

## OSP005 Pre-Submission Local Plan Form and Contents Checklist (February 2025)

The revised [National Planning Policy Framework \(NPPF\)](#) on 12 December 2024 provides transitional arrangements for Councils that are well advanced with plan preparation under the previous system. The content and timetable of the Pre-Submission Local Plan can comply with these transitional arrangements. This means that the Pre-Submission Local Plan would be examined under the December 2023 NPPF.

The following table compare the content of the Pre-Submission Local Plan against key requirements set out in the December 2023 [National Planning Policy Framework](#). It is based on the Planning Advisory Service (PAS) Local Plan Route Mapper & Toolkits.

### Commentary key:

Pre-Submission Local Plan meets the December 2023 NPPF requirement
Pre-Submission Local Plan partially meets the December 2023 NPPF requirement
Pre-Submission Local Plan does not meet December 2023 NPPF requirement

No.	NPPF 2023 Requirement	Paragraph	Commentary
	<i>General Requirements</i>		
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure.	5	Chelmsford area is not referred to in government policy statements.
	Include any relevant material that is set out in a government policy statement(s) for the area for example written ministerial statements.	6	Account has been taken of relevant written ministerial statements.
2.	Contribute to the achievement of sustainable development and the UN Sustainable Development Goals.	7, 8, 9, 16	Applied throughout the plan. Compliance with any updated UN Sustainable Development Goals covering period post 2030 will be monitored.

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3.	Apply the presumption in favour of sustainable development.	11	Applied throughout the plan.
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	15	Applied throughout. Section 4 provides a positive Vision. Various policies positively address housing needs and other priorities including S4, S6 and S7.
5.	Plans should be: Aspirational and deliverable Contain clear and unambiguous policies Accessible through the use of digital tools Serve a clear purpose avoiding duplication	16	Generally applied throughout the plan.
<i>Plan Content</i>			
6.	Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and design quality of places.	17, 20	Included in Strategic Policies and Site Allocation policies.
7.	Outline which policies are 'strategic' policies	21	Set out in the plan including Strategic Policies S1 to S17 and Site Allocation policies as set out at paragraph 1.9.
8.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> . Where larger scale developments are proposed that form part of the strategy for the area, policies should be set within a vision which looks further ahead (at least 30 years).	22	Applied throughout including for the Garden Communities to have a long-term Vision. On adoption, the plan will continue to have a 15-year period.
9.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	23	Provided in Figure 13.

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10.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	23	Applied throughout in site policies and in a detailed housing trajectory (Appendix C).
11.	Include non-strategic policies to set out more detailed policies for specific areas.	18, 28	Included in Policies DM1 to DM31.
12.	Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.	34, 58	Included in various strategic, site and local development management policies and supported by the Planning Obligations Supplementary Planning Document (SPD), Infrastructure Delivery Plan and Viability Evidence Base.
13.	Local Plans and development strategies are examined to assess if they have been positively prepared, justified, effective and consistent with national policy.	35	Applied throughout. Many elements of the adopted plan are being rolled forward with limited/no change into the Pre-Submission plan.
<i>Housing</i>			
14.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as an advisory starting point. Any housing needs which cannot be met within neighbouring areas should also be taken into account when establishing the amount of housing to be planned for within the plan.	61	The plan is informed by an updated Strategic Housing Needs Assessment (SHNA) conducted using the standard method in national planning guidance. A partial update to the 2023 SHNA was carried out in 2024 via an Addendum Report. This reviewed the implications of moving from housing delivery at the proposed revised standard method for assessing housing needs of 1,206 dwellings per annum set out in the NPPF consultation document published in July 2024. Whilst updating analysis for a new housing number, the report also updates other aspects of the SHNA where new data exists. Duty to Co-operate engagement will continue to be undertaken to establish if there is any unmet need from neighbouring authorities. Essex authorities have a memorandum of understanding on how any unmet housing need should be addressed although using the revised housing

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			requirement figure the housing supply buffer is significantly reduced.
15.	<p>Identify the size, type and tenure of housing needed for different groups.</p> <p>Assess a local need for retirement for retirement and care housing provision when considering the housing needs of older people.</p>	63	<p>The 2024 SHNA Addendum Report updates the need for affordable housing and older and disabled people.</p> <p>Policy DM1 includes a requirement for 10% of market housing on greenfield sites of more than 500 dwellings to be provided for older persons in addition to site allocation SGS7a.</p> <p>Policy DM2 includes a reference to build to rent housing and the need for affordable private rent dwellings.</p> <p>Local need for Specialist Residential Accommodation is considered in the SHNA and 2024 update as well as the 2023 GTAA.</p> <p>Polices DM1 and DM2 are supported by published Planning Advice Notes and a revised draft Planning Obligations SPD will be published for consultation alongside the Pre-Submission Local Plan documents.</p>
16.	Provision of affordable housing should not be sought for residential developments that are not major development, other than in designated rural areas. The definition of major development in the Glossary of the NPPF is development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more.	64, 65	Set out in Policy DM2 and supported by a revised draft Planning Obligations SPD.

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	Where a need for affordable housing is identified, specify the type of affordable housing required.		
17.	Expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. A minimum of 25% of all affordable homes should be First Homes, subject to the transitional requirements set out in the Planning Practice Guidance.	66	Set out in Policy DM2 and supported by a revised draft Planning Obligations SPD.
18.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	67, 68	There are five designated neighbourhood areas with Neighbourhood Plans in progress. The Pre-Submission plan continues to set out a housing requirement of 100 new dwellings for Danbury designated neighbourhood area. Broomfield and Boreham are not being considered for new housing growth in the Spatial Strategy. East Hanningfield does fall within the overall strategy options for growth but a housing requirement has not been requested by the Neighbourhood Plan body.
19.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	68	Appendix C and site allocation policies meet this requirement.
20.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	70	The Pre-Submission Local Plan includes sites to accommodate around 10% of the housing requirement on sites no larger than one hectare. Policy DM1 requires 5% self and custom build homes on all development of more than 100 homes. Further information will be set out in relevant Topic Papers.

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21.	Seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing.	70	<p>Policy DM1 enables the provision for self-build and custom-build homes.</p> <p>Policy DM2 provides the circumstances in which Community-led Exception Sites will be supported.</p> <p>Policies DM1 and DM2 are supported by published Planning Advice Notes and a revised draft Planning Obligations SPD is published for consultation alongside the Pre-Submission Local Plan documents.</p>
22.	Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.	72	Addressed in Policy S7.
23.	Support the development of exception sites for community-led on sites that would not otherwise be suitable as rural exception sites.	73	Policy DM2 D enables the provision of Community-led Exception Sites in non-Designated Rural Areas and the Green Wedge in specified circumstances and be supported by a revised draft Planning Obligations SPD.
24.	Support the supply of homes through utilising masterplans, design guides and codes where appropriate to support larger scale developments.	74	Strategic Policy S7 sets out that Strategic Growth Sites require sites to be delivered in accordance with masterplans to be approved by the Council. Relevant site allocation policies refer to the need for a masterplan to be approved as a specific requirement.
25.	Include a trajectory illustrating the expected rate of housing delivery over the plan period.	75	Detailed trajectory is included in Appendix C.
26.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	82	Set out in Strategic Policy S7 and Policy DM2.

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27.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	83	Defined Settlement Boundaries (DSBs) allow development to come forward within villages in principle. Strategic Policy S7 allows new growth sites which are in accordance with the Spatial Principles and Strategic Policies to be allocated through relevant Neighbourhood Plans.
28.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	84	Set out in policies including S1 and DM8
<i>Economy</i>			
29.	Create conditions in which businesses can invest, expand and adapt.	85	Set out in various plan policies including Strategic Policies S6-S8, Policies DM4-DM6 and employment site allocations including SGS16b and GS9a. The plan considers economic changes since adoption, including the latest predicted growth sectors and the Employment Land Reviews with regards to needs for future employment floorspace.
30.	<p>Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.</p> <p>Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.</p> <p>Seek to address potential barriers to investment and be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances.</p>	86	<p>Set out in various plan policies including Strategic Policies S6-S8, Policies DM4-DM6 and employment site allocations including SGS16b and GS9a. The plan considers economic changes since adoption, including the latest predicted growth sectors and the Employment Land Review (ELR) 2023 and Employment Land Review Focused Update 2024 with regards to needs for future employment floorspace.</p> <p>Strategic Policy S6 makes provision for 162,646sqm of net additional employment floorspace. This is informed by forecasts in the 2023 and 2024 Employment Land Reviews. The 2024 Focused Update reviewed the most up-to-date assumptions and data regarding future economic growth prospects for Chelmsford</p>

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			<p>between 2022 and 2041. As a result, the Pre-Submission Local Plan exceeds the recommended minimum employment space requirements over the period to 2041. It under-allocates the need for employment space requirements associated with the July NPPF proposed revised Standard Method for assessing housing needs of 1,206 dwellings per annum compared with 945 dwellings per annum previously (in the 2023 ELR). However, based on the analysis of the demand and supply position (including sites with extant planning permission for employment), the Council has sufficient consented supply to meet job growth forecasts in overall terms throughout the plan period. The use of 'around' employment floorspace figures in specific site allocation policies also allows for an appropriate degree of flexibility in provision and for a higher or lower density development to be brought forward in conformity with other policies in the Plan as a whole. Strategic Policy S6 has also been amended to require a 'minimum' of 162,646sqm of new employment floorspace. Hence, the Council considers that through the Pre-Submission Local Plan and its future reviews, it will accommodate its employment needs going forward.</p>
31.	Planning policies and decisions should recognise and address the specific locational requirements of different sectors.	87	<p>Set out in various plan policies including Strategic Policies S6-S8, Policies DM4-DM6 and employment site allocations including SGS16b and GS9a. The plan considers economic changes since adoption, including the latest predicted growth sectors and the Employment Land Review (ELR) 2023 and Employment Land Review Focused Update 2024 with regards to needs for future employment floorspace.</p>
32.	Support a prosperous rural economy.	88	<p>Set out in various plan policies including Strategic Policies S6-S8, Policies DM4-DM6 and employment site allocations including SGS16b and GS9a. The plan considers economic changes since</p>



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			adoption, including the latest predicted growth sectors and the Employment Land Review (ELR) 2023 and Employment Land Review Focused Update 2024 with regards to needs for future employment floorspace. The plan continues to allocate Rural Employment Areas and proposes extensions to two employment areas outside built-up areas.
	<i>Town centres</i>		
33.	<p>Define a network and hierarchy of town centres and promote their long-term vitality and viability.</p> <p>Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.</p> <p>Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.</p>	90	Set out in plan policies including Strategic Policies S12 S17, and Policy DM5, and supported by the Retail Capacity Study 2023.
34.	<p>Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.</p> <p>Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.</p>	90	The Retail Capacity Study 2023 does not consider it necessary for the plan to allocate additional convenience or comparison goods floorspace in Chelmsford City Centre or South Woodham Ferrers Town Centre over the plan period to 2041. Policies including DM4 and S17 support appropriate main town uses developments. Chelmsford City Centre boundary has been updated in line with the Retail Capacity Study 2023.
35.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	90	Recognised in policies DM4 and S17 and residential site allocations in Location 1.
	<i>Healthy and safe communities</i>		

No.	NPPF 2023 Requirement	Paragraph	Commentary
36.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	96	Set out in various policies including site allocation policies, Strategic Policy S14, Policy DM23, DM24 and DM28-DM30, as well as through the masterplan process. This objective is also supported by the Making Places SPD.
37.	Provide the social, recreational and cultural facilities and services the community needs.	97	Set out in various policies including site allocation policies, Strategic Policy S14, Policy DM23, DM24 and DM28-DM30, as well as through the masterplan process. This objective is also supported by the Making Places SPD.
38.	Consider the social, economic and environmental benefits of estate regeneration.	98	N/A – there are no estate regeneration proposals in the plan.
39.	Plan positively to meet school place requirements and to encourage development which will widen choice in education.	99	Data from ECC Education Services has been used guide site allocations in the plan to ensure appropriate education provision is made. Plan policies including S9, S10 and relevant residential site allocation policies include requirements for new school provision. More detail will be set out in a Topic Paper.
40.	Work proactively and positively with promoters, delivery partners and statutory bodies to plan for public service infrastructure.	100	The City Council works proactively with service and infrastructure providers. More information will be set out in the Pre-Submission Duty to Cooperate Position Statement. The plan policies are also supported by needs identified in the Preferred Options Infrastructure Delivery Plan.
41.	Promote public safety and take into account wider security and defence requirements.	101	Set out in policies including Strategic Policies S14 and S17, DM30 and various site allocation policies.
42.	Provide and protect open space, sports and recreational facilities which meets the needs of the local area. Consider how they can deliver wider benefits for nature and support efforts to address climate change.	102, 103	Set out in various policies including Strategic Policies S5, S9 and S10, Site Allocation Policies and Development Management Policies DM16, DM20, DM21, DM24. Plan is supported by a Preferred Options Infrastructure Delivery Plan and updated Open Space Assessment is underway.

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43.	Protect and enhance public rights of way and access.	104	Set out in relevant site allocation policies and supported by the Making Places SPD.
	<i>Transport</i>		
44.	Actively manage patterns of growth. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	109	These considerations have been considered in the Spatial Strategy (Strategic Policy S7) which is informed by the wider plan evidence base including the 2024 Parish Audit and Integrated Impact Assessment.
45.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.	110	The plan provides for a variety of site types and uses to minimise journeys. The plan includes proposals and policies which seek to reduce the need to travel including Strategic Policies S2 and S16 and site allocations policies. It has also been prepared with the active involvement of local highways authorities.
46.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	110	The plan safeguards a corridor for the North East Chelmsford Bypass and identifies locations for proposed key transport infrastructure including bridges and areas for additional park and ride facilities to support new development growth.
47.	Provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	110	The plan provides for attractive walking and cycling networks drawing on the Chelmsford Cycling and Walking Infrastructure Plan as set out in Strategic Policy S16 and site allocation policies.
48.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. Such	110	A new roadside facility is identified as a possible complementary employment generating use/service in Strategic Site Allocation 16b.

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	facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services.		
49.	Recognise the importance of maintaining a national network of general aviation airfields.	110	Not relevant as no airfields within the plan area.
50.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	113	Not currently required in the adopted Local Plan and not aware of any current identified needs.
51.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users, the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance including the National Design Guide and the National Model Design Code; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	114	Provision is set out in plan site allocations including requirements to promote sustainable travel provision and ensure suitable site access. Site policies are supported by other policies including Strategic Policies S1 and S16, the masterplan process and Making Places SPD. The site allocations are also supported by the Transport/Highways Modelling and Infrastructure Delivery Plan.
52.	Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	115	The plan site allocations are supported by updated Transport/Highways Modelling. The adopted Local Plan was not found to have an unacceptable impact on highway safety, and the residual cumulative impacts on the road network was not found to be severe.

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	<i>Communications</i>		
53.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	118	Covered by Strategic Priority 8, Strategic Policy S9 and supported by the Making Places SPD.
	<i>Making effective use of land</i>		
54.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	123	Provision is set out in plan through site allocations and supported by the masterplan process, Policies S14 and DM29, and Live Well accreditation. Making Places SPD further supports this.
55.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	123	The plan seeks to make the best use of brownfield sites to meet future development growth needs as identified in updated evidence base reports including the Strategic Housing Needs Assessment, SHELAA, Urban Capacity Study and Employment Land Reviews.
56.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	124	The plan proposes site allocations on land in both urban and rural areas and seeks to achieve environmental gains e.g., by providing enhanced public access to the countryside, new tree planting (DM17) and biodiversity net gain (DM16).
57.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	124	The plan allocates land for such uses including two new Country Parks, land for future recreation use and biodiversity (Policies S4, SGS2, SGS3c, SGS6, SGS7a and SGS16a). The plan is also supported by a Green Infrastructure Strategy which supports such functions.

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58.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	124	The plan seeks to make the best use of brownfield sites to meet future development growth needs as identified in updated evidence base reports including the Strategic Housing Needs Assessment, SHELAA, Urban Capacity Study and Employment Land Reviews. Proposed allocations include sites in Location 1 and Growth Site 5.
59.	Promote and support the development of under-utilised land and buildings.	124	The plan seeks to make the best use of brownfield sites to meet future development growth needs as identified in updated evidence base reports including the Strategic Housing Needs Assessment, SHELAA, Urban Capacity Study and Employment Land Reviews. Proposed allocations include sites in Location 1.
60.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.  Allow mansard roof extensions on suitable properties where their external appearance harmonises with the original building, including extensions to terraces where one or more of the terraced houses already has a mansard.	124	The plan policies support appropriate extensions or alterations to buildings including DM11 and DM23. These will enable mansard roofs to come forward where they are in keeping with local character and context.
61.	Reflect changes in the demand for land.	126	Proposed site allocations are supported by the SHELAA and supporting evidence on availability of land including the Urban Capacity Study and Viability Study. No evidence to indicate circumstances have changed resulting in any allocated sites contained within the adopted plan are no longer being deliverable.
62.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market	128	Addressed in the plan including site allocations and policies including S14, S17 and DM31. The plan is also informed by evidence including on number and type of homes required, land

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	conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.		available to accommodate development, market conditions, viability and infrastructure capacity.
63.	<p>Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards. Area-based character assessments, design guides, design codes and masterplans are appropriate tools to use to help to ensure land is used efficiently while also creating beautiful and sustainable places.</p> <p>Significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area.</p>	129, 130	Provision set out in the plan including in Strategic Priority 7, S16, DM1 and DM24 and site allocations. This is supported by the masterplan process and Making Places SPD.
	<i>Design</i>		
64.	Set out a clear design vision and provide maximum clarity about design expectations through the preparation of design codes or guides consistent with the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design codes and guides can either form part of a plan or be supplementary planning documents.	131-134	Provision is set out in the plan including in Strategic Priority 7, S16, DM1 and DM24 and site allocations. This is supported by the masterplan process and Making Places SPD.



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65.	Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.	135	Provision is set out in the plan including in Strategic Priority 7, S14, S16, DM13 to DM15, DM23 to DM26 and site allocations. This is supported by the masterplan process and Making Places SPD.
66.	Ensure new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.	136	Provision set out in the plan including in S17, DM17 and site allocations. This is supported by the masterplan process, Making Places SPD and the Council's Tree Planting Planning Advice Note
<i>Green Belt</i>			
67.	Ensure proposals for new Green Belts demonstrate why development management policies would not be adequate, any major changes in circumstances to warrant the creation of a new Green Belt, the consequences for sustainable development, the need for Green Belt to support adjoining areas, and how new Green Belt would meet other objectives of the Framework.	144	No changes are proposed to the adopted Green Belt boundaries in the plan as sufficient land is available to accommodate growth outside of the Green Belt. There are no exceptional circumstances evident to justify any Green Belt amendments.
68.	Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where	145	No changes are proposed to the adopted Green Belt boundaries in the plan as sufficient land is available to accommodate growth outside of the Green Belt. There are no exceptional circumstances evident to justify any Green Belt amendments.



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	exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.		
69.	Give first consideration to land which has been previously-developed and/or is well-served by public transport, including increasing density within town and cities centres. Set out the ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.	146, 147	No changes are proposed to the adopted Green Belt boundaries in the plan as sufficient land is available to accommodate growth outside of the Green Belt. There are no exceptional circumstances evident to justify any Green Belt amendments.
70.	Where Green Belt boundaries are being defined, they should be clearly outlined and be consistent with the plan's strategy for meeting identified requirements for sustainable development.	148	No changes are proposed to the adopted Green Belt boundaries in the plan as sufficient land is available to accommodate growth outside of the Green Belt. There are no exceptional circumstances evident to justify any Green Belt amendments.
<i>Climate change, flooding and coastal change</i>			
71.	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.
72.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.  Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.	158, 159	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.

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	<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>		<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 2023 and the Essex Open Legal Advice – Energy Policy and Building Regulations (February 2024). 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 will be available to download from the Essex Design Guide. Further information will also be set out in a Topic Paper.</p>
73.	<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</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 will be set out in a Topic Paper.</p> <p>Policy DM31 Part B provides support for the energy efficiency and low carbon heating improvements to existing buildings.</p>

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	support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic.		
74.	Manage flood risk from all sources and apply a sequential, risk based approach to the location of development.	166, 167	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.
75.	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).	168 - 170	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.
76.	Avoid inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	177	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.
	<i>Natural environment</i>		
77.	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	180	Set out in the plan through various policies including Strategic Policies S4, S11 and Policy DM16.

No.	NPPF 2023 Requirement	Paragraph	Commentary
	<p>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>		<p>Availability of agricultural land used for food production is addressed in the Pre-Submission 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 864 hectares of Grade 3 agricultural land and approximately 244 hectares of Grade 2 land. This equates to around 2.4% of the total Grade 2 and around 4.3% of the total Grade 3 land in the plan area. T</p>
78.	<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>
79.	<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>	182	<p>There are no National Parks or Areas of Outstanding Natural Beauty within Chelmsford.</p>
80.	<p>Conserve the special character and importance of Heritage Coast areas.</p>	184	<p>There are no National Parks or Areas of Outstanding Natural Beauty within Chelmsford.</p>

No.	NPPF 2023 Requirement	Paragraph	Commentary
81.	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.	185	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.
82.	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.	189	Set out in the plan through site allocations and various policies including Strategic Policy S4 and DM30.
83.	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.	192	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.
84.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	193	Set out in plan site allocations and policies including DM20 and DM29.
<i>Historic Environment</i>			
85.	Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.	196	Set out in the plan through site allocations and various policies including Strategic Policy S3, DM13-DM15 and the Heritage Impact Assessments in the plan evidence base.
<i>Minerals</i>			

No.	NPPF 2023 Requirement	Paragraph	Commentary
86.	<p>Provide for the extraction of mineral resources of local and national importance.</p> <p>Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.</p>	215, 216	<p>More relevant to Minerals Planning Authorities.</p> <p>The plan is informed by the Adopted Minerals Local Plan (MLP). Minerals Safeguarding Areas are designated on the Draft Policies Plan. Relevant site allocation policies also require a Minerals Resource Assessment to be undertaken to assess if the site contains a viable minerals resource that would require extraction prior to development.</p>

Chelmsford City Council, February 2025

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1	6.1.25
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