**OSP003**March 2024

## **Preferred Options Local Plan Form and Contents Checklist (March 2024)**

The following table compares the content of the Preferred Options Local Plan against key requirements set out in the <u>National Planning Policy Framework</u> (NPPF) published in December 2023. It is based on the Planning Advisory Service (PAS) Local Plan Route Mapper & Toolkits.

## Commentary key:

Preferred Options Local Plan meets NPPF requirement
Preferred Options Local Plan partially meets NPPF requirement
Preferred Options Local Plan does not meet NPPF requirement

No.	NPPF Requirement	Paragraph	Commentary
	General Requirements		
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.
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.

No.	NPPF Requirement	Paragraph	Commentary
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.
	Plan Content		
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.
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.

No.	NPPF Requirement	Paragraph	Commentary
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 Preferred Options plan.
	Housing		
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. 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. Currently not understood to be any unmet housing need but this will continue to be monitored this through the Duty to Co-operate.
15.	Identify the size, type and tenure of housing needed for different groups.  Assess a local need for retirement for retirement and care housing provision when considering the housing needs of older people.	63	Policy DM1 includes references to build to rent and all relevant groups to reflect the most up to date evidence base. This policy also reflects published Planning Advice Notes.  Local need for such provision is considered in the SHNA. The plan makes provision for homes for older people including in Policy DM1 and site allocation SGS7b. Further work around requiring a specific amount of older people housing on new strategic housing sites is proposed ahead of the Pre-Submission Local Plan (the Preferred Options Housing Topic Paper will contain more details).

No.	NPPF Requirement	Paragraph	Commentary
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.
	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.
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 four designated neighbourhood areas with Neighbourhood Plans in progress. The Preferred Options 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 preferred Spatial Strategy. East Hanningfield does fall within the overall strategy options for growth and a housing requirement will be considered if 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	68	Appendix C and site allocation policies meet this requirement.

No.	NPPF Requirement	Paragraph	Commentary
	sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.		
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 Preferred Options Local Plan includes sites to accommodate around 5% (around 1,000 homes) of the housing requirement on sites no larger than one hectare. It is not possible to achieve 10% in part due to a lack a suitable promoted sites with the preferred Spatial Strategy area. Further information will be set out in the Preferred Options Housing Topic Paper.
21.	Seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custombuild housing.	70	Policy DM1 enables the provision for self-build and custom-build homes on a range of site sizes. Further details are given in the Self-Build and Custom-Build Planning Advice Note November 2023.
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	Set out in Policy DM2.
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.

No.	NPPF Requirement	Paragraph	Commentary
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.
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
	Economy		
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 updated Employment Land Review regards needs for future employment floorspace.
30.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.  Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.  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	86	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 updated Employment Land Review regards needs for future employment floorspace.

No.	NPPF Requirement	Paragraph	Commentary
	and to enable a rapid response to changes in economic circumstances.		
31.	Planning policies and decisions should recognise and address the specific locational requirements of different sectors.	87	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 updated Employment Land Review regards needs for future employment floorspace.
32.	Support a prosperous rural economy.	88	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 updated Employment Land Review regards needs for future employment floorspace. The plan continues to allocate Rural Employment Areas and proposes extensions to two employment areas outside built-up areas.
	Town centres		
33.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.  Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in	90	Set out in plan policies including Strategic Policies S12 S17, and Policy DM5, and supported by the Retail Capacity Study 2023.
	such locations.  Retain and enhance existing markets and, where		
	appropriate, re-introduce or create new ones.		

No.	NPPF Requirement	Paragraph	Commentary
34.	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.  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.	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.
	Healthy and safe communities		
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

No.	NPPF Requirement	Paragraph	Commentary
			provision. More detail will be set out in the Preferred Options Infrastructure 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 as set out in the Preferred Options Duty to Cooperate Position Statement. The plan policies are also supported by needs identified in the 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 an Infrastructure Delivery Plan. An updated Open Space Assessment is underway and any updates to requirements identified through this work will be addressed in the PreSubmission Local Plan.
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.
	Transport		
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 preferred 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	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

No.	NPPF Requirement	Paragraph	Commentary
	length of journeys needed for employment, shopping, leisure, education and other activities.		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 facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services.	110	A new roadside facility is identified as a possible complementary employment generating use/service in Strategic Site Allocation 16b.
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.

No.	NPPF Requirement	Paragraph	Commentary
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.
	Communications		
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.

No.	NPPF Requirement	Paragraph	Commentary
	Making effective use of land		
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 Review.
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.
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 Review. 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

No.	NPPF Requirement	Paragraph	Commentary
			evidence base reports including the Strategic Housing Needs Assessment, SHELAA, Urban Capacity Study and Employment Land Review. 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 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.	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 available to accommodate development, market conditions, viability and infrastructure capacity.
63.	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	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.

No.	NPPF Requirement	Paragraph	Commentary
	masterplans are appropriate tools to use to help to ensure land is used efficiently while also creating beautiful and sustainable places.  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.		
	Design		
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.
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,	136	Provision set out in the plan including in S17, DM17 and site

No.	NPPF Requirement	Paragraph	Commentary
	that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.		allocations. This is supported by the masterplan process, Making Places SPD and the Council's Tree Planting Planning Advice Note
	Green Belt		
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 exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.	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.
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	148	No changes are proposed to the adopted Green Belt boundaries in the plan as sufficient land is available to accommodate growth

No.	NPPF Requirement	Paragraph	Commentary
	plan's strategy for meeting identified requirements for sustainable development.		outside of the Green Belt. There are no exceptional circumstances evident to justify any Green Belt amendments.
	Climate change, flooding and coastal change		
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.  (Parliamentary Statement on Planning – Local Energy Efficiency Standards Update on 13 December 2023 states that the Government does not expect planmakers 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).	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, DM31 and site allocation policies including SGS1cc and GS9a. The Making Places SPD further supports this.  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. Further information will also be set out in the Net Zero Carbon Topic Paper. Further work will be undertaken to locally test the requirement to be expressed as a percentage uplift of a dwelling's Target Emissions Rate calculated using a specified version of the Standard Assessment Procedure. The outputs of this work will inform the Pre-Submission Local Plan.

No.	NPPF Requirement	Paragraph	Commentary
73.	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.  In determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic.	160, 164	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 the Preferred Options Climate Change Topic Paper.  Policy DM31 Part B provides support for the energy efficiency and low carbon heating improvements to existing buildings.
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.

No.	NPPF Requirement	Paragraph	Commentary
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.
	Natural environment		
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 the countryside, and the wider benefits from natural capital and ecosystem services.  Additional text in footnote 53 requires local authorities to consider the availability of agricultural land used for food production when allocating sites for development.	180	Set out in the plan through various policies including Strategic Policies S4, S11 and Policy DM16.  Availability of agricultural land used for food production is addressed in the Preferred Options Integrated Impact Assessment. The majority of the agricultural land in Chelmsford is either Grade 2 or 3. The Preferred 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 853 hectares of Grade 3 agricultural land and approximately 246 hectares of Grade 2 land. This equates to around 2.4% of the total Grade 2 and around 4.2% of the total Grade 3 land in the plan area.
78.	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.	181	Set out in the plan through site allocations and various policies including Strategic Policy S4 and Policy DM16.
79.	Great weight should be given to National Parks, the Broads and the Areas of Outstanding Natural Beauty.	182	There are no National Parks or Areas of Outstanding Natural Beauty within Chelmsford.

No.	NPPF Requirement	Paragraph	Commentary
	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.		
80.	Conserve the special character and importance of Heritage Coast areas.	184	There are no National Parks or Areas of Outstanding Natural Beauty within Chelmsford.
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.

No.	NPPF Requirement	Paragraph	Commentary
	Historic Environment		
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 updated Heritage Assessments evidence base.
	Minerals		
86.	Provide for the extraction of mineral resources of local and national importance.  Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	215, 216	More relevant to Minerals Planning Authorities.  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.  The MLP is currently under review and any changes required to this new plan will be considered at Pre-Submission stage.

Chelmsford City Council, March 2024