

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 [National Planning Policy Framework](#) 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 [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	<p align="center">Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
Growth Strategy		
A	<p>In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area</p>	<p><i>The Local Plan Review, as the title suggests is review of the current Local Plan (Core Strategy 2011 and Site Allocations and Development Management Policies Plan 2016). It merges its predecessors into a single Local Plan document and looks forward to 2036, providing a planning policy framework which encourages sustainability development to take place. The Plan provides this through identification of locations, type and design considerations. As side form this it also provides a suite of allocations of housing which will enable the area to meet its Local Housing Need in an appropriate and sustainable manner, balancing the economic, social, and environmental elements of sustainable development.</i></p>
B	<p>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>	<p><i>The Borough is predominantly rural in nature, this comprises fenland, forests, farmland and coastal areas. This provides a rich natural environment. The built-up nature comprises a rich historic environment. These two elements are key considerations. King's Lynn provides a sub-regional centre, with two other smaller towns and around 100 or so further smaller settlements. In terms of constraints, flood risk is high on the agenda given much of the area is located within areas of high risk, the road and rail infrastructure also are a consideration. Ensuring development takes place in an appropriate and sustainable location is key to the Local Plan Review. This is broadly achieved through the Spatial Strategy and Settlement Hierarchy, which seeks to ensure that development is directed to the sustainable locations.</i></p>
C	<p>List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery</p>	<p><i>As touched upon earlier this as review and the majority of the site allocations made in the 2016 Local Plan are carried forward, this includes the strategic sites. A brief summary is provided below, outlining the position at winter 2020/ spring 2021, when the Local Plan was being finalised for publication (further details can be found in the housing trajectory schedule):</i></p> <p><i>King's Lynn:</i></p> <ul style="list-style-type: none"> • <i>E1.4 Marsh Lane (130 homes): Completed (BCKWLN Site)</i> • <i>E1.5 Boal Quay (Mixed use): Not Started (BCKLWN Site)</i>

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		<ul style="list-style-type: none"> • E1.6 Parkway (260 homes): Planning Permission Submitted (BCKLWN Site) • E1.7 Lynnsport (297 homes): Under construction, nearing completion (BCKLWN site) • E1.9 Columbia Way: Not Started, studies and site clearance underway (BCKLWN Site) • E1.15 Bankside: Not Started • E3.1 Hall Lane (300 homes): come forward in two parts has outline permission for 575 new homes (450 & 125). A house builder is on board and preparing a reserved matters application for the larger element • E4.1 Knights Hill (600 homes): Has come forward in two parts has outline planning permission for 655 new homes (600 & 55) <p>West Winch (up to 4000 homes; 2500 homes by 2036):</p> <ul style="list-style-type: none"> • Planning permission submitted by Hopkins homes for northern element for 1,100 new homes • Planning permission submitted for further 500 homes in central area • BCKWLN has set up a dedicated delivery team comprising senior officers. Working with Norfolk County Council, land owners and others to bring forward, including the link road <p>Downham Market:</p> <ul style="list-style-type: none"> • F1.3 Bridle Lane (250 homes): approx. 60% of the site has outline planning permission for 240 new homes. A house builder is seeking to submit a reserved matters application, having been through the pre-app process • F1.4 Nightingale Lane (140 homes): Has outline planning permission for 300 new home. A house builder is on-board, marketing homes, consulting locally and seeking to submit a reserve matters planning application <p>Hunstanton:</p> <ul style="list-style-type: none"> • F2.2 Cromer Road (120 homes) Reserved matters granted and a house builder is current on site which is under construction • F2.4 Hunstanton Road (163 homes) House builder on site, nearing completion

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		<p><i>Wisbech Fringe (550 homes):</i></p> <ul style="list-style-type: none"> • <i>Joint allocation with Fenland District Council</i> • <i>DTC work continuing to ensure site is brought forward and delivered as envisaged by both adopted Local Plans</i> <p>Conclusion: <i>Overall, 80% + of the allocations made by the SADMP (2016) have come forward and have some form of planning permission. Some are under construction, and some have completed. Many have come forward for higher numbers than expressed by the relevant policies as ‘at least’ this has boosted the housing numbers. A small number of the smaller sites are proposed to be removed from the plan as they are not likely to be brought forward. Two further allocations are proposed by the review for just over a further 100 new homes, to offset sites that are proposed for deallocation. The plan also contains a flexible framework for windfall development to continue to come forward over the plan period. In terms of infrastructure requirements there is a relatively low ask, each policy set out what is required and as can be seen most have come forward.</i></p>				
1.	Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: <i>The growth strategy is clearly set out early on in the LPR through LP01: Spatial Strategy, which is supported by interpretation of the housing land supply figures, compared to Local Housing Need.</i></p>				
		<p>Implications of taking no further action: <i>n/a</i></p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: <i>n/a</i></p>				
		<p>Reviewer Comments: <i>The LPR provides a suite of allocations, most of which are carried forward from the existing LP. In addition to this the LPR provides a framework of policies to ensure that sustainable forms of windfall development is enabled in terms of type of development and geographic location</i></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>				
2.	<p>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?</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: LP01: Spatial Strategy clearly sets out the quantum of growth required in order to meet (and boost significantly) the LHN in order that this can at the very least be met with a degree of flexibility. The LPR carries forward the bulk of the allocations made by the previous LP which was ultimately found sound at examination. The focus for growth is upon the north/ south A10/ Rail Line growth corridor and locations specified in the Settlement Hierarchy, which establishes the most sustainable settlements and therefore those capable of accommodating sustainable growth.</p>				
		<p>Implications of taking no further action: n/a</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: n/a</p> <p>Reviewer Comments: The vast majority (80%+) of the allocations already have some form of a planning permission. In some case construction is well underway, some sites have completed in totality. Therefore, it makes sense to continue to support those allocations which are being delivered in line with the current LP, especially given that this a review.</p>				
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
		<p>Reason for score: The approach to managing housing growth is explained both within the LPR and the Sustainability Appraisal. The LPR through allocations aims to at least meet the Local Housing Need (LHN) figure as established through the standard methodology. Factoring in a justifiable windfall allowance based upon recent past trends and those sites which already have planning permission ensures a great degree of flexibility. This can also be seen through the full housing trajectory schedule which supports the Local Plan Review, 5 Year Housing Land Supply Position, and Housing Delivery Test Action Plan (2020).</p>				
		<p>Implications of taking no further action: n/a</p>				

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		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: <i>The housing growth figures within the LPR were based on the latest available published data, for the 2019-20 monitoring period which pre-dates the Covid-19 pandemic. An updated assessment of LHN was undertaken in autumn 2021, for the purposes of testing housing delivery against the requirements of the Housing Delivery Test (HDT). This found, for the first time, that the HDT had been passed, with the 95% target exceeded, although the adjusted LHN figure for the Borough was calculated to be 549 dwellings for the 2020-21 monitoring period. The HDT figures were confirmed when the Government published the latest figures in January 2022, with 96% for the Borough. Notwithstanding, it is important to maintain an up to date record of housing land supply, so the five year land supply figure for 2020-21 is anticipated to be published in spring 2022 and this will be submitted as part of the supporting evidence base.</i>				
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 that exceptional circumstances exist to justify green belt release?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: There is no Green Belt within KLWN				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: n/a				
5.	Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: This is a review of the existing Local Plan, with many of the allocations proposed to be carried forward. As mentioned earlier, many have planning permission, are being built out, or have indeed actually completed. Nevertheless, a full Sustainability Appraisal (including SEA) has been carried				

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		<p>out on all of the policies contained within the Local Plan Review. This accompanying scoping report and update demonstrates that this has been carried out on up-to-date and relevant information. Clearly the local housing need (LHN) figure has played a part in informing decisions and the LPR has been subject to a full Viability Study to ensures that the Plan is viable and therefore can be considered deliverable</p>				
		<p>Implications of taking no further action: n/a</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: n/a</p>				
		<p>Reviewer Comments: There is a whole suite of appropriate supporting evidence base studies which accompany the Local Plan Review (e.g. Sustainability Appraisal and HELAA). In combination this clearly demonstrates how and why the Plan has been informed.</p>				
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
		<p>Reason for score: The LPR provides information regarding the strategic distribution of development within LP01: Spatial Strategy. This provides targets for individual settlements within the settlement hierarchy, down to Growth Key Rural Service Centres (Marham and Watlington). The Plan does not set individual targets for other settlements (i.e. villages), although there is no strategic need to allocate any further housing land across the Borough. As such, the issue of whether or not to allocate further sites for development is entirely a matter for Parish Councils/ Neighbourhood Planning Groups, depending on local circumstances.</p>				
		<p>Implications of taking no further action: Justification for not setting individual targets for all settlements is set out above.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: Justification for not setting individual targets for all settlements is set out above.</p> <p>Reviewer Comments: The LPR set out that the LHN is set to be more than met by plan allocations, therefore there is no strategic need for further housing allocations through the LPR or through Neighbourhood Plans. Accordingly, the housing requirement for all Neighbourhood Plans currently is zero,</p>				

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		<p><i>so it is not deemed necessary to set a strategic requirement for individual villages, given that there is not one.</i></p> <p><i>Should any NPs decide they wish to provide growth this may well be supported and would provide an additional source of supply. Indeed, a number of NPs, which are emerging and indeed have been made, have done so and others may follow suit.</i></p>				
7.		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The site allocation policies are sufficiently detailed				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: As stated earlier most are carried forward from the existing LP, which has been found 'sound'. The majority of sites benefit from some type of Planning Permission, some are already under construction, and some have even completed. In all cases, policies clearly cite the quantum of growth, as minima. Housing policies provide the				
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>				
		-2	-1	0	+1	+2
		Reviewer Comments: The Employment Land Review (ELR) ¹ was prepared in advance of the 2019 Draft Local Plan Review. This informed both the first draft and Pre-Submission Draft versions of the Plan. As explained in the supporting text (section 5.1), the ELR highlighted an over supply of employment land, such that no additional strategic land allocations were needed in the Review. Instead, the Plan focus is regeneration and expansion of town centres.				

¹ <https://west-norfolk-consult.objective.co.uk/kse/event/33936>

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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?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan Review provides allocations for employment land at the three main towns, and in particular at King's Lynn. The demand/need is modest and in the main is already being met through existing sites, these allocations, which are carried forward from the current Local Plan, provide further flexibility. The Plan includes an additional site allocation at Estuary Road, King's Lynn, principally to support regeneration of this part of the town.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: The Local Plan Review is flexible and adaptable to potential changing needs				
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Yes, each site allocation contains site specific details of infrastructure requirements necessary to support these.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a Reviewer Comments: The vast majority of the policies have been found sound previously. Any that have required updating through comments received at consultation stages have been updated, to reflect the latest position.				
10.	Can you demonstrate that the transport and other infrastructure needed to support each growth area or strategic site identified in the local plan policies update: (i) can be funded	-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 align="center">Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
	<p>and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?</p> <p>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?</p>	<p>Reason for score: The Local Plan Review is underpinned by the Norfolk Strategic Infrastructure Delivery Plan (SIDP) 2020. This, together with the Norfolk Strategic Planning Framework provide the basis by which the delivery trajectory in the Plan has been set. The West Winch development (E2.1), the major strategic development within the Borough will entail delivery of the A10 Housing Access Road (HAR). This is reflected in the SIDP. Other major developments (such as Wisbech Fringe) will be supported by longer term infrastructure projects; e.g. upgrading A47 Trunk Road.</p>				
		<p>Implications of taking no further action: n/a</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: n/a</p>				
		<p>Reviewer Comments: Policy E2.1 provides significant detail as to how the scheme will be delivered. It is recognised that timely deliver of the A10 HAR is essential to support development, reiterating the SIDP.</p>				
<p align="center">Process and Outcomes (see also Toolkit Parts 2 and 3)</p>						
E	<p>What are the cross boundary strategic matters affecting your local plan policies update? List these.</p>	<p>Cross boundary strategic planning matters are set out in the DTC document and the Norfolk Strategic Planning Framework (NSPF). These include:</p> <ul style="list-style-type: none"> • Delivery of GI-RAMS • Coastal Management; and • Wisbech Fringe. 				
11.	<p>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?</p>	-2	-1	0	+1	+2
<p>No, we do not meet this requirement</p>		<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>	
<p>Reason for score: DTC activity has informed the evolution of the Local Plan Review and this is evidence through the DTC documents and the NSPF. The DTC statement and NSPF systematically explain how DTC bodies have been engaged throughout the plan-making process.</p>						
<p>Implications of taking no further action: n/a</p>						

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		<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>				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: Having reviewed DTC documents and the NSPF, these clearly demonstrate that the BC has met its duty in this regard, and gone beyond this being involved in creation and updates of the NSPF.				
F	<p>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?</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>	N/A – No policies seek to deviate from national policies. Instead, these intend to apply national policies at the Borough level.				
12.	<p>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).</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: n/a				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: n/a				
13.	<p>Is the local plan policies update:</p> <ul style="list-style-type: none"> • in conformity with any ‘higher level’ plans prepared by the Council; and 	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

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	<ul style="list-style-type: none"> properly reflecting provisions of any made neighbourhood plan? 	<p>Reason for score: The LPR has been prepared in conformity with the NSPF and is specifically intended to complement 'made' Neighbourhood Plans.</p> <p>Implications of taking no further action: n/a</p> <p>Mitigation / Action required (if necessary) to move scale to right: n/a</p> <p>Reviewer Comments: This can be seen through the DTC documents and the NSPF. Neighbourhood Plan activity is incredibly within the Borough and every effort has been made to ensure that the LPR and NPs work together in conformity.</p>				
14.	<p>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]?</p>	-2	-1	0	+1	+2
<p>No, we do not meet this requirement</p>		<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>	
<p>Reason for score: The Consultation Statement was prepared in the aftermath of the Regulation 19 consultation (August/ September 2021). A summary of issues raised was reported to the Local Plan Task Group in October 2021, and this summary feedback was also incorporated into the Consultation Statement. Matters were discussed at all stages through the Task Group, to ensure transparency in decision making, in accordance with the 2012 Regulations and SCI.</p>						
<p>Implications of taking no further action: n/a</p>						
<p>Mitigation / Action required (if necessary) to move scale to right: n/a</p>						
<p>Reviewer Comments: The Consultation Statement provides a systematic assessment of the entire plan-making process from its inception (October 2016). It explains the role of the Local Plan Task Group in developing initial Regulation 18 feedback into a workable and sound Local Plan, taking account of feedback from consultees at all stages.</p>						
15.	<p>Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable</p>	-2	-1	0	+1	+2
<p>No, we do not meet this requirement</p>		<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</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>				
	alternatives? Is it clear why alternatives have not been selected?	Reason for score: Absolutely, the SA (Inc SEA) provides a set of preferred options and a set of reasonable alternatives. These are appraised; systematically discussed in detail, compared and contrasted, and a clear conclusion is provided for each policy as to the option taken forward and why.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: The SA (Inc SEA) and the accompanying scoping report follow a similar approach to that take of the current Local Plan, albeit updated. This approach was previously found sound and commended by the LP Inspector.				
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
		Reason for score: Yes, this is a very detailed in-house appraisal. It has been consulted upon throughout the evolution of the Local Plan Review and this reflected in both the updated scoping report and SA (Inc SEA) report itself.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: This is a comprehensive study. It may require some refinement as a result of changes that may arise through the examination. Notwithstanding, it is considered to be a robust and proportionate evidence base for making policy decisions.				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations	-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 SA (Inc SEA) and the scoping report explain how policies have been informed through the appraisal process. They assess each policy individually and the Plan as a whole in terms 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>				
	have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	Policies and Allocations. Ultimately concluding that the Local Plan Review would provide an appropriate strategy and a sustainable one for the area.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: Please see the SA (Inc SEA) documents.				
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: The Borough Council has a corporate template for undertaking Equalities Impact Assessment. This is a requirement for all Council policies, so is systematically undertaken when reports are presented to Cabinet and/ or Full Council for approval. The assessment screening was undertaken in line with the corporate framework and template, and the impacts of all Plan policies were found to be neutral (Cabinet, 15 June 2021).				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: The Equalities Impact Assessment for the Local Plan Review has taken the form of a screening report. A full Assessment was not deemed necessary, as no policies are found to have any potential negative impacts in terms of the 2010 Equalities Act.				
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

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: The HRA is a comprehensive supporting document that has influenced the Local Plan Review. It has been carried out by external experts in their field and was wholly endorsed by Natural England at the Regulation Pre-Submission Draft consultation stage (August/ September 2021).				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: Please see the HRA.				
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?	-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: Absolutely, the requirements of the HRA are embedded within the Local Plan Review, throughout.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: Measure include items within specific site allocation policies and topic area policies, some of which are strategic. Policies are systematically assessed, and Natural England (main statutory consultee) and the Local Wildlife Trust have been engaged throughout the process.				
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: Yes, see answer to Q20, above				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: 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>								
Housing Strategy										
22.	Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?	-2	-1	0	+1	+2				
No, we do not meet this requirement		No, we may not fully meet this requirement		Unclear whether our plan meets this requirement or not		Yes, we are likely to meet this requirement		Yes, we are confident our plan will meet this requirement		
Reason for score: The spatial strategy fulfils the Borough's assessed Local Housing Need (LHN), in full. This is clearly set out within Local Plan Review Policy LP01: Spatial Strategy.										
Implications of taking no further action for local plan soundness and/or effectiveness: n/a										
Mitigation / Action required (if necessary) to move scale to right: n/a										
Reviewer Comments: See Policy LP01, which sets out how LHN is being met, in full.										
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.	No								
23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably 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: n/a										
Implications of taking no further action: n/a										
Mitigation / Action required (if necessary) to move scale to right: n/a										
Reviewer Comments: n/a										
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period?	-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>				
25.	Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?	Reason for score: The Plan includes a detailed housing trajectory schedule which supports the Review (Appendix C). This will be updated as/ when the latest housing land supply data (for 2020-21 and/ or 2021-22 monitoring periods) becomes available.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: As explained, the trajectory needs to be kept under review and up-to-date.				
25.	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.	-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 Housing Trajectory demonstrates a deliverable housing land supply for the remainder of the Plan period to 2036.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: The Local Plan Review is supported by the 2020 Housing Delivery Test Action Plan, which also includes details of the latest LHN and 5 Year Housing Land Supply Position. The updated HDT figure for the Borough was published by the Government in January 2022 and indicated (for the first time), that the test had been passed, for the 2020-21 monitoring period. An HDT Action Plan is no longer therefore required, although the Council will prepare and submit updated 5 Year Housing Land Supply Positions for 2020-21 and 2021-22 as/ when these become available.				
26.	Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Please see LP01: Spatial Strategy. This confirms that the LPR provides a great degree of 'head room' / flexibility. The Plan includes site specific allocations that exceed the calculated LHN by over 5000 dwellings, a buffer that is considered more than sufficient to give the necessary flexibility.				

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: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: As well as LP01, the Local Plan Review also provides a positive framework for further sustainable windfall development to continue to come forward from both existing sources and seeks to create new ones such as the policy (LP31) which allows development to come forward which is reasonable related to the development boundary, but is outside of it.				
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	-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: Whilst a justified allowance has been made based upon recent trends, this not relayed upon to meet the LHN. It provides greater flexibility				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: The application of a windfall allowance is explained, within the Local Plan Review and the Housing Trajectory.				
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	-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 Local Plan Review is informed by an up-to-date 'Housing Need' Study which identified and establishes this detailed information. This is reflected throughout the Local Plan Review site and topic policies.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: See Housing Needs Assessment 2020 and the Local Plan Review (section 7).				

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>29.</p> <p>Does the local plan policies update specifically address the needs of different groups in the community?</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: Yes, this is captured through topic policies and the site allocation policies themselves. These are based upon the Housing Need Study. The Plan was subject to Equalities Impact Assessment screening, which found no negative impacts upon any groups prescribed under the 2010 Equalities Act.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: It is noted that the LPR is intended to meet the needs of all groups, in terms of delivering housing jobs and the necessary infrastructure. This underpins policies throughout the Plan and is reflected in the Equalities Impact Assessment screening.				
<p>30.</p> <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>		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan Review seeks to strike a balance between providing affordable housing of a variety of types/tenures etc, that meet the need (established through the housing need study) whilst ensuring that development actually takes place; i.e., it is viable and therefore deliverable (again this is based upon evidence; in this case the viability study). The Local Plan Review does not seek to meet the whole AH need, as this aspiration is considered unachievable. However, it goes as far as it possible can do in this regard whilst ensuring that development and homes are delivered on the ground.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: The LPR is supported by a broad evidence base, consisting of a number of studies and assessments. These include the HELAA, Housing Needs Assessment and Retirement Housing Study. It is considered that the Plan balances these with viability, in order to maximise delivery of affordable housing towards meeting defined need (as far as possible).				

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.	<p>Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?</p> <p>Does the local plan policies update make adequate provision for the identified needs?</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
		<i>Reason for score: The Gypsy and Travellers policy criteria are incorporated within LP28. These are based upon the latest published (2016 Gypsy and Traveller Needs Assessment) information and covers the entire plan period through to 2036. The 2016 study identified a virtually negligible need for additional accommodation (just 2 plots), such that it is not considered necessary to make site specific allocations for such minor development. Instead, these are expected to be met through the development management process as/ when individual schemes come forward.</i>				
		<i>Implications of taking no further action: see comments below</i>				
		<i>Mitigation / Action required (if necessary) to move scale to right: see comments below</i>				
<i>Reviewer Comments: Further action is currently being taken to address the age of the current published evidence base (over 5-years old). The LPR was prepared on the basis of the 2016 Gypsy and Traveller Needs Assessment, which informed the Pre-Submission Draft Plan. As/ when the updated Assessment is published (spring/ summer 2022?), this would be submitted as new published evidence and any necessary changes to the LPR arising from these would need to be introduced as Main Modifications during the examination.</i>						
32.	<p>Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?</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
		<i>Reason for score: See answer to Q31, above</i>				
		<i>Implications of taking no further action: See answer to Q31, above</i>				
		<i>Mitigation / Action required (if necessary) to move scale to right: See answer to Q31, above</i>				

	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>				
		<p>Reviewer Comments: Ideally, the LPR should address the needs of travellers and travelling showpeople on the basis of an up to date evidence base. It is accepted that the latest published assessment, at over 5 years old, is dated, although an updated assessment may identify increased demand. An update to this assessment was commissioned in 2021 but this is not, as yet, published or finished. Ideally Policy LP28 should be updated to reflect the latest evidence prior to publication, but this is no longer possible if the Plan is to be submitted in a timely manner. Instead, updates to the LPR would need to be made through Main Modifications during the examination.</p>				
H	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	<p>No sites allocated. As stated in the answer to Q31, above, the current assessed quantum of need (2 pitches) is considered negligible.</p>				
Justified approaches to plan policy and content						
33.	<p>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?</p> <p>[You may wish to check each policy setting a threshold]</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: LPR policies provide sufficient detail to inform decision making. In addition to this, explanations, justifications, descriptions etc are all provided as supporting text throughout the document.</p>				
		<p>Implications of taking no further action: n/a</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: n/a</p>				
<p>Reviewer Comments: The LPR contains several trigger thresholds. Examples include policies LP28 (Affordable Housing) and LP22 (Provision of Recreational Open Space) each provide clear details of trigger thresholds.</p>						
		-2	-1	0	+1	+2

KEY QUESTIONS		Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Plan is stand alone in terms of strategic policies. It incorporates updated strategic policies from the current Local Plan (bringing these into a single document), plus additional strategic policies where these are deemed necessary (e.g. LP06 Climate Change). Individual policies may be supported by future SPDs to provide further detail on certain aspects; e.g. West Winch Growth Area and King's Lynn Urban Historic Area. In all cases, such SPDs will complement and supplement the Local Plan Review and/ or Neighbourhood Plans.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: The LPR clearly sets out which policies are 'strategic', allowing for straightforward consideration in preparing SPDs and/ or Neighbourhood Plans. The Plan provides support to Town/ Parish Councils in preparing Neighbourhood Plans; e.g. LP31.				
35.	Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy? [For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]	-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: Yes, this reflected in the Settlement Hierarchy and designations of environmental and historic aspects. In the case of natural and heritage assets, the LPR recognises that the level of protection is directly proportionate to the significance of individual assets.				
		Implications of taking no further action: Address outstanding concerns with statutory consultees (Environment Agency/ Historic England/ Natural England) through Statements of Common Ground and the LPR examination process itself				
		Mitigation / Action required (if necessary) to move scale to right: Resolve objections raised by statutory consultees through Statements of Common Ground and the LPR examination process itself				

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>				
		<p>Reviewer Comments: <i>The list of policies contained within the plan gives this as an overall context, with relevant policies considered, as a whole, in assessing the impacts of individual proposals upon natural and heritage assets. Outstanding objections by statutory consultees will be resolved through Statements of Common Ground and Main Modifications where necessary.</i></p>				
36.	<p>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.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</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: <i>Policies are written to clear. An example of this is what type of developments may be acceptable in the countryside as outlined by policies such as LP04: Development Boundaries and LP08: Retail Development.</i></p>				
		<p>Implications of taking no further action: <i>n/a</i></p>				
		<p>Mitigation / Action required (if necessary) to move score to right: <i>n/a</i></p>				
		<p>Reviewer Comments: <i>Many of the policies are carried forward and updated, in line with the latest national policies and guidance (NPPF), from the current adopted Local Plan which has been found 'sound' through the examination process.</i></p>				
37.	<p>Is it clear that any standards proposed for 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 National Design Code and National Model Design Code?</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: <i>Each policy is clear in this regard. As an example, site allocation policies set the expectations of what each site should bring forward and deliver. Policies such as LP14, LP22 and LP28 set out clear standards that developments are required to fulfil; re residential car parking, open space and affordable housing contributions respectively.</i></p>				
		<p>Implications of taking no further action: <i>n/a</i></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>				
	[For example, onsite provision of open space, optional technical standards, internal and external space standards.]	<p>Mitigation / Action required (if necessary) to move scale to right: n/a</p> <p>Reviewer Comments: Policies that set standards have all been subject to viability assessment.</p>				
Deliverability						
38.	<p>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?</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: LPR has been comprehensively assessed for viability. A whole Local Plan Review Viability Study has been carried out by external experts and this has informed the policies in the Pre-Submission Draft version of the Plan. This gives consideration to the implications of other obligations, such as CIL.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: Please see the viability study (2021)				
39.	<p>Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?</p> <p>Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?</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: The Local Plan Review reflects the findings of the Viability Study. This concludes that the Borough Council can be confident that sites and policies are viable and therefore the Local Plan Review is deliverable.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: Please see the detailed viability study (2021)				
		-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>				
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?	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: This the monitoring framework is established within the Local Plan Review (section 16).				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: The proposal is to carry forward the existing monitoring framework and adapt this to encapsulate the new and reviewed policies. This has been found to a ‘sound’ approach previously and has ensured that the Local Plan is constantly monitored, the complete set of Authority Monitoring Reports (AMRs) can be found online and the latest will be submitted in support of the Local Plan Review: https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/354/authority_monitoring_reports_amr				
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?	-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: See Q41, above				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
Reviewer Comments: See Q41, above.						
Plan effectiveness (and associated policy clarity)						
		-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>				
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? Where larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan Review clearly identifies which policies are strategic, throughout the document. The Plan period is from 2016 to 2036, with the evidence base corresponding to this timeframe. The Plan is currently anticipated to be adopted in spring 2023, looking just 13 years ahead from adoption. The delays in the process have arisen due to many factors beyond the Borough Council's control (Covid-19 pandemic etc). Changes to the end date (e.g. to 2041) would effectively entail re-starting the plan making process from scratch, to take account of the need for longer term evidence to support strategic policies.				
		Implications of taking no further action: It is likely that the '15 years' issue will be raised at examination. The Borough Council will need to be able to present a suitable justification to deviate from this requirement.				
		Mitigation / Action required (if necessary) to move scale to right: No options that avoid significant delays in the plan-making process are available at this stage.				
		Reviewer Comments: Officers need to be ready to respond to the end-date issue; this having been raised in several Regulation 19 representations. The Plan acknowledges longer term aspirations; particularly with reference to climate change (new Policy LP06) and the West Winch development, a significant proportion of which is expected to be completed beyond 2036.				
43.	Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan Review will entirely supersede the current Local Plan (2011 Core Strategy and 2016 Site Allocations and Development Management Policies Plan). The Review (Appendix D) clearly specifies which LPR policies will be replaced those in the current Local Plan.				
		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: LPR Appendix D clearly specifies which current Local Plan policies are to be replaced by those in the Review.				
44.	<p>Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?</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: Policies are clear and should be easy to apply in decision making. As already mentioned, this is a review of the current Local Plan (rather than an entirely new Plan/ spatial strategy), so the vast majority of policies are already in use. Any updated or new policies follow a similar format to adopted policies in the current Local Plan.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: Policies follow a standard format, which ensures these should be easy to reference and understand by end users (e.g. planning agents, Development Management officers).				
45.	<p>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?</p> <p>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?</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: The Local Plan Review contains an overall Borough wide map, supported by inset maps, all of which are on an OS Base. In addition to this an online interactive planning policy map tool has been specially created for the Local Plan Review, which enables the Plan to be navigated spatially.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: The interactive policies map should be updated at the time the Plan is adopted. This should also incorporate 'made' Neighbourhood Plan policies.				
		-2	-1	0	+1	+2

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>				
46.		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Plan has been positively prepared, throughout. This is necessary to ensure the Plan is comprehensive and robust, given that policies will remain in force for a number of years following adoption.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: Positive wording is applied throughout the document, in accordance with best practice guidance re policy writing.				
47.	<p>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.</p> <p>[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]</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: Policies through the LPR document have been written to be clear and unambiguous in respect of scenarios where each is intended to be applied.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
Reviewer Comments: Policies have been drafted with reference to Development Management colleagues, the main day to day end users of the Plan, throughout the plan making process.						
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>No of policies within LPR:</p> <ul style="list-style-type: none"> • 41 strategic and/ or development policies • 92 site specific/ site allocations policies <p>Policies from the current Local Plan and the LPR policies that will replace these, are set out at Appendix D.</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>				
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: the LPR has been written throughout so as to minimise wholesale repetition of national policies. A degree of repetition is however inevitably necessary, in order to provide a clear context for individual policies.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments: Any policy/ text repetitions that are deemed unnecessary can be filtered out through the examination process and resolved at the Main Modifications stage.				
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: Yes. The Local Plan Review avoids duplication wherever possible, in most instances preferring to use footnotes/ hyperlinks to cross reference other policies, legislation or regimes (e.g. environmental protection legislation, building regulations etc).				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: Cross references/ hyperlinks will need checking at Main Modifications and/ or (adoption) publication stages, to ensure these remain up to date/ current.				

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>				
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>	-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><i>Reason for score: Policies have been written with regular reference to Development Management officers and planning agents (main day to day end users), to ensure that these avoid ambiguity and are clearly written.</i></p>				
		<p><i>Implications of taking no further action: n/a</i></p>				
		<p><i>Mitigation / Action required (if necessary) to move scale to right: n/a</i></p>				
<p><i>Reviewer Comments: The vast majority of the policies have been used since 2016 to guide development across the Borough. The review process has been taken, in part, to see where individual policies may be tweaked and/ or updated where issues have been highlighted through the decision making process.</i></p>						

Date of assessment:	April 2021 (updated March 2022)
Assessed by:	Alex Fradley (Principal Planner)
Checked by:	Michael Burton (Principal Planner)
Overall Score:	93
Comments:	<p>Original assessment undertaken by Principal Planner (checked by Planning Policy Manager) using 2019 Toolkit. Assessment reviewed and updated by Principal Planner using October 2021 Toolkit.</p> <p>The Local Plan Review fulfils the overwhelming range of quality and soundness tests set out in the toolkit.</p> <p>Inevitably a small number of issues and/ or concerns have been identified, with reference to the following issues:</p> <ul style="list-style-type: none"> • Target setting for Neighbourhood Planning • Gypsy and traveller accommodation • End date for the Local Plan Review <p>These issues, while they raise possible concerns for the Plan examination, are not considered to be “show stoppers”. However, clear and robust justification will need to be given to the appointed Planning Inspector through the examination process.</p>