



Habitats Regulations Assessment (HRA)
of the Ipswich Borough Local Plan Core
Strategy and Policies Development Plan
Document Review, Final Draft:
Addendum relating to Proposed Main
Modifications.

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Footprint Contract Reference: 516

Date: 22nd July 2021

Version: Final

Recommended Citation: Liley, D. (2020). Habitats Regulations Assessment (HRA) of the Ipswich Borough Local Plan Core Strategy and Policies Development Plan Document Review, Final Draft: Addendum relating to Proposed Main Modifications. Unpublished report by Footprint Ecology.

Summary

The Conservation of Habitats and Species Regulations 2017 (as amended) require local authorities to assess the impact of their local plan on the internationally important sites for biodiversity in and around their administrative areas. These sites - Special Protection Areas, Special Areas of Conservation and Ramsar sites - are known as European sites. The task is achieved by means of a Habitats Regulations Assessment (HRA).

An HRA asks very specific questions of a plan. Firstly, it 'screens' the plan to identify if there is a risk that certain policies or allocations may have a 'likely significant effect' on a European site, alone or (if necessary) in-combination with other plans and projects. If the risk of likely significant effects can be ruled out, then the plan may be adopted but if they cannot, the plan must be subjected to the greater scrutiny of an 'appropriate assessment' to find out if the plan will have an 'adverse effect on the integrity' of the European sites.

Following an appropriate assessment, a Plan may only be adopted if an adverse effect on the integrity of the site can be ruled out.

This document is an addendum to the HRA for the Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review at Final Draft stage (undertaken in January 2020, with an addendum in May 2020 that reviewed additional pieces of evidence relating to air quality and flood risk) and has been produced alongside the Main Modifications to the Plan. This update should be read alongside the previous HRA report, which was able to conclude that the Plan would not result in adverse effects on European site integrity.

Following Main Modifications of the Core Strategy, the previous HRA conclusions have been checked and all Main Modifications reviewed. None of the Main Modifications change the previous conclusions or findings of the HRA of the Final Draft Plan.

As such, adverse effects on integrity, alone or in-combination are ruled out for all European sites as a result of the Plan at Main Modifications.

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Acknowledgements

Thanks to Anna Roe at Ipswich Borough Council for provision of background material, provision of the draft modifications and comments.

1. Introduction

- 1.1 The Ipswich Borough Council Local Plan Review (the Plan) was submitted to the Secretary of State for independent examination in June 2020. Following the close of the Examination Hearing, in December 2020, the Inspectors wrote to the Council setting out their views on the next steps for the examination of the Plan. This includes public consultation on the Main Modifications identified and discussed during the hearing that are required to make the Plan legally compliant or sound.
- 1.2 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. The most recent amendments (the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019¹) take account of the UK's departure from the EU.
- 1.3 The Habitats Regulations require local authorities to assess the impact of their local plan on the internationally important sites for biodiversity in and around their administrative areas². Together, these Special Protection Areas, Special Areas of Conservation and Ramsar sites are known as European sites. The task is achieved by means of a Habitats Regulations Assessment (HRA).
- 1.4 The HRA for the Plan was finalised in January 2020 (with a subsequent addendum in May 2020 that specifically reviewed further evidence relating to air quality and flood risk) and concluded that at a plan level, the Local Plan Review 2018-2036 will not result in adverse effects on European site integrity. This report is a review of the Core Strategy Main Modifications to check whether they influence findings of the previous HRA. This report should therefore be read alongside the previous 2020 HRA report.
- 1.5 All Modifications have been checked, with the focus on the Main Modifications. Appendix 1 summarises the schedule of Main Modifications to the Core Strategy

¹ The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. See Regulation 4, which also confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

² Regulation 105 *et seq* addresses the assessment of local plans and determines the scope of this HRA alongside recent Government Guidance on the interpretation and application of the Regulations, see <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site> (accessed 24 May 2021)

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DPD with an additional column to record whether the modification has any implications with respect to the 2020 HRA. This provides a record that all modifications have been checked. Section 2 of this report focuses on those modifications that could have implications for the HRA and considers the changes with reference to the 2020 HRA.

2. Implications of Core Strategy DPD Proposed Modifications on the 2020 HRA of the Local Plan

2.1 A check of each modification has identified two changes to the Core Strategy DPD that affect the quantum of growth or locations for development and as such need to be considered in more detail. These are:

- Changes to the overall numbers of dwellings from 8010 to at least 8280 (2018-2036) as set out in modifications to policy CS7 and the supporting text and tables. This level of change is an increase from 445 dwellings per annum to 460 dwellings per annum.
- Policy CS11 (and supporting text) propose extensions to the West Meadows site to provide pitches for Gypsies and Travellers. These are additions to the plan and therefore the implications for the HRA must be checked.

2.2 It should be noted that there are more substantive changes to the quantum and location of growth proposed through the Site Allocations Main Modifications (which are considered in a separate addendum).

Policy CS7 and overall quantum of growth

2.3 The modifications result in an increase level of proposed growth, from 445 to at least 460 per annum. The Council has set out a strategy to meet the requirement through a combination of strategic and more local allocations. In addition, it has reviewed the development potential through an updated Strategic Housing and Employment Land Availability Assessment (SHELAA) published in January 2020. The policy references the need to now allocate land to provide for at least 4,431 houses in the Borough.

2.4 The housing land supply now set out in CS7 is:

- Ipswich Garden Suburb: 1,380 (3,500 minus 205 completions expected late 2036 and 1,915 granted planning permission in January 2020)
- Northern end of Humber Doucy Lane (policy ISPA4) : 449
- Site allocations through policy SP2 of the Site Allocations Plan: 2,880
- Windfall 2023-2036 (50 per annum): 650
- Total: 5,359.

2.5 In the 2020 HRA, likely significant effects were triggered by Policy CS7, with risks identified relating to air and water pollution, water resources, recreation and urbanisation impacts.

- 2.6 In terms of recreation, the appropriate assessment section of the 2020 HRA concluded that the RAMS includes a comprehensive monitoring and review programme that allows for new growth to be incorporated into the programme of avoidance and mitigation measures. The strategy provides for mitigation across administrative boundaries and has numerous opportunities for expansion, and by collecting contributions per dwelling, it is therefore flexible to provide mitigation for varying numbers of houses, at least within the relatively small range of change set out in the modification. As such there is no change to the HRA findings with respect to recreation.
- 2.7 With respect to urbanisation, the appropriate assessment reviewed sites proposed within 1.5km of the Stour and Orwell Estuaries SPA/Ramsar and the overall level of change that might take place within close or direct proximity to the European site. The revised figures in CS7, as set out in the modification, have no meaningful change in the relative proportion of growth within 1.5km and do not affect the HRA conclusions in any way.
- 2.8 For water issues, there is no reference to water quality or supply as current threats or future pressures in the Site Improvement Plan for the Orwell and Stour Estuaries SPA and the supplementary conservation advice³ refers to the risk of eutrophication across the site as low. The 2020 HRA was able to rule out adverse effects on integrity as a result of water issues, including water supply, water quality and flood risk. The relatively small change in the overall quantum of growth do not affect the HRA conclusions in any way.
- 2.9 With respect to air quality, the 2020 HRA considered the potential risks to the Orwell Estuary SPA/Ramsar to be low because of the habitats present and adverse effects on integrity were ruled out, alone or in-combination. The modifications to the plan in terms of housing numbers do not pose any credible further risk, given the relatively small proportionate increase.
- 2.10 The 2020 HRA did highlight that the potential risks from air quality to European sites within Suffolk warrant a co-ordinated approach across local authorities with a comprehensive evidence gathering to inform the next plan review. This recommendation remains relevant.

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<https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK9009121&SiteName=stour&SiteNameDisplay=Stour+and+Orwell+Estuaries+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=8> (accessed 26th May 2021)

Policy CS11 and extensions to the West Meadows site

2.11 Policy CS11 allocates two extensions to the existing West Meadows Gypsy and Traveller site, as shown on the Policies Map. These are:

- IP400a - an extension is proposed to the west of the existing site (0.38ha); and
- IP400b - to the east of the existing site (0.12ha)

2.12 The site is at the far north-west of the Borough and as such located well away (around 7km) from the Orwell Estuary SPA/Ramsar. Due to the location of the site, adverse effects on integrity alone can be eliminated for urbanisation, water issues and air quality and the location means further assessment considering in-combination effects with other plans and projects would not change the outcome of the assessment. Adverse effects on integrity can therefore be ruled out alone or in-combination. For recreation, the site falls within the 13km zone and mitigation is provided through the RAMS, as set out in Policy DM8. This ensures cumulative impacts are addressed and adverse effects on integrity from recreation can therefore be ruled out alone, or in-combination.

3. Formal Integrity Test and Conclusions

- 3.1 The Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review with Proposed Main Modifications has been subjected to an appropriate assessment and integrity test according to the statutory provisions laid out in the Habitats Regulations 2017 as amended.
- 3.2 The HRA of the Final Draft Plan (in 2020) concluded that the Plan would not result in adverse effects on integrity for any European site, alone or in-combination with other plans or projects. Following the Core Strategy Main Modifications, the HRA conclusions have been checked and all Core Strategy Main Modifications reviewed. None of the Main Modifications change the previous conclusions or findings of the HRA of the Final Draft Plan. As such, adverse effects on integrity, alone or in-combination are ruled out for all European sites.

Appendix 1: Schedule of Core Strategy Main Modifications (MMs)

Proposed Main Modifications to the Core Strategy and Policies Development Plan Document of the Local Plan Review and implications in terms of the 2020 HRA. Blue shading reflects rows where the HRA implications need to be checked in further detail.

MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM1	4	Paragraph 1.2	In accordance with the requirement in paragraph 21 of the NPPF for plans to make explicit which policies are strategic policies.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM2	10	Paragraph 2.5	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM3	30	Paragraph 6.8	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared in meeting the area's objectively assessed housing needs, as identified in the most up to date Standard Method calculation of housing need, and to ensure it is consistent with national policy in addressing climate change.	Objective 2 sets out an increase in the number of dwellings by 270, to 2,820. This is a relatively small proportionate increase but must be checked against the HRA conclusions. Policy CS7 provides the detail.
MM4	31	Paragraph 6.13	In accordance with the requirement in paragraph 16(d) of the NPPF (2019) for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM5	32	Paragraph 6.16	In accordance with paragraph 35 of the NPPF, to ensure the Plan is justified as an appropriate strategy based on proportionate evidence.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM6	34	Paragraph 7.2	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM7	35	Diagram 3	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM8	37	Paragraph 8.9	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared in meeting the area's objectively assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.	None, the modification does not result in any increases to the proposed quantum or location of development or affect the HRA findings in any way.
MM9	38	Table 8.1	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared in meeting the area's objectively assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM10	39	Table 8.3	To reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM11	39	New Paragraph	For soundness, to ensure the Plan is justified as an appropriate strategy in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. The 23.2ha figure for the scale of employment growth was assessed in the 2020 HRA.
MM12	39	Policy ISPA1	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is positively prepared in meeting	None, the modification does not result in any increases to the proposed quantum or location of development or affect the HRA

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			the area's objectively assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.	findings in any way. Sets out a proportionately small decrease in the number dwellings within the HMA. .
MM13	40	Paragraph 8.19	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in respect of cross-boundary strategic matters and deliverable.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. The text is supporting text to the policy and relates to an ambition and general support for the northern route. The route is not actually proposed within the plan.
MM14	40	Policy ISPA2	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared and effective in providing for strategic infrastructure and cross boundary matters.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM15	40	Paragraph 8.21	In accordance with the requirement in paragraph 16(d) of the NPPF for the Plan to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM16	41	Policy ISPA3	In accordance with the requirement in paragraph 16(d) of the NPPF (2019) for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM17	41	Policy ISPA4	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the policy is justified, effective in progressing a cross boundary strategic matter and consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. The modifications retain the requirement for project level HRA and sets out the need for SANG to be delivered.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM18	42	Paragraph 8.24	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared and effective in the delivery cross-boundary strategic matters.	None, the modification does not result in any increases to the proposed quantum or location of development or affect the HRA findings in any way.
MM19	42	Paragraph 8.26	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM20	42	New Paragraph	In accordance with the requirement in paragraph 16d) of the NPPF (2019) to ensure the Plan to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. The new text includes positive elements for biodiversity, with reference to net gain and tree protection.
MM21	42	Paragraph 8.27	In accordance with the requirement in paragraph 16d) of the NPPF (2019) to ensure the Plan to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM22	42	Paragraph 8.28	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for the Plan to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM23	44	Policy CS1	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM24	45	Paragraph 8.44	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified based on proportionate evidence.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM25	45	Paragraph 8.45	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified based on proportionate evidence..	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM26	48-49	Policy CS2	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective and consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM27	49	Paragraph 8.55	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified and consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM28	49	Paragraph 8.58	In accordance with the requirement in paragraph 16(d) of the NPPF (2019) for policies to be clear and unambiguous and to ensure the Plan is justified as an appropriate strategy based on proportionate evidence.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM29	52	Policy CS3	In accordance with the requirement in paragraph 16(d) of the NPPF (2019) for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM30	53	Paragraph below Policy CS3	In accordance with the requirement in paragraph 16(d) of the NPPF (2019) for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM31	55	Policy CS4 – g	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM32	57	Paragraph 8.78	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM33	60	Policy CS5	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified and consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM34	63	Paragraph 8.104	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared in meeting the area’s objectively assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.	Sets out an increase in the number of dwellings by 270, to 2,820. This is a relatively small proportionate increase but must be checked against the HRA conclusions. This is supporting text to CS7.
MM35	64	Table 3: Housing Land Supply and Minimum Requirement	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is positively prepared in meeting the area’s objectively assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.	Provides further detail on the figures used in CS7 and the implications of the increased number of dwellings needs to be checked.
MM36	65 – 66	Policy CS7	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is positively prepared in meeting the area’s objectively assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.	Sets out an increase in the number of dwellings by 270, to 2,820. This is a relatively small proportionate increase but must be checked against the HRA conclusions.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM37	66	Paragraph 8.109	In accordance with the requirement in paragraph 16d) of the NPPF (2019) for policies to be clear and unambiguous and to ensure the Plan is justified in accordance with the tests of soundness in paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM38	66	Paragraph 8.111	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM39	67	New Diagram	For soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM40	68	Table 4: Estimated Housing Delivery	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is positively prepared in meeting the area's objectively assessed housing needs, as identified in the most up to date Standard Method for calculating housing need.	Provides further detail on the figures used in CS7 and the implications of the increased number of dwellings needs to be checked.
MM41	69	Policy CS8	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. The modifications include an insertion that the size for the Country Park is a minimum and this strengthens the policy with respect to mitigation.
MM42	70	Paragraph 8.118	To reflect the change in national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM43	74-76	Policy CS10	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous, and for soundness in accordance with paragraph 35 of the NPPF, and, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM44	76	Paragraph 8.129	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is positively prepared in meeting the area's objectively assessed housing needs, as identified in the most up to date the Standard Method for calculating housing need.	Sets out an increase in the number of dwellings by 270, to 2,820. This is a relatively small proportionate increase but must be checked against the HRA conclusions.
MM45	80	Paragraph 8.139	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM46	80	Paragraph 8.140	For soundness in accordance with paragraph 35 of the NPPF and the 2015 Planning Policy for Traveller Sites, to ensure the Plan is positively prepared and consistent with national policy in respect of the provision of need for gypsy and traveller accommodation.	None, the modification does not result in any increases to the proposed quantum or location of development or affect the HRA findings in any way.
MM47	80	New Paragraph	For soundness in accordance with paragraph 35 of the NPPF and the 2015 Planning Policy for Traveller Sites, to ensure the Plan is positively prepared and consistent with national policy in respect of the provision of need for gypsy and traveller accommodation.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. The 23.2ha figure for the scale of employment growth was assessed in the 2020 HRA.

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MM48	80	Paragraph 8.141	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in addressing cross-boundary issues.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM49	80-81	Policy CS11	For soundness in accordance with paragraph 35 of the NPPF and the 2015 Planning Policy for Traveller Sites, to ensure the Plan is positively prepared and consistent with national policy in respect of the provision of need for gypsy and traveller accommodation.	New text proposes extensions to the West Meadows site and this needs checking for any HRA implications.
MM50	81	Paragraph 8.143	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM51	81	Paragraph 8.144	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in addressing cross-boundary issues.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM52	81	Paragraph 8.145	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM53	82	Paragraph 8.147	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified based on the evidence.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM54	83	Paragraph 8.150	To reflect the change in national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM55	83	Policy CS12	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified based on the evidence and consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM56	84	Paragraph 8.153	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF to ensure the policy is justified as an appropriate strategy based on the evidence.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM57	86	Policy CS13	For soundness in accordance with paragraph 35 of the NPPF, to ensure that Plan is positively prepared in meeting employment needs and consistent with national policy in respect of the changes to the UCO in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM58	87	Paragraph 8.166	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and to reflect the changes to the UCO under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. The change from a set figure to a minimum level has no implications for the HRA at this strategic level.
MM59	87	Paragraph 8.169	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified as an appropriate strategy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. The change from a set figure to a minimum level has no implications for the HRA at this strategic level.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM60	88	Paragraph 8.170	To reflect the changes to the UCO under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM61	88	New Paragraph	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy in respect of changes to the Use Classes Order and permitted development rights under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM62	89-90	Policy CS14	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM63	90	Paragraph 8.182	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM64	94-95	Policy CS16	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM65	97	Paragraph 8.212	In accordance with the requirement in paragraph 16(d) of the NPPF (2019) for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM66	97-98	Policy CS17	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared in meeting the development needs of the borough.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM67	98	Paragraph 8.215	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, as the provision of affordable housing is not infrastructure.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM68	101	Policy CS19	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared to meet the development and infrastructure needs of the borough and In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous .	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM69	101	Paragraph 8.229	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM70	101	Paragraph 8.230	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM71	104	Paragraph 8.240	In accordance with the requirement in paragraph 16(d) of the NPPF (2019) for policies to be clear and unambiguous and for soundness to ensure the Plan is effective in dealing with cross-boundary strategic matters.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM72	105	Paragraph 8.247	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. For avoidance of doubt, any Upper Orwell Crossing will be well outside the Stour and Orwell Estuaries SPA/Ramsar.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM73	105	Paragraph 8.249	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM74	105 – 106	Paragraph 8.250	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in dealing with cross-boundary strategic matters.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM75	108	Policy DM1	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM76	110	Policy DM2	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy as set out in the March 2015 Written Ministerial Statement.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM77	111	Paragraph 9.3.1	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM78	113	Policy DM4	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM79	114	Paragraph 9.4.5	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM80	115	Paragraph 9.4.6	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM81	115	Paragraph 9.4.9	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM82	115	Paragraph 9.4.10	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified based on proportionate evidence.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM83	117	Policy DM5	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM84	123	Policy DM8	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	New wording strengthens the policy with respect to the Habitats Regulations and need for mitigation for recreation impacts. The mitigation for recreation impacts is addressed in the appropriate assessment section of the 2020 HRA. The modifications do not affect the previous HRA conclusions.
MM85	124	Paragraph 9.8.2	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in dealing with cross-boundary strategic matters .	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. The text clarifies and strengthens the mitigation requirements with respect to recreation impacts.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM86	129	Policy DM10	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM87	130	Paragraph 9.10.6	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM88	131	Policy DM11	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM89	131	Paragraph 9.11.3	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM90	133	Policy DM12	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM91	135	New Paragraph	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM92	135	Paragraph 9.12.13	To reflect changes in national policy and guidance.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM93	137-138	Policy DM13	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
			soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	
MM94	144	Paragraph 9.14.5	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM95	144	New Paragraph	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM96	145	Policy DM15	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective and consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM97	149	Policy DM17	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. The insertion of the cross-reference to DM8 ensures protection for European sites
MM98	150	Policy DM18	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM99	156	Policy DM21	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF,	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
			to ensure the Plan is justified, effective and consistent with national policy.	
MM100	157 & 158	Paragraph 9.21.7	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM101	158	Paragraph 9.21.8	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM102	159	Policy DM22	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in dealing with the cross-boundary strategic issue of traffic growth management.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM103	160	Paragraph 9.22.8 & New Paragraph	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is effective in dealing with the cross-boundary strategic issue of traffic growth management.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM104	161	Policy DM23	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM105	162	Paragraph 9.23.4	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM106	162	Para 9.23.6	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM107	163 & 164	Policy DM24	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM108	168	Policy DM26	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM109	170	Paragraph 9.27.1	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM110	170-171	Policy DM27	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous, for soundness in accordance with paragraph 35 of the NPPF, and, to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM111	171 & 172	Paragraph 9.27.3	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM112	172	Paragraph 9.27.5	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM113	172	Paragraph 9.27.6	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM114	172	Paragraph 9.27.7	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM115	173	Paragraph 9.27.10	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM116	173	Paragraph 9.27.11	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM117	173	Paragraph 9.27.12	For soundness in accordance with paragraph 35 of the NPPF and to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM118	173	Paragraph 9.27.15	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM119	174	Paragraph 9.27.16	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM120	175	Policy DM28	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM121	178-179	Policy DM30	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous, for soundness in accordance with paragraph 35 of the NPPF, and, to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM122	179	Paragraph 9.30.4	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM123	180	Paragraph 9.30.8	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM124	180	Paragraph 9.30.9	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM125	180	Paragraph 9.30.10	To ensure the Plan is consistent with national policy in terms of reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM126	181	Policy DM31	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM127	181	Paragraph 9.31.3	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM128	182	Policy DM32	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM129	183	Paragraph 9.32.5	To ensure the Plan is consistent with national policy in terms of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM130	183	Paragraph 9.32.6	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM131	184	Policy DM33	For soundness in accordance with paragraph 35 of the NPPF and to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM132	184-185	Paragraph 9.33.1	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy and to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM133	185	Paragraph 9.33.3	To reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM134	185	Paragraph 9.33.4	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is justified and consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM135	185	Paragraph 9.33.7	To reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and ensure consistency with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM136	188	Paragraph 10.8	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM137	190 – 201	Table 8A	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is positively prepared and justified.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM138	207 – 211	Chapter 11	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM139	207	Paragraph 11.3	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM140	207	Objective 1	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM141	207	Objective 2	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	Reference to the increase in the number of dwellings by 270, to 2,820. This is a relatively small proportionate increase but must be checked against the HRA conclusions.
MM142	208	Objective 4	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM143	208	Objective 5	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM144	209	Objective 6	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM145	209	Objective 7	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM146	210	Objective 8	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM147	210	Objective 9	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way. Monitoring of RAMS mii
MM148	210	Objective 10	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM149	211	Objective 11	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way.
MM150	211	Objective 12	For soundness in accordance with paragraph 35 of the NPPF to ensure the Plan is justified and effective.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM151	212	Paragraph 12.1 & New Paragraph	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous, and for soundness to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way
MM152	220	Appendix 5	For soundness in accordance with paragraph 35 of the NPPF, to ensure the Plan is consistent with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way
MM153	223	Appendix 5	To reflect modifications to Policy DM23.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way
MM154	223	Appendix 5	To reflect change in national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way
MM155	226	Appendix 5	To reflect the most up to date position in terms of Planning Practice Guidance.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way
MM156	230	Appendix 5	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way
MM157	230-231	Appendix 5	To reflect The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, to ensure consistency with national policy.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way
MM158	232	Appendix 6	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way

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MM	Page of Core Strategy and Policies DPD Review (as submitted)	Policy/ Paragraph of Page of Core Strategy and Policies DPD Review	Reason	Implications for 2020 HRA findings
MM159	237	New Appendix	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way
MM160	N/A	Plan 2: Flood Risk	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way
MM161	N/A	Plan 5: Ipswich Ecological Network	In accordance with the requirement in paragraph 16(d) of the NPPF for policies to be clear and unambiguous and for soundness in accordance with paragraph 35 of the NPPF.	None, the modification does not result in any changes to the proposed quantum or location of development or affect the HRA findings in any way