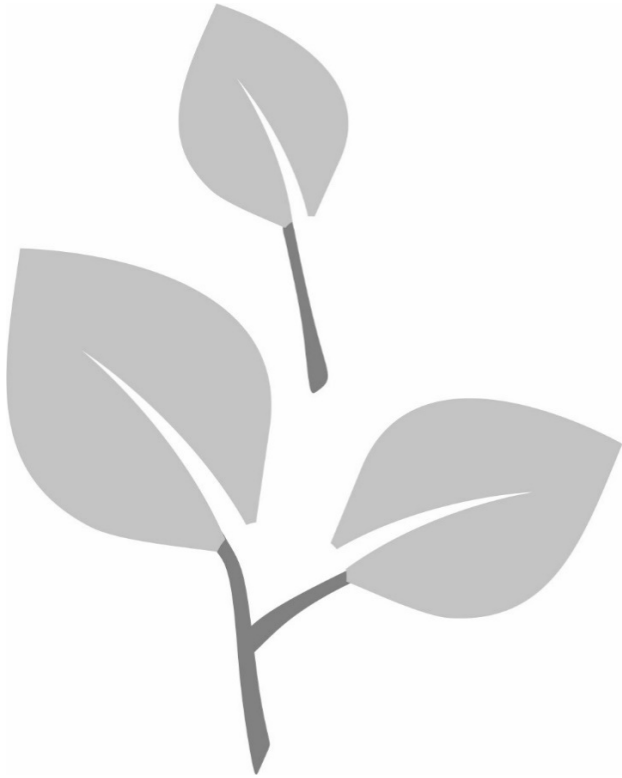
Meets December 2023 NPPF requirement
Partially meets December 2023 NPPF requirement
Does not meet December 2023 NPPF requirement

NPPF Requirement	NPPF Paragraph	Approach in the Pre-Submission Local Plan
<p>Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.</p> <p>Additional text in footnote 53 requires local authorities to consider the availability of agricultural land used for food production when allocating sites for development.</p>	180	<p>Set out in the plan through various policies including Strategic Policies S4, S11 and Policy DM16.</p> <p>Availability of agricultural land used for food production is addressed in the Integrated Impact Assessment. The majority of the agricultural land in Chelmsford is either Grade 2 or 3. The Spatial Strategy promotes development on previously developed sites. However, as the identified development needs cannot be accommodated solely on previously developed land, the loss of some agricultural land to development is inevitable. The plan will lead to a loss of approximately 922 hectares of Grade 3 agricultural land and approximately 264 hectares of Grade 2 land. This equates to around 2.6% of the total Grade 2 and around 4.5% of the total Grade 3 land in the plan area.</p>
<p>Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.</p>	181	<p>Set out in the plan through site allocations and various policies including Strategic Policy S4 and Policy DM16.</p>

<p>Great weight should be given to National Parks, the Broads and the Areas of Outstanding Natural Beauty. The scale and extent of development within these designated areas should be limited. Development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.</p>	<p>182</p>	<p>There are no National Parks or Areas of Outstanding Natural Beauty within Chelmsford.</p>
<p>Conserve the special character and importance of Heritage Coast areas.</p>	<p>184</p>	<p>There are no National Parks or Areas of Outstanding Natural Beauty within Chelmsford.</p>
<p>Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.</p>	<p>185</p>	<p>Set out in the plan through site allocations and various policies including Strategic Policy S4 and Policy DM16. Designated sites are shown on the Draft Policies Map including Local Wildlife Sites. Also supported by the Making Places SPD.</p>
<p>Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.</p>	<p>189</p>	<p>Set out in the plan through site allocations and various policies including Strategic Policy S4 and DM30.</p>
<p>Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.</p>	<p>192</p>	<p>Set out in the plan through site allocations and various policies including Strategic Policy S4 and DM30. There are no Air Quality Management Areas and Clean Air Zones in the plan area.</p>
<p>Ensure that new development can be integrated effectively with existing businesses and community facilities.</p>	<p>193</p>	<p>Set out in plan site allocations and policies including DM20 and DM29.</p>

5. Conclusion

- 5.1. The rationale for the Council's approach to the natural environment to support the Local Plan is clear, robust and compliant with national planning policy. The adopted Local Plan has been reviewed and, while the overarching principles remain sound, the submission Local Plan strengthens and updates the policy framework to reflect new legislation, national policy, updated evidence and consultation responses. This includes a stronger emphasis on biodiversity net gain, ecological networks, green infrastructure and climate resilience, alongside updated policy requirements and supporting guidance to ensure the effective protection and enhancement of the natural environment.
- 5.2. The supporting evidence base, including the Integrated Impact Assessment (IIA) and the Additional Sites Addendum, demonstrates that the Local Plan is expected to result in overall positive effects on the natural environment, including significant benefits in relation to biodiversity, green infrastructure and ecological connectivity. While the assessment identifies the potential for localised adverse effects arising from development, these are expected to be addressed through the implementation of the Local Plan's policy framework, including Strategic Policy S4 and relevant development management policies, together with site-specific mitigation and enhancement measures.
- 5.3. The Local Plan has been prepared through ongoing engagement with key stakeholders, including Natural England, the Environment Agency and Essex County Council, and the Statements of Common Ground demonstrate that there are no outstanding strategic issues in relation to natural environment matters. Amendments made through this process have strengthened the Plan's approach to biodiversity, green infrastructure, flood risk and environmental protection.
- 5.4. Overall, the submission Local Plan provides a coherent and effective framework for conserving and enhancing the natural environment whilst delivering sustainable growth. It is supported by a proportionate and up-to-date evidence base and is consistent with the National Planning Policy Framework and relevant legislation, including the Environment Act 2021. The Plan is therefore considered to be justified, effective and consistent with national policy, and capable of delivering measurable improvements to the natural environment over the plan period.



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