



Babergh and Mid Suffolk Joint Local Plan

PAS Self Assessment Toolkit

March 2021

PART 1: LOCAL PLAN REVIEW ASSESSMENT

Not relevant as the Councils are not reviewing a Local Plan.

PART 2: LOCAL PLAN FORM & CONTENT CHECKLIST

Why you should use this part of the toolkit

The following table sets out a checklist of the key requirements for the content and form of local plans as set out in the National Planning Policy Framework (NPPF). Guidance to supplement the NPPF is set out within [National Planning Practice Guidance](#), which is regularly updated by the Government. You should review relevant sections of the National Planning Practice Guidance and consider any implications for your policies.

This part of the Toolkit will assist by informing all plan making stages, including any visioning and scoping exercises seeking to ascertain what the plan should cover. It should be applied before consultation or publication of a local plan update. This will help to ensure that you have considered all of the key plan-making requirements in preparing your plan in accordance with the NPPF.

This part of the toolkit deals only with the local plan content requirements specified in the NPPF. Toolkit Part 1 provides more detail on carrying out a review of the need to update policies within your plan. Toolkit Part 3 sets out the process requirements for local plan preparation as set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Toolkit Part 4.

How to use this part of the toolkit

You can use column C in the table to record the results of your assessment against the checklist for the following plan making stages:

Local Plan Review: The toolkit can be used to inform the decision on whether or not your local plan policies need to be updated. In this case:

- Ask yourself whether the development plan for your area (which may comprise more than one development plan document or include a spatial development strategy and/or neighbourhood plans) still meets current NPPF requirements.

- Identify which policy and document addresses the requirement in column C or identify why it is not relevant.

If your plan was adopted under the NPPF 2012 you might find the following quick reference colour codes helpful to identify new or revised NPPF requirements since the adoption of your plan:

Key:

New plan-making requirement of the NPPF 2019 not contained within the previous 2012 version
Revised plan-making requirement of the NPPF, containing some changes from the 2012 version
Requirement of the NPPF which has not changed from the 2012 version in relation to plan-making

Scoping your policies update: The checklist can also be used to determine the scope of your local plan policies update and ensure that content requirements are addressed. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/ planning context of your local authority area(s); and then
- consider whether your local plan policies update will need to address these content requirements or identify whether they are contained in other documents that form the development plan in your area.

Assessing your draft policies update: The checklist can also be used to ensure that your emerging draft policies update is adequately addressing content requirements of national planning policy. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/planning context of your local authority area(s); and then
- if it is, whether your draft local plan policies update addresses these content requirements (or identify whether they are contained in other documents that form part of the development plan in your area).

How to use the results of this part of the toolkit

This checklist is to help you review your policies and/or develop an update to these where required. There is no requirement to publish or submit this table to the Planning Inspectorate. However, you may find it (or some elements) helpful to assist you in demonstrating how the policies update does/does not accord with the NPPF.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<i>General Requirements</i>		
1.	<p>Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.</p> <p><i>(The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications. 6. Other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission.)</i></p>	<p>NPPF Para 5, 6</p> <p>See <i>italic</i> and brackets text to left.</p>	<p>Cross references are made in Joint Local Plan (JLP) to the East Marine Plan and South East Marine Plan (Document C21).</p> <p>The JLP has had regard to any relevant National Infrastructure Policy Statements on Electricity Networks, Renewable Energy Infrastructure or Gas Supply Infrastructure and Oil Pipelines. No specific requirements for the Joint Local Plan have been identified.</p> <p>National infrastructure projects -</p> <p>https://infrastructure.planninginspectorate.gov.uk/projects/Eastern/</p> <ul style="list-style-type: none"> • East Anglia ONE/TWO/THREE offshore windfarms • Progress Power Gas-Fired Power Station, Eye Airfield • Sizewell C Nuclear Power Station – changes to the proposed development are currently being considered by the Planning Inspectorate. • Galloper Offshore Wind Farm • Bramford – Twinstead Overhead Line (national grid power)

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			<ul style="list-style-type: none"> East Anglia – new water network of interconnecting pipelines, from Scunthorpe to Colchester <p>The JLP has had regard to the - changes at national policy level, including the Town and Country planning (Use Classes) (Amendment) (England) Regulations 2020, and policies have been structured to be compatible with this.</p>
2.	Contribute to the achievement of sustainable development.	NPPF Para 8, 9, 16	<p>Consistent with NPPF, Para 8, and based upon the JLP's vision which embeds the principles of sustainable development, – the JLP sets the following key priorities (03.01):</p> <ul style="list-style-type: none"> Enabling sustainable economic growth Enhancing and protecting the environment Delivering appropriate housing Support the delivery of strong and healthy communities. <p>The priorities are supported by social, economic and environmental objectives under the themes of housing, economy, environment, healthy communities and infrastructure. The approach within the Plan has been developed with the aim of delivering the spatial vision, informed by a range of both evidence-based studies and the Sustainability Appraisal.</p>

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			<p>In accordance with Para 9 of the NPPF, section 04 of the JLP sets out the approach for implementation consistent with the NPPF & the Town and Country (Local Planning) (England) Regulations as amended - http://www.legislation.gov.uk/ukxi/2012/767/regulation/34/made</p> <p>As per para 16, the JLP:</p> <ul style="list-style-type: none"> • Sets out the objective of contributing to sustainable development and the policies and sites within the Joint Local Plan have been subject to and informed by Sustainability Appraisal throughout their development, along with reasonable alternative options.
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	<p>For plan making purposes the JLP has:</p> <p>A) The JLP has pro-actively and positively undertaken to identify and allocate development opportunities of a sufficient supply and mix to ensure flexibility to rapid changing needs. The JLP has sought to ensure that both urban and rural areas have development opportunities to meet their specific needs.</p>

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			<p>B) The Strategic Policies (Part1) of the JLP ensure that provision is made for objectively assessed needs in the area. In particular, strategic policies SP01 – SP-07 set the framework and broad spatial pattern for meeting the key objectively assessed needs for housing and economic development, supported by strategic infrastructure provision (SP08) and the protection and management of the environment (SP09 & 10). No unmet needs have been identified from neighbouring areas, and the Councils have positively engaged on this through the Duty to Cooperate requirements. For further information see the Core Document Library Section E document references ES01 to ES20.</p> <p>Consideration has been given to the environmental qualities and impacts of the area and Strategic Policies SP08-SP10 seek to ensure that appropriate consideration and mitigation is afforded to the environment.</p>
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	The vision, supporting strategic policies (SP01 – SP10) and Part 2 policies LP01 and LP35) and Part 3 allocations (LS01 & LA01 – LA120) set the framework for addressing housing need and other economic, social and environmental priorities across both districts.
5.	Plans should be: Aspirational and deliverable	NPPF Para 16	As per para 16, the JLP:

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	<p>Contain clear and unambiguous policies</p> <p>Accessible through the use of digital tools</p> <p>Serve a clear purpose avoiding duplication</p>		<ul style="list-style-type: none"> • The policies contained therein are positively prepared to manage the delivery of development. • Sets out aspiration targets and policy thresholds which are considered deliverable (and supported through evidence & assessment, including where relevant the <u>Infrastructure Delivery Plan (Document ER01)</u> and the <u>Plan Viability and CIL review study (Document ER02)</u> • There have been 2 separate regulation 18 consultation exercises which have shaped the content of the plan – see consultation statement (Document A06), following which a Regulation 19 Consultation was undertaken (Nov. 2020) • Is clearly written and unambiguous. • The consultations have been undertaken in accordance with the SCI - Accessible via digital tools. • Serves a clear purpose without duplication.
6.	<i>Plan Content</i>		
7.	<p>Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and quality of development.</p>	<p>NPPF Para 17, 20</p>	<p>SP03 - In all cases the scale and location of development will depend upon the role of settlements within the settlement hierarchy, spatial distribution, infrastructure capacity and opportunities, as well as having regard to natural, built and historic environment. SP03 also sets out the roles of</p>

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			<p>settlements, with Ipswich Fringe settlements, Market Towns/Urban Areas and Core Villages acting as a focus for development. – Settlement boundaries have been created in order to demonstrate the extent of land required to meet the development needs of the plan. Policy also requires high quality design.</p> <p>SP04 sets out the broad spatial distribution of new additional housing provision. SP05 sets out strategic employment sites which shall be protected, and expansion supported in principle. Net additional employment sites along the strategic transport corridor (A12, A14 and A140) supported in principle subject to criteria. SP06 sets out the defined town centre areas where proposals for retail and town centre uses will be supported. SP08 sets out the expectations of planning applications to include appropriate infrastructure provision, the policy also specifies that when planning decisions are made, regard will be given to the Infrastructure Delivery Plan (<u>Document ER01</u>) and associated evidence base. Key strategic infrastructure projects are also identified in this policy. Site allocations have been identified with the consideration of the availability, suitability and deliverability of sites, constraints (e.g. flood zones) and infrastructure capacity / opportunities (para 09.08 of the JLP).</p>

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			Further detail is set out in the settlement hierarchy and spatial housing approach topic papers (Documents EP01 and EP03).
8.	Outline which policies are ‘strategic’ policies	NPPF Para 21	Part 1 of the JLP contains Strategic Policies which are identified as policies SP01 to SP10. Local Policies are contained within Part 2 of the JLP (LP 1 – LP35). For the purposes of the NPPF, site allocations are classified as strategic policies – these are identified in Part 3 of the JLP document referenced “LA001 – LA140].” Policy LS01 identifies hinterland and hamlet allocations..
9.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> .	NPPF Para 22	The published Local Development Scheme anticipates adoption of the JLP within 2022. Therefore, the JLP has an end date of March 2037 (19 years from the 2018 base date).
10.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	All designations are identified on the Councils interactive mapping system as well as key policies map extracts in the printed version of the JLP. The Ipswich Fringe, strategic transport corridors and Core Villages are all identified on the Key Diagram.
11.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	SP01 sets out the housing requirement for the plan period. SP04 sets out the overall spatial distribution of housing land. The background text to policy SP01 recognises that delivery is a key challenge for the plan. A buffer of approximately 20% in the supply of new land for housing is provided to give Plan

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			flexibility and greater certainty that the objectively assessed needs can be met. It will also help to ensure favourable positions are maintained on both the five year land supply and housing delivery test assessments during the lifetime of the Plan.
12.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28	Part 2 of the JLP contains non-strategic / local policies (identified as LP policies). This includes provision of local infrastructure and community facilities, design principles, conserving and enhancing natural and historic environment and other development management policies.
13.	Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 57	<p>Contributions for infrastructure provision that is expected from development is set out in the Infrastructure Delivery Plan (<u>Document ER01</u>), where the needs are identified together with estimated costs and expected funding mechanisms. This is in accordance with Para 34 of the NPPF, as it includes infrastructure, such as that needed for education, health, transport, flood and water management, green and digital infrastructure.</p> <p>Policies SP08, SP09 and LP35 aim to provide a policy framework for securing an appropriate level of infrastructure, including developer contributions and obligations. Requirements for proposed allocations are set out in each allocation policy and have been informed by the content of the IDP(<u>Document ER01</u>). The policy does not</p>

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			<p>undermine the deliverability of the plan as the policies and broad development typologies have been subject to appropriate viability testing (Document ER02) in accordance with the national guidance.</p> <p>In terms of setting out the levels and types of affordable housing provision required, this is dealt with under policy SP02 (Affordable Housing).</p> <p>All of the Plan policy requirements have been subject to an appropriate viability assessment (Document ER02)</p>
	<i>Housing</i>		
14.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point.	NPPF Para 60	The standard method has been followed to identify the overall housing needs for both districts. SP01 sets out the minimum housing requirement for Babergh and Mid Suffolk over the plan period. In accordance with NPPF/NPPG requirement calculated using 2014-based household projections and most recent affordability ratios published in March 2020. Document EP02 sets out how the local housing need has been calculated.
15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 61	The JLP identifies and plans to meet the needs of different groups within the community. Appendix 1 of the Council's Housing OAN Topic Paper (Document EP02) provides a summary of all the needs identified.

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16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 62	<p>The SHMA – Part 2 Partial Update (Document EH05) identifies the affordable housing needs.</p> <p>The following tables are included within the background text to Policy SP02, which is extracted from the SHMA Part 2 Update (Document EH05). The needs are also identified in the Council’s OAN Topic Paper (Document EP02)</p> <table><tr><th colspan="6">Babergh Affordable Housing Mix (tenure & size) 2018 - 2036</th></tr><tr><th>Tenure & size</th><th>1 bed</th><th>2 bed</th><th>3 bed</th><th>4 or more bed</th><th>Total</th></tr><tr><td>Shared ownership</td><td>134 (26.4%)</td><td>165 (32.6%)</td><td>156 (30.9%)</td><td>51 (10.1%)</td><td>506</td></tr><tr><td>Social rent & Affordable rent</td><td>271 (27.6%)</td><td>228 (23.2%)</td><td>225 (22.9%)</td><td>259 (26.4%)</td><td>984</td></tr><tr><td>Discount home ownership & starter homes (demand)</td><td>106 (21.3%)</td><td>173 (34.8%)</td><td>145 (29.2%)</td><td>72 (14.5%)</td><td>496</td></tr><tr><td>Total</td><td>511</td><td>566</td><td>526</td><td>382</td><td>1986</td></tr><tr><td>Total per annum</td><td>28</td><td>32</td><td>29</td><td>21</td><td>110</td></tr></table> <p><i>Percentages calculated as the number of bedrooms required for each tenure. Please note percentages may not add up to 100% due to rounding.</i></p>	Babergh Affordable Housing Mix (tenure & size) 2018 - 2036						Tenure & size	1 bed	2 bed	3 bed	4 or more bed	Total	Shared ownership	134 (26.4%)	165 (32.6%)	156 (30.9%)	51 (10.1%)	506	Social rent & Affordable rent	271 (27.6%)	228 (23.2%)	225 (22.9%)	259 (26.4%)	984	Discount home ownership & starter homes (demand)	106 (21.3%)	173 (34.8%)	145 (29.2%)	72 (14.5%)	496	Total	511	566	526	382	1986	Total per annum	28	32	29	21	110
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17.	Expect at least 10% of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups	NPPF Para 64	The approach is consistent with national policy. There is no reason to repeat or depart from this.																																										
18.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	NPPF Para 65	Table 4 in the JLP (referenced in SP04 – Spatial Distribution policy) provides each designated neighbourhood area with a minimum housing requirement. These figures reflect the overall plan strategy and include outstanding planning permissions at the base date of the plan and growth allocated through the JLP.																																										
19.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	NPPF Para 67	A housing trajectory has been prepared for the Plan covering the period 2018 to 2037 (see Appendix 01 of the JLP). Due to separate housing needs and targets for Babergh and Mid Suffolk areas, a trajectory has been prepared for each																																										

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			<p>district. Document EM04 and Document EM05 shows the Council's full published 5 year land supply positions in Oct 2020.</p> <p>Both Councils have a significant supply of land to meet identified housing needs. An appropriate supply buffer has been included in the Plan to enable flexibility and contingency to address any unforeseeable delivery problems. Regular monitoring will be undertaken to record performance.</p>
20.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 68	<p>The Councils have identified a range and diversity of sites across the Plan period. The supply of small sites have been identified as follows:</p> <ul style="list-style-type: none"> • Babergh - 1,306 (16%) dwellings from small sites, from a housing requirement of 7,904 dwellings. • Mid Suffolk – 1,398 (14%) dwellings from small sites, from a housing requirement of 10,165 dwellings. <p>See Document EP02 for the relevant calculations.</p>
21.	Support the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area.	NPPF Para 71	This is addressed in national policy and entry level exception sites can be considered through windfall development.
22.	Include a trajectory illustrating the expected rate of housing delivery over the plan period, and requiring a buffer of 10% where the local planning authority wishes to demonstrate a	NPPF Para 73	As per row 19 above, a housing trajectory for each district area has been prepared, in Appendix 01 of the Plan. An

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	five year supply of deliverable sites through an annual position statement or recently adopted plan.		approximate 20% buffer has been built into the overall land supply.
23.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 77	Policy SP01 is flexible to allow for changing housing circumstances over the lifetime of the Plan and also allows for further appropriate local evidence to be taken into account. Policy LP08 (affordable housing policy) and its supporting text specifically encourages sustainable community-led housing schemes. Furthermore, Policy LP08 also accommodates for an element of market housing on rural exception sites at a threshold of up to 35% will be supported only where it is necessary in order to deliver the affordable housing to ensure financial viability and greater flexibility in suitable and sustainable exception sites.
24.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 78	The plans spatial strategy seeks to secure a balance to growth in the strategic transport corridor areas, as well as ensuring that other market towns and rural communities' benefit from appropriate growth. All settlements of 10+ well related dwellings have defined settlement boundaries as set out in the policies map. SP03 supports development within settlement boundaries subject to criteria. The windfall development in hamlets and dwellings clusters policy (LP01) accommodates infill development where appropriate in rural areas.

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25.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 79	<p>Policy SP03 sets out that <i>outside of the defined boundaries in isolated locations development will only be permitted in exceptional circumstances</i>, in accordance with para 79 of the NPPF. Exceptionality shall be considered in accordance with national policy and guidance.</p> <p>Other policies which are of relevance to homes in any locations: LP02 makes provision for residential annexes. LP03 makes provision for residential extensions and conversions.</p>
<i>Economy</i>			
26.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 80	<p>As detailed in economy topic paper (Document EP06) a key priority of the JLP is to enable sustainable economic growth.</p> <p>Overall the intention of the policies related to the economy is to support sustainable economic growth on employment sites, in town centres and with related facilities (including the tourism sector), whilst providing flexibility to respond to the unforeseen changing economic circumstances.</p>

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			<p>The retention of the network of employment sites across the District is supported, unless they are no longer deemed viable. It is recognised that some of the uses on the sites may change, particularly as a result of the Use Class Order amendments, however that shall have to be monitored as the extent of change on existing sites cannot be managed through planning policy nor forecast. Further growth of strategic sites is supported, subject to relevant criteria, along the strategic growth areas and transport corridors.</p> <p>The network of town and service centres is supported in line with national policy with slight amendment proposed to the defined centres based on the evidence.</p> <p>Similarly tourism, cultural and recreational assets are supported.</p> <p>SP05 sets out a framework to support and encourage sustainable economic growth with 'in principle' support made to the protection and expansion of identified strategic employment sites.</p> <p>SP06 supports retail and town centre uses in appropriate location.</p>

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			<p>SP07 is based on the recognition of the importance of tourism to the local economy and sets a framework for supporting tourism and leisure proposals.</p> <p>LP12 – LP16 set out development management policies relevant to assessing, supporting and managing proposals for employment, retail, leisure, town centre and tourism uses.</p>
27.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.	NPPF Para 81	<p>A key priority of the JLP is to enable sustainable economic growth. The economy topic paper (Document EP06) details the national and local policy context to proactively encourage sustainable economic growth.</p> <p>Economically the vision for Babergh and Mid Suffolk seeks to [enable]....<i>significant growth...,embedding the principles of sustainable development, balancing social, economic and environmental issues.</i></p> <p>to do so, ...strategic employment sites will be protected</p> <p>SP05 sets out a framework to support and encourage sustainable economic growth with 'in principle' support made to the protection and expansion of identified strategic sites.</p>

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			<p>. The Councils' Open for Business Economic Strategy (<u>Document D16</u>) identifies issues to be addressed at the local level. This includes protecting the employment base and safeguarding employment land, whilst delivering a range of employment land to meet identified needs – all of which are supported through the policy framework set out in the JLP..</p> <p>.</p> <p>The Councils are also undertaking Vision for Prosperity work in Hadleigh and Sudbury in Babergh and in Eye, Needham Market and Stowmarket in Mid Suffolk District. These are the market towns within the two districts and Policy SP05 also identifies strategic sites in these locations.</p>
28.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 81	<p>SP05 sets out a framework & criteria to support and encourage sustainable economic growth with 'in principle' support made to the protection and expansion of identified strategic sites.</p> <p>LP12 provides criteria to determine proposals for employment use.</p> <p>LP 13 seeks to safeguard economic opportunities.</p>

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29.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 81	<p>The overall strategic basis of the JLP is to meet OAN, whilst supporting the delivery of necessary infrastructure.</p> <p>The spatial distribution (SP04) reinforces the intention to address barriers and maximise the benefits from access to infrastructure. Further detail is set out in the economy topic paper.</p> <p>With regard to specific infrastructure, The Sector Needs Assessment (SNA) (Document EC03) identified broadband connectivity as a key factor influencing businesses locating to the area and expanding..</p> <p>SP08 identifies improvements to digital infrastructure technology as a strategic priority for investment and LP33 seeks to manage provision of all (including digital) infrastructure.</p>
30.	Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	NPPF Para 81	<p>A key priority of the JLP is to enable sustainable economic growth.</p> <p>SP05 sets out a framework to support and encourage sustainable economic growth with 'in principle' support made to the protection and expansion of identified strategic sites. The policy contains criteria for assessment of proposals</p>

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			<p>with the aim of ensuring there is a deliverable supply of employment sites available to meet the changing needs of the economy.</p> <p>LP12 sets out positively prepared criteria for assessing proposals for employment use as well as specifically supporting small scale employment use in predominantly residential areas.</p> <p>LP13 seeks to safeguard economic opportunities, subject to criteria, to maintain a diverse supply of employment land.</p>
31.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 82	<p>SP05 sets out a framework to support and encourage sustainable economic growth with 'in principle' support made to the protection and expansion of identified strategic sites. The sites set out in SP05 cater for a range of clusters and networks which are concentrated in specific locations.</p> <p>LP13 sets criteria for considering proposals for expansion and relocation of employment use to meet business needs.</p>
32.	Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.	NPPF Para 83	SP05 sets out existing employment areas in core villages and rural clusters should be retained and their expansion supported where appropriate.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>SP07 supports tourism provision where appropriate in scale and character.</p> <p>LP12 provides criteria for determining proposals for employment development.</p> <p>LP15 & LP16 tourism – supports improvements and expansions of facilities where criteria are met & support conversion of an existing rural building and for countryside tourism accommodation.</p>
33.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 83	<p>LP15 tourism & LP 16 countryside tourist facilities– supports improvements and expansions of facilities where criteria are met & support conversion of an existing rural building</p> <p>LP24 – New agricultural/ rural buildings in the countryside provides criteria for new agricultural/rural buildings that are suitable or sustainable subject to criteria.</p> <p>LP22 change in land use for equestrian or other animal/rural land base use provides the opportunity for change in land use including erection of building(s) subject to criteria. The second part of the policy relates to residential accommodation subject to criteria.</p>
34.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 83	<p>SP07 supports tourism provision where appropriate in scale and character.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>LP15 tourism – supports improvements and expansions of facilities where criteria are met & support conversion of an existing rural building.</p> <p>LP16 supports appropriate countryside tourism accommodation.</p>
35.	Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	NPPF Para 83	LP31 sets policy to support and safeguard key services and facilities within the districts
36.	Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	NPPF Para 84	<p>SP03 provides the settlement hierarchy.</p> <p>SP05 – supports sites and clusters in core villages and rural areas.</p> <p>LP24 – New agricultural/ rural buildings in the countryside provides criteria for proposals to demonstrate accordance with,</p>
37.	<i>Town centres</i>		
38.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 85	SP06 supports a sequential approach to new retail and town centre uses (taking account of the recent amendments to the use classes) in the defined centres of Sudbury, Hadleigh, Stowmarket, Needham Market, Eye and Debenham.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>LP14 Town Centre and retail - -</p> <ul style="list-style-type: none"> To maintain vitality and viability proposals that include 'above the shop' homes, and/or a mix of retail and other leisure and cultural activity, including support for the evening economy, and improvements to the public realm (such as tree planting and green infrastructure) will be encouraged, and proposals that ensure new and existing open spaces, community facilities, including meeting places that are accessible to all will be supported in principle. LP14 and proposal maps - Define town centre boundaries. Applications for town centre uses outside of town centre boundaries require a sequential test. Applications in excess of 2,500m² will be required to provide an impact assessment. Applications which would have a significant adverse impact on the vitality and viability of nearby centres will not be supported.
39.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 85	Town centre boundaries are identified on the relevant policies map for Hadleigh, Sudbury, Stowmarket, Needham Market, Eye and Debenham.
40.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 85	Markets located in towns of Sudbury, Hadleigh and Stowmarket. JLP does not allocate marketspaces for alternative uses. No evidence to suggest that new markets are required, or existing ones need to be expanded.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
41.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 85	There is considered capacity within identified centres to meet the current and future needs for town centre uses, particularly taking account of the new flexibilities enabled through Use Class E and F.
42.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 85	Limited evidence to suggest that edge of centre sites are required for town centre uses. SP06 and LP14 require sequential tests to be applied for out of town centre applications. The potential uncertainties as a result of the current economic baseline and the recent changes to the use class order.
43.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 85	The overall settlement hierarchy (SP04) is based on a tiered approach which is based initially on the districts' towns and centres with numerous Part 3 allocations being proposed on locations which would support the vitality of centres. LP14 requires consideration to be given to not eliminating separate access arrangements to upper floorspaces which could be used for residential and other uses.
44.	<i>Healthy and safe communities</i>		
45.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	NPPF Para 91	LP19 – includes consideration of effects on health and living conditions

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>LP26 requires proposals to be designed for health, amenity, well-being and safety; incorporate high levels of public open space; design out crime and create an environment where people feel safe and has a strong community focus.</p> <p>LP30 – requires developments in excess of 1ha to provide on-site open space</p> <p>.</p>
46.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 92	<p>LP30 - Developments in excess of 1 hectare will be required to provide on-site open space provision to meet identified needs/deficits, unless there is a Council preference to make improvements to existing open space within the locality in an equally or more accessible location than the proposed development.</p> <p>LP31 supports the provision of new community services and improving existing facilities, and retention of these services/facilities unless compensatory provision is provided, or the service is not viable or valued by the community. For the purpose of this policy, services and facilities include: village and public halls, community centres, places of worship, cinemas, libraries, leisure centres, museums, public houses, restaurants, cafés, convenience shops, banks, building societies, and post offices. The loss of facilities will either require compensatory provision or the applicant to demonstrate that the service or facility is not viable or valued by the community, either in its current or future form.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
47.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 92	The JLP policies have been produced reflecting information of gaps and needs identified in the documents listed in the Sustainability Appraisal Plans and Programmes section (<u>Document A03 – Appendix B</u>).
48.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 92	LP31 sets out that services/facilities should be retained unless compensatory provision is provided, or the service is not viable or valued by the community.
49.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 92	LP31 - Proposals for new community services and facilities or improving existing facilities will be supported where the proposal is well related to and meets the needs of the local community, would reduce the need to travel to other settlements, is of a proportionate scale to the settlement and would not adversely affect existing facilities. LP34 – Health and education provision – states that the Councils will be supportive of proposals that enable dual use of new facilities within school grounds that can be used by the community.
50.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 92	The Councils have taken an integrated approach to the spatial strategy. Policy SP03 (Settlement Hierarchy) has been drafted from an assessment of accessibility to facilities, services and economic opportunities – as set out in <u>Document EP01</u> . Housing (SP04) and employment (SP05) locations have been identified with regard to the assessment findings to ensure sustainable patterns of growth.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
51.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 93	Two predominantly rural districts. No estate regeneration projects identified at this time.
52.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 95	LP26 requires proposals to be designed for health, amenity, well-being and safety and to design out crime and create an environment where people feel safe and has a strong community focus.
53.	Provide open space, sports and recreational facilities which meets the needs of the local area.	NPPF Para 95	LP30 – requires developments of 1 hectare or more to provide on-site open space to meet identified needs/deficits, unless there is a Council preference to make improvements to existing open space within the locality.
54.	Protect and enhance public rights of way and access.	NPPF Para 98	LP23 – Agricultural Land to Residential Garden Land – must be no significant adverse impact on public rights of way. LP32 – Development proposals shall, where relevant, incorporate enhancements to the Public Rights of Way network and protect the existing network. Where Public Rights of Way are in the vicinity of a site, or pass through a site, the relevant site allocation policies (e.g. LA048) require Public Rights of Way to be retained and enhanced.
55.	<i>Transport</i>		

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
56.	Should actively manage patterns of growth in support of objectives in Para 102. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	NPPF Para 103	Through the preparation of the Infrastructure Delivery Plan (IDP) (Document ER01) and the assessment of the proposed site allocations in relation to their impact on existing transport and highway infrastructure, the transport issues are being considered from the early stages of plan-making and development proposals. The proposed spatial distribution focussing growth within the market towns and core villages and along the A14 corridor enables the targeting of improvements to transport infrastructure which will benefit the wider population. Opportunities to maximise sustainable transport solutions are referred to in the IDP. Opportunities to promote walking, cycling and public transport use are also identified and pursued in the IDP.
57.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.	NPPF Para 104	Access to facilities and services is considered at an early stage of the assessment of potential site allocations, for example through the SHELAA methodology (in terms of 'Accessibility to local services and facilities' and also 'Access to wider transport networks') (Document EH06), and also through the B&MSDC Settlement Hierarchy Review (Document EP01), therefore the availability of facilities and services and the sustainable mean of accessing these facilities and services is taken into account for both urban and rural settlements.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
58.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 104	Policy LP32 (Safe, Sustainable and Active Transport) requires that all developments to maximise the uptake in sustainable and active transport, and that development will be expected to contribute to the delivery of sustainable transport strategies for managing the cumulative impacts of growth. In practical terms the example of the provision of critical railway and highways infrastructure in Thurston, with the identified need for closing and diverting the existing pedestrian level crossing, together with the delivery of key highway infrastructure including pedestrian and cycle links is an example where, using robust evidence, critical sites and routes are identified with specific mitigation measures to enable sustainable growth.
59.	Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 104	Policy LP32 (Safe, Sustainable and Active Transport) requires that proposals for all development shall, where relevant, incorporate: <ul style="list-style-type: none"> - Pedestrian routes suitable for disabled persons and those with impaired mobility. - Cyclists facilities, including routes, secure and covered cycle parking, showers and changing facilities. - Linkages to existing pedestrian and cycle networks. Further to this, the IDP (Document ER01) refers to expected pedestrian and cycle links which are identified to enable sustainable growth and to mitigate the impact of development. The IDP provides a link between the Suffolk

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			wide walking and cycling strategy and the opportunities arising from development for improving walking and cycling.
60.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	NPPF Para 104	<p>Large-scale transport facilities that are currently being looked into as a result of the planned growth of the JLP and the growth from existing commitments include projects such as the Thurston Rail Station Passenger Level Crossing (closure and diversion); the package of measures identified in the Ipswich Strategic Planning Area Transport Mitigation Strategy; there are also important pedestrian and cycle links being developed in relation to proposed growth, such as the link between Elmswell and Woolpit. There are also other rail improvement projects such as at Needham Station, and other smaller scale projects that are listed in the transport section of the IDP.</p> <p>The IDP summarises the key elements of the projects, their estimated costs and expected funding mechanisms, as well as the lead provider.</p>
61.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 104	<p>The IDP (Document ER01) (which is an iterative document) takes account of the existing airfields within our Districts and their role. This is to recognise the importance of maintaining a national network of general airfields, and their need to adapt and change over time and also recognise the emergency service needs that these airfields can provide.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
62.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 107	The IDP (Document ER01) takes account of the existing provision and any identified needs.
63.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	NPPF Para 108	<p>Through the preparation of the IDP (Document ER01) and the assessment of the proposed site allocations, County Council colleagues have been consulted for their advice on likely issues with access to the site, safety and impact on the local road networks that the development may have. At this stage opportunities are also pointed out to create links to the existing pedestrian /cycle network within the vicinity of the site.</p> <p>In policy terms, Policy LP32 (Safe, Sustainable and Active Transport) requires that development proposals that are expected to, or likely to cause a significant increase in transport movements, should be supported by a transport statement (TS) or transport assessment (TA), and an indicative thresholds is provided for both TAs and TSs. The policy also specifies that non-residential developments will be considered on a case by case basis.</p>
64.	Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	NPPF Para 109	Through the early consultation of the County Council Highway team, for the initial assessment of the proposed site allocations, cases where highway safety could be a major concern have been identified and sites consequently removed from the list of potential allocations.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The residual cumulative impact on the road network has also been assessed. This has been done through strategic Transport Modelling (Documents ET01 – ET14) to measure the impact of the cumulative growth proposed. The modelling has provided information on the junctions and road links that are under pressure. The modelling also provides evidence for the mitigation measures that will be required to ensure sustainable growth can be achieved. To ensure that the cumulative impact of traffic is comprehensive, the modelling also takes account of the cross-boundary growth proposed in neighbouring authorities, such as the growth proposed in the respective local plans for Ipswich, East Suffolk (Suffolk Coastal Local Plan) and West Suffolk.</p>
65.	<i>Communications</i>		
66.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 112	<p>The Digital Connectivity section of the <u>Infrastructure Delivery Plan (Document ER01)</u> refers to mobile, land based and broadband communications.</p> <p>Within the Joint Local Plan, Digital Connectivity and telecommunications in general is referred in terms of a driver for economic growth and to facilitate home working, it is further strengthened in Policy SP08 (Infrastructure Provision), as strategic infrastructure, to reflect the increased importance of this infrastructure now and for the future.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
67.	<i>Making effective use of land</i>		
68.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	NPPF Para 117	<p>SP09 requires development to support the enhancement and management of the natural and local environment, including: landscape; biodiversity geodiversity and the historic environment and historic landscapes through detailed development management policies set out in the JLP, including environmental protection measures.</p> <p>LP10 – Moorings, Marinas and Houseboats – Proposals must not result in any adverse effect on the integrity of the SPA, Ramsar Sites and AoNB. Construction Management Plan must be agreed to mitigate construction impacts. Proposals must demonstrate no deterioration in Water Framework Directive status.</p> <p>LP12- requires employment development to be sensitive to its surroundings, including residential and other amenity.</p> <p>LP17 requires development to be located away from any hazardous source; where necessary development will include measures to address land instability issues. The policy also seeks to prevent, or where not practicable, reduce all forms of possible pollution and development proposals need to demonstrate it protects and enhances groundwater, surface water features and not lead to a deterioration in the quality of the environment to help achieve objectives of the Water Framework Directive.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>LP18 includes a range of measures to protect and enhance biodiversity, such as biodiversity net gain.</p> <p>LP19 – support development which will not significantly adversely affect the natural and historic environment; support proposals that are sensitive to their landscape and visual or amenity impacts; support development that enhances and protects landscape values and historic environment.</p> <p>LP20 – support development in or near AONBs that gives great weight to conserving and enhancing the landscape and scenic beauty; does not adversely affect the character, quality views and distinctiveness of the AONB;</p> <p>LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses – layout, size, scale, design, materials and siting must not create serious adverse impact on the natural and local environment (including pollution); must respect and enhance the character of the surrounding landscape; protect significant trees and hedgerows; must not create significant detriment to biodiversity and geodiversity;</p> <p>LP23 – Agricultural Land to Residential Garden Land – must not have an adverse impact on the landscape characteristics and biodiversity of the locality; must not threaten designated or Priority Habitats Sites</p> <p>LP24 – New agricultural/rural buildings in the countryside – relationship and impacts with surroundings (including ecological, biodiversity, listed buildings) will be considered.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>LP25 - development must minimise its dependence on fossil fuels and make fullest contribution to mitigation of climate change; achieve reduction in CO2 emissions of 19% below Part L buildings regulations; meet higher water efficiency standards of 110 litres per person per day; use passive design principles; use energy efficiency measures; on-site renewable and other low carbon energy generation; encourages building materials with low embodied carbon; risks associated with future climate change must be planned as part of layout and design;</p> <p>LP26 – all new development must be designed for health, amenity, well-being and safety; prioritise movement by foot, bicycle and public transport; design out crime and create safe environments;</p> <p>LP27 – renewable, decentralised and community energy generating proposals will be supported subject to criteria (including amenity, landscape and ecology)</p> <p>LP30 – Developments in excess of 1 hectare will be required to provide on-site open space;</p> <p>LP32 – Safe, Sustainable and Active Transport – supports walking and cycling including enhancements to Public Rights of Way network;</p> <p>Relevant site allocation policies require Public Rights of Way to be retained and/or enhanced</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
69.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	NPPF Para 117	Key Environmental Issues recognise there are limited available previously developed land available in the Districts. LP17 prioritises development on previously developed land.
70.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 118	<p>LP07 requires proposals to include sufficient amenity standards including access to open space for residents. LP18 supports proposals that</p> <ul style="list-style-type: none"> • plan positively of the creation, protection, enhancement and management of local networks of biodiversity with wildlife corridors and connect areas. Working with local partnerships for habitat restoration or creation. • Identify and pursue opportunities for securing measurable net gains in biodiversity and suitable indicators for monitoring biodiversity. • Seek to enhance biodiversity commensurate with scale of development. <p>LP26 – proposals must be designed for health amenity, well-being and safety and are only supported if they include good practice in design. Incorporate high levels of soft landscaping including public open space that creates and connects to green infrastructure networks, prioritising a walkable neighbourhood.</p> <p>LP27 – supports community energy generating proposals subject to the impact upon the local community has been</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>fully taken into consideration and where appropriate, effectively mitigated</p> <p>LP29 supports the incorporation of SuDs where it takes opportunities to provide multifunctional benefits including biodiversity, landscape, amenity and water quality enhancement.</p> <p>LP30 requires on site open space provision to meet needs/deficits.</p>
71.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	NPPF Para 118	<p>Wildlife - LP18 gives significant weight to the protection of designated and potential designated sites. Supports development which plans positively for the creation, protection, enhancement and management of local networks of biodiversity including wildlife corridors.</p> <p>Recreation – LP30 permits development on designated open spaces subject criteria including that the space no longer performs a role as a functional amenity, or is surplus to requirements</p> <p>Flood Risk Mitigation – Environment Objective v. - Ensure new development avoids areas of flood risk and reduce future flood risk; SP10 – requires a sequential risk-based approach taking into account future-proofing measures for impacts on flooding; LP18 – background text recognises that green infrastructure may help reduce flood risk. LP29 – in areas of medium/high risk of flooding development needs to</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>demonstrate it can be made safe for its lifetime without increasing flooding elsewhere; Cooling and shading - LP25 requires climate change adaption measures through effective design principles to include means to help buildings respond to winter and summer temperatures. Food Production – Key Environmental issues highlight that both districts have a high volume of high-quality agricultural land; LP17 prioritises development on previously developed land to minimise the loss of best and most versatile agricultural land.</p> <p>Carbon storage is not currently identified as a standalone issue however LP18 encourages an increase in trees and wildlife areas that would increase means to store carbon. LP27 supports energy sources, storage and distribution. LP25 requires reductions in CO2 emissions, supports on-site low carbon energy generation and building materials with low embodied carbon</p>
72.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	NPPF Para 118	<p>Brownfield land within settlements, may be located within settlement boundaries, where development will be permitted subject to criteria within SP03.</p> <p>LP17- prioritises development on previously developed land; requires development when necessary to include measures</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			to remediate land affected by contamination and locate development away from any hazardous source; Where necessary, development will include measures to address land instability issues where identified;
73.	Promote and support the development of under-utilised land and buildings.	NPPF Para 118	LP05, in part, addresses additional dwellings on sub-divided plots; LP17 – prioritises development on previously developed land; LP21 supports the re-use/redevelopment of a heritage asset, including Heritage at Risk, where it would represent optimal viable use subject to conditions;
74.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 118	LP14 requires consideration to be given to ensuring that development proposals do not eliminate separate access arrangements to upper floorspaces which could be used for residential, community or employment uses;
75.	Reflect changes in the demand for land.	NPPF Para 120	SP05, LP12 and LP13 provide some flexibility surrounding employment uses, which would allow for changes in the demand for land through the plan period. Existing allocations have been reviewed, and sites have been deallocated where there is no reasonable prospect of an application coming forward for the use previously allocated. Furthermore, changes in the demand for land would be assessed through a plan review (<5 years).

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
76.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.	NPPF Para 122	<p>LP17 – prioritises development on previously developed land;</p> <p>Housing Mix - SP01 – the mix, type and size of new housing development will be expected to reflect established needs assessments. SP02 and LP08 set out the affordable housing requirements.</p> <p>Whole Plan has been viability tested (Document ER02).</p> <p>Typology approach used to assess sites, which included brownfield development.</p> <p>Infrastructure availability and capacity is evidenced by the Councils Infrastructure Delivery Plan (Document ER01).</p> <p>SP03 – requires design to be sympathetic to its surrounding and demonstrates high-quality design</p> <p>SP09 requires development to support the enhancement and management of the natural and local environment, including: landscape; biodiversity geodiversity and the historic environment and historic landscapes through detailed development management policies set out in the JLP, including environmental protection measures.</p> <p>LP12 required employment development to be sensitive to its surroundings, including residential and other amenity.</p> <p>LP17- prevent, or where not practicable, reduce all forms of possible pollution; Development proposals need to demonstrate it protects and enhances groundwater, surface water features and not lead to a deterioration in the quality</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>of the environment to help achieve objectives of the Water Framework Directive.</p> <p>LP18 includes a range of measures to protect and enhance biodiversity, such as biodiversity net gain.</p> <p>LP19 – support development which will not significantly adversely affect the natural and historic environment; support proposals that are sensitive to their landscape and visual or amenity impacts; support development that enhances and protects landscape values and historic environment.</p> <p>LP20 – support development in or near AONBs that gives great weight to conserving and enhancing the landscape and scenic beauty; does not adversely affect the character, quality views and distinctiveness of the AONB;</p> <p>LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses – layout, size, scale, design, materials and siting must not create serious adverse impact on the natural and local environment (including pollution); must respect and enhance the character of the surrounding landscape; protect significant trees and hedgerows; must not create significant detriment to biodiversity and geodiversity;</p> <p>LP23 – Agricultural Land to Residential Garden Land – must not have an adverse impact on the landscape characteristics and biodiversity of the locality; must not threaten designated or Priority Habitats Sites</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>LP24 – New agricultural/rural buildings in the countryside – relationship and impacts with surroundings (including ecological, biodiversity, listed buildings) will be considered.</p> <p>LP26– all new development must be designed for health, amenity, well-being and safety; prioritise movement by foot, bicycle and public transport; design out crime and create safe environments;</p> <p>LP27 – renewable, decentralised and community energy generating proposals will be supported subject to criteria (including amenity, landscape and ecology)</p> <p>LP30 – Developments in excess of 1 hectare will be required to provide on-site open space;</p> <p>LP32 – Safe, Sustainable and Active Transport – supports walking and cycling including enhancements to Public Rights of Way network;</p> <p>Relevant site allocation policies require Public Rights of Way to be retained and/or enhanced</p>
77.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards.	NPPF Para 123	JLP identifies sufficient land to meet housing requirements over the plan period. No minimum density standards are set through the JLP.
78.	<i>Design</i>		

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
79.	Set out a clear design vision and provide maximum clarity about design expectations.	NPPF Para 125 & 126	<p>SP03 supports development within settlement boundaries that is sympathetic to its surroundings and of high-quality design.</p> <p>SP05 proposals for employment land requires design and layout to be sensitive to its surroundings, including any landscape or heritage assets.</p> <p>LP01 supports windfall development in hamlets and dwelling clusters that would not be detrimental to the character and appearance of the settlement or result in visual intrusion into surrounding landscape</p> <p>LP02 requires annexes to be subordinate in scale, form and mass from main dwelling.</p> <p>LP03 requires extensions and conversions to be in keeping with size, scale, mass, design and materials of existing dwelling and compatible with areas character and appearance. Good quality design which maintains or enhances the character and appearance of building, street scene and surroundings.</p> <p>LP04 requires replacement dwellings to be in keeping in design, scale, mass and materials with areas character and appearance and no more visually intrusive to that of the original.</p> <p>LP08 requires affordable housing is tenure blind and integrated within development.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>LP09 requires transit and permanent sites to be designed with regard to established design guidance documents and best practice</p> <p>LP21 requires proposals to contribute to local distinctiveness respecting built form and scale of heritage asset through appropriate design and materials.</p> <p>LP22 states layout, size, scale, design, materials and siting of any proposal and equipment must not create an adverse impact upon the natural and local environment or the appearance of the locality.</p> <p>LP25 requires development to reflect passive design principles</p> <p>LP26 requires proposals to be of high-quality design with a clear vision of the positive contribution it will make to its context.</p>
80.	Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.	NPPF Para 127	<p>SP01 and SP02 requires housing development (including affordable housing) to have regard to the mix and type of housing needs identified in the district needs assessment evidence.'</p> <p>SP03 supports development within settlement boundary that is sympathetic to its surroundings and of high-quality design.</p> <p>SP05 - proposals for employment land -requires design and layout to be sensitive to its surroundings, including any landscape or heritage assets.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>SP09 requires development to support the enhancement and management of the natural and local environment</p> <p>LP03 and LP05 expects good quality design which maintains or enhances the character and appearance of building, street scene and surroundings.</p> <p>LP03 requires proposals to be reflecting and respecting relationship of site and its context with adjoining properties.</p> <p>LP04 requires proposals to be of good quality design and respect any heritage value of the area including setting value.</p> <p>LP06 requires all major housing proposals to include supported and special needs housing. Small sites are expected to reflect the mix and type of housing needs identified in district needs assessment.</p> <p>LP06, LP07 & LP26 requires proposal to be well designed and will meet any special needs of the residents of the property and will meet requirements for accessibility and adaptable dwellings under Part M4(2) of Building Regs.</p> <p>LP12 – requires employment development to be sensitive to surroundings and to demonstrate high quality sustainable design.</p> <p>LP15 supports tourism which reflects the intrinsic quality and respects the character of the countryside and is of an appropriate scale for their context.</p> <p>LP19 supports development that integrates positively with the existing landscape character and reinforces local distinctiveness and identity of individual settlements.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Development is required to enhance landscape values and the historic environment.</p> <p>LP20 supports development that will not adversely affect the character, quality views and distinctiveness of the AONB</p> <p>LP26 requires proposals to -</p> <ul style="list-style-type: none"> • include high quality design and architecture and create character and interest. • Be compatible/harmonious with its location and appropriate in scale, mass, form, siting, design, materials, texture and colour in relation to surrounding area. • protect and retain important natural features incorporating high levels of soft landscaping. • Include good practice in design, incorporating design principles, such as design-out crime and create an environment for people to feel safe and has a strong community focus. • Where appropriate, design should consider the needs of disabled people and an ageing population and follow Dementia Friendly principles.

81.	<i>Green Belt</i>	
82.	Set out proposals for new Green Belts within strategic policies. This should demonstrate why normal planning and development management policies would not be adequate, any major changes in circumstances, consequences for sustainable development, the need for Green Belt to support adjoining areas, and how new Green Belt would meet other objectives of the Framework.	NPPF Para 135 n/a
83.	Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.	NPPF Para 136 n/a

84.	Strategic policies should make as much use as possible of suitable brownfield sites and underutilised land and optimise the density of development including promoting an uplift in minimum density standards in town and city centres and locations well served by public transport. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.	NPPF Para 137 & 138	n/a
85.	When defining Green Belt boundaries, plans should ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development, not include land which it is unnecessary to keep permanently open, identify areas of safeguarded land between the urban area and the Green Belt where necessary, make clear that the safeguarded land is not allocated for development at the present time, be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period, and define boundaries clearly.	NPPF Para 139	n/a

86.	<i>Climate change, flooding and coastal change</i>	
87.	Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	<p data-bbox="1070 276 1198 339">NPPF Para 149</p> <p data-bbox="1220 276 2085 347">Strategic Policy SP10 – Climate Change a) includes the need for all development to take a proactive approach as stated in para.149</p> <p data-bbox="1220 395 2085 467">LP17 – takes into account long term implications by supporting proposals that:</p> <ul data-bbox="1220 475 2085 587" style="list-style-type: none"> - minimise the loss of the best and most versatile agricultural land - contributes towards making more efficient use or re-use of existing resources <p data-bbox="1220 595 2085 667">-Requires development to comply with SCC Construction Surface Water Management Plan</p> <p data-bbox="1220 675 2085 778">– demonstrates it protects and enhances groundwater, surface water features and must not lead to deterioration in quality in quality of the environment.</p> <p data-bbox="1220 826 2085 1018">LP18 narrative identifies the importance of a Green Infrastructure to ensure an improved and healthy environment is available for present and future communities. Improvements can include reducing vulnerability and increase resilience to extreme weather events and flooding through measures such as SuDs</p> <p data-bbox="1220 1066 2085 1137">LP25 – policy expects and actively supports developers to explore innovative ways to cut CO2 emissions</p> <p data-bbox="1220 1185 2085 1329">LP25 requires residential development to meet passive design principles, include energy efficiency measures and encourages the incorporation high level building materials with low embodied carbon</p>

88.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	NPPF Para 149	<p>SP10 requires the need to take into account long term implications from climate change.</p> <p>LP12 – Employment proposals must demonstrate high-quality sustainable design.</p> <p>LP17 – policy aims to ensure all development are environmentally sustainable and seek to prevent and mitigate against environmental impacts and climate change.</p> <p>LP18 narrative identifies the importance of a Green Infrastructure to ensure an improved and healthy environment is available for present and future communities. Improvements can include reducing vulnerability and increase resilience to extreme weather events and flooding through measures such as SuDs.</p> <p>LP21 – supports proposals to enhance the environmental performance of heritage assets, by having regard to Historic England’s Advice and Guidance.</p> <p>LP25 requires improvements to water efficiency to achieve higher efficiency standards in response to both districts identified as areas experiencing “serious” water stress - (www.gov.uk/government/publications/water-stressed-areas-2013-classification).</p> <p>LP25 requires proposals to demonstrate risks associated with future climate change have been planned for as part of layout of scheme and design, to ensure longer – term resilience.</p>
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			<p>LP26 Maintains good design is a key aspect of sustainable development with potential to maintain and enhance existing environments and can also benefit the health of residents and community safety.</p> <p>LP28 requires development to conform with the principle of Holistic Water Management including water efficiency and re-use measures.</p> <p>LP31 supports new services and facilities which are well related to and meets the needs of the local community and would reduce the need to travel to other settlements.</p> <p>LP32 aims to ensure accessibility for all and to deliver sustainable development. All development required to maximise the uptake in sustainable and active transport using a transport hierarchy. Will also be expected to contribute to the delivery of sustainable transport strategies for managing cumulative growth.</p> <p>LP33 states that where cumulative impact of schemes on strategic infrastructure could restrict development, a coordinated approach will be used to pool resources to address requirements if appropriate.</p>
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89.	Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.	NPPF Para 151	<p>SP10 requires approaches to identify opportunities to deliver decentralised energy systems and support community led initiatives – in line with para.151.</p> <p>Housing LP02 – requires proposals for residential annexes to minimise dependence on fossil fuels and to fully contribute to the mitigation of climate change through adopting sustainable approach to energy use.</p> <p>LP25 – requires all new development to make fullest contribution to the mitigation of climate change through adopting a sustainable approach to energy use and residential developments required to achieve CO2 emissions of 19% below TER. Onsite renewable and other low carbon energy generation should be fully investigated for viability and feasibility and fully supported where considered appropriate.</p> <p>LP27 acknowledges new standalone technologies have not been investigated within the two districts the policy supports proposals which are appropriate in scale, design and location.</p> <p>LP27 supports renewable, decentralised and community energy generating proposals subject to meeting set out criteria.</p>
90.	Strategic policies should manage flood risk from all sources.	NPPF Para 156	<p>SP10 requires development to take into account implications for flood risk, requires future proofing measures for impacts of flooding.</p> <p>LP18 narrative identifies the importance of a Green Infrastructure to ensure an improved and healthy environment is available for</p>

			<p>present and future communities. Improvements can include reducing vulnerability and increase resilience to extreme weather events and flooding through measures such as SuDs.</p> <p>LP29 notes Lead Flood Authority Suffolk County Council and provides link to local SuDs guidance. It also acknowledges The Essex and South Suffolk Shoreline Management Plan 2 (2010) which identifies a small section of Babergh where development should be restricted, due to pressure from coastal erosion.</p>
91.	Avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 167	<p>SP10 requires development to take into account implications including biodiversity, landscape and coastal change.</p> <p>Housing - LP01 states Sustainable Development is at the heart of planning and location is a critical determinant on its sustainability and has a significant effect on extent to which it contributes socially, economically and environmentally.</p> <p>Housing LP04 replacement dwellings need to maintain the social and environmental aspects of sustainable development and environmental policies.</p> <p>Housing LP10 – regarding moorings, marinas and houseboats, A sustainable development approach.</p> <p>LP17 requires proposals to</p> <ul style="list-style-type: none"> – minimise the loss of the best and most versatile agricultural land – where necessary must include measures to address land instability issues and

			<p>– prevent or where practicable reduce all forms of possible pollution including land, ground and surface water and any other amenities.</p> <p>LP18 - requires development to be in locations that will not significantly adversely affect the natural and historic environment including effects on health and living conditions.</p> <p>LP22 and LP23 both state proposals should not result in the irreversible loss of best and most versatile agricultural land or productive agricultural</p> <p>LP24 – requires proposals to demonstrate sustainability of location.</p> <p>LP28 requires development to consider its impact on water resources and capacity of water supply infrastructure and taking into account effects of climate change.</p> <p>LP29 acknowledges the Essex and Suffolk Shoreline Management Plan 2 (2010) identifies an area in Babergh within which development should be restricted due to pressure from coastal erosion, the small section of estuary which is on the Shotley Peninsula. Policy requires there is to be no site conflict with areas identified as vulnerable to coastal erosion.</p>
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92.	<i>Natural environment</i>	
93.	<p>Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.</p>	<p>NPPF Para 170</p> <p>Section 12 of the NPPF and policy SP09 and SP10 requires development to support the enhancement and management of our natural environment. Includes effective use of land, help improve biodiversity, using natural resources prudently and including environmental protection measures.</p> <p>LP01 – supports development there is no detrimental impact upon environmental assets or result in visual intrusion into surrounding landscape and aims to preserve and enhance development in AONB (where appropriate). Special regard given to protecting and enhancing biodiversity and geodiversity.</p> <p>LP02 – Residential annexes – proposals should not cause the felling of or any damage to any significant trees and hedgerows that contribute to the environmental quality and visual amenity benefits of the locality. Where applicable, proposals must protect and enhance biodiversity and geodiversity.</p> <p>LP03 – requires proposals for residential extensions and conversions to not cause the felling or damage of trees or hedgerows that contribute to environment quality of locality. Ecology/biodiversity may be a material consideration as part of the assessment.</p> <p>LP07 – Supported and Special needs housing, LP09 Gypsy and Traveller sites & LP11 Self and custom build – special regard shall be given to protecting and enhancing biodiversity and geodiversity</p> <p>LP10 – requires moorings, marinas and houseboat proposals to maintain integrity of the Stour and Orwell SPA, RAMSAR and Suffolk Coast and Heaths AONB.</p> <p>LP12 requires employment use to be sensitive to surroundings including landscape. Employment proposals must protect and</p>

		<p>enhance biodiversity and geodiversity affected by the development.</p> <p>LP15 – tourism proposals will be supported where they protect biodiversity. Proposals in the countryside must follow a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant on the local ecology, biodiversity, trees and hedgerows, or as a last resort compensate for losses that cannot be avoided or mitigated for;</p> <p>LP16 – countryside tourist accommodation must protect and enhance biodiversity and geodiversity.</p> <p>LP18 All development should follow a hierarchy of seeking firstly to; enhance habitats, avoid impacts, mitigate against harmful impacts, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated. Policy include requirement for Biodiversity Net Gain of at least 10%. Policy protects designated and potentially designated site, protect and improve sites of geological value and geological sites of international, national and local significance. Conserve, restore and contribute to the enhancement of biodiversity and geological conservation interests. Plan positively for the creation, protection, enhancement and management of local networks for biodiversity with wildlife corridors that connect areas. Development which would have an adverse impact on species protected by legislation will not be permitted unless there is no alternative.</p> <p>LP19 supports proposals that will not significantly adversely affect the natural environment and those which will enhance and protect landscape values</p>
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			<p>LP20 requires proposals near AONB's to conserve and enhance the landscape and scenic beauty and not adversely affect character, quality of views and distinctiveness of the AONB</p> <p>LP22- Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses - layout, size, scale, design etc must not create serious adverse impact on the natural and local environment. The proposal must integrate with existing features and respect and enhance the character of the surrounding landscape/area through sensitive integration. Proposals must not adverse affect or damage any significant trees and hedgerows that contribute to the environmental quality and visual amenity. Proposals must not create significant detriment to biodiversity, geodiversity or the interlinked surrounds.</p> <p>protects against the loss of significant trees and hedgerows that contribute to the environmental quality and visual amenity benefits of the rural location</p> <p>LP23– Agricultural land to residential garden land - support proposals that will not have an adverse impact upon landscape characteristics and biodiversity of the locality. Sites must not threaten designated or Priority Habitat Sites.</p> <p>LP24 – New agricultural/rural buildings in the countryside – Impact on landscape, habitat sites and protected species will be considered.</p> <p>LP26 – Design and residential amenity – Proposals must respond to and safeguard the existing character/context. Proposals shall safeguard environmental and natural features of merit. Be compatible with its location. Protect and retain important natural features such as trees or hedgerows. Incorporate high levels of soft landscaping, street trees, and public open space that creates, and connects to, green infrastructure and networks.</p>
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			<p>LP29 supports SuDs to be incorporated to take opportunities to provide multifunctional benefits including biodiversity, landscape, amenity and water quality enhancement. Additionally, above ground, appropriate SuDS are incorporated within new developments wherever possible, and take opportunities to provide multifunctional benefits, including biodiversity and landscape enhancement.</p> <p>LP30 – The total or partial loss of designated open spaces may be permitted where – proposals improve the biodiversity interest of designated open spaces, including as part of wider ecological networks.</p>
94.	Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	NPPF Para 171	<p>Section 12 of the NPPF and LP18 states the Councils will employ the hierarchical approach of avoidance, mitigation and compensation. Section 12 of the NPPF ensures all designated sites are identified and mapped, and the plan has been produced taking into consideration the level of protection to afford all identified sites.</p> <p>SP09 policy supports a Strategic approach for mitigation measures from cumulative growth which would impact upon SPAs SACs and RAMSAR sites along the Suffolk Coast</p> <p>LP15 requires tourism in the countryside to follow a hierarchy to avoid impact, mitigate for impacts on the local ecology, biodiversity, trees and hedgerows or as a last resort compensate for losses.</p> <p>LP18 supports proposals that conserve, restore and contribute to the enhancement and management of local networks of wildlife corridors that connect areas.</p>

			LP25 requires proposals to incorporate soft landscaping and public open space that creates and connects to green infrastructure and networks.
95.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 173	LP10 – requires moorings, marinas and houseboat proposals to maintain integrity of the Stour and Orwell SPA, RAMSAR and Suffolk Coast and Heaths AONB
96.	Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.	NPPF Para 174	<p>Chapter 12 of the JLP ensures all designated sites and local sites of biodiversity and geodiversity are identified and mapped, and the plan has been produced taking into consideration the level of protection to afford all identified sites.</p> <p>SP09 requires development to support enhancement and management of the natural and local environment, including environmental protection measures.</p> <p>LP18 supports proposals that;</p> <ul style="list-style-type: none"> -conserve, restore and contribute to the enhancement of biodiversity and conservation interests. -plan positively for the creation, protection, enhancement and management of local networks of biodiversity and wildlife corridors. -link existing green infrastructure networks and areas for habitat restoration or creation to ensure ecological networks are more resilient to current and future pressures. -identify and pursue opportunities for securing measurable net gains for biodiversity and suitable indicators. -apply additional measures to assist recovery of species listed on S14 of NERC Act 2006

<p>97.</p>	<p>Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.</p>	<p>NPPF Para 178 & 180</p>	<p>LP17 requires proposals to include measures to remediate land affected by contamination and land instability issues where identified. The policy also requires proposals to prevent and/or reduce all forms of possible pollution. They must also need to demonstrate it protects and enhances groundwater and surface water features. Where applicable, site allocations include the consideration of remediating land affected by contamination. LP19 supports development which will not significantly adversely affect the natural and historic environment, that integrates with existing landscape character, enhancing and protecting landscape values and historic environment. LP20 supports development that gives great weight to conserving and enhancing the landscape and scenic beauty of the AONB and its setting. That does not adversely affect the character, quality views and distinctiveness or threaten public enjoyment of these areas. LP22 states there must be no significant detriment to amenity in terms of pollution and disturbance. LP23 – proposals would not have adverse impact on the landscape characteristics and biodiversity of the locality. Must not be intrusive through intensification, damaging character of countryside setting or nearby residential setting. LP24 – proposals must not adversely impact on character and landscape of area. LP26 states proposals must protect the health and amenity of occupiers and surrounding uses by avoiding development that is over-looking, over-bearing, results in loss of daylight and/or unacceptable levels of pollution including any other amenity issues.</p>
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			SP08 states that the Councils will work with partners on the delivery of the Ipswich Strategic Planning Area Transport Mitigation Strategy to mitigate cumulative transport and air quality impacts.
98.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.	NPPF Para 181	<p>LP05 – for applications for replacement dwellings / additional dwellings on sub-divided plots - requires proposals to be free from unacceptable noise, odour, dust, light or any other pollutants and impacts</p> <p>LP17 requires proposals to prevent and/or reduce all forms of possible pollution, including air.</p> <p>SP08 states that the Councils will work with partners on the delivery of the Ipswich Strategic Planning Area Transport Mitigation Strategy to mitigate cumulative transport and air quality impacts.</p>
99.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 182	<p>LP07 requires supported and special needs housing proposals to be well connected to urban areas or main core villages that have sufficient access to local services and facilities.</p> <p>LP09 requires Gypsy and Traveller and Travelling Showpeople sites to be well related to local services and facilities</p> <p>LP20 requires development to support the wider environmental, social and economic objectives as set out in the AONB Management Plan (Document D11).</p> <p>LP24 – must ensure the fine balance between a prosperous rural economy and ensuring the rural countryside character and environment is maintained and does not cause conflict of uses through impacts on existing rural commercial activity/business.</p>

			LP31 states services and facilities proposals need to be well related to and meets the needs of the local community.
100.	<i>Historic Environment</i>		
101.	Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.	NPPF Para 185	<p>LP21 is the main policy which addresses the historic environment. It includes the following:</p> <ul style="list-style-type: none"> • the Councils expectations for heritage statements and/or archaeological assessment; • states the Councils will support the re-use/redevelopment of heritage assets (including Heritage at Risk) subject to conditions; • the Councils will support development which contributes to local distinctiveness, and enhances the environmental performance of heritage assets subject to a sensitive approach; • Heritage harm should be avoided in the first instance. Where it cannot be avoided mitigation should be used. Where harm is identified the Councils will have regard to the statutory duties and the planning balance set out in national policy (i.e. public benefits test dependent upon harm/importance). <p>Conservation of the historic environment is also considered in a number of criteria based JLP policies, with Policy LP21 – The Historic Environment providing the most detailed development management policy for the conservation of the historic environment.</p>

			Site allocations – Heritage assessment evidence has been used to inform the JLP. Where applicable site allocation policies include the requirement for development to conserve and where appropriate enhance the setting of heritage assets. Applications on LS01 sites require compliance with the relevant JLP policies, including the relevant historic environment policies referenced above.
102.	<i>Minerals</i>		The minerals and waste local plan are the responsibility of SCC – a statutory consultee to the JLP process. The minerals and waste Local Plan identifies Minerals Safeguarding Areas (MSAs) identified for existing or proposed mineral sites, aggregate rail deposits and aggregate recycling facilities.
103.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 204	n/a
104.	Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials.	NPPF Para 204	n/a
105.	Safeguard mineral resources by defining Mineral Safeguarding Areas.	NPPF Para 204	n/a
106.	Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	NPPF Para 204	n/a

107.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.	NPPF Para 204	n/a
108.	Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health	NPPF Para 204	n/a
109.	Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction	NPPF Para 204	n/a
110.	Ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high-quality restoration and aftercare of mineral sites takes place.	NPPF Para 204	n/a

PART 3: LOCAL PLAN PROCESS REQUIREMENTS CHECKLIST

Why you should use this part of the toolkit

The aim of this part of the toolkit is to assist you in ensuring that the relevant process requirements of specific legislation and policy have been met to enable you to proceed towards adoption of a local plan policies update.

The part of the Toolkit deals only with the process requirements for plan preparation set out in legislation and the NPPF associated with reviewing policies and updating local plan policies. Toolkit Part 1 provides more detail on carrying out a local plan policy review assessment. Toolkit Part 2 highlights the content that should be included in the local plan policies update as prescribed in the NPPF. Soundness and quality issues are dealt with in Toolkit Part 4.

How to use this part of the toolkit

The table below sets out key plan making process questions that you must consider when undertaking the stages of reviewing policies and updating your local plan policies. The rows marked:

- 'L' set out legal requirements included in legislation relevant for that stage of plan making; and
- 'PM' highlight project management reminders arising from these requirements.

For each requirement the table also highlights, where relevant, the supporting documents in which this information is typically recorded.

For each of the requirements listed indicate whether you have met the requirement with a *Yes* or *No*. You should ensure you can answer each question relevant to that plan stage with a 'Yes' before moving to the next stage of updating your plan. You can use the 'comments' section in the table to confirm the title and date of relevant documents and include hyperlinks to where they are published on your website (or file paths for documents not yet published).

The following abbreviations in the table are used:

P&CA - [Planning and Compulsory Purchase Act 2004 \(as amended\)](#)

T&CP - [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#)

The table does not make any reference to specific national planning policy guidance, case law or Ministerial Statements on the basis that this is not static and the degree to which it is relevant will vary depending upon particular circumstances. There is case law relevant to most plan making authorities; for example at the time of publication, when undertaking a screening assessment for a Habitats Regulation Assessment, of particular relevance is the '[People Over Wind judgement](#)' (Court of Justice of the European Union, 12 April 2018), the '[Dutch Nitrogen](#)' case (Court of Justice of the European Union, 7 November 2018) and other recent relevant Court of Justice judgements. Therefore, when developing your local plan update, you need to work with your legal team to ensure that you are familiar with relevant case law and Ministerial Statements and take account of these as and when appropriate.

You should also be aware that any reference to specific legislation includes any amendments to those instruments that are in force at the time of publication. Legislation relevant to England, including amendment regulations, can be accessed online at www.legislation.gov.uk. It is important that you check for any future amendments that may be brought into force following publication of this toolkit.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to ensure that requirements are met. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find it (or some elements) helpful to include with your supporting documents or to help you answer any questions from the Planning Inspector related to plan process.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		Stage A: Navigating the process of reviewing Local Plan policies				
1.	L	Have you consistently kept under review the matters which are likely to affect the development of your area and the planning of its development?	P&CPA Section 13 T&CP Regulation 34	Y	<ul style="list-style-type: none"> ● Authority Monitoring Report ● Baseline technical data 	<p>Annual Monitoring Reports have been regularly produced since 2011 to review matters likely to affect development.</p> <p>New Evidence Base reports and studies have been produced and updated to inform Local Plan preparation. These are kept updated on Council's website, and all relevant evidence is available in the Councils Core Document Library.</p>
2.	L	Have you prepared to undertake a review of your local plan policies and complete the review within 5 years of the date of adoption of the current local plan? (also see guidance within Part 1 of the Route Mapper and the 'Local Plan Review Assessment' within Part 1 of the Toolkit)	T&CP Regulation 10A NPPF para 33	Y	<ul style="list-style-type: none"> ● Local Development Scheme 	A review was undertaken within five years of the adoption of the Babergh Core Strategy (2014) and the Mid Suffolk Core Strategy Focused Review (2012). The Joint Local Plan will replace these documents and is anticipated for adoption in 2022 as set out in the

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						published Local Development Scheme.
3.	L	Have you prepared to review your Statement of Community Involvement and complete the review within 5 years of the date of adoption of the current Statement of Community Involvement?	P&CPA Section 18 and 19(3) T&CP Regulation 10A	Y	<ul style="list-style-type: none"> ●Local Development Scheme ●Statement of Community Involvement 	<p>The Statement of Community Involvement (SCI) (Document A12) was reviewed and updated in Feb 2019. The Councils have adopted an Addendum to the SCI to set out necessary changes as a result of Covid-19 (Document A13). Currently it is anticipated the JLP to be adopted within the five years of the SCI adoption.</p> <p>This will be kept under review as necessary. Currently the next SCI review is due 2024.</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
4.	PM	Have you checked your scheme of delegation and engaged with the relevant person(s) who will make decisions on the outcome of any review(s) of the Local Plan policies and the Statement of Community Involvement?	The Council's scheme of delegation	Y	<ul style="list-style-type: none"> ●The Council's scheme of delegation 	Full Council will make decisions on the outcome of any review(s) of the Local Plan policies. In the case of the Statement of Community Involvement addendum (<u>Document A13</u>), these can be made under emergency powers in response to changes as a result of Covid-19. There has been internal member engagement as the JLP has been developed.
5.	L	<p>Have you prepared a report for the relevant person(s) deciding on the review of the local plan policies that takes into account the matters that are likely to affect the development of your area and the planning of its development to enable them to make a decision on whether:</p> <ol style="list-style-type: none"> 1. the policies do not need updating (publishing the reasons for this decision); and / or 2. that one or more strategic policies do need updating (moving to Stage 	<p>T&CP Regulation 10A</p> <p>NPPF para 33</p>	Y	<ul style="list-style-type: none"> ●Published report and decision ●5 year plan review assessment (See Part 1 of this toolkit) ●Baseline technical data 	<p>The Joint Local Plan is a comprehensive replacement of all preceding adopted planning policies in Babergh and Mid Suffolk.</p> <p>The Joint Local Plan Preferred Options (Reg 18) document (Document B09) went to the Babergh Council meeting on 25th June 2019 and to the Mid Suffolk Council meeting on 27th June 2019.</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		B to update your Local Development Scheme to set out the timetable for this revision)?				<p>The Joint Local Plan Options (Reg 18) document (Document B02) went to the Babergh Council meeting on 18th July 2017 and to the Mid Suffolk Council meeting on 20th July 2017.</p> <p>The Regulation 19 version of the JLP (Document A01) went to the Babergh Council meeting on 10th November and a Mid Suffolk Council meeting on 11th November 2020.</p> <p>The most recent Local Development Scheme (July 2020) (Document A11) was presented to the Babergh Council meeting on 21st July 2020 and to the Mid Suffolk Council meeting on 23rd July 2020.</p>
		Stage B: Scoping and preparing for your policies update				

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
6.	L	Where an update of the Statement of Community Involvement is required have you prepared, consulted and adopted a revised Statement in accordance with the procedures set out in Part 2 of the P&CPA? Have you ensured that the Statement is up to date and reflects who the relevant consultation bodies are - for all stages of the plan making process - and what actions will be undertaken to involve the community in any updates to the local plan policies?	P&CPA Part 2 T&CP Regulation 18 NPPF Para 16	Y	<ul style="list-style-type: none"> ●Statement of Community Involvement 	<p>The SCI was updated Feb 2019 (Document A12). The document sets out introduction, key principles of community involvement, plan-making, planning applications, appendices, glossary and contacts.</p> <p>The Statement of Community Involvement Addendum (Document A13) explains how the plan-making process is amended in response to Covid-19, and that this addendum can be made under emergency powers in response to changes as a result of Covid-19.</p>
7.	PM	Have you prepared a report for the relevant person(s) who will make a decision on the outcome of the review of the Statement of Community Involvement including where relevant details and justification of proposed changes?	P&CPA Section 18 T&CP Regulation 10A	Y	<ul style="list-style-type: none"> ●Published report and decision ●Statement of Community Involvement 	List of common themes and responses have been included in appendix 1 of the SCI document (Document A12), which members were involved in. A committee report was produced.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		This should also consider the any practicalities of making documents available for inspection at the submission stage.				<p>The Statement of Community Involvement Addendum (Document A13) explains how the plan-making process is amended in response to Covid-19, and that this addendum can be made under emergency powers in response to changes as a result of Covid-19.</p> <p>All the reports for <u>Council</u> meetings or Cabinet meetings are available to view via this link on the website under <u>Council</u> and Committee Meetings.</p> <p>This SCI (Document A12) went to the <u>Babergh Council meeting</u> on 19th February 2019 that the SCI went to for adoption. The SCI went to the <u>Mid Suffolk Council meeting</u> on 21st February 2019. The SCI Addendum (Document A13) went to the Babergh</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						Council meeting on 10 th November and a Mid Suffolk Council meeting on 11 th November 2020.
8.	PM	Have you identified the proposed scope of the update of the local plan by setting out the principal policy areas that will be considered?		Y	<ul style="list-style-type: none"> ●Published report and decision on review of local plan policies ●Baseline technical data 	This was addressed in the Sustainability Appraisal Scoping Report (January 2017) (Document B01) and the Joint Local Plan Regulation 18 document (August 2017) (Document B02).
9.	PM	Have you drafted a project plan to manage and timetable the development and update of the local plan policies?		Y	<ul style="list-style-type: none"> ●JLPPB Project Plan ●Local Development Scheme ●Authority Monitoring Report 	The Local Development Scheme (Document A11) is the formal timetable plan and has been kept up to date throughout the JLP development. The latest version was published in July 2020.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						Internal project planning has been undertaken to ensure cross service, corporate and political input and understanding as well as actively managing evidence base processes.
10.	L	Have you prepared a new Local Development Scheme which identifies the local plan policies update document(s) and the Sustainability Appraisal and timescales for their production?	P&CPA Section 15(2) and Section 19(1)	Y	<ul style="list-style-type: none"> •Local Development Scheme •Authority Monitoring Report 	<p>A new Local Development Scheme (<u>Document A11</u>) sets out a timetable for adopting Local Plan development plan documents and the Sustainability Appraisal approved July 2020.</p> <p>Local Plan Reg19 Autumn 2020 Reg22 Winter 2020/21 Reg24 Summer 2021 and Reg26 Winter 2021/22</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
11.	L	Does your Statement of Community Involvement and project plan identify the legally prescribed bodies you will engage with under the duty to cooperate? This should also include each Local Enterprise Partnership and each Local Nature Partnership in the area.	P&CPA Section 20 and Section 33A T&CP Regulation 4	Y	<ul style="list-style-type: none"> ●Statement of Community Involvement ●Duty to Cooperate Statement(s) of Common Ground 	Appendix 2 of the SCI (Document A12) sets out bodies and organisations the councils are legally obliged to consult. Also, a range of other organisations and bodies that are appropriate. The Councils have undertaken a significant process of engagement through the Duty to Cooperate (DtC) and is documented through the DTC statement (Document A07) and statements of common ground (see the Councils Core Document Library – Documents ES01 to ES20).
12.	L	Have you identified the “strategic matters” that will be included in the updated local plan policies and which have / would have a significant impact on your area and at least one other planning area and on which you are required to engage constructively, actively and on an ongoing basis?	P&CPA Section 20 and Section 33A	Y	<ul style="list-style-type: none"> ●Published report and decision on review of local plan policies ●5 year plan review assessment (See Part 1 of this toolkit) ●Duty to Cooperate Statement(s) of 	The key topics are identified in the Duty to Cooperate section of the Joint Local Plan. They are set out in detail within the Duty to Cooperate Statement (Document A07) and multiple Statements of Common Ground with relevant partners (see the Councils Core

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
					Common Ground / Duty to Cooperate Statements	Document Library – Documents ES01 to ES20).
13.	L	In addition to the legally prescribed bodies does your Statement of Community Involvement and project plan identify any additional bodies / person(s) who you will engage with on strategic cross-boundary matters and who will be party to your Statement(s) of common ground?	NPPF para 27 and para 35	Y	<ul style="list-style-type: none"> ●Statement of Community Involvement ●Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	<p>Including the relevant authorities within, or adjacent to the district. The direct cross boundary neighbouring authorities to Babergh and Mid Suffolk are: West Suffolk, Breckland, South Norfolk, East Suffolk, Ipswich, Braintree, Colchester and Tendring.</p> <p>The Duty to Cooperate Statement (<u>Document A07</u>) also shows the engagement and effective cooperation implemented.</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
14.	PM	Have you designed a template to record the progress made with the above bodies / person(s). This should document where effective co-operation is and is not happening throughout the plan making process, and the outcomes from engagement. This will also be required as evidence to demonstrate that you have met the Duty to Cooperate.	P&CPA Section 20 and Section 33A NPPF para 27 and para 35	Y	<ul style="list-style-type: none"> ●Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements ●Template documents 	A number of Statements of Common Ground record progress and have been updated towards submission where appropriate. The Ipswich Strategic Planning Area Board Statement of Common Ground is now on Version 7 (Document ES18). A chronological log of discussions, matters and outcomes has been developed.
15.	PM	In line with your Local Development Scheme and project plan have you timetabled relevant meetings / briefings with the authorities senior management team and elected Members (including any relevant Cabinet / Committee) to ensure that there is support for the development of the local plan policies update and that any necessary permissions for publication are obtained?		Y	<ul style="list-style-type: none"> ●Any relevant local authority reports and decisions 	<p>Internal project planning has been undertaken to ensure cross service, corporate and political input and understanding as well as actively managing evidence base processes.</p> <p>Formal approval of each stage of the Joint Local Plan consultation is undertaken through the Babergh and Mid Suffolk Council meetings.</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
16.	L	Have you prepared a Scoping Report for the development of your Sustainability Appraisal to inform the update of your plan policies? Have you included a proposed framework for testing local plan policies update options and alternatives using the baseline information and an identified set of sustainability objectives? Have you incorporated the requirements of the Strategic Environmental Assessment?	<p>P&CPA Section 19 and Section 39</p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)</p> <p>The European Directive 2001/42/EC</p> <p>NPPF Para 32</p>	Y	<ul style="list-style-type: none"> ●Local Development Scheme ●Sustainability Appraisal Scoping document ●Sustainability Appraisal report 	<p>There have been 3 scoping reports undertaken (Document <u>B01</u>, <u>B04</u> and <u>B10</u>. The scoping process has been updated as the plan has developed over time. The most recent scoping consultation was March/April 2020 (<u>Document B10</u>). This was undertaken in advance of the assessment of the Regulation 19 Joint Local Plan and provides the basis upon which the Joint Local Plan is appraised.</p> <p>The scoping report included the framework for testing policies and has had minor amendment based upon the outcomes of the consultation. Each policy and proposal has been assessed against the social, environmental and economic objectives in the SA framework in order to establish the positive and negative effects. Where</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						significant effects were found potential mitigation measures were identified wherever possible. The results of the appraisals were used to inform the decision making process and establish appropriate options to take forward into the Joint Local Plan. The SA report contains a compliance checklist (<u>Document A03 – Page 4, Table 1.1</u>) to demonstrate that all legislative requirements (including Strategic Environmental Assessment) have been complied with.
17.	L	Have you consulted the statutory environment consultation bodies, and other interested parties, on the scope and level of detail of the environmental information to be included in the Sustainability Appraisal report?	The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)	Y	<ul style="list-style-type: none"> ●Statement of Community Involvement ●Sustainability Appraisal report scoping document ●Sustainability Appraisal report ●Copies of the consultation 	Yes. All Statutory Bodies have been consulted on the SA Scoping Report March 2020 (<u>Document B10</u>). The SA Scoping Report was also sent to targeted key stakeholders (including town/parish councils and developers/landowners) to enable wider comment. All

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
					letters sent to, and any responses from, the bodies	responses were considered and a summary of comments and actions is included within the SA Appendix A (<u>Document A04</u>).
		Stage C: Developing the update to your local plan policies				
18.	L	Have you collected in a presentable format the relevant baseline information that will inform and evidence an update to your plan? This may include evidence commissioned by third parties.	P&CPA Section 13 and Section 20	Y	<ul style="list-style-type: none"> ●Baseline technical data ●Commissioned reports and studies ●Authority Monitoring Report 	The evidence used to inform the Joint Local Plan is available via the Councils website: https://www.babergh.gov.uk/planning/planning-policy/evidence-base/current-evidence/ All relevant baseline information is provided within the Core Document Library for Examination.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
19.	L	<p>Have you undertaken early engagement with stakeholders to help develop spatial options, particularly on strategic cross-boundary matters?</p> <p>Have you ensured that you are keeping a continual log of engagement for your Duty to Cooperate Statement of Common Ground?</p>	<p>P&CPA Section 20 and Section 33A</p> <p>NPPF para 27 and para 35</p>	Y	<ul style="list-style-type: none"> ●Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	<p>Early engagement was undertaken for the Joint Local Plan Options document (2017) (Document B02).</p> <p>Engagement under the Duty to Cooperate has been recorded in Document A07 and the Statements of Common Ground (Documents ES01 to ES20). Engagement with Ipswich Housing Market Area local planning authorities through the Ipswich Strategic Planning Area has been ongoing. Engagement with West Suffolk has only developed more latterly as issues have arisen following planning applications being submitted in a neighbouring village within Mid Suffolk District. A continual log of engagement is being kept. Discussions with West Suffolk have also involved Suffolk County Council and Highways England.</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>Engagement with Breckland Council and South Norfolk Council has been undertaken through discussions at a Norfolk and Suffolk local authorities meeting that takes place at multiple times during the year. Engagement with local planning authorities in North Essex has been at the time of Babergh and Mid Suffolk public consultations or responding to their public consultations. There was engagement with Braintree District Council on a cross-boundary strategic matter that is now no longer being pursued by either Babergh or Braintree Districts.</p> <p>In the first half of 2020, engagement has been had with neighbouring authorities in collecting data for the Water Cycle Study and in</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>obtaining GIS information for Sustainability Appraisal.</p> <p>Engagement has also taken place with the Environment Agency, Anglian Water and Essex and Suffolk Water in respect of water matters; with the Clinical Commissioning Groups on health matters; with Network Rail and Greater Anglia on rail matters; Natural England on environmental matters; and Historic England on heritage matters through heritage assessment work.</p>
20.	L	Have you drafted policies / policy options and alternatives based on evidence and engagement? Do the options serve a clear purpose, have they been prepared positively and written in a clear manner and unambiguous?	NPPF para 15 to 34	Y	<ul style="list-style-type: none"> •First draft plan •Sustainability Appraisal report •Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	Yes. The Councils have set out policy options and alternative options in Joint Local Plan public consultations in 2017 (Document B02) and 2019 (Document B09). These have been informed by the baseline data and key issues identified in the district from the Sustainability Appraisal

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						(Document A03 & A04) as well as the evidence base reports underpinning the Joint Local Plan. The Councils have had regard to comments made at previous consultation rounds as set out in the Consultation Statement (Document A06).
21.	L	Have you taken account of the NPPF requirements for plan content and the Government's planning policy for traveller sites? At the time of publication this was included in the August 2015 DCLG Planning Policy for traveller sites. This policy must be taken into account in the preparation of development plans.	NPPF Planning policy for traveller sites, DCLG August 2015	Y	<ul style="list-style-type: none"> ●Evidence based documents ●First draft plan ●Consultation statement ●Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	<p>Yes account has been had to the NPPF in producing the JLP, creating a framework for addressing housing needs and other economic, social and environmental priorities.</p> <p>Specific evidence relating to Gypsy and Traveller provision is in the form of an Accommodation Needs Assessment (ANA), published in May 2017 (Document EH03). This sets out the needs within the two districts and accords with the Planning Policy for Traveller Sites (2015).</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						The LP09 G&T & travelling showpeople policy is a flexible criteria based policy that will allow for the collaboration of partner agencies to accommodate needs as they arise.
22.	L	<p>Have you considered plan production processes set out within the NPPF, including:</p> <ul style="list-style-type: none"> • Plan making provisions set out in section 3 – para 15-37 • Considering transport issues at the earliest stages of plan production – para 102 • Aligning strategies and investments – para 104 • Considering changes in the demand for land – para 120 • Discussing the strategic location of housing growth and any proposed changes to Green Belt boundaries with neighbouring authorities – para 137 • Applying a sequential, risk-based approach to the location of 	NPPF	Y	<ul style="list-style-type: none"> •Evidence based documents •First draft plan •Consultation statement •Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	Yes. The Councils have produced a joint document for the districts of Babergh & Mid Suffolk covering the key Plan components set out in NPPF para 20. Part 1 of the JLP covers strategic policies with Part 2 covering non-strategic policies and Part 3 site specific policies. Ongoing strategic cooperation has been undertaken with relevant bodies as set out in the Duty to Cooperate Statement (Document A07). Statutory environmental assessments (SA and HRA) (Documents A03 , A04 and A05) have been

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		<p>development to avoid flood risk to people and property – para 157</p> <ul style="list-style-type: none"> Allocating land with the least environmental value – para 171 				<p>carried out iteratively and the Plan is supported by an Infrastructure Delivery Plan (<u>Document ER01</u>) and has been viability tested (<u>Document ER02</u>).</p> <p>The Councils have undertaken iterative transport assessment modelling on the emerging Plan allocations with partners across the Ipswich Housing Market Area since 2018 (Documents ET01 – ET14). The evidence has helped form the strategy and associated infrastructure proposals.</p> <p>As evidenced by the Consultation Statement Report (<u>Document A06</u>) and DtC statement (<u>Document A07</u>), the Council has engaged significantly with infrastructure providers and neighbouring authorities to ensure strategies are aligned</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>where possible and compatible.</p> <p>Various environmental assessment reports have been undertaken including heritage, landscape, flood risk, habitats assessments and sustainability appraisal to ensure environmental impacts are minimised and appropriate sustainable growth promoted - all of which are available in the Councils Core Document Library.</p>
23.	L	Have you developed a clear and robust framework that will allow you to consistently monitor the implementation and impact of the policies in the plan and to enable a review to be triggered where necessary?	<p>P&CPA Section 13 and Section 35</p> <p>T&CPA Regulation 34</p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)</p>	Y	<ul style="list-style-type: none"> ●Sustainability Appraisal ●Authority Monitoring Report ●Reports or documents setting out the appraisal and monitoring framework 	<p>A Sustainability Appraisal (Document A03 & A04) has been conducted as part of the production of the Local Plan. A requirement of the Sustainability Appraisal is to monitor the likely significant effects of the plan.</p> <p>A monitoring framework (see Appendix 02 of the JLP) and annual monitoring report has</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
			NPPF Para 31, 33, 75, 120			also been developed as ways of ensuring the Councils can consistently monitor the implementation and impact of the policies in the plan and can be reviewed where necessary.
24.	L	Have you undertaken a Habitats Regulations Screening Assessment to determine whether the update to the local plan is likely to have a significant effect on a European site or a European offshore site (either alone or in combination with other plans or projects)?	<p>The Conservation of Habitats and Species Regulations 2017 (as amended)</p> <p>The European Directive 92/43/EEC</p>	Y	<ul style="list-style-type: none"> ●Habitats Regulations Assessment screening report ●Habitats Regulations Assessment 	<p>A HRA including Appropriate Assessment (<u>Document A05</u>) has been undertaken as part of the production of the Local Plan. The HRA has been endorsed by Natural England who has agreed a Statement of Common Ground (<u>Document ES10</u>).</p> <p>To ensure adequate protection of Protected Species and habitats Sites is in place a Construction Environment Management Plan will be agreed upon prior to commencement. The HRA also took into consideration The Recreational disturbance, Avoidance and Mitigation</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>Strategy for the Suffolk Coast (Document EE09).</p> <p>The HRA has undertaken regulation compliance tests which are published within those reports.</p>
25.	L	<p>Have you consulted the relevant “nature conservation body” on your Habitats Regulations Screening Assessment and had regard to their representations? Have you also consulted, if considered appropriate, other relevant organisations?</p>	<p>The Conservation of Habitats and Species Regulations 2017 (as amended)</p> <p>The European Directive 92/43/EEC</p>	Y	<ul style="list-style-type: none"> ●Habitats Regulations Assessment screening report ●Habitats Regulations Assessment ●Statement of Community Involvement ●Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	<p>A HRA including Appropriate Assessment (Document A05) has been undertaken as part of the production of the Local Plan and have undertaken regulation compliance tests which are published within those reports. Natural England has been consulted as required. The HRA has been endorsed by Natural England who has agreed a Statement of Common Ground (Document ES10). In light of the consultation response a HRA addendum and Technical note has been produced to provide greater clarity regarding water</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>quality/quantity, disturbance, Zone of influence and air quality. Monitoring of air quality over the life of the plan has also been agreed.</p> <p>Anglian Water have also been involved in respect of a wastewater matter with potential impacts on protected habitats and water quality, and a Statement of Common Ground has been produced with Anglian Water, Natural England and the Environment Agency (Document ES11).</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
26.	L	<p>Did the Habitats Regulations Assessment screening assessment determine that the plan is likely to have a significant effect on a European site or a European offshore site?</p> <p>If so you <u>must</u> undertake an appropriate assessment of the implications of the plan (as part of your Habitats Regulatory Assessment (HRA)) for the Plan's policies and site(s) within the context of the European site's conservation objectives.</p>	<p>The Conservation of Habitats and Species Regulations 2017 (as amended)</p> <p>The European Directive 92/43/EEC</p>	Y	<ul style="list-style-type: none"> ●Habitats Regulations Assessment screening report ●Habitats Regulations Assessment ●Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	A HRA including Appropriate Assessment (<u>Document A05</u>) has been iteratively undertaken as part of the production of the Local Plan and have undertaken regulation compliance tests which are published within those reports.
27.		Have you carried out an Equalities Impact Assessment?	Equality Act 2010		<ul style="list-style-type: none"> ●Equalities Impact Assessment 	An Equalities Impact Assessment was published alongside the Joint Local Plan Preferred Options document (July 2019) and the Regulation 19 Joint Local Plan (November 2020). The Equalities Impact Assessments went to both Babergh and Mid Suffolk

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						Council meetings on 25 th June 2019 and 27 th June 2019 respectively; and 10 th November 2020 and 11 th November 2020. The updated version for the Regulation 19 JLP is available as <u>Document A10</u> in the Core Document Library.
28.		Have you considered combining the Sustainability Appraisal, Equalities Impact Assessment and potentially Habitats Regulations Assessment as part of an Integrated Impact Assessment that is developed and updated alongside the plan in order to inform its options? This may not be appropriate in all instances.	Equality Act 2010	n	<ul style="list-style-type: none"> ●Habitats Regulations Assessment screening report ●Habitats Regulations Assessment ●Equalities Impact Assessment 	No. The Sustainability Appraisal (<u>Document A03</u>), Equalities Impact Assessment (<u>Document A10</u>) and Habitats Regulations Assessment (Appropriate Assessment) (<u>Document A05</u>) are all separate documents.
29.	L	Have you assessed the draft plan / policy options against relevant soundness and quality measures?	NPPF Para 35 to 36	Y	<ul style="list-style-type: none"> ●Draft plan / policy options ●Duty to Cooperate Statement(s) of Common Ground ●Local Plan Form and Content 	Yes. The Plan has been assessed against national planning policy/guidance soundness and legislation requirements using the full Planning Advisory Service Toolkit (<u>Document A16</u>). The

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
					<p>Checklist (see Part 2 of this Toolkit)</p> <ul style="list-style-type: none"> Local Plan Soundness and Quality Assessment (see Part 4 of this Toolkit) 	<p>statutory environmental assessments for Sustainability Appraisal (Document A03) and Habitats Regulations Assessment (Document A05) have undertaken regulation compliance tests and are published within those reports.</p>
30.	L	<p>Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted policies map?</p> <p>If yes, have you prepared a submission policies map?</p>	T&CPA Regulations 5(1) (b), 9 (1), 17 & 22(1)		<ul style="list-style-type: none"> Submission policies map Brief statement if a submission policies map is not required 	<p>Policies put forward by the Joint Local Plan are supported by submission policies maps, located in Part 3 Place and Allocations Policies. An online digital version of the policies map is also available with the JLP. Policies presented within these maps are as follows:-</p> <ul style="list-style-type: none"> SP03 – Settlement Boundaries SP05 - Strategic Employment Sites LP09 – Provision for Gypsy and Traveller and Travelling Showpeople

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<ul style="list-style-type: none"> • LP10 – Moorings, Marinas and Houseboats • LP14 – Retail and Town Centres • LP20 – Areas of Outstanding Natural Beauty • LP20 - Flood Zones 2 & 3 • LP30 – Designated Open Space • JLP Part 3 – all allocations.
31.	L	Is the local plan policies update consistent with any other adopted Local Plan Documents for the area?	T&CPA Regulation 8(3) and (4)	Y	•Local Plan and relevant background papers	Yes. The Joint Local Plan is the forerunning new suite of up-to-date planning policies to be adopted in Babergh and Mid Suffolk districts. It will supersede all currently adopted planning policies.
32.	L	Is the local plan policies update intended to supersede any adopted development plan policies, does it state that fact and identify the superseded policies?	T&CPA Regulation 8(5)	Y	•Local Plan	Upon adoption, the Joint Local Plan will replace all existing Babergh and Mid Suffolk development plan policies (apart from adopted Neighbourhood Plan policies).

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						A schedule of specific policies to be superseded or abandoned upon adoption of the Joint Local Plan has been produced and included in the Plan (Document A01 - Appendix 03).
33.	L	Is the local plan policies update (if a London Borough or Mayoral DC) in general conformity with the spatial development strategy?	P&CPA section 24	N/A	<ul style="list-style-type: none"> ●Letter from Mayor of London/ Mayoral Development Corporate ●Local Plan and relevant background papers 	n/a
		Stage D: Consulting and engaging on the policies update				

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
34.	PM	Have you obtained the relevant authority permissions to publish the first draft / options for public consultation?		Y	<ul style="list-style-type: none"> Any relevant authority reports to Cabinet / Committee 	Yes. The Joint Local Plan Regulation 18 options document (Document B02) was published for public consultation between 21 st August 2017 and 10 th November 2017, following approval at the Babergh Council meeting on 18 th July 2017 and the Mid Suffolk Council meeting on 20 th July 2017.
35.	L	<p>Have you notified the following bodies or persons that you are preparing a local plan policies update and invited them to make representations on what the plan should contain?</p> <ul style="list-style-type: none"> The specific consultation bodies that may have an interest; The general consultation bodies that the authority consider appropriate; Residents or other persons carrying on business in the area as considered appropriate; and Any other stakeholders that you have engaged with in earlier stages on strategic matters and who will be party 	<p>P&CPA Section 20 and Section 33A</p> <p>T&CP Regulation 18</p> <p>NPPF Para 16, 24-27, and 35</p>	Y	<ul style="list-style-type: none"> Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements Consultation Statement Copies of consultation notifications Records of discussion 	<p>Yes, this has happened at all JLP consultation stages and the volume of consultees has evolved as the Plan has in order to capture new respondents or interested parties.</p> <p>Engagement is detailed in the Consultation Statement (Document A06) and Duty to Cooperate Statement (Document A07), through a log continually updated, and through any published records of discussions.</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		to your Duty to Cooperate Statement(s) of Common Ground and are relevant parties pursuant to your duty to cooperate.				
36.	L	<p>Have you made sure that the consultation and invitation to make representations:</p> <ul style="list-style-type: none"> • Follows the principles set out in your adopted Statement of Community Involvement; • Integrates any involvement with the Duty to Cooperate Statement(s) of Common Ground; and • Is proportionate to the scale of issues involved in the local plan policies update. 	<p>P&CPA Section 19</p> <p>NPPF Para 27 and 35</p>	Y	<ul style="list-style-type: none"> •Statement of Community Involvement •Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements •Consultation Statement 	<p>Yes, consultations have been undertaken in accordance with the Statement of Community Involvement (<u>Document A12</u>) and the Statement of Community of Involvement Addendum (<u>Document A13</u>). Duty to Cooperate partners have been contacted during the consultations and outside of consultation periods, where the opportunity to raise any matters of concern has been available. The Consultation</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						Statement (<u>Document A06</u>) identifies how the consultation has been undertaken and the main issues that has arisen, formally cross-referring to the Duty to Cooperate prescribed bodies and neighbouring authorities. The Duty to Cooperate Statement (<u>Document A07</u>) and the relevant Statements of Common Ground cover all matters proportionately.
37.	L	<p>Have you prepared a draft of your Consultation Statement (a “proposed submission document”) that includes a record of:</p> <ul style="list-style-type: none"> • The individuals or bodies invited to make representations; • How this was done; • The main issues raised; and • In preparation of Stage E (and to be completed in Stage E as outline below) how the main issues have been addressed in the local plan policies update. 	<p>P&CPA Section 19</p> <p>T&CPA Regulation 17, 18, 19 and 22</p> <p>NPPF Para 16, 24-27, and 35</p>	Y	<ul style="list-style-type: none"> •Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements •Consultation Statement 	Yes. The Councils have produced a compliant Consultation Statement (<u>Document A06</u>) for the Joint Local Plan process. Appendix A of the Consultation Statement provides examples of the organisations and persons who were invited to make representations. Appendix B sets out how people were invited to make representations.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						Sections 2 and 3 of the Consultation Statement sets out how engagement was undertaken in 2017 and 2019 respectively, identifying the main issues raised and how these were taken into account in the Joint Local Plan. The Consultation Statement also identifies the main issues raised during the Regulation 19 consultation (<u>Document A06</u>) – chapter 4).
38.	L / PM	<p>Have you consulted on the following emerging documents alongside your first draft plan so that they can be reviewed against representations and policy options and alternatives as they are developed?</p> <ul style="list-style-type: none"> • Sustainability Appraisal; and • Habitats Regulations Screening Assessment (or Habitats Regulations Assessment if one has been developed at this stage) 	<p>P&CPA Section 19 and Section 39</p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)</p> <p>The Conservation of Habitats and Species Regulations 2017 (as amended)</p>	Y	<ul style="list-style-type: none"> •Sustainability Appraisal (and any drafts) •Habitats Regulations Assessment screening report •Habitats Regulations Assessment •Statement of Community Involvement •Duty to Cooperate Statement(s) of 	<p>Yes. The statutory environmental assessments for Sustainability Appraisal (<u>Document A03 & A04</u>) and Habitats Regulations Assessment (<u>Document A05</u>) have undertaken regulation compliance tests and are published within those reports.</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
			<p>The European Directive 2001/42/EC</p> <p>The European Directive 92/43/EEC</p> <p>NPPF Para 32</p>		<p>Common Ground / Duty to Cooperate Statements</p> <ul style="list-style-type: none"> ● Consultation Statement 	
		Stage E: Developing the submission version of the policies update				
39.	PM	Taking account of the consultation have you considered whether there is a need for further evidence and / or evidence to be updated to support the policy options set out in your plan?	P&CPA Section 13 and Section 20	Y	<ul style="list-style-type: none"> ● Consultation statement ● Baseline technical data ● Commissioned reports and studies 	Yes. An extensive amount of evidence has been undertaken to support the Joint Local Plan policies. The Councils have produced a number of additional evidence base studies resulting from the 2019 consultation including evidence on, heritage and landscape

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						impact, flood risk, infrastructure and viability. Evidence has been updated with support from statutory bodies where relevant. No further evidence base is considered required. All evidence for the JLP is available online and is set out in the Core Document library for Examination.
40.	PM	<p>Have you considered whether further consultation and engagement is required depending on the nature and significance of any proposed changes to the preferred strategy following consultation and / or further evidence?</p> <p>Where further consultation and engagement is required prior to submission this should be undertaken, recorded and reported in line with the requirements set out above. This includes updating and consulting where necessary on any corresponding amendments to the Sustainability Appraisal and Habitats Regulations Assessment.</p>	P&CPA Section 13 and Section 20	Y	<ul style="list-style-type: none"> ●Consultation statement ●Baseline technical data ●Commissioned reports and studies ●Sustainability Appraisal (and any drafts) ●Habitats Regulations Assessment screening report ●Habitats Regulations Assessment 	Yes. All consultation and evidence base matters have been reviewed throughout the Plan making process. No other matters are considered necessary to undertake further consultation engagement prior to Examination.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
					<ul style="list-style-type: none"> ●Statement of Community Involvement ●Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	
41.	L	Have you prepared the Sustainability Appraisal report on any revised draft of the local plan policies update? Is it clear how the sustainability appraisal has influenced the plan?	<p>P&CPA Section19(5)</p> <p>Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>	Y	●Sustainability Appraisal	Yes. A sustainability appraisal report has accompanied each iteration of the Joint Local Plan process. The SA report Appendix A (Document A04) sets out consultation issues raised relating to the SA and the response and Chapter 7 (Table 7.23) of the SA report (Document A03) sets out the recommendations for the Joint Local Plan
42.	L	Have you prepared an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 [HRA], or evidence to demonstrate that an Appropriate Assessment is not	The Conservation of Habitats and Species Regulations 2017 (as amended)	Y	●Habitats Regulations Assessment screening report	Yes. The statutory environmental assessment for Habitats Regulations Assessment/ Appropriate Assessment (Document A05) have undertaken regulation

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		required and confirmation from Natural England that they concur?	The European Directive 2001/42/EC The European Directive 92/43/EEC NPPF Para 32		●Habitats Regulations Assessment	compliance tests and are published within those reports. The HRA has been endorsed by Natural England who has agreed a Statement of Common Ground (<u>Document ES10</u>).
43.	L	Have you updated your Equalities Impact Assessment?	Equality Act 2010	Y	●Equalities Impact Assessment	An Equalities Impact Assessment was published alongside the Joint Local Plan Preferred Options document (July 2019) and the Regulation 19 Joint Local Plan (November 2020). The Equalities Impact Assessments went to both Babergh and Mid Suffolk Council meetings on 25 th June 2019 and 27 th June 2019 respectively; and 10 th November 2020 and 11 th November 2020. The updated Equalities Impact Assessment for the Regulation 19 JLP is available as <u>Document A10</u> in the Core Document Library.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
44.	L	Have you taken account of all of the representations received from all person(s) in response to the consultation(s) in Stage D? Have you recorded how the main issues have/will be addressed in your draft consultation statement?	T&CPA Regulation 17, 18 and 22	Y	<ul style="list-style-type: none"> ●Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements ●Consultation Statement ●Local Plan ●Relevant correspondence 	Yes. The Councils' Statement of Consultation (<u>Document A06</u>) records all the stages of formal JLP public consultation (from 2017, 2019 and 2020), together with the main issues raised, the Councils' response (for Regulation 18 comments) and how they have been taken into account when evolving the JLP document.
45.	PM	Have you considered whether or not you intend to confirm the housing land supply through the independent examination process? If so, have you clearly stated this within your Regulation 19 Submission local plan policies update and have you ensured that you will engage appropriately with developers and others with an interest in housing delivery on the housing land supply?	NPPF para 74 T&CPA Regulation 17, 18 and 22	Y	<ul style="list-style-type: none"> ●Local Plan ●Relevant correspondence 	Yes. The Councils do not wish to confirm the housing land supply. However, the Councils are confident of a very robust 5 year land supply position in both Babergh (currently 6.74 years) (<u>Document EM04</u>) and Mid Suffolk (currently 7.67 years) (<u>Document EM05</u>) with positive tools in place to maintain flexibility and buffers during the Plan lifetime.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
46.	PM	<p>Does your local plan policies update include a trajectory illustrating the expected rate of housing delivery over the plan period?</p> <p>Will your local plan policies update provide for a 5 year supply of deliverable housing sites (incorporating the appropriate buffer) on adoption against the housing requirement (which is informed by a local housing need assessment conducted using the standard method as a starting point)?</p>	NPPF paras 11, 73 and 74	Y	<ul style="list-style-type: none"> Local Plan 	<p>Yes. A housing trajectory has been prepared for the Plan covering the period 2018 to 2037 (Appendix 1 of the JLP – Document A01).</p> <p>Due to separate housing needs and targets for Babergh and Mid Suffolk areas, a trajectory has been prepared for each district.</p> <p>Both Councils have a significant supply of land to meet identified housing needs. A substantial supply buffer has been included to enable flexibility and contingency to address any unforeseeable delivery problems. Regular monitoring will be undertaken to record performance.</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		Stage F: Independent examination and adoption				
47.	PM	<p>Have you obtained the relevant authority permissions to publish the submission version of the local plan policies update?</p> <p>You may want to consider including approval to submit this to the Secretary of State (Planning Inspectorate)</p>		Y	<ul style="list-style-type: none"> Any relevant authority reports to Cabinet / Committee 	Approval to publish the Regulation 19 JLP was sought at the Babergh Full Council Meeting on 10 th November 2020, and Mid Suffolk Full Council Meeting on the 11 th November 2020. At these same meetings, delegated authority was granted to submit the JLP for Examination.
48.	L	Have you made clear where and within what period representations must be made?	T&CPA Regulation 17, 19, 20 and 35	Y	<ul style="list-style-type: none"> Report or record of decisions 	Yes, the Joint Local Plan Regulation 19 consultation opened on 12 th November 2020 and closed at 12 noon of 24 th December 2020 – 6 weeks. These dates were published on the Councils website, included in the Councils Statement of Representations Procedure (Document B12), Notice of Regulation 19 publication

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						(Document B13) and letters / emails sent to consultees.
49.	L	<p>Have you published on your website and made copies of the following available for inspection:</p> <ul style="list-style-type: none"> the proposed submission documents the statement of the representations procedure statement and details of where and when documents can be inspected <p>Have you checked you have met all other requirements of your Statement of Community Involvement?</p>	T&CPA Regulations 19 and 35	Y	<ul style="list-style-type: none"> Statements and record of where and when documents were made available Consultation Statement 	Yes, the proposed submission documents were made available on the Councils website. The Regulation 19 Consultation was held whilst Covid-19 restrictions were in place. In line with the SCI Addendum (Document A13), provided hard copies of documents on request at a cost set out in the SCI (Document A12). The JLP consultations met the requirements of the SCI (Document A12) and SCI Addendum (Document A13).
50.	L	<p>Have you sent to each of the specific consultation bodies invited to make representations under Regulation 18(1):</p> <ul style="list-style-type: none"> A copy of each of the proposed submission documents; and the statement of the representations procedure 	T&CPA Regulation 19(b)	Y	<ul style="list-style-type: none"> Consultation Statement Evidence of notifications (email) 	Appendix A of the Councils Consultation Statement (Document A06) sets out the consultation bodies invited to make representations. The emails / letters sent to the specific consultation bodies

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						included links to the proposed submission documents and the statement of representations procedure (<u>Document B12</u>).
51.	L	<p>Have you sent to each of the general consultation bodies invited to make representations under Regulation 18(1):</p> <ul style="list-style-type: none"> the statement of the representations procedure; and where and when the documents can be inspected 	T&CPA Regulation 19(b)	Y	<ul style="list-style-type: none"> ● Consultation Statement ● Evidence of notifications (email) 	<p>Appendix A of the Councils Consultation Statement (<u>Document A06</u>) sets out the consultation bodies invited to make representations. The emails / letters included links to the proposed submission documents and the statement of representations procedure. Due to Covid-19 restrictions in place at the time of the consultation, documents could not be inspected in person. Instead, documents were made available to view online, and hard copies of documents could be supplied at a cost in line with the SCI. This complied with the SCI Addendum (<u>Document A13</u>) and the relevant legislation.</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
52.	L	Have you, on the day of publication, requested the opinion of the Mayor of London (if a London Borough or Mayoral DC) on the general conformity of the local plan update with the spatial development strategy?	P&CPA Section 24 T&CPA Regulation 21	N/A	●Copy of letter	N/A – this applies to London boroughs.
		Getting ready for submission to PINS				
53.	PM	Get ready for submission and examination, this might mean starting the process of appointing a programme officer, securing rooms for a potential hearing and other practical arrangements. Refer to guidance from the Planning Inspectorate.	See <u>PINS Procedure Guide for Local Plan Examinations 2019</u>	Y		A programme officer has been appointed, and examination website has been set up. The Councils have reviewed availability for potential venues to hold hearing sessions.
54.	PM	Have you obtained the relevant authority permissions to submit the plan to the Secretary of State via the Planning Inspectorate (PINS)		Y	●Any relevant authority reports to Cabinet / Committee	Delegated authority has been granted to submit the JLP for Examination, by Babergh Council on 10 th November, and Mid Suffolk Council on 11 th November, when approval was granted to proceed with a Regulation 19 consultation.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
55.	L	Have you collated all of the representations made to the publication draft plan policies update?	P&CPA Section 20(3) T&CPA Regulation 22(1)(e)	Y		Yes.
56.	PM	Does each representation made have a unique ID and contact details? PINs require that these are provided in an electronic database enabling the full text of each representation to be accessed easily in both policy and paragraph number order and representor order. The database should also clearly identify those who have made a request to be heard by the Inspector under section 20(6) of the PCPA	See <u>PINS Procedure Guide for Local Plan Examinations 2019</u>	Y		Yes.
57.	L	Have you assembled the relevant supporting documents (documents relevant to the preparation of your plan which normally includes or comprises the evidence base)?	P&CPA Section 20(3) T&CPA Regulation 22(1)(g)	Y	●Submission documents / Examination library	Yes. All relevant supporting documents are available on the Councils Core Document Library, which is available on the Councils website.
58.	PM	Do all of the documents that you will submit to the inspectorate have a unique		Y	●Submission documents /	

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		reference listed in an 'Examination Library'?			Examination library	Yes. All documents submitted to the inspectorate are provided with a reference number as set out in the Core Document Library.
59.	L/ PM	You may need to consider whether you need to redact certain personal details from representations for the website and inspection purposes. However, those who have made representations should be able to contact one another and documents should be provided without details redacted. See the guidance from the Planning Inspectorate.	General Data Protection Regulation 2018 See PINS Procedure Guide for Local Plan Examinations 2019	Y		Personal details have been redacted from representations published on the Councils website, in line with data requirements. These are accessible via an interactive consultation portal, or in report format through Document A14 and Document A15 .
60.	L	Have you prepared a statement setting out: <ul style="list-style-type: none"> • Which bodies and persons were invited to make representations under Regulation 18 • How they were invited • A summary of the main issues raised • How the representations have been taken into account 	P&CPA Section 20 (3) T&CPA Regulation 22(1)(c)	Y	● Consultation statement	Yes. This has been addressed in the Consultation Statement (Document A06).

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
61.	L	Have you prepared a statement giving: <ul style="list-style-type: none"> the number of representations made under Regulation 22 a summary of the main issues raised OR <ul style="list-style-type: none"> Stating that no representations were made 	P&CPA Section 20(3) T&CPA Regulation 22(1)(c)	Y	<ul style="list-style-type: none"> Consultation Statement The Statement as required in Regulation 22(1)(c) – this can be included in the Consultation statement 	Yes. This has been addressed in the Consultation Statement (Document A06 – Chapter 4).
62.	PM	Consider what documents need printing to ensure that hard copies are available where necessary for inspection and for the examination library.	See PINS Procedure Guide for Local Plan Examinations 2019	Y		At the time of submission, public health measures are in place to limit the spread of Coronavirus. New legislation temporarily removes the requirement to make certain documents available for inspection at premises. The Councils will review this periodically in line with Government guidance. All documents are available online.
		Submission to PINS				

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
63.	L	<p>Have you sent the Secretary of State (the Planning Inspectorate) a hard copy and electronic version of:</p> <ul style="list-style-type: none"> • a copy of the local plan policies update • and (if prepared) policies map <p>Have you sent the Secretary of State (the Planning Inspectorate) an electronic version of:</p> <ul style="list-style-type: none"> • the Final 'consultation statement' supplemented by or incorporating the documents consultation required under Regulation 22(1) • The Sustainability Appraisal • Copies of representations • 'Supporting documents' <p>Guidance from PINS also highlights other material necessary for the examination which includes:</p> <ul style="list-style-type: none"> • An Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 [HRA], or evidence to demonstrate that an Appropriate Assessment is not 	<p>P&CPA Section 20(1) and 20(3)</p> <p>T&CPA Regulations 22</p> <p>See PINS Procedure Guide for Local Plan Examinations 2019</p>			To be addressed in due course.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		<p>required and confirmation from Natural England that they concur;</p> <ul style="list-style-type: none"> • The LPA's current Local Development Scheme; • In London, confirmation that the Mayor has indicated general conformity with the London Plan (note however that the Inspector is entitled to take his/her own view on conformity). • It is also helpful if the LPA provide an Equalities Impact Assessment 				
64.		<p>As soon as practical after submission, on your website, have you published:</p> <ul style="list-style-type: none"> • The documents submitted to PINS (identified above) including representations made under Regulation 20 (where practicable) taking into account GDPR requirements? • Statement as to where and when these documents are available for inspections (again this should be in line with any requirements in 	T&CPA Regulation 22(3) and 35(1)(b)			The Councils intend to update this information as soon as practical after submitting the plan to the Inspectorate.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		your Statement of Community Involvement)?				
65.	L	For each general consultation body invited to make representations under Regulation 18(1), have they been sent: <ul style="list-style-type: none"> notification that the documents submitted to PINS are available for inspection details of where and when they can be inspected 	T&CPA Regulation 22(3)(b)		●Copies of correspondence	The Councils will contact the relevant organisations shortly after the plan is submitted. In line with current public health measures, documents are not being made available to inspect in person. The Councils will keep this under review periodically.
66.	L	Have you given notice to persons who have requested to be notified that submission has taken place?	T&CPA Regulation 22(3)(c)		●Copies of correspondence	The Councils will contact the relevant persons shortly after the plan is submitted to notify them that submission has taken place.
67.	L	If examination hearings are being held, at least six weeks before its opening has the Programme Officer: <ul style="list-style-type: none"> published the time and place of the examination and the name of the person appointed to carry out the examination on your website? notified those who have made representations on the published 	P&CPA Section 20 T&CPA Regulations 24 and 35		●Website	To be addressed in due course in liaison with the Programme Officer.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		DPD which have not been withdrawn of these details?				
68.	L	Have you asked the Inspector to recommend 'main modifications' (changes that materially affect the policies) to make a submitted local plan policies update sound and legally compliant? These modifications should be published for consultation.	See Section 6 of the <u>PINS Procedure Guide for Local Plan Examinations 2019</u> P&CPA Section 20 (7C)		<ul style="list-style-type: none"> ●Schedule of proposed main modifications 	Yes. The Councils have asked the Inspector to recommend 'main modifications' if necessary. Any consultation on main modifications will be addressed in due course, if necessary.
69.	L	Depending on the scope of the modifications, have you considered whether there is a need to undertake further Sustainability Appraisal, Habitats Regulations Assessment, and Equalities Impact Assessment on the modifications.	The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) The European Directive 2001/42/EC The Conservation of Habitats and Species Regulations 2017 (as amended)		<ul style="list-style-type: none"> ●Sustainability Appraisal (and any drafts) ●Equalities Impact Assessment ●Habitats Regulations Assessment screening report 	If necessary, this will be addressed in due course.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
			The European Directive 92/43/EEC Equality Act 2010			
70.	L	If the plan policies update is sound, have you formally adopted the plan policies update in a full meeting of the local planning authority?	T&CPA Regulation 4(1) and (3) of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000).		●Any relevant authority reports to Cabinet / Committee	To be addressed in due course.
71.	L	On adopting a Local Plan policies update, have you made publicly available a copy of the plan, an Adoption Statement and Sustainability Appraisal?	T&CPA Regulations 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.		●Adoption Statement	To be addressed in due course.

PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a 'mock' examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 'key questions' in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the 'tests' as follows. Is the draft local plan update:

- **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 areas 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 National Planning Policy Framework.

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with PAS advice on proportionate evidence.

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

	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	In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area	The Plan seeks to provide a comprehensive supply of deliverable sites to meet the identified housing, economic and environmental objectives and needs in Babergh and Mid Suffolk. Opportunities for sustainable development are proposed in appropriate urban and rural contexts, to ensure flexibility and diversity for all communities to meet their future needs up to 2037. Infrastructure and environmental improvements are embedded within the Plan to ensure that the districts promote sustainability and enable mitigation and adaptation to the effects of climate change.
B	In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update	<p>The options tested have been informed by key evidence, sustainability appraisal and democratic input. Growth has been distributed with consideration to consultation responses (Regulation 18 JLP 2017 & 2019), the availability and deliverability of sites, the preferred spatial distribution pattern, the sensitivities and constraints of the area (e.g. Flood zones, historic features and landscape designations) and infrastructure capacity and opportunities (e.g. education and healthcare capacity and transport connectivity).</p> <p>In consideration of historic patterns of development, allowance has also been made for windfall development across the plan area.</p>
C	List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery	<p>The housing spatial distribution is based upon the below settlement hierarchy:</p> <ul style="list-style-type: none"> • Ipswich Fringe • Market towns & urban areas • Core villages • Hinterland villages • Hamlets • Windfall.

	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>Economic growth is concentrated on the existing strategic employment areas that are essential to maintaining the future prosperity of the districts. The areas are:</p> <ul style="list-style-type: none"> • Stowmarket • Sudbury • Ipswich fringe (Claydon and Great Blakenham, Wherstead, Sroughton) • Acton • Eye • Hadleigh • Needham Market • Raydon; and, • Woolpit. <p>Economic led regeneration is supported at Brantham and at the Former Sroughton Sugar Beet factory. Net additional strategic growth is focussed on the areas of greatest accessibility along the transportation corridors.</p> <p>The strategic infrastructure necessary to support the proposed growth include:</p> <ul style="list-style-type: none"> • Strategic transport improvements along the strategic corridors. • A district wide education expansion programme to match projected population growth; • Mitigation for internally protected habitat sites & strategic enhancement and management of the natural and local environment and networks of green infrastructure. • Capacity upgrades to Hartismere water resource zone • Improvements to digital technology and • Improvement to networks of local facilities, such as health provision, across the districts as detailed in the Infrastructure Delivery Plan (IDP). 				
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	-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>				
	strategy' within the context of paragraph 35 of the NPPF?	Reason for score: +2. Part 1 of the Plan sets out a settlement hierarchy (Policy SP03) together with strategic policies (Policies SP04 and SP05) for identifying the broad locations for new sustainable housing and economic development. Policies SP08-SP10 ensure that development is supporting by appropriate infrastructure and addressing environmental impacts. Part 2 identifies a number of non-strategic policies (Policies LP01, LP04, LP06-LP12, LP14-LP15, LP17-LP21, LP25-LP29) setting out the additional criteria where locations and standards for sustainable development will be acceptable. Part 3 of the Plan together with the Policies Map identifies specific new allocations proposed in the districts. A sustainability appraisal assessment (<u>Document A03</u>) has been carried out on the proposals of the Plan and demonstrate that the Plan is an appropriate strategy which as far as possible, promotes overall sustainable development and avoids/mitigates substantial adverse impacts. Implications of taking no further action: Continued objection from those who do not support the overall or specific locations for growth. Mitigation / Action required (if necessary) to move scale to right: n/a Reviewer Comments:				
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 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: +2. A significant amount of development required to meet identified needs has already been committed by extant planning permissions with clear proposals for implementation. For major site allocations in the Plan, the deliverability or developability has been assessed throughout the Plan production by the initial Strategic Housing and Economic Land Availability Assessment (SHELAA) process (<u>Document EH06</u>), evidence base assessments (including sustainability appraisal – <u>Document A03</u>) and follow up engaged with landowners/developers. The Councils' engagement with major site owners has informed the production of the Plan trajectory. The requirements for major site development have been identified in the site allocation policies and subjected to viability testing. Implications of taking no further action: n/a Mitigation / Action required (if necessary) to move scale to right: n/a Reviewer Comments:				

	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>				
3.	<p>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?</p> <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>	-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: +2. Standard method is used to provide the housing requirements of the plan for both districts. No exceptional circumstances have been identified to justify an alternative approach to the standard method (see <u>Document EP02</u>). The standard method provides a significant increase (approx. 40%) in housing requirements for both districts against saved Core Strategy policies, therefore it is not considered that actual housing need is higher than the standard method. JLP identifies sufficient land to meet housing requirement over the plan period. JLP provides an approximate 20% buffer in the supply of land to allow for flexibility and will give greater confidence to meeting delivery targets and an ongoing five year land supply.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
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 circumstances exist to justify green belt release?</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
		Reason for score: +2. Does not apply to B&MSDC as no Green Belt designation.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
		-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>				
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?	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: +2. Standardised and consistent methodology for assessment of all SHELAA sites (Document EH06). Sites considered SHELAA suitable all tested through the sustainability appraisal process (Document A03). All site typologies considered thorough viability appraisal (Document ER02).				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
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: +2 A minimum housing requirement figure is provided in the JLP under Policy SP04 for all designated neighbourhood plan areas at the time of production. The NP housing requirements are expected to be for the same period as the Plan (2018 to 2037).				
		Implications of taking no further action: none				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
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

	KEY QUESTIONS	<p>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>Reason for score: +2. A significant amount of development required to meet identified needs has already been committed by extant planning permissions with clear proposals for implementation. Site allocation policies in the Plan identify the dwellings expected on each site, which is established through the Councils' evidence base documents such as SHELAA (Document EH06), Infrastructure Delivery Plan (IDP) (Document ER01), Flooding (Documents EE11 and Document EE16), Landscape (Document EE12) and Heritage assessments (Documents EE13, EE14 and EE15). The relevant housing mix is expected to be informed by consideration of the district housing needs assessment and/or specific local evidence (as required by policies SP01, SP02, LP06, LP07). Non-residential allocations set out the broad land use expectations expected to be delivered. Where appropriate site allocation policies include the requirement to make contributions towards infrastructure provision, and/or where land is required for infrastructure – such as land reserved for a primary school. Infrastructure requirements is evidenced by the Councils' IDP (Document ER01).</p> <p>Implications of taking no further action: n/a</p> <p>Mitigation / Action required (if necessary) to move scale to right:</p> <p>Reviewer Comments:</p>
D	<p>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?</p> <p>List these targets and the evidence source for this 'need' target?</p>	<p>NA. The Employment Sectoral Needs Assessment (Document EC03) identified a minimal net employment land requirement target of 2.9Ha in Babergh and 9.4Ha in Mid Suffolk. This has been accommodated through planning permissions, significant sites include Brantham in Babergh, the Sroughton Enterprise Park at Sroughton in Babergh, and the Stowmarket Enterprise Park at Gateway 14, Mill Lane in Stowmarket, Mid Suffolk. The issues with regards to employment land supply is rather maintaining a range of employment sites to meet demand with sufficient flexibility to accommodate demands over the plan period. This has been achieved through criteria-based policy for net additional sites along the transport corridors in accordance with the spatial distribution on a demand led basis.</p> <p>NA. Retail. The Babergh and Mid Suffolk Town Centre and Retail Study (2015) (Document EC01) identified a potential demand for convenience good equivalent in Babergh of 2,548m 'small superstore format' and 1,777m in Mid Suffolk by 2031. For comparison shopping in Babergh of 10,432m and Mid Suffolk of 3,152m by 2031. However, since 2015 this has been addressed through planning permissions. Furthermore, the unforeseen economic challenges and fundamental impact on town centre uses combined with the recent changes to the Use Class Order through the introduction of Class E has significantly changed the baseline of the land available suitable for retail use. This change</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>				
		will have national consequences. Consequently, the plan provides flexibility for addressing proposals for retail and other Class E use.				
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
		Reason for score: +1. For employment sites provision is made through sites which have not yet commenced, such as Mill Lane in Stowmarket and the significant regeneration sites at Brantham in Babergh and the Sroughton Enterprise Park in Babergh. These are considerably in excess of the net requirements. There is also a variable level of vacancies in many of the established employment areas where there is potential for economic growth. Allocating sites in excess of this risks undermining the potential enhancement of the network of sites across both districts which are vital to maintaining the sustainability of the extensive largely rural area. With regard to retail the policy approach for net additional provision is consistent with the National Planning Policy Framework (NPPF) firstly focussing new provision in the retail and district centres.				
		Implications of taking no further action: Some uncertainty on specific delivery requirements and timescales for major sites, particularly large employment sites (Mill Lane, Stowmarket).				
		Mitigation / Action required (if necessary) to move score to right: This can be improved by the inclusion of a requirement to produce a masterplan or development framework for each major site. Contact all interested parties on key delivery sites and ensure clearly understood principles for bringing the sites forward. There is a need for ongoing monitoring of vacancy and delivery of committed schemes.				
		Reviewer Comments:				
		-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>				
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	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: +2. The Plan policies such as SP08 (Infrastructure Provision) set out the expectations of planning applications to include appropriate infrastructure provision, the policy also specifies that when planning decisions are made, regard will be given to the Infrastructure Delivery Plan (IDP) (Document ER01) and associated evidence base. Key strategic infrastructure projects are also identified in this policy. The IDP summarises the key elements of the infrastructure needs that have been identified to support the planned growth. The IDP includes estimated costs and expected funding mechanisms, as well as the lead provider for delivering the infrastructure.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
10.	Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> 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
		Reason for score: +1. Through the preparation of the IDP (Document ER02), the Councils have worked closely with key infrastructure providers. Providers have been consulted for their advice in terms of mitigation measures needed to ensure that sustainable growth can be delivered. For each anticipated mitigation measures, or identified infrastructure project, an estimated cost is provided, with potential funding source and lead provider. An indication of timescale is also provided, in terms of short, medium, long term. The IDP identifies Potential Remaining Funding Gaps, and the Potential Funding Sources to address this. Statements of Common Ground has been produced with key transport infrastructure providers, involving Suffolk County Council (Documents ES16 and ES20), Highways England (Document ES16), Network Rail (Document ES20) and Greater Anglia (Document ES20). Some transport projects that are identified as required to deliver the growth of the Joint Local Plan are not costed out, and therefore it is not possible at this stage to provide an indication of potential funding gap, although the Statements of Common Ground with the Councils key partners will progress these matters through collaborative work, and consequently raise our confidence in this matter. Additionally, the Councils are working closely and involving our neighbouring authorities, for example the mitigation				

	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>measures developed as part of the work of the Ipswich Strategic Planning Area (ISPA) Transport Mitigation Strategy (referred at item 9.) involving the authorities of the Ipswich Strategic Planning Area, similar work, albeit on a smaller scale, is taking place with West Suffolk Council to cover cross boundary matters arising towards the north-west of the A14, within the vicinity of Bury St Edmunds. A Statement of Common Ground has been produced with the ISPA authorities and is on its seventh iteration (Document ES18) and with West Suffolk Council (Document ES15).</p> <p>Implications of taking no further action: As per above, if no action is taken to keep the IDP up to date, as a 'live' evidence base, the Councils are likely to fall behind in the understanding of the needs and mitigations measures required.</p> <p>Mitigation / Action required (if necessary) to move scale to right: Can be strengthened through our continued work with infrastructure providers.</p> <p>Reviewer Comments:</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>Housing:</p> <ul style="list-style-type: none"> • Identification of housing market area; • confirming there are no unmet needs; • Production of a shared evidence base; <p>Employment:</p> <ul style="list-style-type: none"> • Production of a consistent monitoring approach for Use Class E; • role of Ipswich as an employment hub; <p>Infrastructure</p> <ul style="list-style-type: none"> • highways, rail, health, education, water, power; • Impact of planned growth in the Ipswich Fringe on highway capacity and air quality; <p>Protected European Sites</p> <ul style="list-style-type: none"> • Recreational disturbance Avoidance and Mitigation Strategy;

	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>				
		Retail, Leisure and Other Commercial Provision <ul style="list-style-type: none">• role of Ipswich Town Centre;• role of parks, open spaces and sports provision in Ipswich;• swimming pool provision in neighbouring authorities. <p>Much of this is detailed in the Ipswich Strategic Planning Area Statement of Common Ground (Document ES18) where relevant to the housing market area and functional economic area, in a letter from Ipswich Borough Council (Document ES19), as well as in the Statement of Common Ground with West Suffolk Council (Document ES15).</p>				
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?	-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: +2. The Duty to Cooperate Statement (Document A07) identifies the cross-boundary strategic matters mentioned above and shows them in a table, the relevant partners engaged, management and working arrangements, any evidence base, outcomes and ongoing cooperation. Key documents are cross-referenced. A Statement of Common Ground for the Ipswich Strategic Planning Area (Document ES18) has been developed since 2018 and identifies these issues and outcomes. Statements of Common Ground (Documents ES01 to ES20) identify areas of agreement and difference. Interim documents were produced prior to the Publication of the Joint Local Plan and some were further developed up to Submission.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				

	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>				
F	<p>Are there any aspects of the local plan policies update not in conformity with national policy? 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?</p> <p><i>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?</i></p>	The Councils consider that the Joint Local Plan is in conformity with national policy.				
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 through voluntary agreement).	-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: +2. No relevant strategic planning frameworks in place.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
13.	Is the local plan policies update:	-2	-1	0	+1	+2
	<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? 	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: +2. The Councils have produced several 'higher level' plans many of which are being updated alongside the production of the Joint Local Plan (JLP). The Joint Strategic Plan Refresh 2016-2020 identifies three priority areas of economy and environment; housing; and strong and healthy communities. The JLP supports these three priority areas through protecting and supporting the principle of expanding strategic employment sites and				

	KEY QUESTIONS	<p>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>focusing the principle of additional employment sites along the strategic transport corridors; through supporting the enhancement and management of the natural and local environment including landscape, biodiversity, geodiversity and the historic environment; through the delivery of housing across a mix of types, sizes and tenures; and through engagement with neighbourhood planning groups and also the provision of community facilities.</p> <p>A new Corporate Plan (2019-2027) (Document D21) has been produced, which is designed to address the challenges and seize the opportunities facing the districts, and their organisations, for the foreseeable future. The vision is ‘Great communities with bright and healthy futures that everyone is proud to call home’. The strategic priorities are the environment, economy, housing, wellbeing, customers and communities, each underpinned by their own strategies. At the centre of the Corporate Plan is the JLP. Some of these strategies have been produced and others are in the process of being produced as detailed below.</p> <p>In 2019 the Councils set up an Environment and Climate Change Task Force to look at the climate challenge being faced in the districts. The Councils’ first Carbon Reduction Management Plan will set out the Councils’ approach on how to reach their ambition to become carbon neutral by 2030. Proposals to help achieve this were set out at simultaneous Cabinet meetings in July 2020 and have been developed alongside the JLP. The JLP has policies that address climate change and environmental matters in line with this emerging strategy. A Biodiversity Task Force has also met numerous times to address biodiversity matters alongside the JLP. A Sustainable Transport Action Plan is also to be developed by the two Councils.</p> <p>An Open for Business Economic Strategy was published in February 2018 (Document D16) and supports the implementation of the New Anglia Local Enterprise Partnership (NALEP) strategies through identifying issues to be addressed at the local level. This includes protecting the employment base and safeguarding employment land, whilst delivering a range of employment land to meet identified needs. This is reflected in the JLP.</p> <p>A Homes and Housing Strategy (2019-2024) (Document D23) was published in March 2019, which focuses on delivering the right homes in the right places through developing effective solutions to meeting housing need and has been produced alongside the emerging JLP and the Infrastructure Delivery Plan, alongside the Homelessness Reduction Strategy. The Strategy is also aligned to the Councils’ Communities and Economic Strategies to stimulate housing led growth and economic prosperity. An Action Plan accompanies the Homes and Housing Strategy.</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>				
		On Neighbourhood Planning, we are recognising for example local green space allocations etc. New allocations and alternate settlement boundaries in 'made' (adopted) NPs have been recognised. Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right: n/a Reviewer Comments:				
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 [you should revisit and update this following the publication of your Regulation 19 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: +2. The Consultation Statement (Document A06) documents the consultation process of the JLP, and demonstrates compliance with the with 2012 Regulations and the Statement of Community Involvement (SCI) (Document A12). The main issues raised and how they have been addressed it set out in the report. A written addendum to Statement of Community Involvement (Document A13) has been produced identifying measures to be taken to ensure effective engagement for the Regulation 19 consultation in the context of Covid-19 restrictions.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
15.	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable	-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: +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>				
	alternatives? Is it clear why alternatives have not been selected?	<p>The Sustainability Appraisal (Document A03) has been conducted in such a way that it meets the requirements of the EU Strategic Environment Assessment Directives (including through EU exit legislation) and UK Government guidance on the preparation of Sustainability Appraisals. The policies and sites within the Joint Local Plan have been subject to Sustainability Appraisal throughout their development, along with reasonable alternative options. Issues raised through consultations have been considered and where appropriate addressed. Each policy and proposal has been assessed against the social, environmental and economic objectives in the SA framework in order to establish the positive and negative effects. Where significant effects were found potential mitigation measures were identified wherever possible. The results of the appraisals were used to inform the decision making process and establish appropriate options to take forward into the Joint Local Plan. Each stage of developing the Joint Local Plan has included undertaking Sustainability Appraisal to take account of new evidence and new policy options. These updates helped further refine the options to include in the Joint Local Plan.</p> <p>Implications of taking no further action:</p> <p>Mitigation / Action required (if necessary) to move scale to right:</p> <p>Reviewer Comments:</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: +2</p> <p>The policies and sites within the Joint Local Plan have been subject to Sustainability Appraisal (Document A03) throughout their development, along with reasonable alternative options. Issues raised through consultations have been considered and where appropriate addressed. Each policy and proposal has been assessed against the social, environmental and economic objectives in the SA framework in order to establish the positive and negative effects. Where significant effects were found potential mitigation measures were identified wherever possible. The results of the appraisals were used to inform the decision making process and establish appropriate options to take forward into the Joint Local Plan</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>				
		Implications of taking no further action: Mitigation / Action required (if necessary) to move scale to right: Reviewer Comments:				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-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: +2. This is documented comprehensively in the Sustainability Appraisal (Document A03 – Chapter 7, Table 7.23) and summarised in the Sustainability Appraisal Statement in accordance with Regulation 16 of the Environmental Assessment of Plan and Programme Regulations 2004.				
		Implications of taking no further action: Mitigation / Action required (if necessary) to move scale to right: Reviewer Comments:				
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: + 2. An Equalities Impact Assessment was undertaken to support the Joint Local Plan Preferred Options document (July 2019) and Joint Local Plan Pre-Submission Document (November 2020). These were published alongside the Joint Local Plan at the Babergh and Mid Suffolk Council meetings in June 2019 and November 2020. The latest Equalities Impact Assessment (EIA) is available as Document A10 in the Core Document Library.				
		Implications of taking no further action: n/a Mitigation / Action required (if necessary) to move scale to right: n/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>				
		Reviewer Comments:				
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: +2. Yes. This is documented within the Habitats Regulations Assessment (HRA) (Document A05 , Table 9 pg 69) and has influenced the wording of the Joint Local Plan throughout the production . The HRA has considered the Recreational disturbance, Avoidance and Mitigation Strategy and all relevant plans and projects identified in the Sustainability Appraisal Plans and Programmes section. The HRA has been carried out in full compliance to the Regulations.				
		Implications of taking no further action: amendments continue where required to ensure Local Plan is sound				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
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 mechanisms for delivering them?	Reviewer Comments:				
		-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: +2. Yes. This is documented within the HRA Appropriate Assessment (AA) (Document A05 , Appendix 3, pg 131) and has influenced the wording of the Joint Local Plan throughout the production. Any mitigation measures required have been included within policies and sites to ensure compliance with HRA AA. The HRA has been endorsed by Natural England who have agreed a Statement of Common Ground (Document ES10). This includes a HRA addendum and Technical note to provide greater clarity regarding water quality/quantity, disturbance, Zone of				

	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>				
		influence and air quality. Monitoring of air quality over the life of the plan has also been agreed, as detailed in the Statement of Common Ground.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
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: +2. Yes. The HRA AA, it is comprehensively documented (Document A05 Table 7 pg 37.) and has influenced the wording of the Local Plan throughout the production. The HRA has ensured identified species and habitats sites of high sensitivity are protected throughout the Local Plan with the requirement for a Construction Environment Management Plan as well as mitigation zones to take measures for avoiding impacts upon designated sites.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
	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	-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: +2. Yes. The total of outstanding planning permissions, windfall development and new identified allocations within the plan comfortably exceeds the district housing requirements for both districts over the plan period. A supply buffer of approx 20% for the overall housing requirement has been proposed and allocated with 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>				
	<i>has agreed to plan for your unmet need], can you explain and robustly justify why?</i>	diverse range of sites. <u>Document EP03</u> Spatial Housing Approach Topic Paper provides further detail and evidence on the housing supply in the JLP.				
		Implications of taking no further action for local plan soundness and/or effectiveness:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
G	<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>	No.				
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: +2. No unmet needs have been identified.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
		-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>				
24.	<p>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?</p> <p>Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?</p>	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: +2. Yes. A housing trajectory has been prepared for the Plan covering the period 2018 to 2037 (see Appendix 1 of the JLP). Due to separate housing needs and targets for Babergh and Mid Suffolk areas, a trajectory has been prepared for each district. Both Councils have a significant supply of land to meet the overall identified housing needs. A substantial supply buffer (approx. 20%) has been included to enable flexibility and contingency to address any unforeseeable delivery problems. Regular monitoring will be undertaken to record performance. The spatial approach for the distribution of housing in the Plan is set out in Policy SP04 with specific allocations being made throughout Part 3 of the document. A diverse range of sites will help to ensure flexibility. The proposed growth has been clearly linked to infrastructure requirements from the Infrastructure Delivery Plan (IDP) (Document ER01) and the broad typologies of sites expected to come forward have been viability tested (Document ER02).				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
25.	<p>Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific 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.</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
		Reason for score: +2. Yes. The Councils have a large supply of extant planning permissions and a comprehensive approach to allocations in the JLP will assist to ensure a large supply of sites are available in the first 5 years and throughout the Plan lifetime. However, in historic years the delivery trend of new housing has been below performance targets and this Plan has sought to address this with a significant supply buffer of 20% against the total local housing requirement and with a diversity of sites proposed. The Councils are therefore confident that the JLP can confirm a 5 year Housing Land Supply in both Babergh and Mid Suffolk on adoption with an appropriate buffer. There is some risk of uncertainty around the ongoing effects of COVID-19 pandemic upon the development industry and how				

	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 might affect the Councils housing delivery supply and performance. However, the Plan is a long term strategy and 'normal' circumstances could reasonably be expected to return within the Plan period. Implications of taking no further action: Mitigation / Action required (if necessary) to move scale to right: Reviewer Comments:				
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 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: +2. A significant buffer of approximately 20% in the supply of new land for housing has been identified. Implications of taking no further action: None expected. Mitigation / Action required (if necessary) to move scale to right: n/a Reviewer Comments:				
27.	Is the Council reliant on the delivery of any 'windfall' sites (sites not specifically identified in the development plan) 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?	-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: +2. Yes, the Councils have made an allowance of 500 dwellings per district area over the lifetime of the Plan. This allowance is considered realistic and is justified by windfall supply evidence set out in paragraph 15 and Appendix C of Document EP03 - Spatial Housing Approach Topic Paper. Implications of taking no further action: None. Mitigation / Action required (if necessary) to move scale to right: n/a Reviewer Comments:				
		-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>				
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	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: Policies relating to the size, type and tenure of housing are written in a flexible manner to ensure the JLP can adapt to changing needs. Policy SP01, SP02 and LP06 requires new housing development to reflect established needs in the most relevant district needs assessment, or any local housing needs surveys where relevant (mix, type and size). Policy SP02 and LP06 requires 35% affordable housing on major development schemes (tenure and size). Tables on pages 30 and 31 of the JLP identify the type and tenure of affordable housing required, as identified in the SHMA. Paragraphs 13.30 and 13.31 of the JLP identify the requirement for supported and special needs housing (including residential care homes). Policy LP07 sets out a criteria based policy to support the sustainable development of supported and special needs housing.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move score to right:				
		Reviewer Comments:				
29.	Does the local plan policies update specifically address the needs of different groups in the community?	-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: Yes, the JLP addresses the needs of different groups in the community (including those identified in NPPF paragraph 61), as set out in the Housing Objectively assessed Needs Topic Paper (Document EP02).				

	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>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
		-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: +2 <p>The JLP sets a requirement for 35% on-site affordable housing. The justification for this level of affordable housing is set out in the Councils Housing OAN Topic Paper (Document EP02). The affordable housing requirements have been subject to viability testing. The JLP does not set any geographical variations for affordable housing requirements.</p> <p>The Joint Local Plan provides for the full need for affordable housing. Further information is set out in the Housing OAN Topic Paper (Document EP02).</p>				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
		-2	-1	0	+1	+2
30.	<p>Can your affordable housing requirements, including any geographical variations, be justified?</p> <p>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?</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>				
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?	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: +2. The needs of travellers and travelling showpeople has been adequately assessed in line with national guidance, through the Accommodation Needs Assessment (ANA) (2017) (Document EH03). Tables 8 & 9 of the Councils Housing OAN Topic Paper (Document EP02) demonstrates that there is already sufficient provision for Gypsy and Traveller pitches in Mid Suffolk, and sufficient Travelling Showpeople plots in Babergh and Mid Suffolk to meet the needs identified by the ANA. One additional Gypsy, Traveller pitch in Babergh is expected to be met through the application of Policy LP09.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
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 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: +2. Yes. The JLP identifies a 5-year supply of deliverable travellers and travelling showpeople pitches and plots to meet needs – see Housing OAN Topic Paper (Document EP02).				
		Implications of taking no further action: continue effective monitoring of G&T and travelling showpeople provision.				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				

	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>				
H	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	Appendix 2 of the Housing OAN Topic Paper (Document EP02) lists the traveller and travelling showpeople plots and pitches identified through monitoring in January 2020.				
	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: +1. <ul style="list-style-type: none">SP02/ LP06– requires 35% affordable housing on sites of ten or more dwellings or 0.5ha or more. The site size thresholds for requiring affordable housing contributions are in line with national policy.SP03 / LP01 – 10 dwelling threshold for settlement boundaries / LP01 policy – Not directly justified by evidence, but threshold set to provide a consistent and clear basis for applications.LP06 – proposals of ten or more dwellings or sites of 0.5ha or more must accommodate 50% of dwellings meeting accessibility and adaptability under Part M4(2) of Building Regulations and to reflect the mix and type of housing needs identified. Site size threshold is considered appropriate to ensure that the policy is deliverable.LP14 – Town Centre and Retail – Applications for retail and leisure development in excess of 2,500sqm outside of town centre boundaries will be required to provide an impact assessment. This is in line with NPPF para 89.LP25 – Sustainable Construction and Design – all major developments are required to submit a Sustainability Design and Construction Statement.LP25 – requires non-residential development of 1,000sqm and above to meet a minimum of BREEAM “very good” standard.LP30 requires development in excess of 1ha to provide on-site open space provision – to meet needs and deficits as identified in the Open Space Assessment. Unless there is a Council preference to make				

	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>improvements to an existing open space within the locality or more accessible than the proposed development. This requirement is established through existing local plan policies.</p> <ul style="list-style-type: none"> LP32 - Indicative thresholds of between 50 and 80 dwellings for requiring a transport statement is set out in the policy. This indicative threshold was included in response to recommendations by the County Council (Local Highway Authority). <p>Where thresholds have implications on viability (e.g. affordable housing contribution) these have been tested through the Councils Viability Study (Document ER02).</p>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
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?	-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: +2. No strategic matters are deferred to other DPDs. SPDs will be used to supplement policy detail where appropriate. Neighbourhood Plans may also pursue matters which are set out in the JLP and or take forward other issues of local importance.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
		-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>				
35.	<p>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?</p> <p>[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]</p>	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: +2 <ul style="list-style-type: none"> <u>Settlement Hierarchy (SP03)</u> - The distribution of growth includes consideration of the settlement hierarchy, alongside a range of factors as set out in paragraph 9.08 of the JLP (e.g. availability/deliverability of sites). As a result, the growth attributed to settlements through the JLP does not rigidly follow the settlement hierarchy. SP03 states that the scale and location of development will depend upon the role of settlement within the settlement hierarchy, with Ipswich Fringe Settlements, Market Town/Urban Areas and Core Villages acting as a focus for development. LP12 requires employment proposals to be in accordance with the settlement hierarchy/spatial distribution. Approach is in general conformity with NPPF. <u>Biodiversity</u> – LP18 requires all development to follow the mitigation hierarchy of seeking firstly to enhance habitats, avoid habitats, mitigate against harmful impacts or as a last resort compensate for the losses that cannot be avoided or mitigated for. LP15 requires proposals to follow hierarchy with respect to the local ecology, biodiversity, trees and hedgerows. This approach is in general conformity with the NPPF. <u>Transport</u> – LP32 states that all developments are to maximise the uptake in sustainable and active transport and a transport hierarchy must be considered. This will prioritise the following modes of transport in order – walking, cycling, public transport and car sharing. This is in general conformity with the NPPF. 				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
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.	-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:				

	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>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>	<p>In relation to the Eye Airfield Employment Land (listed under SP05) and policy LA099 – A restriction on land use is introduced in response to comment made by Essex and Suffolk Water, to prescribe B1/B8 (offices, storage and distribution) uses - for new businesses locating to this land allocation. This is in order to limit the risk of water shortages for this specific area where evidence shows that there are issues for businesses which consume large amounts of potable water, such as the food industry.</p> <p>SP05 states that applications for Class E uses on strategic employment sites will be considered on their individual merits.</p> <p>The score of +1 is due to economic uncertainties. Consequently the plan policies are enabling and flexible to accommodate changing demands and circumstances.</p> <p>Implications of taking no further action: some evidence is dated.</p> <p>Mitigation / Action required (if necessary) to move scale to right: updated evidence or clear justifications.</p> <p>Reviewer Comments:</p>				
37.	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</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: +2.</p> <p>M4(2) Requirements - 50% of dwellings to be M4(2) (Policy LP06) - Justification – As set out in Housing OAN Topic Paper (Document EP02).</p> <p>Onsite provision of open space - Developments of 1 ha+ will be required to provide on-site open space to meet identified needs/deficit in the Open Space Assessment (Policy LP30) - Justification – as assessed in the Open Space Assessment</p>				

	KEY QUESTIONS	<p>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>Space standards - Meet Nationally Described Space standards (Policy LP26) - Justification – As set out in Housing OAN Topic Paper (Document EP02).</p> <p>Water Efficiency - Meet 110 litres per person per day (policy LP25) - Justification – East Anglia identified as experiencing ‘serious’ water stress. Supported by relevant water authorities.</p> <p>CO² emissions of residential buildings – 19% reduction in CO² emissions below the Target emissions Rate of 2013 Edition of 2010 Building Regulations (Part L) (Policy LP25) - Justification - In line with the Ministerial Statement that enables local planning authorities to require energy efficiency standards that exceed Building Regulations. This requirement is in line with the Councils wider environmental objectives, the strategic policies of the plan and neighbouring authorities.</p> <p>BREEAM - BREEAM measures the environmental performance of new and existing non- residential buildings (Policy LP25) - Justification – provides an effective tool to assess the environmental performance of non-residential buildings to contribute to Climate Change objective VI. of the Local Plan</p> <p>All policy requirements have been assessed as viable for the broad typologies of development expected in the JLP (Document ER02), and are considered deliverable.</p>
		<p>Implications of taking no further action:</p> <p>Mitigation / Action required (if necessary) to move scale to right:</p>

	KEY QUESTIONS	Assessment				
		<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>				
		Reviewer Comments:				
	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: +2. Yes. Viability assessment work has been carried out in compliance with the national guidance and confirms that the main typologies of development are viable with the full policy requirements set out in the Plan (including AH, enhanced S106 costs and with regard to CIL) (Document ER02). A CIL charging schedule review is running to a similar timetable to the JLP Examination process and will enable appropriate consideration of the new Plan requirements together with the current market characteristics. It is anticipated that the current CIL charges can be increased accounting for the new JLP policies, as is evidences in Viability Report.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
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	-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: +2. Yes. As per box 38 above, the Viability report confirms that all policy requirements in the JLP are viable for the broad typologies expected to be delivered in the Plan (Document ER02). For brownfield development it is recommended that a more flexible approach to AH is adopted and this is enabled through policy SP02, which requires consistent viability evidence to demonstrate issues if 35% cannot be achieved.				

	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>				
	requirements in the local plan policies update?	Implications of taking no further action: Mitigation / Action required (if necessary) to move scale to right: Reviewer Comments:				
		-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
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?	Reason for score: +2. The monitoring framework clearly identifies the policies, separated into housing, economic, environmental, healthy communities & infrastructure objectives and site allocations that are to be monitored as well as the indicators for this. These are measurable through internal systems which can be readily captured. The monitoring framework is set out in Appendix 02 of the JLP. Implications of taking no further action: None Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
		-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
41.	Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u> ? Where triggers for plan review and/or update are identified are they justified and proportionate?	Reason for score: +2. The Annual Monitoring Report will be used to ensure regular monitoring of the effectiveness of the Local Plan to identify any actions required to retain its currency and validity. The AMR will be the mechanism to regularly review whether any full or partial update of the Local Plan is required. The Joint Local Plan will be reviewed at least every 5 years. A review of the planning policies will consider whether all, or specific parts, of the suite of policies are in need of amendment, for example in order to update for consistency with relevant national planning policies, where identified local development needs change significantly or where policies are not performing as intended. Implications of taking no further action: None				

	KEY QUESTIONS	Assessment				
		<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>				
		Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:				
	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 from adoption? Does the evidence relied on to support those policies correspond/cover this whole period?	-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: +2. Yes. The Plan time period runs from 2018 to 2037, in anticipation of adoption in 2022 (as set out in the Local Development Scheme, (Document A11)). Part 1 strategic policies clearly cover the period the Plan covers, The evidence base used to support the Plan cover the period 2018 – 2036. However, the inclusion of an additional year is not considered to fundamentally change the outcomes and requirements of the existing evidence as the overall level of housing anticipated (taking account of reduced needs in the latest standard method approach) is similar to the growth assumptions made in many of the evidence base studies at the time. The Council has taken a proportionate approach, and where relevant applied one additional year of any annualised needs in order to cover the period up to 2037.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
43.	Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?	-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

	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>				
		Reason for score: +2. Yes. Upon adoption the Joint Local Plan is expected to wholly supersede all existing adopted planning policies across Babergh and Mid Suffolk districts. A schedule of specific policies to be superseded or abandoned upon adoption of the Joint Local Plan has been produced and included in the Plan (Appendix 03). Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: n/a Reviewer Comments:				
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: +2. Yes, each policy has supporting text which clearly sets out the intended objectives for each policy.				
		Implications of taking no further action: None.				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				
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? 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?	-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: +2. Yes. Policies referencing specific areas are explained and linked to proposal maps. Layouts, styling and electronic versions have been chosen to support the accessibility and usability of the maps provided. To aid the decision-making process, electronic versions allow for policies to be visually separated and looked at in isolation, by switching policy layers on and off.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: n/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>				
		Reviewer Comments:				
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: +2. Yes, each policy has been positively prepared and makes clear the type of development it will promote.				
		Implications of taking no further action: None.				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
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 this may not be either justified or deliverable]	-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: +2. Yes. Only the policies which refer to overarching issues refer to all development and would be applied where relevant. These policies are: SP08 – Infrastructure SP10 – Climate Change LP17 – Environmental protection LP18 – Biodiversity LP26 – Design & residential Amenity LP27 – Sustainable Construction and Design LP32 – Safe, sustainable and active transport. LP33 – Managing Infrastructure provision LP35 – Developer Contributions and Planning Obligations				

	KEY QUESTIONS	<p>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>Implications of taking no further action: None.</p> <p>Mitigation / Action required (if necessary) to move scale to right: n/a</p> <p>Reviewer Comments:</p>
I	<p>State how many policies are in your local plan update?</p> <p>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.</p>	<p>The JLP contains 10 Strategic Policies (part 1), 35 Local Policies (part 2) and 107 site allocation policies (part 3)</p> <p>i) Repetition within the plan: Heritage is referred to in the following policies: LP02, LP03, LP04, LP05, LP07, LP09, LP11, LP12, LP15, LP16, LP22, LP27, LP31</p> <p>Landscape is referred to in the following policies: LP01, LP07, LP09, LP11, LP12, LP15, LP19, LP22, LP23, LP24, LP26, LP31</p> <p>Biodiversity: LP02, LP03, LP07, LP09, LP11, LP12, LP15, LP22, LP23</p> <p>ii) Replicate/repeat NPPF paragraphs:</p> <p>No major repetition identified. Some policy such as LP14 (Town Centre and Retail) & LP21 (Historic Environment) direct the reader / decision maker towards the NPPF, but it does not repeat the NPPF word for word.</p> <p>iii) Cross reference other policies;</p> <ul style="list-style-type: none"> a. SP09 links through to development management policies – justified b. LP02 – residential annexes – links to sustainable construction and design policy – justified c. LP04 – Replacement dwellings – states that development may be permitted providing the proposal complies with LP03 and then adds additional criteria d. LP05 – Replacement dwellings – states that development may be permitted providing the proposal complies with LP03 and then adds additional criteria

	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>				
48.	<p>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?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</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
		Reason for score: +1 – Some cross referencing and repetition has been identified. However, it is deemed appropriate as this largely occurs within criteria based policies, where it is important to highlight the different considerations a decision-maker will have in mind. It is noted that some Strategic Policies and Local Policies (e.g. SP02 & LP07 Affordable Housing) cover the same topic. However, in some instances it is considered appropriate to have two separate policies, one covering strategic matters and one covering matters of detail and development management which is more appropriately dealt with in a Local Policy.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
49.	<p>Do policies avoid duplicating other regulatory requirements (for example, building regulations)?</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
		Reason for score: +2. JLP includes a requirement to meet nationally described space standards, accessible and adaptable dwellings (M4(2) of the Building Regulations), and higher water efficiency (Part G2 of Building Regulations). These are optional building standards therefore the inclusion is policy is justified.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				

	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>				
		-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
50.	<p>Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?</p> <p>[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.]</p>	<p>Reason for score: + 2 - Some ambiguity has been identified, but this is largely justified as the Plan covers a diverse area, and proposals would need to be appropriate to their surroundings. Site allocation policies require contributions towards infrastructure provision ‘to the satisfaction of the LPA’. This is considered justified as this would need to be assessed at the time of an application.</p>				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments:				