PAS LOCAL PLAN ROUTE MAPPER TOOLKIT 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 <u>National Planning Policy Framework</u> and other statements of national planning policy, where relevant.

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 <u>cross referring to evidence</u> 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 <u>PAS advice on proportionate evidence</u>.

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 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.
	Growth Strategy	
А	In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area	Whilst the extant Borough Plan was only adopted in 2019, the development strategy, of the Borough Plan Review, reassesses the borough's requirements for growth and directs this to the most sustainable locations; whilst taking the opportunity to include the latest legislation requirements set out within the 2021 NPPF, PPG and Environment Act. The Review utilises new evidence base work providing a supportable level of housing and employment and focusing on urban areas. Both strategic and non-strategic sites have been reassessed to ensure sustainability and deliverability, with two of the strategic sites (Sites HSG4 and HSG7) being removed from the plan.
В	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	Sustainability underpins the distribution of growth. In turn, development is directed to places with good transport links and in close proximity to existing town centres where landowners have confirmed intentions to develop, contributing to the growth of the borough. Key considerations such as heritage and landscape have influenced where growth will take place and the nature of it.
c	List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery	 Nuneaton: SHA1 – Land at Top Farm, North of Nuneaton (key infrastructure required to support delivery can be found in Policy SHA1). SHA2 – Arbury (Policy SHA2). SHA3 – Land at Tuttle Hill (Judkins Quarry) (Policy SHA3). SEA4 – Coventry Road (Policy SEA4). Bedworth: SHA4 – Hospital Lane (Policy SHA4). SHA6 – Land at former Hawkesbury Golf Course (Policy SHA6). SEA6 – Bowling Green Lane (Policy SEA6).

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		 CEM1 – Land north of Marston Lane, Bedworth (Policy CEM1). Bulkington: SHA5 – West of Bulkington (Policy SHA5). (Closer to Coventry than a main growth area): SEA2 – Wilsons Lane (Policy SEA2). SEA3 – Prologis Extension (Policy SEA3). 							
	Overall does the local plan policies update clearly articulate the strategy for where and	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	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			
1.	how sustainable development will be delivered and that this is 'an appropriate	Reason for score: +2							
	strategy' within the context of paragraph 35	Implications of taking no further action: N/A							
	of the NPPF?	Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: Strategic housing, employment and mixed-use allocations are provided in the Borough Plan Review, directing large developments to the most sustainable locations whilst ensuring a supply of housing and employment land is available in the borough. Sustainable development may also be brought forward through non-strategic allocations and through adhering to other policy requirements such as policy DS2 – Settlement hierarchy.							
		-2	-1	0	+1	+2			
	Is it clear how the amount of development identified for any growth areas or major site	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			
2.	allocations has been determined – and that the level proposed is deliverable and	Reason for score: +2							
	justified?	Implications of taking no further action: N/A							
			quired (if necessary) to						
			_	Reviewer Comments: The strategic sites allocated within the Borough Plan Review include a minimum housing yield. This is determined by a number of factors including planning application or pre-application engagement,					

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.					
3.	Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower? 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? Does the level of housing provide for an appropriate and justified buffer?	and local character. -2 No, we do not meet this requirement Reason for score: +2 Implications of taking Mitigation / Action red Reviewer Comments: year period and applie is 434 dwellings per and Coventry and Warwick to undertake an updat previous inaccuracies is sub-regional HEDNA cowhich was significantly. It was considered that need for affordable horeport 'Towards a Houneed set out within the appropriate housing an annum and employme	is the most recent afford inum. However, in order ishire housing market ar red sub-regional HEDNA. in ONS estimates for autoncluded a housing need or lower than the figures in given the aspirations for	Unclear whether our plan meets this requirement or not move scale to right: N/set out in the NPPG, utiliability ratio. The 'stand'r to provide a more upea, the Coventry and W. This took account of thorities within the HM/d figure of 409 dwellings in the draft HEDNA. The Borough including should also be prepare uneaton and Bedworth'er considerations which ment. The report concluses appropriate for the	Yes, we are likely to meet this requirement A A A A A A A A A A A A A	Yes, we are confident our plan will meet this requirement Id projections over a 10-Nuneaton and Bedworth housing need within the appointed Iceni Projects d looked to address hitigation trends. The yment need of 47.7ha Ind the extraordinary n's unique position. This ely assessed housing neil's decision on an f 545 dwellings per	
4.	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	-2 No, we do not meet this requirement Reason for score: +2	-1 No, we may not fully meet this requirement	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 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.					
	that exceptional circumstances exist to	Implications of taking	no further action: N/A				
	justify green belt release?	_	quired (if necessary) to				
		Reviewer Comments:	No green belt land has b	een released as part of	the Borough Plan Revie	ew.	
		-2	-1	0	+1	+2	
	Is it clear how sites have been selected and have site allocations been made on a	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	
	consistent basis having regard to the evidence base, including housing and	Reason for score: +2	requirement	requirement of not	requirement	requirement	
5.	employment land availability assessments,	Implications of taking no further action: N/A					
	the Sustainability Appraisal and viability		quired (if necessary) to	move scale to right: N/	Α		
	assessment? If not, can you justify why?	Reviewer Comments: Public consultation has been undertaken (Call for Sites, Issues and Options, Preferred Options) and a thorough search of sites has been undertaken. The sites have then been examined by or had regard to evidence in the Housing and Employment Land Availability Assessment, Sustainability Assessment and Habitat Regulation Assessment and therefore, are considered justifiably allocated for development.					
		-2	-1	0	+1	+2	
6.	Does the local plan policies update identify a housing requirement for designated	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	
	neighbourhood areas?	Reason for score: +2					
		Implications of taking					
		•	quired (if necessary) to				
			Not applicable – The Bo				
7.	Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary	No, we do not meet this requirement	No, we may not fully meet this	Unclear whether our plan meets this	Yes, we are likely to meet this	Yes, we are confident our plan will meet this	
,.	supporting infrastructure?	Reason for score: +2	requirement	requirement or not	requirement	requirement	
	,,		no further action. N/A				
		Implications of taking no further action: N/A					
		Mitigation / Action red	Mitigation / Action required (if necessary) to move scale to right: N/A				

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.						
		Reviewer Comments: Yes, sufficient detail is included.						
D	What targets have you set for non- residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?	 68.45ha of employment land for local industrial and distribution / warehousing development (including 5.35ha for replacement provision). 19.4ha of employment land for strategic B8 warehousing and distribution development (indicative). 2ha of employment land for office space. 						
	List these targets and the evidence source for this 'need' target?	(Iceni Projects (2023). Review of Nuneaton & Bedworth Employment Land Portfolio).						
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?	Mitigation / Action red Reviewer Comments: Employed land has bee Borough Plan Review 's policies in the Borough The Strategic Employm required floorspace, ac progress has been made	No, we may not fully meet this requirement no further action: N/A quired (if necessary) to remain the identified and allocate Strategic Employment An Plan Review and associated the information of the information of the identification of the	ed which will meet the illocations'. The delivery ated policies throughouse area of the land in he and open space. The alloning permission which	need identified. The site of the sites is supported it the plan. ctares. A ratio has been ocated sites demonstrat indicates the targets ar	ed by site specific applied to allow for the te evidence that		
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2 No, we do not meet this requirement Reason for score: +2	-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 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.					
		Implications of taking no further action: N/A					
		Mitigation / Action required (if necessary) to move scale to right: N/A					
		Reviewer Comments:					
		Chapter 7 – Strategic allocations identifies the infrastructure required to support each of the strategic housing/employment/mixed-use allocations through either stating it should be provided on-site or through financial contributions paid. Policy HS1 aims to support the provision and delivery of infrastructure whilst policy HS2 requires measures to deal with the issues of air quality. Policy HS3 supports the provision of superfast broadband infrastructure.					
	Can you demonstrate that the transport and	-2	-1	0	+1	+2	
	other infrastructure needed to support each	No, we do not meet	No, we may not fully	Unclear whether	Yes, we are likely to	Yes, we are confident	
	growth area or strategic site identified in the local plan policies update: (i) can be funded	this requirement	meet this requirement	our plan meets this requirement or not	meet this requirement	our plan will meet this requirement	
	and delivered; and (ii) is supported by the	Reason for score: +2					
10.	relevant providers/ delivery agents in terms		no further action: N/A				
	of funding and timescales indicated?			maya saala ta riaht. N/	Δ		
	Have you identified the extent of any	Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:					
	funding gap? If so, are you able to explain		very Plan/Infrastructure	Funding Statement de	monstrates that transpo	ort and other	
	why you are confident that any gap can be		to support each strategi	_			
	addressed?	relevant providers.					
	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.	Strategic and cross bou - Transport. - Housing deliv - Strategic B8 e - Green Infrasti	ery. mployment land.				

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.					
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?	Mitigation / Action re	-1 No, we may not fully meet this requirement no further action: N/A quired (if necessary) to Yes, discussions with rel			+2 Yes, we are confident our plan will meet this requirement	
F	Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?	No – as a Council we for on local evidence.	eel the Borough Plan Rev	view conforms with nati	ional policy. It can be ro	bustly defended based	
	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?						
	Are there any specific policies in the local plan policies update where there are	-2 No, we do not meet	No, we may not fully	0 Unclear whether	+1 Yes, we are likely to	+2 Yes, we are confident	
12.	differences to any policy approach set out in a relevant strategic planning framework (e.g.	this requirement	meet this requirement	our plan meets this requirement or not	meet this requirement	our plan will meet this requirement	
	the London Plan, or a plan produced by a Combined Authority or through voluntary	Reason for score: +2 Implications of taking no further action: N/A					
	agreement).	Mitigation / Action re	quired (if necessary) to	move scale to right: N/	Ά		
		Reviewer Comments:	Not applicable.				

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.				
13.	Is the local plan policies update: • in conformity with any 'higher level' plans prepared by the Council; and	-2 No, we do not meet this requirement Reason for score: +2	-1 No, we may not fully meet this requirement	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
	properly reflecting provisions of any made neighbourhood plan? Possesses Consultation Statement	Implications of taking Mitigation / Action re Reviewer Comments:	no further action: N/A quired (if necessary) to The Borough Plan review ms of neighbourhood ar	w conforms with the Co	uncil's Corporate Plan -	- Building a Better
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 No, we do not meet this requirement Reason for score: +2 Implications of taking Mitigation / Action re	-1 No, we may not fully meet this requirement no further action: N/A quired (if necessary) to The Consultation Statem	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
15.	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?	Mitigation / Action re Reviewer Comments:	-1 No, we may not fully meet this requirement no further action: N/A quired (if necessary) to The SA has incorporated rnatives have not been so the same series.	the SEA requirements,		+2 Yes, we are confident our plan will meet this requirement le alternatives and

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.				
	Does the Sustainability Appraisal adequately	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
16.	assess the likely significant effects of policies and proposals?	Reason for score: +2				
	and proposals:	Implications of taking	no further action: N/A			
			quired (if necessary) to			
		Reviewer Comments:	The SA adequately asse	sses the likely significan	t effects of policies and	proposals.
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this	Unclear whether our plan meets this	Yes, we are likely to meet this	Yes, we are confident our plan will meet this
	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations		requirement	requirement or not	requirement	requirement
17.		Reason for score: +2				
	have been amended as a result and does it	Implications of taking	no further action: N/A			
	show (and conclude) that the local plan	Mitigation / Action required (if necessary) to move scale to right: N/A				
	policies update is an appropriate strategy?		The SA has influenced the Review update is an app	_	policies and site alloca	tions. It demonstrates
		-2	-1	0	+1	+2
18.	Is it clear how an Equalities Impact	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
10.	Assessment has influenced the local plan policies update?	Reason for score: +2				
	poneies apaace:		no further action: N/A			
		Mitigation / Action re	quired (if necessary) to	move scale to right: N/	A	
		Reviewer Comments:	Yes.			
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.					
		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	
19.	Does the Habitats Regulations Assessment	Reason for score: +2					
	consider the local plan policies update in		no further action: N/A				
	combination with other plans and projects?		quired (if necessary) to	move scale to right: N/	A		
		Reviewer Comments:	Yes.				
		-2	-1	0	+1	+2	
		No, we do not meet	No, we may not fully	Unclear whether	Yes, we are likely to	Yes, we are confident	
		this requirement	meet this requirement	our plan meets this requirement or not	meet this requirement	our plan will meet this requirement	
		Reason for score: +2					
		Implications of taking no further action: N/A					
	If the Habitats Regulations Assessment has	Mitigation / Action required (if necessary) to move scale to right: N/A					
20.	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: Given the Environment Agency's advice to Warwickshire County Council in 2019 regarding the Mineral Plan, it was recommended in the HRA of the Preferred Options that a further requirement is explicitly added to Policy NE4 that 'All new housing and employment allocations with piled foundations or basements within 1km of Ensor's Pool SAC should undertake a hydrogeological study to confirm it will not affect groundwater flows or quality at the SAC'. This recommendation has now been added in the Water Quality part of Policy NE4.					
		It was recommended in the HRA of the Preferred Options that, for the general health of the SAC, the policy for site SHA2 (Arbury) includes a requirement for the developer to work with landowners and Natural England to provide support (either financial or in kind through the services of an estate management company for the adjacent development) to aid with litter collection and patrolling of the SAC. The Council ultimately decided that it was unnecessary to include this recommendation in policy because the Council's Parks Department already have a long lease on the Pool which enables the Council to maintain the area.					

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.					
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	-2 No, we do not meet this requirement Reason for score: +2 Implications of taking	-1 No, we may not fully meet this requirement no further action: N/A	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	
		Mitigation / Action re Reviewer Comments:	quired (if necessary) to r Yes.	move scale to right: N/	A		
	Housing Strategy						
22.	Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing	No, we do not meet this requirement Reason for score: +2	-1 No, we may not fully meet this requirement	O Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
	requirement in full and that this can be achieved as a minimum? If not [for instance,	· · ·	no further action for loc				
	because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?	e another local authority has agreed for your unmet need], can you Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments:					
G	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.	We have not been formally asked to accommodate any unmet need from neighbouring areas, as of yet, due to their Local Plan Reviews being at an earlier stage than where we are in the process.					
		-2	-1	0	+1	+2	

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.				
		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
	Does your local plan policies update	Reason for score: +2				
23.	accommodate any of this unmet need where you can sustainably to do so?	Implications of taking	no further action: N/A			
	i i		quired (if necessary) to	move scale to right: N/	Ά	
		Reviewer Comments: We have not been formally asked to accommodate any unmet need from neighbouring areas, as of yet, due to their Local Plan Reviews being at an earlier stage than where we are in the process.				
		-2	-1	0	+1	+2
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a	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
24.	5-year supply during the plan period?	Reason for score: +2				
	Is your strategy for delivery and	Implications of taking	no further action: N/A			
	implementation clearly articulated and	Mitigation / Action re	quired (if necessary) to	move scale to right: N/	Ά	
	justified to support the trajectory?	Reviewer Comments:	Yes – policy DS4.			
		-2	-1	0	+1	+2
25.	Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on	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
23.	adoption; and (ii) that beyond this 5 year	Reason for score: +2				
	period sites are developable and (iii) if relevant, you have included a 5 or 20	Implications of taking	no further action: N/A			
	percent buffer to deal with under-delivery.		quired (if necessary) to	move scale to right: N/	Ά	
		Reviewer Comments:				
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.					
	Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to	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	
26.	any unforeseen changes in circumstances and to ensure that the full requirement will	Reason for score: +2	no further action: N/A				
	be met during the plan period?		quired (if necessary) to	move scale to right: N/	Λ		
		Reviewer Comments:	•	move scale to right. N/	<u> </u>		
		-2	-1	0	+1	+2	
	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	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	
27.		Reason for score: +2					
	when? Is there compelling evidence to	Implications of taking no further action: N/A					
	confirm that such sites will continue to come	Mitigation / Action required (if necessary) to move scale to right: N/A					
	forward?	Reviewer Comments: The Council is not reliant on the delivery of any 'windfall' sites during the plan period.					
		-2	-1	0	+1	+2	
28.	Does the local plan policies update make it	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	
20.	clear what size, type and tenure of housing	Reason for score: +2					
	is required?	Implications of taking	no further action: N/A				
		Mitigation / Action re	quired (if necessary) to	move scale to right: N/	A		
		Reviewer Comments:	Yes – policies H1 and H2				
		-2	-1	0	+1	+2	
29.	Does the local plan policies update specifically address the needs of different groups in the community?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.					
		Reason for score: +2 Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A					
		Reviewer Comments: with disabilities and lo	Yes, for example policy Ing-term limiting illnesse build housing, providing	H5 relates to Accessible s are accommodated fo	and Adaptable Homes or, in the Borough, whils	t policy H1 refers to	
	Can your affordable housing requirements, including any geographical variations, be justified?	No, we do not meet this requirement	-1 No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
30.	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?	Reason for score: +2 Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: Yes – policy H2.					
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?	Mitigation / Action re	-1 No, we may not fully meet this requirement no further action: N/A quired (if necessary) to			+2 Yes, we are confident our plan will meet this requirement	
32.	Will the local plan policies update provide for a 5-year supply of deliverable travellers		Policy H3 refers to Gypsite Allocations DPD which -1 No, we may not fully meet this requirement			+2 Yes, we are confident our plan	

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.				
	and travelling showpeople pitches to meet identified needs?					will meet this requirement
		Reason for score: +2				
		Implications of taking	no further action: N/A			
		Mitigation / Action re	quired (if necessary) to	move scale to right: N/A	1	
			Policy H3 refers to Gyps te Allocations DPD which			
н	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	 GTSA1 – Sunrise Cottage for three additional pitches within the existing site. GTSA2 – The Old Nursery for five to six new pitches within the site. GTSA3 – Winter Oak for six additional pitches within the existing site. 				
	Justified approaches to plan policy and conten	t				
33.	Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	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
33.	this clear in the supporting text?	Reason for score: +2				
	[You may wish to check each policy setting a	Implications of taking	no further action: N/A			
	threshold]	Mitigation / Action re	quired (if necessary) to	move scale to right: N/A	1	
		Reviewer Comments:	Evidence base work just	ifies any thresholds state	ed in the Borough Plan F	Review.
		-2	-1	0	+1	+2
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear why matters will be covered in other	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
	Development Plan Documents or	Reason for score: +2				

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.						
	Supplementary Planning Documents and	Implications of taking no further action: N/A						
	why this is appropriate?	_	quired (if necessary) to r	move scale to right: N/A	1			
	Reviewer Comments: Matters of non-strategic detail will be covered in supporting Supplementary Planning Documents. The Counci an advanced stage, currently consulting on Main Modifications, following a hearing on its Gypsy and Traveller last October. It provides criteria to be used to identify potential locations. The DPD states in the vision states: vision for this DPD is for the needs of the travelling community in and visiting the borough to be provided with sufficient pitches so that they can live, work, and rest in the borough. Pitches will be well located and integrat the environment and the local community thereby providing good access to essential services."							
	Where the local plan policies update defines	-2	-1	0	+1	+2		
	a hierarchy do policies throughout the Plan	No, we do not meet	No, we may not fully	Unclear whether our	Yes, we are likely to	Yes, we are		
	consistently: (i) reflect this hierarchical	this requirement	meet this requirement	plan meets this requirement or not	meet this requirement	confident our plan will meet this		
	approach; (ii) make clear the level of		requirement	requirement of not	requirement	requirement		
	protection afforded to designations depending on their status within the	Reason for score: +2						
35.	hierarchy; and (iii) is the approach consistent	Implications of taking no further action: N/A						
	with National Policy?	Mitigation / Action required (if necessary) to move scale to right: N/A						
	[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]	Reviewer Comments: The settlement hierarchy is defined within the Borough Plan Review. The Heritage policy makes clear the different level of protection afforded to different types of heritage asset, having regard to their significance and designation. It differentiates between designated and non-designated heritage assets and provides different criteria for different types of assets. This is in line with national policy.						
	Where policies seek to limit certain uses, is	-2	-1	0	+1	+2		
	this justified by evidence and is the rationale	No, we do not meet	No, we may not fully	Unclear whether our	Yes, we are likely to	Yes, we are		
36.	clear in the supporting text to the policy and in the evidence.	this requirement	meet this requirement	plan meets this requirement or not	meet this requirement	confident our plan will meet this requirement		
	[For example, policies relating to town	Reason for score: +2						
	centres, employment or retail may seek to	Implications of taking	no further action: N/A					
	limit certain uses.]	Mitigation / Action required (if necessary) to move scale to right: N/A						

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.						
		•	Reviewer Comments: Yes – all policies which seek to limit certain uses, such as hot foot takeaways, within 400m walking distance of a school, are supported by evidence.					
	Is it clear that any standards proposed for	-2	-1	0	+1	+2		
37.	development are justified and deliverable, taking into account the scale of the development? Where relevant, are they consistent with the principles set out in the	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		
37.	National Design Code and National Model	Reason for score: +2						
	Design Code?	Implications of taking no further action: N/A						
	[For example, onsite provision of open space, optional technical standards, internal and external space standards.]	e provision of open nnical standards, internal Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: Yes, for example policies H4 and BE3.						
	Deliverability							
		-2	-1	0	+1	+2		
	Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in	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		
38.	respect of any required standards,	Reason for score: +2						
	affordable housing provision and transport	Implications of taking	no further action: N/A					
	and other infrastructure needs and if	Mitigation / Action re	quired (if necessary) to	move scale to right: N/	A			
	relevant the implications of CIL?	Reviewer Comments:	<u> </u>	eview is supported by a	viability appraisal which	h has tested the policies		
		-2	-1	0	+1	+2		
39.	Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?	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 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.					
	Is it clear the viability and delivery of		no further action: N/A				
	development will not be put at risk by the requirements in the local plan policies		quired (if necessary) to				
	update?	Reviewer Comments:	Yes, policies such as the	affordable housing poli	icy are informed by the	viability test.	
		-2	-1	0	+1	+2	
40.	Does the monitoring framework clearly set out what matters will be monitored, and the	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					
	indicators used? Are these measurable and	Implications of taking no further action: N/A					
	can the data be readily secured/captured?	Mitigation / Action required (if necessary) to move scale to right: N/A					
		Reviewer Comments: Each policy has a table of indicators and targets, at the end, specifying how the policy will be monitored.					
		-2	-1	0	+1	+2	
	Does the local plan policies update and monitoring framework identify a clear framework for plan review?	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.		Reason for score: +2					
	Where triggers for plan review and/or update are identified are they justified and	Implications of taking	no further action:				
	proportionate?	Mitigation / Action re	quired (if necessary) to	move scale to right:			
		Reviewer Comments:	Yes – Policy DS9.				
	Plan effectiveness (and associated policy clarit	y)					
		-2	-1	0	+1	+2	

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.					
	Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the	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	
	strategic policies provide for a minimum of	Reason for score: +2					
42.	15 years <u>from adoption?</u> Does the evidence relied on to support those policies	Implications of taking	no further action: N/A				
	correspond/cover this whole period? Where	Mitigation / Action re	quired (if necessary) to	move scale to right: N/	A		
	larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)?	Reviewer Comments: adoption, on the provi	The plan period is defin so we adopt in 2024.	ed as 2021-2039 which	will allow for a minimu	m 15 year period from	
		-2	-1	0	+1	+2	
		No, we do not meet	No, we may not fully	Unclear whether	Yes, we are likely to	Yes, we are confident	
	Does the local plan policies update clearly	this requirement	meet this requirement	our plan meets this requirement or not	meet this requirement	our plan will meet this requirement	
43.	set out which adopted Development Plan	Reason for score: +2					
	policies it supersedes?	Implications of taking	no further action: N/A				
		Mitigation / Action re	quired (if necessary) to	move scale to right: N/	A		
		Reviewer Comments:	Yes - Paragraph 1.4.				
		-2	-1	0	+1	+2	
		No, we do not meet	No, we may not fully	Unclear whether	Yes, we are likely to	Yes, we are confident	
		this requirement	meet this	our plan meets this	meet this	our plan will meet this	
44.	Are the objectives the policies are trying to	Reason for score: +2	requirement	requirement or not	requirement	requirement	
	achieve clear, and can the policies be easily used and understood for decision making?		f .1 .: 21/A				
	used and understood for decision making:	Implications of taking no further action: N/A					
		Mitigation / Action required (if necessary) to move scale to right: N/A					
				move scare to right: 147			
		Reviewer Comments:		move scale to right. Hy	^		

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.				
	For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; and (ii) clearly defined on the Policies Map?	No, we do not meet this requirement Reason for score: +2	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
45.	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?	Implications of taking	no further action: N/A quired (if necessary) to Yes.	move scale to right: N/	Α	
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?		-1 No, we may not fully meet this requirement no further action: N/A quired (if necessary) to Yes.	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
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]		No, we may not fully meet this requirement no further action: N/A quired (if necessary) to Yes.	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 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.					
-	State how many policies are in your local plan update? Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.	47 policies are contained within the Borough Plan Review.					
48.	Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies? If you find duplication or repetition you may want to take minute to consider whether this is appropriate.	Mitigation / Action re	-1 No, we may not fully meet this requirement no further action: N/A quired (if necessary) to We have avoided unnecessary)			+2 Yes, we are confident our plan will meet this requirement within the local plan	
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?		-1 No, we may not fully meet this requirement no further action: N/A quired (if necessary) to Yes.	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	
		-2	-1	0	+1	+2	

	KEY QUESTIONS	Assessment Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/paragraphs where appropriate.				
	Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?	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.	[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.]	Reason for score: +2 Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: Yes.				

Date of assessment:	19/07/2023
Assessed by:	Jade Bagley – Planning Policy Officer
Checked by:	Sarah Matile – Principal Planning Policy Officer
Overall Score:	100/100
Comments:	