

## 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](#).

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.

	<b>KEY QUESTIONS</b>	<p style="text-align: center;"><b>Assessment</b></p> <p style="text-align: center;"><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>
<b>Growth Strategy</b>		
<b>A</b>	<p><b>In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area</b></p>	<p>The strategy for delivering growth and development is addressed in the adopted CPP1. The <b>adopted CPP1</b> recognises that new development in the City is constrained by its location between the sea and the South Downs National Park. In spatial terms, the Plan seeks to concentrate development within the built-up area with growth directed to eight development areas. All except one is in the existing urban area of Brighton and Hove. The greenfield development at Toad's Hole Valley and potential housing sites within the urban fringe are on the edge of the urban area which offers the potential for sustainable development.</p> <p>The CPP2 site allocations conform with and support the delivery of the adopted CPP1 strategy and housing target – this is explained in the <b>Housing Provision Topic Paper May 2021</b></p>
<b>B</b>	<p><b>In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update</b></p>	<p>CPP2 site allocations conform with and support the delivery of the adopted CPP1 strategy and housing target – this is explained in the <b>Site Allocations Topic Paper May 2021</b> and the <b>Housing Provision Topic Paper May 2021</b>.</p>
<b>C</b>	<p><b>List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery</b></p>	<p>Development areas are defined in the <b>adopted CPP1</b> and supported by the <b>CPP1 Annex 2 Infrastructure Delivery Plan</b>.</p> <p>CPP2 allocates additional strategic site allocations (SA7 and SSA1- SSA7) and housing allocations (H1 and H2) and E3 to support the delivery of the adopted CPP1 housing target and other identified needs - see <b>Housing Provision Topic Paper May 2021</b>. Infrastructure requirements to support delivery:</p> <p><b>SA7 Benfield Valley</b> – biodiversity conservation and enhancements; gateway and interpretation facilities to South Downs National Park; open space enhancements; access improvements; repair of Benfield Barn</p>

	<b>KEY QUESTIONS</b>	<p style="text-align: center;"><b>Assessment</b></p> <p style="text-align: center;"><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><b>SSA1 Brighton General Hospital Site</b> – delivery of health and care facility; community facilities, sustainable transport infrastructure improvements phased delivery of sewerage network infrastructure; biodiversity net gains; local employment training</p> <p><b>SSA2 Combined Engineering Depot, New England Road</b> - sustainable transport infrastructure improvements, air quality improvements and biodiversity net gain, local employment training, phased delivery of sewerage network reinforcement.</p> <p><b>SSA3 Land at Lyon Close, Hove</b> – expanded D1 health facilities and/or community use; sustainable transport infrastructure improvements, air quality improvements and biodiversity net gain, local employment training, phased delivery of sewerage network reinforcement.</p> <p><b>SSA4 Sackville Trading Estate and Coal Yard</b> – play space/ community facilities, sustainable transport infrastructure improvements, air quality improvements, biodiversity net gain, local employment training, phased delivery of sewerage network reinforcement.</p> <p><b>SSA5 Madeira Terrace and Drive</b> - restore and repair of terraces, (internet) infrastructure improvements (to support event space); sustainable transport, access and public realm improvements, biodiversity net gains</p> <p><b>SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive</b> – sustainable transport infrastructure, biodiversity net gain.</p> <p><b>SSA7 – Land Adjacent to American Express, Community Stadium, Village Way</b> – sustainable transport infrastructure; biodiversity net gain local employment training.</p> <p><b>H1 Housing and Mixed Use Sites</b> – as indicated phased delivery of sewerage network reinforcement/ access for maintenance and upsizing of existing water and/or wastewater infrastructure.</p> <p><b>H2 Housing Sites – Urban Fringe</b> sustainable transport infrastructure improvements; linkages and access to South Downs National Park, green infrastructure, local food growing and biodiversity net gain; publicly accessible open space and where indicated phased delivery of sewerage network reinforcement/ access for maintenance and upsizing of existing water and/or wastewater infrastructure.</p>				
<b>1.</b>	<p><b>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?</b></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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				

		<b>Assessment</b>				
	<b>KEY QUESTIONS</b>	<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>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
		The City Plan Part 2 allocations SA7, SSA1-SSA7 and H1-H3 and E1 complement and are consistent with the adopted CPP1 strategy for accommodating growth in the city to 2030 and the adopted CPP1 – see <b>Housing Provision Topic Paper May 2021</b> .				
2.	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
		The <b>Site Allocations Topic Paper May 2021</b> accompanying the CPP2 outlines the site assessment process undertaken and sets out the approach to determining amount of development for the CPP2 site allocations. This provides the evidence that the level proposed are considered deliverable and justified.				
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?	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>				
	<b>Does the level of housing provide for an appropriate and justified buffer?</b>	<p>The adopted City Plan Part 1 at Policy CP1 Housing Delivery sets out the city's housing target. The CPP2 is not a local plan update.</p> <p>The role of the City Plan Part 2 is to support the implementation of the City Plan Part 1 through detailed development management policies and site allocations. This issue is addressed in detail in the Housing Provision Topic Paper May 2021 accompanying the CPP2.</p>				
4.	<b>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?</b>	-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	
<b>Reason for score: N/A</b>						
<b>Implications of taking no further action:</b>						
<b>Mitigation / Action required (if necessary) to move scale to right:</b>						
<b>Reviewer Comments:</b>						
Not relevant to BHCC						
5.	<b>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?</b>	-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	
<b>Reason for score: +2</b>						
<b>Implications of taking no further action:</b>						
<b>Mitigation / Action required (if necessary) to move scale to right:</b>						
<b>Reviewer Comments:</b>						
<p>The Sites Allocation Topic Paper May 2021 sets out the staged approach to site identification, assessment and allocation during the preparation of the City Plan Part 2 informed by:</p> <ul style="list-style-type: none"> <li>• 2014 Urban Fringe Assessment</li> <li>• 2018 Housing and Employment Land Availability Assessment</li> </ul>						

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<ul style="list-style-type: none"> <li>• Call for sites at the Issues and Options consultation 2018 and annual SHLAA updates</li> <li>• Sustainability Appraisal</li> <li>• Strategic Flood Risk Assessment Level 1 and 2</li> <li>• Consultation on the draft City Plan Part 2.</li> <li>• Regulation 19 Consultation on the Proposed Submission City Plan Part 2.</li> </ul> <p>The audit trail for sites is set out in Appendix 1 of the Sites Allocation Topic Paper. Appendix 4 – 7 provides the Site Profiles which includes an assessment of availability/deliverability/ viability issues.</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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  No, the adopted City Plan Part 1 sets out a housing target for the plan area of 13,400 homes to 2030. Brighton & Hove does not have a city-wide coverage of neighbourhood forums; there are currently five designated neighbourhood areas and four designated neighbourhood areas along with a parish council. To date there are no adopted neighbourhood plans.				
7.	Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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><b>Reviewer Comments:</b></p> <p>Yes, following the approach of the City Plan Part 1, the Strategic Site Allocations (SA7, SSA1 – SSA7) and housing allocations (H1-H3) set out in the CPP2 specify the mix and quantum of development (expressed unless stated otherwise as minima) and local priorities are identified such as transport improvements, community safety, open space or public realm improvements and sustainable drainage requirements informed by the site assessments and sustainability appraisal – see appendix 4-7 of the Site Allocations Topic Paper (supported by background evidence including the Urban Characterisation Study, Open Spaces Study and Strategic Flood Risk Assessment Level 1 and 2 Screening ) together with key infrastructure requirements (informed by the Infrastructure Delivery Plan or through consultation with statutory consultees e.g. Southern Water re water and/or wastewater infrastructure).</p>				
<b>D</b>	<p><b>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?</b></p> <p><b>List these targets and the evidence source for this ‘need’ target?</b></p>	<p>Targets are set out in the adopted City Plan Part 1, see Table 2 Summary of Development Proposals:</p> <ul style="list-style-type: none"> <li>• Forecast employment land requirement of 112,240 sq m of office space (B1a and B1b) and 43,430 sq m industrial floorspace (B1c, B2 and B8) over the plan period to 2030. requirement for employment land was informed by the 2013 Employment Land Study.</li> <li>• Retail needs to 2030 have been estimated at 58,313 sq m of comparison floorspace and 2,967 sq m of convenience retail (informed by the 2011 Retail Assessment Update).</li> <li>• The need for visitor accommodation has been updated by the Visitor Accommodation Update Study 2018 and has informed CPP2 Policy DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities. As indicated in the supporting text at 2.141 the forecast need is for a further two new hotels in Brighton by 2022 in addition to the planned pipeline hotels that are set to open in the next 2-3 years. The City Plan is guided by the low-growth forecast requirement of up to 5 new hotels over the plan period.</li> <li>• The development needs generated by a growing population; schools, community facilities’, sport and recreation and cultural provision also need to be accommodated were also recognised and informed by the Infrastructure Delivery Plan (2017))</li> </ul>				
<b>8.</b>	<p><b>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</b></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
		<b>Reason for score:</b>				



		<b>Assessment</b>				
	<b>KEY QUESTIONS</b>	<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>				
	meet needs identified, can you justify and explain how those needs will be met?	<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  Housing allocations (H1-H3) see tables 6 and 9 and SSA1-7 specify the mix and quantum of development (expressed unless stated otherwise as minima) to meet the identified needs. This is further explained in the Housing Provision Topic Paper May 2021.  The CPP2 allocates further sites/ opportunities for employment (H1 Mixed Use Housing Site Allocations and SSA1-7 in order to reduce the shortfall of employment sites to meet the forecast floorspace demand and address the barriers to economic growth identified in the Economic Strategy 2018-2023.  Meeting retail, leisure and other needs were largely addressed in the City Plan Part 1. However Strategic site allocations in CPP2 also help address others need identified in the IDP (e.g. SSA1 Brighton General Hospital).				
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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  The Infrastructure Delivery Plan (IDP) Annexe document to the adopted City Plan Part 1 identifies existing infrastructure provision, current shortfalls and existing and future needs to support new development over the plan period up to 2030. This is regularly updated; it was last updated in 2017 and will be updated in 2021.  The CPP2 site allocations identify infrastructure requirements (informed by Infrastructure Delivery Plan or through consultation with statutory consultees e.g. Southern Water re water and/or wastewater infrastructure).				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		The Transport Technical Paper May 2021 addresses the transport mitigation requirements in order to support the provision of planned growth.				
<b>10.</b>	<p><b>Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?</b></p> <p><b>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?</b></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
		<b>Reason for score:</b>				
		Implications of taking no further action: HE maintained objection at Reg. 19 stage and consequently a risk to the soundness of the Plan.				
		Mitigation / Action required (if necessary) to move score to right: Continue dialogue with HE to attempt to reach a mutually satisfactory conclusion.				
		<p>Reviewer Comments:</p> <p>The Infrastructure Delivery Plan (IDP) Annex document to the adopted City Plan Part 1 identifies existing infrastructure provision, current shortfalls and existing and future needs to support new development over the plan period up to 2030. This is regularly updated, it was last updated in 2017 and will be updated in 2021.</p> <p>The Strategic Site Allocations SSA1- SSA7 were informed by representations by landowners/developers (SSA1-SSA4, SSA7) and through the council's Madeira Drive Regeneration Framework (SSA5 and SSA6) and assessed through the Site Assessment Topic Paper and SA. The local priorities for each SSA set out any particular infrastructure requirement informed by the IDP or through representations by statutory consultees (eg Southern Water). It is considered that the infrastructure needed to support the strategic site allocations can be funded and delivered.</p> <p>With respect to transport – an objection raised by Highways England (HE) at the Reg. 18 Draft Plan stage has yet to be fully resolved. The representation requested confirmation that the cumulative impact of traffic that would be created by the housing development sites allocated in CPP2 on the SRN (in particular the junctions on the A27) had been included within the strategic modelling undertaken for CPP1. If it had, the junctions would be able to accommodate the future traffic levels once previously agreed mitigation work was implemented. If not, consideration of further appropriate mitigation may be required in order for HE to be satisfied that the effects of the development proposed in CPP2 would not have an unacceptable impact on the operation of the SRN junctions.</p>				

	<b>KEY QUESTIONS</b>	<p style="text-align: center;"><b>Assessment</b></p> <p style="text-align: center;"><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>Extensive dialogue with HE has occurred with regard to this issue. During the preparation of CPP1 collaborative work was undertaken between the Highways Agency (now known as Highways England) and the city council and its transport modelling consultant. This included assessing the impact of the proposed amount of development on the strategic road network (SRN) and agreeing appropriate mitigation work where necessary to enable the SRN to accommodate the forecast extra traffic. HE has requested further modelling work to ensure this remains the case. The view of the LPA and its consultants (Systra) is that the overall quantum of development proposed in CPP2 remains broadly similar, and its distribution as set out through site allocations in CPP2 will not materially affect the capacity or safety of junctions on the SRN, and that an acceptable mitigation design exists for all of the SRN junctions to address the forecast impacts.</p> <p>However, HE maintain concerns related to the performance of two of the A27 SRN junctions compared with the June 2014 STA modelling. It is intended to agree a Statement of Common Ground clearly setting out the remaining areas of disagreement.</p> <p>The extent of the transport infrastructure mitigations to SRN junctions required is not yet agreed with HE so it is not possible to fully ascertain the amount of funding required. At this stage it seems unlikely that any major remodelling of SRN junctions will be necessary, so the cost of the work is likely to be relatively low. Once mitigation proposals are agreed the Council will work with HE to identify and secure funding through recognised funding mechanisms to support delivery.</p>
<b>Process and Outcomes (see also Toolkit Parts 2 and 3)</b>		
<b>E</b>	<b>What are the cross boundary strategic matters affecting your local plan policies update? List these.</b>	<p>These are set out in the Duty to Cooperate Statement May 2021 (see Section 3):</p> <ul style="list-style-type: none"> <li>Housing needs and provision</li> <li>Employment Land</li> <li>Gypsies and Traveller needs</li> </ul>

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<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>				
<b>11.</b>	<b>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?</b>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
		<p>i) Most cross-boundary issues affecting the city were considered as part of the City Plan Part 1 (2016) and do not fall to be re-opened. Strategic matters were dealt with in the preparation and examination of the City Plan Part 1. The role of the City Plan Part 2 is to support the implementation of the existing strategic plan through site allocations and detailed development management policies. The Duty to Cooperate Statement May 2021 (section 3) is currently being prepared and will be made available after submission. The Statement of Common Ground will identify the cross boundary strategic issues. A Statement of Common Ground is nearing completion and will be available shortly and will be published as an appendix to the Duty to Cooperate Statement.</p> <p>ii) Section 4 identifies the bodies we have and continue to engage with.</p> <p>iii) The Statement of Common Ground which is currently being prepared will highlight the on-going duty to cooperate activities and a timetable of future work programmed to address unmet needs through LSS3 which will provide an overarching framework for future local plan reviews.</p>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>				
<b>F</b>	<p>Are there any aspects of the local plan policies update not in conformity with national policy? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</p> <p><i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i></p>	The CPP2 is considered to be in conformity within the NPPF.				
<b>12.</b>	Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments: N/A</b>				
<b>13.</b>	<p>Is the local plan policies update:</p> <ul style="list-style-type: none"> <li>in conformity with any 'higher level' plans prepared by the Council; and</li> <li>properly reflecting provisions of any made neighbourhood plan?</li> </ul>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>It is considered that the City Plan Part 2 is in conformity with the City Plan Part 1 supporting the delivery of its strategy and complementing the strategic policies by detailed development management policies.</p> <p>There are to date no adopted neighbourhood plans.</p>				
<b>14.</b>	<p><b>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]?</b></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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<p><b>Reviewer Comments:</b>            Details of the City Plan Part 2 scoping consultation undertaken in 2016 is set out in in this Statement of Consultation: <a href="https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/Statement%20of%20Consultation%20%26%20Appendices%201%20to%206.pdf">https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/Statement%20of%20Consultation%20%26%20Appendices%201%20to%206.pdf</a></p> <p>Details of how under Regulation 18 the draft City Plan Part 2 was consulted upon in 2018 is set out in this Statement of Consultation: <a href="https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposed-submission-stage-2020">https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposed-submission-stage-2020</a></p> <p>The Regulation 22 Consultation Statement has been prepared and will be published at submission, it summarises the earlier stages of consultation in Table 1 and sets out how these consultation and the Regulation 19 Proposed Submission City Plan Part 2 consultation undertaken September – October 2021 complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and Brighton &amp; Hove's SCI (adopted 2015). These consultation statements set out what consultation was undertaken, when consultation took place, with who and how consultation responses has influenced the preparation of the plan.</p> <p>It should be noted with respect to the Regulation 19 consultation, whilst the council was unable to comply with the SCI requirements to place paper copies on deposit due to Covid-19 restrictions in 2020, the changes made to the way</p>				

	<b>KEY QUESTIONS</b>	<b>Assessment</b> <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		the council usually made the documents available were made in accordance with the 2020 amended regulations and all reasonably practicable means were considered to ensure effective community engagement in particular with those who do not have internet access and further detail is set out in section 2.3 of the Regulation 22 Consultation Statement.				
15.	<b>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?</b>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<p><b>Reviewer Comments:</b></p> <p><u>Policies</u> Alternative options for each policy were developed and assessed during the preparation of the plan. The results of the options assessments are presented in full in Appendix D and summarised in Section 5 of the SA (June 2018). SA 2018: <a href="https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20SA%2007.06.18.pdf">https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20SA%2007.06.18.pdf</a></p> <p>Section 5 of the SA (April 2020) also summarises the policy options considered at draft stage. Appendix D of the SA (April 2020) provides an outline of the reasons for selecting or rejecting policy alternatives. SA 2020: <a href="https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/PropSub%20SA%20April%2025%202020%20%26%20Appx%20H%2012May2020A_0.pdf">https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/PropSub%20SA%20April%2025%202020%20%26%20Appx%20H%2012May2020A_0.pdf</a></p> <p><u>Sites</u> Options to allocate sites for different uses were considered during policy options stage, as described above. These are set out in full in Appendix D of the SA (2018) and are summarised in Section 6 of the SA (2018) and Section 6 of the SA (April 2020). Sites were initially identified through background evidence including the SHLAA, HELA and Call for Sites, as set out in the Site Allocation Topic Paper. Site appraisals using the SA Framework were undertaken for all sites being considered for allocation. The SA site assessment process was not used to reject sites; all sites were considered to</p>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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 potential for allocation, reflecting the high development needs of the city. The SA site assessment process identified mitigation required and formed the basis of the policy appraisal for the relevant site allocation policy. Site appraisals are set out in full in Appendix F of the SA (2018) and Appendix F of the SA (April 2020).				
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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b> The likely significant effects of policies and proposals are assessed in the SA 2018 and SA 2020 as follows: SA 2018: <ul style="list-style-type: none"> <li>• Appendix D: options appraisals</li> <li>• Appendix F: site assessments</li> <li>• Appendix G: policy appraisals</li> </ul> SA 2020: <ul style="list-style-type: none"> <li>• Appendix F: site assessments</li> <li>• Appendix G: policy appraisals</li> </ul>				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				



		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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><b>Reviewer Comments:</b> The SA does not have a separate “conclusion” section</p> <p>Section 9 in SA 2020 summarises the various changes to policies which have been recommended or made as a result on the SA process. Section 8.4 summarises the cumulative impacts of the Plan. Appendix E outlines the likely effects without implementation of the plan. These sections contribute towards concluding the plan is an appropriate strategy.</p>				
<b>18.</b>	<b>Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?</b>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<p><b>Reviewer Comments:</b> A combined Health &amp; Equalities Impact Assessment was undertaken during the preparation of the draft plan and updated during preparation of the proposed submission plan. The HEQIAs included recommendations for individual policies where required. HEQIA 2018: <a href="https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20HEQIA%20June%20202018.pdf">https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20HEQIA%20June%20202018.pdf</a>  HEQIA 2020: <a href="https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/HEQIA%20April%20May%20202020.pdf">https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/HEQIA%20April%20May%20202020.pdf</a></p>				
<b>19.</b>	<b>Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?</b>	-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

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>				
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b> The Habitats Regulation Assessment <a href="https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20%20Hove%20City%20Plan%20Part%202%20HRA%2028%20August%202018.pdf">https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20%20Hove%20City%20Plan%20Part%202%20HRA%2028%20August%202018.pdf</a> was carried out on the draft CPP2 to establish if the Plan might have any likely significant effects on any European sites. Section 3.2 of the HRA lists the other plans and projects which were considered in combination with the draft CPP2. The nature of changes to the Proposed Submission CPP2 did not require the HRA to be updated				
<b>20.</b>	<b>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?</b>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b> The HRA screening report, screened out all potential impacts on European sites with the exception of air quality impacts on the Ashdown Forest SAC, where it concluded that more detailed evidence was needed to satisfy the requirement for 'appropriate assessment' in the HRA Regulations. To address this, AECOM undertook a detailed air quality impact assessment of traffic effects: <a href="https://www.brighton-hove.gov.uk/sites/brightonhove.gov.uk/files/BH%20AQ%20Impact%20Assessment%20Final%20Aug%202018.pdf">https://www.brighton-hove.gov.uk/sites/brightonhove.gov.uk/files/BH%20AQ%20Impact%20Assessment%20Final%20Aug%202018.pdf</a> which concluded that 'growth in Brighton and Hove City will not result in an adverse effect on the integrity of Ashdown Forest SAC either on its own or 'in combination' with other plans and projects'. Natural England was formally consulted as part of the HRA work and has agreed these findings.				
<b>21.</b>	<b>Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?</b>	-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
		<b>Reason for score:</b>				

		<b>Assessment</b>				
	<b>KEY QUESTIONS</b>	<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>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  See response to Q20.				
	<b>Housing Strategy</b>					
<b>22.</b>	<b>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?</b>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action for local plan soundness and/or effectiveness:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  This issue is addressed in detail in the Housing Provision Topic Paper May 2021 accompanying the CPP2 Proposed Submission The City Plan Part 1 (Policy CP1) sets a minimum housing provision target of 13,200 net dwellings to be delivered over the period 2010-2030. Part B of the policy indicates the broad distribution of housing and that this provision is to be delivered from a variety of sources including strategic allocations within the identified Development Areas, other allocations within the built-up area and on the urban fringe, and allowance for small windfall development.  The updated assessment of housing delivery set out in the updated Housing Provision Topic Paper (May 2021) shows potential to deliver 15,096 net dwellings, which would provide a surplus of 1,896 dwellings against the City Plan target. This figure incorporates the proposed site allocations in CPP2 which are (subject to proposed Modifications to the Plan) in total are projected to deliver 3,276 dwellings comprising 1,100 dwellings on the four strategic allocations (Policies SSA1-SSA4), 1,277 dwellings on non-strategic housing and mixed use allocations within the existing built-up area (Policy H1) and 899 dwellings on allocated urban fringe sites (Policy H2) (see Table 3 and accompanying discussion in the Topic Paper).				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>The Council is confident that this identified housing delivery is achievable by the City Plan end date of 2030. It is accepted that the rate of housing delivery since the start of the City Plan period has fallen short of the projected CPP1 target, however the Housing Delivery Action Plan demonstrates that the council is now committed to a range of actions to boost housing delivery, including by accelerating its direct delivery of affordable housing and by taking action to unlock stalled development sites.</p> <p>However, housing delivery rates will be to some extent dependent on general housing market conditions and specific landowner/developer actions which are outside the council's control. For this reason, the identification in the SHLAA of housing potential which exceeds the CPP1 requirement provides greater confidence that the minimum CPP1 target will be met. All of the City Plan site allocation policies (both in CPP1 and CPP2) set minimum housing provision figures, which allows potential for housing totals to be exceeded on individual sites when development proposals come forward at the planning application stage subject to assessment in terms of impact on the highways network and other infrastructure.</p> <p>For these reasons, the Council is confident that, with the site allocations proposed in CPP2, there is a sufficient supply of housing to achieve the City Plan provision target.</p>				
<b>G</b>	<b><i>Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.</i></b>	<p>The Duty to Cooperate paper May 2021 and Statement of Common Ground in Appendix 3 sets out the unmet needs in neighbouring areas and the section 3 lists the formal duty to cooperate request to meeting housing need. As set out in answer to Q3, CPP2 is a 'Part 2' plan and its role is to support the implementation of the overarching development strategy already established in the adopted City Plan Part One, rather than revisit or amend the housing figures. In addition, as explained in Section 3 of the Duty to Cooperate paper, the CPP1 housing provision target falls well below the objectively assessed housing need (OAN) for Brighton &amp; Hove (meeting only 44% of the city's own assessed need) and therefore the Plan is currently unable to provide any surplus housing to meet the needs of neighbouring areas.</p>				
<b>23.</b>	<b>Does your local plan policies update accommodate any of this unmet need where you can sustainably to do so?</b>	-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

		<b>Assessment</b>				
	<b>KEY QUESTIONS</b>	<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>				
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  CPP2 is a 'Part 2' plan and its role is to support the implementation and delivery of the strategic policy framework already set out in the adopted CPP1. CPP1 Policy CP1 sets a minimum housing provision target of 13,200 net dwellings which meets only c44% of the city's total objectively assessed need as identified at the time of the CPP1 examination. The level of housing provision reflects the very significant constraints on the capacity of the city to physically accommodate new development, particularly due to the sea to the south and South Downs National Park adjoining or close to the edge of the existing built-up area to the west, north and east of the city. For this reason, the City Plan is unable to meet any unmet need from neighbouring areas.				
24.	<p>Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period?</p> <p>Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?</p>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  A housing trajectory is included in CPP1 in Annex 3: Housing Implementation Strategy. The trajectory has subsequently been updated on an annual basis in the council's published Strategic Housing Land Availability Assessments (SHLAA) Updates. The most recent published update is the SHLAA Update 2020 (published in February 2021) <a href="https://www.brighton-hove.gov.uk/strategic-housing-land-availability-assessment-shlaa">https://www.brighton-hove.gov.uk/strategic-housing-land-availability-assessment-shlaa</a> Chart A in section 6.8 of the document includes an updated housing trajectory based on monitoring data at 1 April 2020. The housing sites allocated in CPP2 have been incorporated within the overall City Plan trajectory.				

	<b>KEY QUESTIONS</b>	<p align="center"><b>Assessment</b></p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>The Council's Housing Delivery Action Plan 2019 (published January 2021) includes analysis of recent housing delivery and projected future housing supply; assessment of the main barriers and constraints to housing delivery; and sets out the actions which the Council is undertaking to help improve delivery in the future.</p> <p><a href="https://www.brighton-hove.gov.uk/brighton-hove-housing-delivery-action-plan-2019">https://www.brighton-hove.gov.uk/brighton-hove-housing-delivery-action-plan-2019</a></p>				
25.	<p><b>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.</b></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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<p><b>Reviewer Comments:</b></p> <p>The Council currently cannot demonstrate a 5-year supply against the CPP1 minimum housing target. The most recent figures are set out in the SHLAA Update 2020 which shows a 5-year housing shortfall of 342 residential units (equivalent to 4.7 years housing supply). These figures incorporate a 5% buffer consistent with the most recent Housing Delivery Test figures (published January 2021) which show a housing delivery figure of 108% against the City Plan housing target over the period 2017-2020<sup>1</sup>.</p> <p>As set out in answer to Q22, the SHLAA and CPP2 identify sufficient housing to exceed the CPP1 minimum target of 13,200 homes over the period to 2030. However, annual rates of delivery since the start of the City Plan period have fallen short of those required by the CPP1 phased trajectory, which has led to an outstanding housing supply shortfall carried forward from previous years. Both the SHLAA housing trajectory and Housing Delivery Action Plan provide evidence of improving housing delivery with levels of housing completions projected to increase substantially from 2022/23 onwards. This reflects the significant level of residential development already under construction and substantial number of residential planning permissions approved over the past three years. In addition, the Housing Delivery Action Plan demonstrates that the council is now committed to a range of actions to boost housing delivery, including by accelerating its direct delivery of affordable housing and by taking action to unlock stalled development sites.</p>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>				
		<sup>1</sup> It should be noted that the Housing Delivery Test completions figures include allowance for student accommodation and other communal accommodation, however these are not included in the City Plan housing requirement and housing trajectory, and are not counted in the Council's 5-year housing supply figures.				
		-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
		As set out in the updated Housing Provision Topic Paper (May 2021), the most recent assessment of housing delivery shows potential to deliver 15,096 net dwellings over the City Plan period 2010-2030, which would provide a surplus of 1,896 dwellings against the City Plan target. In addition, the City Plan site allocation policies (both in CPP1 and CPP2) set minimum housing provision figures, which allow for the housing totals to be exceeded on individual sites when development proposals come forward at the planning application stage (subject to assessment of development impacts and infrastructure requirements). The housing supply figures therefore include 'head room' which provides some flexibility to accommodate development delays and/or non-implementation of some housing sites.				
		The Housing Delivery Action Plan details a range of actions that the Council is undertaking to increase and accelerate housing delivery. These include:				
		<ul style="list-style-type: none"> <li>• The allocation of housing and mixed use sites in CPP2 (Policies SSA1-SSA4, H1 and H2);</li> <li>• Direct Council delivery of affordable housing through a range of initiatives, principally through the New Homes for Neighbourhoods and Homes for Brighton &amp; Hove Joint Venture programmes;</li> <li>• Partnership working to accelerate delivery and unlock stalled sites drawing on available public funding (e.g Housing Infrastructure Fund and One Public Estate);</li> <li>• Improving communication with housing providers to understand and overcome barriers to development and to accelerate housing delivery (including through improvements to the Council's Planning service).</li> </ul>				
26.	<b>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?</b>					

	<b>KEY QUESTIONS</b>	<p align="center"><b>Assessment</b></p> <p align="center"><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>Housing delivery rates will inevitably be subject to general housing market conditions and specific landowner/developer actions which are outside the Council's control. However, the identification in the SHLAA of housing potential which exceeds the minimum City Plan requirement, allied to the range of Council actions and interventions set out in the Housing Delivery Action Plan, provides confidence that the City Plan minimum housing target will be met.</p>				
27.	<p><b>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?</b></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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<p><b>Reviewer Comments:</b></p> <p>The City Plan housing provision target set in CPP1 Policy CP1 includes provision for 2,015 net dwellings to be delivered on small 'windfall' sites of 5 or less dwellings over the Plan period from 2010-2030. This included 765 net dwellings on small sites already identified (developments which had been completed and those with planning permission), plus an allowance for a further 1,250 net dwellings to come forward on further small windfall sites not yet identified. The City Plan does not include any allowance for 'windfall' development on sites of more than 5 dwellings to avoid any potential double counting with sites identified in the SHLAA and potential/proposed allocations in CPP2.</p> <p>As set out in the updated Housing Provision Topic Paper (May 2021) (Paragraphs 4.9-4.12 and Table 4), 1,461 net dwellings have been completed on small sites over the period 2010-2019 (averaging 146 net dwellings per year). In addition, a further 1,176 net dwellings are projected to come forward through future small windfall development, including 171 net dwellings under construction and a further 239 dwellings from planning permissions not yet started (including a 10% discount for assumed non-implementation). The dwellings supply from small windfall sites is now projected to total 3,047 net dwellings over the period 2010-2030, which is well above the figure assumed in Policy CP1 (+1,032 net dwellings). This reflects the much higher than expected delivery from small sites to date (2010-2020)</p>				



		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>				
		and projected forward. The council is therefore confident that the supply of housing projected from 'windfall' sites will comfortably exceed the assumption made in the Policy CP1 housing provision figures.				
<b>28.</b>	<b>Does the local plan policies update make it clear what size, type and tenure of housing is required?</b>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  The broad size, type and tenure of housing is set out in CPP1 Policy CP19 Housing Mix and its supporting text, based on various detailed housing needs studies (e.g the 2012 Local Housing Requirements Update and 2015 Objectively Assessed Need for Housing).  CPP2 Policy DM1 Housing Quality, Choice and Mix requires that proposals for new residential development incorporate a range of dwelling types, tenures and sizes that reflect and respond to the city's identified housing needs, and makes provision for a range and mix of housing /accommodation formats subject to the character, location and context of the site, for example, self and custom build housing, build for rent, community led housing, starter homes and other types of provision supported by national and local policy.				
<b>29.</b>	<b>Does the local plan policies update specifically address the needs of different groups in the community?</b>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				

	<b>KEY QUESTIONS</b>	<p align="center"><b>Assessment</b></p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>The broad policy for size, type and tenure of housing is set out in CPP1 Policy CP19 Housing Mix and CPP2 Policy DM1 Housing Quality, Choice and Mix (see answer to Q28). In addition, CPP2 includes several policies which address the specialist housing requirements of particular groups – these include Policies DM4 Housing and Accommodation for Older Persons; DM5 Supported Accommodation (Specialist and Vulnerable Needs); and DM6 Build to Rent Housing. The Council commissioned specific evidence studies to support Policies DM4 and DM6. These studies - the Older People Housing Needs Assessment (Nov 2019) and the Build to Rent Viability Study (Aug 2019) - were published alongside the CPP2 Proposed Submission.</p>				
30.	<p>Can your affordable housing requirements, including any geographical variations, be justified?</p> <p>Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?</p>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<p><b>Reviewer Comments:</b></p> <p>Affordable housing needs including housing unit sizes and tenure mix are addressed in City Plan Part 1 (Policy CP20 Affordable Housing) and the accompanying Affordable Housing Brief, rather than in CPP2. The City Plan policy draws on evidence from the council’s Assessment of Affordable Housing Need and Affordable Housing Development Viability Study (both published in 2012) and the subsequent Objective Assessment of Housing Need (2015). However, updated information on local housing need is provided by the Council’s Housing Register and the Council publishes quarterly and annual Housing Market Reports which provide information on local house prices and prices for rented accommodation, together with updated evidence on the affordability of housing for local households.</p> <p>CPP1 Policy CP20 seeks 40% onsite affordable housing in developments of 15 or more (net) dwellings, with lower proportions of affordable housing or equivalent off-site contributions sought on smaller schemes down to 5 dwellings. The CPP1 Annex 1: Implementation and Monitoring Plan sets an overall target to achieve approximately 30% of all housing delivery as affordable housing. However, the policy requirements are constrained by considerations of development viability and are not in themselves sufficient to meet all local affordable housing needs. In addition, particularly since public funding for affordable housing has become less available, many</p>						

	<b>KEY QUESTIONS</b>	<p align="center"><b>Assessment</b></p> <p align="center"><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>residential applications have fallen well short of meeting the policy requirements, particularly those on brownfield sites and mixed use schemes. Largely in response to this, the Council itself has increased its commitment to direct delivery of affordable housing through its 'New Homes for Neighbourhoods' programme and through its Joint Venture programme (Homes for Brighton &amp; Hove) with the Hyde Group.</p> <p>CPP2 will help to maximise the delivery of affordable housing through the allocation of additional strategic sites in Policies SSA1-SSA4 and non-strategic sites in Policies H1 Housing Sites and Mixed Use Sites and H2 Housing Sites – Urban Fringe. The proposed allocations include both privately owned sites where the council would seek a proportion of affordable housing through Policy CP20, but also council-owned sites which form part of the New Homes for Neighbourhoods and Joint Venture programmes where the aim will be to develop 100% affordable housing.</p>				
31.	<p><b>Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?</b></p> <p><b>Does the local plan policies update make adequate provision for the identified needs?</b></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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<p><b>Reviewer Comments:</b></p> <p>The conclusion of the Gypsy and Traveller Accommodation Assessment (2019) is that within the Brighton &amp; Hove Local Planning Authority area (i.e. the City Plan area) there is no need for additional traveller pitches for households that meet the planning definition. There is a need for 11 additional pitches for households that meet the planning definition within the SDNPA planning area that falls within the Brighton &amp; Hove administrative area.</p> <p>Strictly speaking therefore, there is no unmet need for traveller pitches which the City Plan needs to address. However, BHCC has agreed in a Statement of Common Ground with the SDNPA to continue to work jointly to seek to address the need arising in the area of the National Park that falls within the administrative area of Brighton &amp; Hove. This need remains unaddressed.</p>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>				
32.	Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  See response to Q32.				
<b>H</b>	<b>List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery</b>	A comprehensive site search exercise was undertaken jointly with the South Downs National Park Authority (Gypsy & Traveller Site Assessments, Brighton & Hove City Council and the South Downs National Park Authority (2017). A further independent Study was commissioned by the City Council to scrutinise the site selection process undertaken up to that point and to analyse a shortlisted site in more detail (Brighton And Hove Detailed Traveller Site Assessment, 2017). During the assessment process, it was confirmed that the shortlisted site was no longer available as it is being progressed as a Joint Venture with a Registered Provider for 100% affordable housing and is therefore unavailable for alternative uses.				
<b>Justified approaches to plan policy and content</b>						
33.	Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text?	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				

		<b>Assessment</b>				
	<b>KEY QUESTIONS</b>	<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	[You may wish to check each policy setting a threshold]	<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
		<p><b>Policy DM1 Housing Quality, Choice and Mix</b> – criterion c) sets a requirement for developments of 10 or more dwellings to provide 10% of the affordable residential units and 5% of all the residential units as suitable for occupation by a wheelchair user in accordance with Building Regulation M4(3). Justification for this is provided in the supporting text of the policy and in more detail in section 3 of the Space and Accessibility Standards Topic Paper May 2021.</p> <p><b>Policy DM3 Residential Conversions and retention of smaller dwellings</b> – sets a floor area threshold above which conversion of dwellings into smaller units of self-contained accommodation will be granted. The justification for this threshold is set out in section 2 of the Space and Accessibility Standards Topic Paper May 2021 and explained in the supporting text.</p> <p><b>DM7 Houses in Multiple Occupation (HMOs)</b> includes in part 2 certain criteria to further manage the growth and spread of HMOs across the city. The Council’s evidence is set out in ‘Small Houses in Multiple Occupation: evidence to justify a citywide Article 4 Direction’.</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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
		Strategic matters were addressed in the Adopted City Plan Part 1. A number of CPP1 policies indicate that further details were to be addressed in the City Plan Part 2. The City Plan Part 2 complements the adopted City Plan Part 1 by providing more detailed development management policies.				
<b>34.</b>	<b>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 Development Plan Documents or Supplementary Planning Documents and why this is appropriate?</b>					

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>A number of CPP2 policies are supporting by supplementary planning guidance and these documents and role are highlighted in the supporting text of relevant policies:</p> <p>DM18 High Quality Design and Places – refers in supporting text to the draft Urban Design Framework SPD which will provide detailed design guidance, site specific design principles and tall building assessment criteria which would not be appropriate to include in the local plan policies but will positively support the delivery of high quality building and places.</p> <p>DM21 Extensions and Alterations – refers to the adopted 2020 Residential Extensions and Alterations SPD which complements the policy by providing more detailed design guidance.</p> <p>DM23 Shopfronts – policy is supported by detailed design guidance in the adopted SPDO2 Shop Front Design</p> <p>DM24 Advertisements – policy is supported by detailed guidance in the adopted SPD07 Advertisements</p> <p>DM26 Conservation Areas, DM7 Listed Buildings and DM28 Locally Listed Buildings – are supported by SPD06 on Architectural Features</p> <p>DM33 Safe, Sustainable and Active Travel and DM36 Parking and Servicing – are supported by the adopted Parking Standards SPD14 and the parking standards themselves are included as Appendix 2 of the City Plan Part 2.</p> <p>DM37 Green Infrastructure and Nature Conservation – is supported by adopted SPD11 Nature Conservation and Development and SPD06 Trees and Development Sites.</p> <p>DM43 Sustainable Drainage – is support by the 2019 adopted SPD16 Sustainable Drainage which provides more detailed/ technical guidance appropriate to the local circumstances.</p> <p>H1 – Housing Sites - Tables 6 and 7 cross reference to the adopted Shoreham Harbour Joint Area Action Plan site allocation references.</p>				
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?	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
		The City Plan Part 2 contains the following policies that contain hierarchies:				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]	<p><b>Policies DM12 Changes of Use within Regional, Town, District and Local Shopping Centres and DM13 Important Local Parades, Neighbourhood Parades and Individual Shops</b> provide an updated hierarchy of shopping centres in accordance with adopted City Plan Part 1 Policy CP4 Retail Provision and based on monitoring as set out in the 2019 Retail Topic Paper. Please note that the council are proposing main modifications to these policies (See Schedule of Proposed Main and Minor Modifications - Ref SD02) to address the impact of the 1st September UCO changes that came into effect after the Proposed Submission City Plan Part 2 was approved by council for Regulation 19 consultation. This is further explained in the Retail Policies Topic Paper May 2021.</p> <p>Within the Design and Heritage section of the City Plan Part 2 the policies make clear the level of protection afforded to heritage designations in accordance with the NPPF – see policies <b>DM26-DM30</b>.</p> <p><b>Policy DM37 Green Infrastructure and Nature Conservation</b> sets out the level of protection that is afforded to internationally, nationally and locally protected sites reflecting the guidance in NPPF and Habitat Regulations. Please note that following Regulation 19 consultation, Main Modifications are proposed to Policy DM37 address concerns raised by Natural England that this hierarchy was not sufficiently clear (a statement of common ground has been prepared).</p>				
<b>36.</b>	<p><b>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.</b></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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<b>Reviewer Comments:</b>						
<p><b>DM7 Houses in Multiple Occupation (HMOs)</b> includes in part 2 certain criteria to further manage the growth and spread of HMOs across the city. The Council’s evidence set out in ‘Small Houses in Multiple Occupation: evidence to justify a citywide Article 4 Direction’.</p>						

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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><b>Policies DM12 Changes of Use within Regional, Town, District and Local Shopping Centres and DM13 Important Local Parades, Neighbourhood Parades and Individual Shops</b> provide an updated hierarchy of shopping centres in accordance with adopted City Plan Part 1 Policy CP4 Retail Provision and based on monitoring as set out in the 2019 Retail Topic Paper. Please note that the council are proposing main modifications to these policies (See Schedule of Proposed Main and Minor Modifications - Ref SD02) to address the impact of the 1<sup>st</sup> September UCO changes that came into effect after the Proposed Submission City Plan Part 2 was approved by Council for Regulation 19 consultation. This is further explained in the Retail Policies Topic Paper May 2021.</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
37.	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p>	<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
		<p>Whole Plan Viability was undertaken with the City Plan Part 1. The following additional local standards proposed in the CPP2 are considered appropriate and supported by the evidence base, both in terms of need and impact on viability. All include a clear justification as to why they have been set in the supporting text accompanying the policy:</p> <p><b>DM1 Housing Quality, Choice and Mix</b> – includes requirements for the optional nationally described spaces standards (NDSS) and standards and the wider lifetime home and wheelchair user requirement option provisions in Building Regulations M4(2) and M4(3). The justification for these standards are set out in the Space and Accessibility Topic Paper May 2021. The viability implications of applying the NDSS and optional accessibility standards in new residential development have been examined through work commissioned by the Council to support the introduction of a Community Infrastructure Levy (CIL). The Community Infrastructure Levy (CIL) Viability Study (Dixon Searle, 2017 with successive addendums in 2018) included the proposed NDSS and optional accessibility standards (including the required proportions of M4(3) wheelchair housing units) as a standard assumption within all the</p>				



		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>development viability scenarios tested. The standards were further tested in relation to build to rent through the Brighton &amp; Hove Build to Rent Study 2019, Dixon Searle Partnership.</p> <p><b>DM6 Build to Rent</b> – sets the requirement at part 2a) for the provision of up to 20% affordable housing at genuinely affordable housing rents to be agreed with the council. The justification is set out in the supporting text and based on viability evidence set out in the Brighton &amp; Hove Build to Rent Study 2019, Dixon Searle Partnership.</p> <p><b>Policy DM36 Parking and Servicing</b> requires development to provide for sufficient levels of parking in line with the parking standards set out in Appendix 2 of the CPP2. These standards were justified and consulted upon as part of the preparation of adopted SPD14 ‘Parking Standards for New Development’.</p> <p><b>DM44 Energy Efficiency and Renewables</b> - extends the CPP1 CP8 Sustainable Development standard of at least 19% improvement on the carbon emission targets set by Part L to all development as justified by the Brighton &amp; Hove Energy Study 2018 see in particular section 7.2, page 90 which also considered viability. Proposed modifications seek to future proof the policy given the government’s published intention to move ahead with the Future Homes and Buildings Standards with interim uplift expected mid 2022. Policy DM44 at part 2 sets out minimum Energy Performance Certificate (EPC) ratings ahead of the Minimum Energy Efficiency Standards (MEES) Regulations as justified by the Brighton &amp; Hove Energy Study 2018 (see section 5.6, page 78) which also considered viability.</p>				
		<b>Deliverability</b>				
<b>38.</b>	<p><b>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?</b></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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				

	<b>KEY QUESTIONS</b>	<p style="text-align: center;"><b>Assessment</b></p> <p style="text-align: center;"><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>Yes, the viability of all policies has been assessed, including all required development standards, developer contributions and CIL charging requirements. The Community Infrastructure Levy (CIL) Viability Study (Dixon Searle, 2017 with successive addendums in 2018) tested the viability of the council's CIL charging rates (implemented from 5 October 2020) for a wide range of scheme development scenarios (i.e different mixes of uses, scales of development and locations across the city). The viability testing factored in the development standards and developer requirements set out in both adopted CPP1 policies and proposed CPP2 policies. This included:</p> <ul style="list-style-type: none"> <li>• Energy and water – Requirements set in CPP1 Policy CP8 Sustainable Buildings including energy performance for residential development of 19% carbon reduction improvement against Part L (equivalent to Code for Sustainable Homes level 4 in energy use) and the Water efficiency 'optional' standard of 110 litres/person/day.</li> <li>• Residential space and accessibility standards – Requirements proposed in CPP2 Policy DM1 Housing Quality, Choice and Mix for all residential development to meet the NDSS and M4(2) Accessibility standards, with schemes of 10 or more residential units to provide 10% of affordable housing and 5% of all housing units as M4(3) wheelchair user housing.</li> <li>• Affordable housing – The residential mix within scheme development scenarios tested incorporated a range of affordable housing assumptions including starting at 5 units or more and testing up to 40% affordable housing in line with the requirements in CPP1 Policy CP20 Affordable Housing.</li> <li>• Residual s106 developer contributions – An assumption of £3,000/unit was included for non-strategic sites. For strategic sites, detailed infrastructure costs were factored in where known.</li> </ul> <p>As set out in the answer to Q37, CPP2 Policy DM44 Energy Efficiency and Renewables extends the CPP1 Policy CP8 Sustainable Development standard of at least 19% improvement on the carbon emission targets set by Part L to cover all development including non-residential and also sets out minimum Energy Performance Certificate (EPC) ratings ahead of the Minimum Energy Efficiency Standards (MEES) Regulations. Additional analysis of viability to justify this is set out in the Brighton &amp; Hove Energy Study 2018.</p>				
<b>39.</b>	<b>Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?</b>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>				
	Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?	<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  Yes, see response to Q37.				
<b>40.</b>	Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b> City Plan Part One Annex 1 Implementation and Monitoring – sets out the key monitoring indicators and targets and identifies how the City Plan will be implemented. This sets out clear targets and trigger points/ action to be taken if the monitoring targets are not being met.  The CPP2 is accompanied by Proposed CPP2 Implementation and Monitoring Targets document which sets out the proposed monitoring indicators and targets for the policies in the CPP2 and identifies how the CPP2 will be implemented. It is proposed that these monitoring targets will be included in an updated Annexe 1 to the CPP1 which will be updated by way of an addendum following adoption of the CPP2. For certain policy areas, the existing CPP1 monitoring targets are sufficient. Where targets are set care was taken to ensure that they are proportionate, measurable and data is available.				
<b>41.</b>	Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u> ?	-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

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>				
	<b>Where triggers for plan review and/or update are identified are they justified and proportionate?</b>	<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b> Triggers for reviewing the policy approach and development management practices are proportionate for a part 2 plan and cross refer to those set out in the City Plan Part One Annex 1 Implementation and Monitoring.				
<b>Plan effectiveness (and associated policy clarity)</b>						
<b>42.</b>	<b>Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years <u>from adoption</u>? Does the evidence relied on to support those policies correspond/cover this whole period?</b>	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b> CPP2 is a Part 2 plan, so the policies cover the period to 2030 to complement CPP1. This is indicated explicitly in Para 1.5. CPP2 is a Part 2 plan, so the policies cover the period to 2030 to complement CPP1. This is indicated explicitly in Para 1.5.  CPP2 Para 1.1 indicates that CPP1 sets a strategic planning policy framework and contains strategic policies, whilst Para 1.3 states the role of CPP2 to complement the strategic policy framework. Whilst Policies SA7 and SSA1 to SSA7 are explicitly 'strategic'. Policies DM1- DM44, H1-H3 and E1 are considered to be non-strategic policies.  Evidence relied on to support the policies covered the period to 2030.				
<b>43.</b>	<b>Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?</b>	-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

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<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>				
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  Appendix 5 of the Proposed Submission City Plan Part 2 lists the retained Brighton & Hove Local Plan 2005 policies that will be superseded on adoption of the CPP2.				
44.	Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  The policies are considered clear and easily readable, so the purpose of the policy is clear for development management purposes. The supporting text is in general concise and supportive of the policy (setting out and justifying the approach taken/ evidence supporting the particular policies. Following consultation at the draft CPP2 stage, the council has sought to balance representations seeking further detail/ clarification has been sought requested and those seeking more streamlined supporting text.				
45.	For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; <u>and</u> (ii) clearly defined on the Policies Map?  Where you have included maps or graphics within the local plan policies update are	-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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				

		<b>Assessment</b>				
	<b>KEY QUESTIONS</b>	<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>				
	these legible and is it clear if and how they are to be used in decision making?	<p><b>Reviewer Comments:</b></p> <p>Area/ site allocations (SA7, SSA1-7 H1-H3 and E1) are clearly described in the relevant policies through site names in the Plan, illustrative maps (SA7 and H3) in the CPP2 and designations (nature conservation, heritage and development, retail centre boundaries and frontages etc) are all shown on the CPP1 policies map or shown as proposed changes to the Policies Map published as East, West and Central area maps with clear reference to policies in the legend. The proposed changes are also available as an interactive map on the CPP2 webpage. These proposed changes are also described in Appendix 6 Tables 1 and 2 of the CPP2.</p> <p>Tables and figures where included in the CPP2 are there to provide further understanding or clarity for a specific policy (e.g. DM1, DM8, DM12, DM46). Site allocations listed in tables 6-9 are referenced in the relevant Policies (H1-H3).</p>				
46.	Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<p><b>Reviewer Comments:</b></p> <p>The policies in the CPP2 make clear the type of development it will promote by description and/ or by reference to Use Class Order and uses positive wording.</p> <p>A schedule of Proposed Modifications to the Proposed City Plan Part 2 set out proposed changes to policies where the Use Classes Order have changed since the Proposed Submission CPP2 was approved by council for Regulation 19 consultation in April 2020.</p>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<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>				
		A limited number of policies whilst have a general positive wording/ presumption include negative wording in specified circumstances/ criterion for example DM37 Green Infrastructure and Nature Conservation, DM40 Protection of the Environment and Health and DM42 Protecting the Water Environment.				
<b>47.</b>	<p><b>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.</b></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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<p><b>Reviewer Comments:</b></p> <p>Policies make it clear where the policies apply to all development or to certain scales, uses or locations of development.</p>				
<b>I</b>	<p><b>State how many policies are in your local plan update?</b></p> <p><b>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.</b></p>	<p>There are 58 policies in the City Plan Part 2 the majority of these are development management policies.</p> <p>In general, through the CPP2 repetition has been avoided. For strategic site allocations where specific local priorities/ emphasis there are either reference to development management matters/ issues requested to be included by statutory consultees and includes cross reference to other policies such as those in the adopted City Plan Part 1 for clarity.</p> <p>i) With respect to addressing local priorities, there is consistency of wording of criterion in Strategic Site Allocations where these relate to issues such as employment training, or delivery of sewerage network reinforcement but this repetition is considered appropriate.</p> <p>ii) Every effort has been made to avoid replication or repetition of paragraphs in the NPPF but for clarity of overall approach in certain circumstances the wording may reflect the NPPF wording – eg DM6, DM25, DM37.</p>				

		<b>Assessment</b>				
	<b>KEY QUESTIONS</b>	<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>				
		iii) Cross reference is made to higher level policies in the City Plan Part 1 (DM1, DM2, DM4, DM6-DM8, DM11, DM12, DM15, DM17, DM19, DM22, DM25, DM35, DM39, DM44, DM46).  Cross reference to other policies in CPP2 is limited to the following policies (DM1 – DM5, DM15, DM22, DM25, DM39, DM44, SA7, H2)				
48.	Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?  If you find duplication or repetition you may want to take minute to consider whether this is appropriate.	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>  Every effort has been made to avoid unnecessary repetition and to limit cross referencing to other policies to where necessary (for example reference to the higher level CPP1 policy) to address an issue raised by statutory consultee by way of cross reference rather than repetition of issue raised by another policy or for clarity for site allocations to aid the reader and decision maker.				
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				



	<b>KEY QUESTIONS</b>	<p align="center"><b>Assessment</b></p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>The CPP2 does not seek to duplicate other regulatory requirements. Policy H1 Housing Quality, Choice and Mix requires all residential development to meet the nationally described space standards and M4(2) and for proposals of 10 or more units the percentage of units that should meet M4(3) as justified in the enhanced standards for accessibility and this is justified in the Space and Accessibility Standards Topic Paper May 2021. Policy DM25 Telecommunications states that new development or major renovation works to existing buildings should ensure that sufficient ducting space for future digital full fibre connectivity infrastructure is provided as part of the development but this does not go beyond building regulations. Policy DM44 Energy Efficiency and Renewables extends the CPP1 CP8 Sustainable Development standard of at least 19% improvement on the carbon emission targets set by Part L to all development as justified by the Brighton &amp; Hove Energy Study 2018 see in particular section 7.2, page 90. Proposed modifications seek to future proof the policy given the government's published intention to move ahead with the Future Homes and Buildings Standards with interim uplift expected mid 2022. Policy DM44 at part 2 sets out minimum Energy Performance Certificate (EPC) ratings ahead of the Minimum Energy Efficiency Standards (MEES) Regulations as justified by the Brighton &amp; Hove Energy Study 2018 (see section 5.6, page 78)</p>				
50.	<p><b>Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?</b></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
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<p><b>Reviewer Comments:</b></p> <p>Every effort has been made to ensure that the proposed policies avoid ambiguity and that any specific requirements are justified and clear in how they would be applied in the decision-making process. Only one Policy DM22 makes use of the phrase ‘to the council’s satisfaction’ in relation to the need to address specific requirements regarding the felling/ replacement of trees with the council’s arboriculture team. The term ‘where appropriate’ has been used in a handful of policies but the supporting text provides clarification.</p>				