

OSP007

Pre-Submission (Regulation 19) Local Plan Soundness and Quality Assessment (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 (Regulation 19) Local Plan can comply with these transitional arrangements meaning it would be examined under the December 2023 NPPF.

The following table assesses the ‘soundness’ of the Pre-Submission (Regulation 19) Local Plan (shortened to ‘Pre-Submission Local Plan’ throughout the table). It is based on the Planning Advisory Service (PAS) Local Plan Route Mapper & Toolkits. A Local Planning Authority should submit a Plan for Independent Examination which it considers to be “sound”. The tests of soundness are set out in the National Planning Policy Framework (NPPF). Plans are sound if they are:

- **Positively prepared** – providing a strategy which, as a minimum seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence
- **Effective** – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF. Please note that in accordance with paragraph 234 of the 2024 NPPF, for the purpose of preparing local plans the Pre-Submission Local Plan will be examined under the 2023 NPPF available via [National Planning Policy Framework](#).

Where appropriate, a score has been highlighted **in purple** on the degree to which the plan meets the requirements underpinning the question. Where a particular question is not applicable, a score of +2 has been used.

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
	Growth Strategy	
A	Summarise your strategy for delivering growth and development in your area	<p>The Pre-Submission Local Plan follows the approach in the adopted Local Plan by continuing to focus new development growth to sustainable locations in three Growth Areas. The amount and type of new development has provided the starting point for forming the Spatial Strategy, which has also been shaped by the Vision, Spatial Principles and the need to secure sustainable development. This includes the protection of the Green Belt and Green Wedge. The Spatial Strategy avoids new development in areas of high flood risk, or ensures that any flood risk is managed for development at highly sustainable locations in Chelmsford City Centre. To meet additional growth needs to 2041, sites are allocated for around 4,233 new homes (with a further 2,180 new homes after 2041), and around 162,646 sqm of employment floorspace. Site allocations in the adopted plan which are not yet built and have been carried forward.</p>
B	Identify the key factors which informed the distribution of development in the local plan policies update	<p>As above (Part A), new housing and employment growth is focused on three Growth Areas continuing the approach taken in the adopted Local Plan. We are not considering growth in the Green Belt. Other influencing factors include meeting our requirements in the NPPF and national guidance, including meeting housing, employment and Gypsy and Traveller and Travelling Showpeople requirements. The Integrated Impact Assessment (IIA) also plays an important role in identifying the key sustainability issues. It assesses the emerging Plan in terms of potential environmental, social, economic and health performance and any reasonable alternatives.</p> <p>A number of additional studies and updates to the evidence base have been undertaken to inform the Pre-Submission Local Plan. The published evidence base is available on the Council website at www.chelmsford.gov.uk/lp-review. This includes an updated Infrastructure Delivery Plan, updated Strategic Housing Needs Assessment, new Archaeology Assessment, new Open Space Study and new Air Quality Assessment.</p>
C	List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery	<p>Growth Area 1: Central and Urban Chelmsford</p> <ul style="list-style-type: none"> - Previously developed sites in the urban area - Site 2 West Chelmsford - Site 3a-3d East of Chelmsford - Site 4: Land North of Galleywood Reservoir - Site 5: Land surrounding Telephone Exchange, Ongar Road, Writtle <p>Growth Area 2: North Chelmsford</p> <ul style="list-style-type: none"> - Site 6: North East Chelmsford (Chelmsford Garden Community)

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		<ul style="list-style-type: none"> - Site 7a-7c: Great Leighs - Site 8: North of Broomfield - Site 9a: Waltham Road Employment Area - Site 14b: Ford End - Site 15: Little Boyton Hall Farm Rural Employment Area <p>Growth Area 3: South and East Chelmsford</p> <ul style="list-style-type: none"> - Site 10: North of South Woodham Ferrers - Site 11b & 11c: Bicknacre - Site 12: St Giles, Bicknacre - Site 13: Danbury - Site 16a: East Chelmsford Garden Community (Hammonds Farm) - Site 16b: Land adjacent to A12 Junction 18 - Site 17a & 17b: East Hanningfield <p>Strategic Policy S9 – Infrastructure requirements, sets out the type of infrastructure requirement to support development during the plan period. Priorities for infrastructure provision or improvements are also contained within relevant Strategic Policies and Site Allocation policies. The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.</p>				
1.	Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is 'an appropriate strategy' within the context of paragraph 35 of the December 2023 NPPF?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The updated Spatial Strategy is clearly set out in Strategic Policy S7. It identifies the scale and distribution of sustainable new development across Chelmsford during the Local Plan period up to 2041 and beyond. It also confirms the Settlement Hierarchy and presents the sites/locations for growth identified indicatively on the Key Diagram. All rolled forward sites from the adopted Local Plan are considered to represent sustainable and sound development allocations which have been previously subject to Independent Examination. New site allocations are considered suitable locations for such development and will help to meet identified needs in a sustainable way. Therefore the Pre-Submission Local Plan is considered 'an appropriate strategy' within the context of the NPPF.				

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		The Pre-Submission Local Plan has also been assessed by the Pre-Submission Integrated Impact Assessment (IIA). This finds that the Pre-Submission Spatial Strategy performs as well as or better than reasonable alternatives tested and will focus new housing and employment growth to the most sustainable locations.				
2.	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Section 6 of the Pre-Submission Local Plan sets out the Spatial Strategy and provides explanation on each of the growth areas. The Pre-Submission Local Plan contains clear policies to allocate sites for housing and employment, as well as housing requirement for Danbury Neighbourhood Plan. Sites which have yet to be fully delivered from the current adopted Local Plan have been carried over to the new plan, with revised numbers where appropriate to reflect updated information including approved masterplans and responses to the Preferred Options Local Plan Consultation Document. The amount of development on new and rolled over sites is supported by evidence which has been used to inform and justify the position reached. This includes the Strategic Housing and Employment Land Availability Assessment (SHELAA), Integrated Impact Assessment (IIA), Call for Sites at earlier stages of plan preparation which informed the SHELAA, latest Housing Trajectory, Viability testing and Infrastructure Delivery Plan (IDP). The Housing Topic Paper provides further detail on forecast delivery rates for housing and an overview of the number of dwellings currently subject to pre-application advice, within major planning applications and secured planning permission.				
3.	Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Strategic Policy S6 – Housing and Employment Requirements sets out the housing requirements and the justification for the approach taken. The Pre-Submission Local Plan will proceed to Independent Examination under the transitional arrangements identified for plan-making in the National Planning Policy Framework (NPPF) December 2024. S6 makes overall provision for 22,990 new homes equating to 1,210 net new dwellings per annum (dpa) including a 1.5% supply buffer. The housing requirement of 1,210 dpa accords with the Government's transitional arrangements for use of the new standard method for calculating housing needs set out the NPPF (December 2024). For Local Plans to use the proposed NPPF transitional arrangements, the emerging local plan minimum housing requirement needs to be at least 80% of the revised standard method. For Chelmsford this is 1,454 dpa i.e. 80% of 1,454 = 1,163 dpa. The 1,210 dpa in the Pre-				

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	<p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	<p>Submission Local Plan meets 83% of identified local housing need (or 3% above the 80% minimum requirement) and is therefore clearly justified.</p> <p>The review plan preparation process has considered a range of other alternative strategies and options, as part of the Integrated Impact Assessment (IIA) process and through technical evidence base testing, before deciding on the policies and sites in the Pre-Submission Local Plan. The has included the assessment of different Spatial Strategies options, higher and lower growth requirements and different housing and employment development sites including:</p> <ul style="list-style-type: none"> • Lower housing growth of 955 dwellings per year based on the Strategic Housing Needs Assessment 2023 • Higher housing growth of 1,406 dwellings per year based on the proposed revised Standard Method in the July 2024 NPPF consultation document. <p>In view of the approach taken to assess reasonable alternatives, the Pre-Submission Local Plan is considered justified. More information on the reasonable alternatives assessed and the reasons for rejecting them is set out in the Pre-Submission Integrated Impact Assessment (IIA) report and in the Local Plan Topic Papers available via Local Plan Review.</p> <p>As referenced above, the Pre-Submission Local Plan includes a small supply buffer. However, this will allow the Council to achieve the step change in the housing requirement and significantly boost supply (1,210 dpa compared with 805 dpa in the current Adopted Local Plan) and comply with the December 2024 NPPF transitional arrangements. The NPPF does not require a supply buffer, and the supply of new dwellings will be closely monitored through the Authority Monitoring Report (AMR). As such, the small supply buffer is appropriate and justified.</p>				
4.	<p>Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Development growth in the Green Belt has been discounted as there is sufficient and suitable land available outside the Green Belt to meet the development needs in a sustainable way. As such, this question is not applicable. Development allocations in the Pre-Submission Local Plan will be focused at settlements outside the Green Belt, informed by a Settlement Hierarchy and Parish Audit to select sustainable locations.</p>				

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	circumstances exist to justify green belt release?					
5.	Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Growth identified in the Pre-Submission Spatial Strategy (Strategic Policy S7) will be accommodated on unbuilt allocated sites rolled forward from the adopted Local Plan and new site allocations. All rolled forward sites are considered to represent sustainable and sound development allocations which have been previously subject to Independent Examination and in the case of the strategic greenfield sites have approved masterplans and planning applications submitted. New site allocations are considered suitable locations for such development and will help to meet identified needs in a sustainable way.				
		<p>A rigorous Call for Sites process at earlier stages of plan preparation including the Preferred Options stage have informed the SHELAA. The SHELAA conclusions provide a robust understanding of the plan area housing and employment capacity and the starting point for the consideration of sites. Suitable new sites and locations for development have subsequently been tested in detail to assess the impacts, suitability for development and to help identify ways to mitigate any adverse impacts. The evidence base is available on the Council's website: https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/local-plan-review/ and includes Strategic Housing Needs Assessments, Employment Land Reviews, Integrated Impact Assessments (which incorporates a Sustainability Appraisal), viability assessments, traffic modelling, Archaeological Assessment, Strategic Flood Risk Assessments, Infrastructure Delivery Plans, Open Space Assessment, Local Wildlife Sites review and Air Quality Assessment.</p> <p>Through the process of reviewing the local plan a range of other alternative strategies and options have been considered, as part of the Integrated Impact Assessment process and through technical evidence base testing, before deciding on the policies and sites in the Pre-Submission Local Plan. This has demonstrated that the sites are considered suitable and sustainable. Site allocation policies have been refined and strengthened, where appropriate, to help address community and stakeholder concerns raised and any suggestions made for their improvement in previous consultations.</p> <p>More information is set out in the Strategic Sites and Spatial Strategy Topic Paper.</p>				

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6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan identifies a housing requirement for the Danbury Neighbourhood Plan. A housing requirement has not been provided to other designated neighbourhood areas as they either are outside the locations proposed for growth in the Spatial Strategy or have not requested a housing requirement.				
7.	Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Each site allocation has its own site policy which identifies the amount and type of development and where appropriate other requirements such as on-site supporting development required, movement and access arrangements, principles in relation to historic and natural environment, design and layout, and specific infrastructure requirements. The sites which have been carried forward from the adopted Local Plan have been updated where necessary. Policies have been informed by the Infrastructure Delivery Plan (IDP) and make clear that infrastructure required is in addition to relevant requirements of Policy S9 and that financial contributions will be sought in accordance with Policy S10. Requirements for masterplanning are also clearly set out in relevant site allocation policies.				
D	What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period? List these targets and the evidence source for this 'need' target?	<p>Strategic Policy S6 also makes provision for 162,646sqm of net additional employment floorspace to help accommodate economic growth and employment requirements up to 2041. This is informed by forecasts in the Employment Land Review (ELR) 2023 and partial update carried out in 2024 via a Focused Update.</p> <p>The Focused Update reviewed the most up-to-date assumptions and data regarding future economic growth prospects for Chelmsford 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</p>				

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		<p>higher or lower density development to be brought forward in conformity with other policies in the Plan as a whole. Strategic Policy S6 also requires a 'minimum' of 162,646sqm of new employment floorspace. Hence, through the Pre-Submission Local Plan and its future reviews, employment needs will be met going forward.</p> <p>The Retail Capacity Study Update 2023 has been used to inform the amount of convenience and comparison goods floorspace and leisure floorspace required over the plan period. This finds that there is no need to allocate new retail and leisure floorspace allocations as needs can be accommodated by the existing stock (e.g. vacant floorspace) and through new strategic allocations.</p>				
8.	Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Spatial Strategy (S7) sets out where the targets will be delivered. Growth Area 1 will deliver around 4,450 new homes, 9,000sqm of new employment floorspace and 5 Travelling Showpeople plots. North Chelmsford (Growth Area 2) will continue to deliver a considerable amount of new development over the plan period including over 7,200 new homes, 5 Travelling Showpeople plots, 10 Gypsy & Travellers pitches and 66,400sqm of new employment floorspace. Growth Area 3 will have significant new growth of around 4,400 new homes, 20 new Gypsy and Traveller pitches, 18 new Travelling Showpeople plots, and 87,200sqm of new employment floorspace over the plan period and beyond.</p> <p>Each site allocation has its own site policy which identifies the amount and type of development and where appropriate other requirements such as on-site supporting development is required. This is supported by the latest Housing Trajectory in the Pre-Submission Local Plan.</p>				
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Strategic Priority 8 - Delivering new and improved strategic and local infrastructure sets out how the Local Plan will seek to ensure that necessary new or upgraded strategic and local infrastructure and facilities are provided alongside the development of new residential communities including education, police, ambulance and fire and rescue, primary healthcare provision, recycling facilities and appropriate drainage, as well as community facilities such as halls and</p>				

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		<p>places of worship. It will also ensure that appropriate levels of open space, sports and leisure provision, such as multi-use facilities, are provided as part of development to meet the needs of residents.</p> <p>Individual site policies identify infrastructure requirements required to support the identified growth together with Strategic Policy S9 Infrastructure Requirements and Strategic Policy S10 Securing Infrastructure and Impact Mitigation.</p> <p>To support this the Infrastructure Delivery Plan (IDP) identifies the infrastructure needed to support the planned development and contains details regarding its phasing and costing. Capacity in infrastructure and services will be monitored through updates to the IDP.</p>				
10.	Can you demonstrate that the transport and other infrastructure needed to support each growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated? Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Council continues to actively engage with Essex County Council (ECC) as the Highway and Transportation Authority, Lead Education Authority, Lead Local Flood Authority and National Highways to assess the transport, education and flood impact of the growth in the Local Plan Review including the Strategic Road Network (SRN) and Local Highway Network (LHN) and how it can be satisfactorily mitigated. This includes preparing an extensive transport modelling evidence base in partnership with Essex County Council (ECC) as the Highway Authority. The Pre-Submission transport impact assessment (December 2024) concludes that with the focus of new development along A12 corridor, impact is largely limited to the A12 and junctions and to a lesser extent A414 east of A12 and A1114 (Baddow by-pass) and A138 (Chelmer Road/Colchester Road) corridors. The forecast modelling also shows that the impact from Local Plan proposals has minor impact along A12 relative to background growth. The assessment finds that Junctions 18 (Sandon) and 19 (Boreham Interchange) will need improvements, improvements to Boreham Interchange within the National Highways A12 Development Consent Order (DCO) Scheme will be required as a minimum to accommodate growth in the Local Plan and that the two garden communities (North-East Chelmsford and East Chelmsford) will need to focus on 60% modal shift targets to sustainable and active travel. However, overall, the assessment concludes that the impact of the Local Plan on the strategic highway network should not be considered severe.</p> <p>Individual site policies identify transport infrastructure requirements required to support the identified growth together with Strategic Policy S9 Infrastructure Requirements and Strategic Policy S10 Securing Infrastructure and Impact Mitigation. This is informed by the 2024 Infrastructure Delivery Plan (IDP) and detailed Viability Assessment, 2024 which demonstrates that the Plan is viable with the burden of cost being placed on developments within it.</p>				

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		<p>The two Garden Community Site Policies (North-East Chelmsford SGS6 and East Chelmsford SGS16a) require measures to enable a 60% share for active and sustainable transport modes. In addition, Strategic Policy S16 requires all new strategic scale development to demonstrate in their place making objectives to achieving a significant modal shift to active and sustainable modes of travel, ensuring walkable neighbourhood principles, providing mobility hubs, and supporting technological advances and smarter sustainable transport options.</p> <p>Uncertainty remains in relation to funding of the A12 DCO Scheme until the Government’s Spending Review concludes in late spring 2025. However, the Council is doing all it can to lobby for Government funding at this stage.</p> <p>See also response above in relation to other infrastructure.</p>				
	Process and Outcomes (see also Toolkit Parts 2 and 3)					
E	What are the cross boundary strategic matters affecting your local plan policies update? List these.	<p>The key strategic matters identified through the consultation with Duty to Cooperate bodies are as follows:</p> <ul style="list-style-type: none">• Delivering homes for all including Gypsy and Traveller 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.				
		-2	-1	0	+1	+2

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11.	Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The City Council undertook a variety of Duty to Co-operate activities in advance of starting the review of the adopted Local Plan including updating its Duty to Co-operate Strategy in January 2022. A Duty to Cooperate Position Statement (2024) has been prepared ahead of the Pre-Submission Local Plan publication. This is available at: https://www.chelmsford.gov.uk/media/g2pn5tmg/dtc002-duty-to-cooperate-position-statement-december-2024.pdf Statements of Common Ground (SoCG) are being prepared following the Preferred Options stage of consultation to record agreement between CCC and several Duty to Cooperate bodies including Chelmsford's neighbouring authorities, Essex County Council, Natural England, Historic England and the Environment Agency. Agreed SoCG will be published alongside the Pre-Submission Local Plan consultation and reviewed ahead of submission of the plan for Independent Examination. The SoCGs clearly set out the process and outcomes of the Duty to Cooperate engagement and highlight areas of agreement and of difference. The aim will be to resolve any outstanding matters where cross-boundary strategic matters will be addressed by email and/or Duty to Co-operate meetings.				
F	Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?	The National Planning Policy Framework (NPPF) published in December 2024 sets out transitional arrangements for Councils that are well advanced with plan preparation. The Pre-Submission Local Plan accords with the transitional arrangements by meeting 83% of identified local housing need – 3% above the 80% minimum requirement. It was also published for the Regulation 19 consultation on 4 th February 2025, within the transitional arrangement deadline of 12 th March 2025. Therefore, the Review of Chelmsford's Local Plan will proceed using the transitional arrangements meaning the Pre-Submission Local Plan will be examined under the previous 2023 NPPF. Overall, the Pre-Submission Local Plan is in line with local and national policy and supported by a comprehensive and up-to-date evidence base and therefore is considered sound overall and ready for public consultation and submission for Independent Examination. This is demonstrated by the assessment of the Pre-Submission Local Plan against the NPPF December 2023 (Local Plan Form and Contents Checklist February 2025) and the process requirements for plan preparation set out in legislation and the NPPF (Local Plan Process Requirements Checklist) which are both available via at www.chelmsford.gov.uk/lp-review . Any outstanding matters will also continue to be worked on up to the Independent Examination. Policy DM25 identifies a new lower water efficiency target of 90 litres/person/day (l/p/d) compared with 110 l/p/d required in Part G of the Building Regulations. Together these will reduce water stress and respond to recommendations in the plan evidence base notably the Water Cycle Studies and Preferred Options Integrated Impact Assessment. The change also				

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	For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?	<p>responds to preferred options consultation responses from Essex County Council and Anglian Water. As such, the Council is satisfied that DM25 can be robustly defended.</p> <p>Policy DM31 sets a local standard for net zero carbon development (in operation) which also 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. As such, the Council is satisfied that DM31 can be robustly defended.</p> <p>Policies SP4, DM16, SGS6 and SGS16a require the Garden Community developments to deliver 20% Biodiversity Net Gain (BNG) above the ecological baseline for the site. The opportunity exists for these developments to seek to achieve 20% biodiversity net gain given their scale and that they will each be creating significant amount of multifunctional green infrastructure on site including open spaces, a Country Park, habitat creation, allotments and specific areas where wildlife and ecological areas are prioritised. The requirement on North-East Chelmsford Garden Community also accords with the site's approved Masterplan (Development Framework Document or DFD for short). As such, the Council is satisfied that 20% BNG targets for the Garden Communities can be robustly defended.</p>				
12.	Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Not applicable to the Local Plan.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	through voluntary agreement).					
13.	Is the local plan policies update: <ul style="list-style-type: none"> in conformity with any 'higher level' plans prepared by the Council; and properly reflecting provisions of any made neighbourhood plan? 	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Made (adopted) neighbourhood plans within the plan area relate to the adopted Local Plan. Parish/Town Council's may decide to review and update their made neighbourhood plans because of the provisions in the new Local Plan.				
14.	Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement to date	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Pre-Submission Local Plan has been informed by a significant amount of earlier consultation and engagement with the local community and key stakeholders in accordance with the Council's Statement of Community Involvement (SCI). This is detailed in the Issues and Options (Regulation 18) You Said, We Did Feedback Report and Preferred Options (Regulation 18) You Said, We Did Feedback Report both available via at www.chelmsford.gov.uk/lp-review . These reports set out a summary of the consultation process including who was consulted and how they were consulted, the representations received, and the main issues raised in the representations. They also include a high-level summary of CCC's response to the comments made and how they have informed the next version of the plan. As such, the Council is satisfied that the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 have been met.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	[you should revisit and update this following the publication of your Regulation 19 local plan policies update]?	<p>The Regulation 18 consultations both went beyond the minimum requirements of legislation and the Council's adopted SCI utilising a range of effective communication tools and channels to ensure that there were opportunities for Parish and Town Councils, residents, stakeholders and businesses to learn more about the Local Plan and how to make comments.</p> <p>Under current regulations there is only the legal requirement to consult on the Local Plan at two stages (Regulation 18 and Regulation 19) which means that the Council gave an additional opportunity for people to comment on the review of the Local Plan at Regulation 18 stage.</p> <p>The Council's SCI is available at https://www.chelmsford.gov.uk/media/byjfrq2v/statement-of-community-involvement-adopted-september-2020.pdf. The SCI describes the Council's principles for consultation and engagement on plan-making which include ensuring consultations are accessible to all and how clear, concise and straightforward language will be used. The SCI also outlines the stages of Local Plan production and identifies statutory consultees, general consultation bodies and Duty to Cooperate Bodies.</p>				
15.	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Following good practice, the Council has undertaken an Integrated Impact Assessment (IIA) for the Review of the Local Plan. This brings together four strands of assessment - the Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), Habitats Regulations Assessment (HRA), an Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA). Each Local Plan stage has been subject to an IIA and a IIA Report published alongside each Local Plan consultation document. Where alternative approaches were proposed/identified, these were evaluated and the outcomes used to inform the subsequent preparation of the Plan. Reasonable alternatives have also been assessed through the IIA process. This has included the assessment of different Spatial Strategies options, higher and lower growth requirements and different housing and employment development sites including:</p> <ul style="list-style-type: none"> • Lower housing growth of 955 dwellings per year based on the Strategic Housing Needs Assessment 2023 • Higher housing growth of 1,406 dwellings per year based on the proposed revised Standard Method in the July 2024 NPPF consultation document • Not having a Spatial Strategy • Development growth in the Green Belt 				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<ul style="list-style-type: none"> Development growth in the Green Wedge Alternative Spatial Strategies including: <ul style="list-style-type: none"> Expanding the existing development allocations within the adopted Spatial Strategy with further expansion of North East Chelmsford (Chelmsford Garden Community) Growth along transport corridors at Chatham Green, Boreham, Howe Green and Rettendon Employment development at Howe Green (Junction 17 of the A12) Other Key Service and Service Settlements outside the Green Belt. <p>As such, the Council is satisfied that all reasonable alternatives have been considered and it is clear why reasonable alternatives have not been selected. Further information is set out in Chapter 6 of the Pre-Submission IIA and in the Strategic Sites and Spatial Strategy Topic Paper.</p>				
16.	Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The IIA includes the Sustainability Appraisal and this robustly assesses the likely significant effects of policies and proposals and any reasonable alternatives against an appraisal framework. The IIA has been used at each stage of the Review and been subject to separate consultation.</p> <p>Relevant Chapters of the Pre-Submission IIA include 4, 5, 6 and Appendices F, G and H. Further information is also contained in the Strategic Sites and Spatial Strategy Topic Paper.</p>				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The IIA process has been integral to the Local Plan preparation process, with IIA being carried out at each stage of the Local Plan Review. IIA Reports have been published at each Local Plan consultation stage and available for public comment. Feedback Reports have also produced summarising the main issues received in the responses and</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	<p>how they have/will be considered. Chapter 5 of the Pre-Submission IIA report appraises the Spatial Strategy, Growth Areas and associated site allocation policies. Overall, this finds that the Pre-Submission Spatial Strategy performs as well as or better than reasonable alternatives tested and will focus new housing and employment growth to the most sustainable locations.</p> <p>Chapter 8 describes how the IIA process has informed the Local Plan and includes the following policy recommendations:</p> <ul style="list-style-type: none">• Tighter water efficiency standards below Building Regulations Optional Standards for all development in DM25• Reference as to how aspirations will be measured in S14• The need to ensure a direct link between the 10% BNG requirement and progress on responding to the biodiversity emergency• A need to secure the long-term management of existing and new habitats• A need to work collaboratively with partners in implementing Carbon Net Zero through DM31• Consideration of measures to address inconsistent delivery on sites• Regeneration schemes should aspire to benefit existing residents rather than displacing them• The degree of self-containment in large urban extensions should consider phasing to ensure residents and vulnerable groups are not disadvantaged in access to basic services• Sustainable design and construction and Construction Environmental Management Plans should reflect industry best practice• Monitoring of the balance between homes and jobs• Partnership working to facilitate behavioural change for e.g. travel, health, water and recycling, to reflect the role of the Local Plan as a tool for enabling change. <p>The Council’s response to the recommendations, including changes made to the Pre-Submission Local Plan, is set out in relevant Topic Papers.</p>				
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: An Equality Impact Assessment (EqIA) has been undertaken at each stage of the Local Plan as part of the IIA. The EqIA, included in full at Appendix I of the Pre-Submission Local Plan IIA, considers the impact of the Local Plan upon those groups with protected characteristics. Overall, it finds that the Strategic Policies do not directly affect a				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		number of the protected characteristics considered under the Equality Impact Assessment, reflecting the intention and scope of the plan as a land use document. All of the Strategic Policies and Site Allocations are assessed as having either a positive, mixed or neutral outcome in respect of the protected characteristics. Consequently, the Pre-Submission Local Plan document is considered to be generally compatible with the duties of the Equality Act 2010.				
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Habitats Regulations Assessment (HRA) is included in full at Appendix N of the Pre-Submission Local Plan IIA. In line with best practice the HRA process has been run alongside each stage of Local Plan development to highlight any potential impacts on European sites. The HRA considers the plan policies in combination with other plans and policies. The Pre-Submission HRA has concluded that, overall, most aspects of the plan will have no significant effects on any European sites due to the absence of effect pathways. These pathways include a combination of water quality, air quality and visitor pressure effects, and effects on species away from the sites. Where such pathways may be present, additional analysis has been undertaken, reinforcing the conclusion that the Pre-Submission Local Plan will have no adverse effects on the integrity of any European sites, either alone or in combination with other plans.				
20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The HRA, at Appendix N of the Pre-Submission Local Plan IIA, confirms that the mitigation required through Local Plan policy to avoid recreational disturbance of birds along the Essex Coast through the RAMS Strategy includes established tools for successfully mitigating new residential development and is an appropriate and effective method of mitigating future potential disturbance as a result of development within the Plan. Further mitigation measures related to RAMS include protection of ecology, nature and biodiversity through RAMS contributions, in DM16; and the creation of circular routes and green infrastructure, as well as minimising car use is included as a requirement of Site Policy 10.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	mechanisms for delivering them?	Mitigation for water quality changes are referenced in Chapter 5 of the HRA, including ensuring development does not contribute to water pollution in Strategic Policy S4; wastewater treatment and SUDS in Strategic Policy S9 and, where relevant, to allocated sites.				
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: It is clear how the HRA has directly influenced the Pre-Submission Local Plan. For example, in requiring tighter water efficiency standards below Building Regulations Optional Standards for all development in DM25. Recreational disturbance of birds along the Essex Coast is also addressed through Policy DM16.				
	Housing Strategy					
22.	Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Council is at an advanced stage of reviewing its adopted Local Plan and to meet the local housing need using the Standard Method in full (1,454 net new homes per annum or an additional 4,636 homes across the plan period following the December 2024 NPPF) would require significant delays and extra costs to the Council and would not be supported by the current evidence base. However, the Pre-Submission Local Plan proposes a housing requirement of 1,210 new homes per annum (22,990 across the plan period) which equates to a significant proportion (83%) of the December 2024 NPPF local housing need figure of 1,454 calculated using the latest standard method. As such, the Council can meet the latest plan-making transitional arrangements enabling the plan to be examined under the December 2023 NPPF.				

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
G	<p><i>Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.</i></p>	<p>To date, none of the local authorities that are considered to share a Housing Market Area with Chelmsford (Braintree District Council, Colchester Borough Council, Maldon District Council and Tendring District Council) have indicated that they are unable to meet their housing need. Outside the Housing Market Area, Basildon, Castle Point and Southend-on Sea Councils have all formally enquired whether Chelmsford can accommodate unmet housing need from their areas. No specific detail has been given on the amount of housing shortfall as none of these authorities have up-to-date Local Plans or are well advanced in their preparation of a local plan. As such, Chelmsford City Council have formally replied stating that they are unable to help at this time.</p> <p>Chelmsford's local housing need has increased by 59% from April 2024 – December 2024 using the standard method, resulting in Chelmsford having the highest annual need in Essex. The Council is progressing the Local Plan through the December 2024 NPPF transitional arrangements, requiring incorporation of most of the housing supply buffer identified at the Preferred Option stage into its local housing need number (housing requirement). Significantly amending the Council's Local Plan and Spatial Strategy would delay publication of the Local Plan resulting in the inability to use the 2024 NPPF transitional arrangements, with revisions requiring earlier stages of consultation to be repeated.</p> <p>The Local Plan's evidence base, including the Integrated Impact Assessment (IIA), demonstrates that there is no capacity to meet unmet housing need from other local authority areas at this late stage of the plan preparation.</p> <p>Neighbouring local authorities are at different stages of plan preparation and review. The evidence bases to support the review of the adopted Local Plan includes a revised Strategic Housing Needs Assessment (SHNA) for Chelmsford. This assesses the size, type and tenure of housing needed for different groups in the community for the administrative area of Chelmsford only.</p> <p>A revised Gypsy and Traveller Accommodation Assessment (GTAA) for Essex has been undertaken to ensure that local planning authorities across Essex together with Southend-on-Sea and Thurrock councils work collaboratively to develop fair and effective strategies to meet the identified need for permanent and transit sites. Local Plans will then identify land for sites where appropriate.</p> <p>Basildon District Council also wish to explore alternative options for meeting their identified need for 235 Gypsy and Traveller pitches and at least 13 Travelling Showpeople plots. Despite undertaking a specific Gypsy and Traveller 'call for sites', Chelmsford City Council has not been able to identify suitable and deliverable site allocations to meet the whole of the identified need for Chelmsford. The Pre-Submission Local Plan includes a criteria-based policy addressing the small shortfall within the Chelmsford City Council boundary. Therefore, there is no capacity to accommodate any unmet Gypsy and Traveller need from Basildon District Council.</p>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		The Essex Planning Officers' Association (EPOA) has agreed mechanisms for dealing with unmet housing and Gypsy and Traveller need, which provide a robust process and should be the starting point for such requests.				
23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably to do so?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: There is no capacity to accommodate any unmet housing and Gypsy and Traveller need from neighbouring authorities as described above.				
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period? Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Appendix C of the Pre-Submission Local Plan contains a detailed housing trajectory and housing trajectory graph. This illustrates that a 5-year housing land supply can be achieved. Justification for the projected timeframes is given in the introduction to Appendix C with more information provided in the Housing Topic Paper.				
25.	Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.	Reason for score: The Pre-Submission Local Plan policies (including the site allocations) will provide for a five-year requirement at point of adoption. A 5% buffer is not required in the December 2023 NPPF. Beyond this period, sites in the supply are developable. Historically the Council has included a housing supply buffer of between 16 – 18% across different Local Plan periods. To help achieve the step change in the housing requirement and comply with the December 2024 NPPF transitional arrangements, the supply buffer has been reduced to 1.4%. This will enable the Plan to quickly pivot and proceed under the transitional arrangements for a plan-led system. The NPPF does not require a supply buffer, and the supply of new dwellings will be closely monitored through the Authority Monitoring Report. The Pre-Submission Local Plan includes a monitoring framework which sets out a series of triggers and actions relating to Strategic Policy S6 Housing and Employment Requirements.				
26.	Does the level of supply provide any ‘head room’ (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: As set out above under Question 26 the Pre-Submission Local Plan include a small supply buffer. However, the reduction in the generous supply buffer provided at Preferred Option (Regulation 18) stage will allow the Council to achieve the step change in the housing requirement (1,210 dpa compared with 805 dpa in the current Adopted Local Plan) and comply with the December 2024 NPPF transitional arrangements. The NPPF does not require a supply buffer, and the supply of new dwellings will be closely monitored through the Authority Monitoring Report. The key new strategic site in the Local Plan – Site 16a East Chelmsford Garden Community (Hammonds Farm) has land allocated for 4,500 new homes with 3,000 new homes envisaged to be delivered within the Plan period (by 2041). It is possible that the delivery on this site could accelerate allowing more homes to be delivered sooner in the trajectory.				
27.	Is the Council reliant on the delivery of any ‘windfall’ sites (sites not specifically identified in the development plan)	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Pre-Submission Local Plan housing trajectory in Appendix C includes an allowance for 2,373 dwellings through windfall over the plan period. This starts from the monitoring year 2027/2028 so that sites are not double				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?	counted. The windfall allowance is based on the historic evidence for windfall completions and future windfall projections. This shows that there is compelling evidence to support 196 dwellings per annum for years one to five in the Council's Housing Trajectory. Given the unpredictability of supply and completion rates over a longer period the City Council have used a reduced rate of 175 dwellings per annum beyond year five until 2040/41 of the Housing Trajectory. It is considered that 175 dwellings per annum is a conservative figure which can be relied upon for the longer-term future projections for windfalls. Further information is provided in the Housing Topic Paper.				
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: Strategic Policy S6, DM1, DM2, DM3 and individual site allocation policies, set out the requirements in relation to housing mix and tenure. The 2024 Strategic Housing Needs Assessment (SHNA) Addendum Report updates the need for affordable housing and older and disabled people. 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 specific site allocation SGS7a. Policy DM1 also sets out requirements for Accessible and Adaptable dwellings, Wheelchair user dwellings and self-build homes and custom housebuilding. Policy DM2 includes a reference to build to rent housing and the need for affordable private rent dwellings. Local need for Specialist Residential Accommodation is considered in the SHNA 2023 and 2024 update as well as the 2024 Gypsy and Traveller Accommodation Assessment (GTAA). Policies DM1 and DM2 are supported by published Planning Advice Notes (PAN) and a revised draft Planning Obligations SPD (Supplementary Planning Document) which is published for consultation alongside the Pre-Submission Local Plan documents.				
29.	Does the local plan policies update specifically address the needs of different groups in the community?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: Strategic Policy S6, DM1, DM2, DM3 and individual site allocation policies specifically address the housing needs of different groups including for affordable housing, older people, Build to Rent, Specialist Residential Accommodation, Self and Custom Build, rural housing and Gypsies and Travellers.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
30.	Can your affordable housing requirements, including any geographical variations, be justified? Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The geographical requirements with respect to affordable housing are fully addressed in the Strategic Housing Needs Assessment Addendum (2024). It is not possible to meet the area's affordable housing need in full, as is often the case in the south-east of England, where high house prices inevitably lead to high levels of affordable housing need. However, the Pre-Submission Local Plan maintains the 35% affordable housing requirement alongside market housing from the adopted Local Plan (in line with Policy DM2) but increases the proportion of affordable housing for rent from 22% - 24.5% of the overall requirement on threshold sites in response to increased need for this tenure of accommodation evidenced in the 2023 SHNA and 2024 Addendum. The corresponding reduction in affordable home ownership from 13% - 10.5% also reflects the updated evidence base. This requirement is justified and supported by the plan evidence base including the SHNA Addendum (2024) and Local Plan Viability Note (2024). Increasing the 35% would result in sites being unviable for development. More information is given in the supporting text for Policy DM2 and the Housing Topic Paper.				
31.	Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence? Does the local plan policies update make adequate provision for the identified needs?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The needs for Travellers and Travelling Showpeople have been assessed via a recent Essex-wide GTAA (2024). Strategic Policies S6 and S7 of the Pre-Submission Local Plan seek to meet needs in full over the plan period mainly through new allocated permanent pitches and plots on strategic sites for Gypsies and Travellers as defined by the Planning Policy for Traveller Sites (PPTS) published in December 2023, with the remaining need to be met through windfall applications using the criteria of Policy DM3 and the regularisation of existing pitches.				
		The Gypsy and Traveller Pitches Trajectory 2022-2041 in the Pre-Submission Local Plan shows that as of December 2024, three windfall sites accommodating 3 pitches in total have already secured planning permission in 2024. The trajectory also includes the completion of a new site providing 9 pitches in 2022/23 via a planning obligation relating to strategic sites allocated in a previous Development Plan. The Council can therefore demonstrate that its policy approach of combining strategic site allocations and windfall permissions is sound.				

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>The PPTS requires local planning authorities in producing their Local Plan to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets. Given the dynamics of the site allocations and the lack of sites submitted to various SHELAAs and a bespoke Call for Gypsy and Travellers sites, it has not been possible to meet this requirement. The lack of a 5-year supply of pitches was a material consideration in the granting of two of the windfall planning permissions issued in 2024 and will continue to be a material consideration when sites are submitted for planning permission at the development management stage. The Council will endeavour to ensure early delivery of additional pitches within the strategic site allocations wherever possible.</p> <p>The Chelmsford GTAA also identified a need for 31 pitches from households not meeting the December 2023 PPTS definition of Gypsies and Travellers. These needs are reflected in Policy DM1 Part C) ii) (Specialist Residential Accommodation).</p> <p>In December 2024, a revised PPTS was published alongside the new NPPF. This widened the definition of Gypsies and Travellers to include 'all other persons with a cultural tradition of nomadism or of living in a caravan'. It is not clear how many of the households that form the 31-pitch need identified in the Chelmsford GTAA would fall within this new definition. At this late stage of Plan preparation, and given the position set out above, it is not considered practical to delay plan preparation to enable a new GTAA to be conducted and considered. Policy DM3 enables weight to be given to households that meet the PPTS definition therefore it is considered reasonable to review this matter upon adoption of the Pre-Submission Local Plan.</p> <p>Paragraph 30 of the 2024 PPTS states that the implementation of policies set out in the NPPF will also apply to plan-making and decision-taking for traveller sites. It goes on to state that in applying those implementation provisions to traveller sites, references in those provisions in the NPPF should be read to include policies in the PPTS. On this basis it seems logical that for the purposes of plan-making, the 2023 PPTS that was published alongside the December 2023 NPPF, would apply to transitional plans be examined against the 2023 NPPF.</p> <p>The Traveling Showpeople Plots Trajectory 2022-2024 included in the Pre-Submission Local Plan shows that as of December 2024, 10 plots within strategic allocations have a resolution to grant planning permission and 11 plots have completed as part of a planning application allowed on appeal (Appeal reference: PP/W1525/W/24/3341747). The need arising from this site was included in the final Chelmsford GTAA and therefore the combination of this planning permission and site allocations from the adopted and Pre-Submission Local Plan currently address the identified need.</p>

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>																								
		<p>The site granted planning permission on appeal was the only proposed Travelling Showpeople site in the SHELAA. A bespoke call for sites for Travelling Showpeople plots was not conducted alongside the Call for Gypsy and Traveller Sites, as the Preferred Options Local Plan proposed sufficient allocations to meet the needs identified in the draft GTAA.</p> <p>It is not possible to expand the existing Travelling Showpeople sites and the intensification of plots on existing sites has led to the overcrowding problems identified as net new need in the Chelmsford GTAA.</p> <p>Currently, the Travelling Showpeople Plots Trajectory shows a five-year supply of 16 plots against an identified need for 26 plots between 2023-2027 in the final Chelmsford GTAA. Consequently, the Council will endeavour to ensure earlier delivery of additional plots within the strategic site allocations wherever possible.</p>																								
32.	Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?	-2	-1	0	+1	+2																				
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement																				
		Reason for score: The Travelling Showpeople Plots Trajectory 2022-2024 in Appendix C of the Pre-Submission Local Plan shows that as of December 2024 the 5-year need will not be met. However, this need can be met over the remainder of the plan period. The Council will endeavour to ensure earlier deliver of additional plots within the strategic site allocations wherever possible. The Gypsy and Traveller Pitches Trajectory 2022-2024 in Appendix C of the Pre-Submission (Regulation 19) Local Plan shows that it is not possible to meet the full level of need for Gypsies and Travellers during the first 5 years. However, this can be met over the remainder of the plan period provided a modest amount of windfall and the 2023 PPTS definition of Gypsies and Travellers can be relied upon. More details are set out in the Housing Topic Paper.																								
H	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	<table><tr><th>Site</th><th>Pitches</th><th>Plots</th><th>Timescales</th></tr><tr><td>SGS2 West Chelmsford</td><td></td><td>5</td><td>2029/30</td></tr><tr><td>SGS6 North East Chelmsford Garden Community</td><td>10</td><td></td><td>2035/36</td></tr><tr><td>SGS7a Great Leighs</td><td></td><td>5</td><td>2026/27</td></tr><tr><td>SGS16a East Chelmsford Garden Community</td><td>20</td><td>13</td><td>10 pitches 2030-2035; 10 pitches 2035/36 and 13 plots 2035/36</td></tr></table>					Site	Pitches	Plots	Timescales	SGS2 West Chelmsford		5	2029/30	SGS6 North East Chelmsford Garden Community	10		2035/36	SGS7a Great Leighs		5	2026/27	SGS16a East Chelmsford Garden Community	20	13	10 pitches 2030-2035; 10 pitches 2035/36 and 13 plots 2035/36
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	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		SGS10 North of South Woodham Ferrers		5	2029/30	
	Justified approaches to plan policy and content					
33.	Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text? [You may wish to check each policy setting a threshold]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Various policies set clear specific policy requirements which are justified by the plan evidence base. This includes: S14 – requires specific policy requirements for all new strategic scale residential development (defined in the policy), development of 50 or more dwellings, Use Class C2 (Residential Institutions) and non-residential development in excess of 1,000 sqm. This is justified by the Essex Design Guide. S16 - requires specific policy requirements for all new strategic scale residential development (defined in the policy). This is supported by viability testing and the traffic modelling evidence base. DM1 and DM2 – requires specific policy requirements for dwelling types and sizes (defined in the policy). The policy thresholds reflect the plan evidence base including the Strategic Housing Needs Assessment (SHNA) (2023) and Addendum Report (2024) and Viability testing. Further information is provided in the Housing Topic Paper. DM17 – requires specific policy requirements for all new strategic scale residential development (defined in the policy). This is supported by viability testing and the Making Places Supplementary Planning Document. Policy DM25 – requires specific policy requirements for different sizes and types of residential development and specific size of non-residential development (defined in the policy). This is supported by the plan evidence base including the Water Cycle Study (February 2024) and Essex County Council Parking Guidance.				
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Pre-Submission Local Plan does not defer strategic matters to other documents. It does appropriately defer more detailed information on the implementation/delivery of certain policies to Supplementary Planning Documents. This is clearly stated in the plan and includes Policies S9, S10, DM1 and DM3.				
35.	Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy? [For example, hierarchies could relate to nature	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Several policies include a hierarchical approach. These set out the levels of protection afforded clearly and are consistent with national policy, and include: Policy S7 - focuses development at higher order settlements outside the Green Belt. The Settlement Hierarchy is clearly described within the policy and is informed and supported by the NPPF and the plan evidence base including the Defined Settlement and Urban Area Technical Notes. Policy S4 and DM16 - defines the hierarchy for Designated Sites in the policy in line with the NPPF. Policy S12 - sets a hierarchy of city, town and neighbourhood centres (as designated on the Draft Policies Map). This follows through into Policy DM5 which sets out clear criteria for development within (or outside of) those centres. This is consistent with the NPPF and is supported by the Retail Capacity Study Update 2023.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	conservation, heritage assets, town centres/retail, settlements.]					
36.	Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence. [For example, policies relating to town centres, employment or retail may seek to limit certain uses.]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Several policies seek to limit certain uses. These are supported by the plan evidence base, provide a clear rationale for the limits specified and include: Policy DM4 - seeks to limit development on employment sites to employment uses, unless certain criteria are met. This is to ensure that defined Employment Areas and Rural Employment Areas continue to be the focus for employment and to maintain a supply of employment space to meet forecast needs over the plan period as defined in the Employment Lane Review (2024) and Focused Update (2025). Policy DM16 - seeks to restrict development within Designated Sites commensurate with their status to protect areas important for habitat and wildlife. This policy accords with national planning policy and the plan evidence base including the IIA and Local Wildlife Sites Review 2025. Policy DM5 - supports certain uses within Primary Shopping Areas, city, town and local centres (as designated on the Draft Policies Map). This is supported by the Retail Capacity Study Update 2023. Specific site allocation policies also limit uses to those identified in the policy to meet identified needs for housing and employment over the plan period.				
37.	Is it clear that any standards proposed for development are justified and deliverable, taking into	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

	KEY QUESTIONS	Assessment				
		Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.				
	<p>account the scale of the development? Where relevant, are they consistent with the principles set out in the National Design Code and National Model Design Code?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p>	<p>Reason for score: Development standards in plan policies are justified and supported by the plan evidence base and consistent with national planning policy and guidance. Examples include:</p> <p>Policy DM1 – requires residential developments over a certain size to provide accessible and adaptable dwellings and wheelchair user dwellings. This is in response to the need identified in the SHNA and Addendum Note and have been found to be deliverable through the plan viability testing.</p> <p>Policy DM24 - requires all new major development to be of high-quality built form and urban design. This accords with the National Design Guide and accompanying National Model Design Code.</p> <p>Appendix B - provides standards that apply to all new residential developments in Chelmsford including open space, private amenity space and tree planting. These standards are justified by the plan evidence base including the Open Space Assessment 2025 and Making Places SPD.</p> <p>Specific site allocation policies are also required to provide semi-natural greenspace of at least 12ha each to meet Natural England’s 8ha/1000 new population metric and minimum circular dog-walking route on or off site of 2.3km.</p>				
	Deliverability					
38.	Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: This has been addressed in full and in detail by specialist consultants HDH Planning & Development Ltd. The viability evidence base reports are published online (Refs V001 and V002).				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
39.	Does the local plan policies update reflect the conclusions and recommendations of your viability evidence? Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Pre-Submission Local Plan policies have been formulated and tested in the viability evidence base reports. Overall, these conclude that the viability and delivery of most development will not be put at risk by the requirements in the plan policies. The 2023 Local Plan Viability Update notes that there would be scope to seek a greater level of developer contributions in the current market and subject to current costs however there is uncertainty in the market so a cautious approach is taken. Policy S11 makes clear that in negotiating planning obligations, the Council will require a fully transparent open book viability assessment to demonstrate full mitigation cannot be afforded and that all possible steps have been taken to minimise the residual level of unmitigated impacts. Policy DM2 sets out clearly when a viability assessment is justified and when a viability assessment is submitted, what is required. In doing so, the plan provides flexibility into relevant policies to allow for site specific and/or unexpected viability constraints to be addressed at the planning application stage.				
40.	Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Section 10 of the Pre-Submission Local Plan sets out a detailed monitoring framework. This is based on the monitoring framework in the adopted Local Plan which has been updated to reflect the changes proposed in the review of the Local Plan. The monitoring framework sets out measurable indicators for monitoring which will be used on an annual basis and published through the Authority's Monitoring Report (AMR). The AMR will be used to report the performance of the Local Plan as well as recommending any actions required to ensure the delivery of the Local Plan.				
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
41.	Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u> ?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
	Where triggers for plan review and/or update are identified are they justified and proportionate?	Reason for score: Strategic Policy S13 – Monitoring and Review sets out the clear intention for reviewing the plan based on the need to review the Plan every 5 years. The monitoring framework sets out the triggers for any actions required, these are justified and proportionate to the key indicator.				
	Plan effectiveness (and associated policy clarity)					
42.	Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years <u>from adoption</u> ? Does the evidence relied on to support those policies correspond/cover this whole period? Where larger scale developments are proposed as part of the strategy, does the vision look further	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: The Pre-Submission Local Plan clearly sets out the timeframe for the Plan period of 2022 – 2041 and Strategic Policies. In line with the approved Local Development Scheme (LDS) the plan is programmed to be adopted in 2026 which will provide for a minimum of 15 years from adoption. Evidence base studies have been updated to cover the whole plan period to 2041. The two Garden Communities (Strategic Growth Sites 6 and 16a) will extend beyond the plan period but are not expected to deliver over a 30-year period.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	ahead (at least 30 years)?					
43.	Does the local plan policies update clearly set out which adopted Development Plan policies it supersedes?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Tables 9 and 10 in Appendix A of the Pre-Submission Local Plan provide a Schedule of Superseded Documents and Schedule of Superseded Policies that will be superseded by the new Local Plan. Paragraph 1.7 clearly sets out that once adopted, the new Local Plan will supersede the previously adopted Local Plan (2013-2036) and its policies and refers readers to Appendix A for more information.				
44.	Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Pre-Submission Local Plan policies have been drafted to ensure that they are clear, concise and easy to understand for the reader and decision-maker. In addition to changes in national planning policy, the plan review has considered the achievability and effectiveness of policies in decision making in the adopted Local Plan (2020). They have also been informed by consultation with officers in the Development Management service. Furthermore, policy implementation issues flagged through the latest published Authority Monitoring Reports have informed the policies in the new plan.				
45.	For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; <u>and</u> (ii) clearly defined on the Policies Map?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Pre-Submission Local Plan meets this requirement. Each designated or defined policy area is clearly represented on the Draft Policies Map in Section 11 and referred to in relevant plan policies including Policies S7, S12, Site Allocation Policies, DM4 and DM8.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?					
46.	Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Most policies are positively worded or neutral and make clear what type of development will be supported and in what circumstances.				
47.	Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed. [Note: If you have said 'all development' this implies equal application irrespective of the development scale/use/location and	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Where policies apply to specific thresholds, uses, scale of development or locations this is clearly set out in the policy. Policies that apply to all development have been carefully considered and are supported by the plan evidence base and NPPF.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	this may not be either justified or deliverable]					
I	State how many policies are in your local plan update? Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.	The Pre-Submission Local Plan contains 103 policies. This includes Strategic, Development and Site Allocation policies. A limited number of policies (i) repeat parts of other policies within the plan (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies such as S4 and S9.				
48.	Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies? If you find duplication or repetition you may want to take minute to consider whether this is appropriate.	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Overall, that there is limited repetition of the NPPF, of other policies and cross referencing in policies, and this is only undertaken where necessary, for example, to highlight the importance of and/or linkages between issues so the plan is read a whole and alongside the NPPF.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Pre-Submission Local Plan avoids repeating other regulatory requirements. Limited referencing is included where necessary for clarity and information, for example in Policies DM1, DM31, DM25 and Appendix B.				
50.	Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker? [For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Pre-Submission Local Plan policies have been drafted to ensure that they are clear and avoid ambiguity for decision-makers. Many policies in the adopted Local Plan have been subject to limited and/or minor changes as part of the plan review.				