

Local Plan Legal Compliance Checklist (April 2013)

This checklist has been updated for PAS by SNR Denton. It supersedes the previous checklist and is based on Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012. It should be used with the Soundness Self Assessment Checklist (also updated January 2013).

Remember that the evidence you provide to support your plan should be relevant and proportionate. Please don't use this checklist as a reason to assemble more than is needed.

Glossary:

"Act" means the Planning and Compulsory Purchase Act 2004 (as amended)

"NPPF" means the National Planning Policy Framework published March 2012

"Regulations" means the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012

LDS means **Local Development Scheme**

SCI means **Statement of Community Involvement**

DPD means **Development Plan Document**

Stage one: The early stages

Where the 'possible evidence' column refers to a document that will not be complete until a later stage (for example, the sustainability appraisal report), documents that will contribute to that report are relevant at the earlier stages. This way, the submitted report provides the evidence at submission, with an audit trail back to its source.

In terms of legal compliance, the main issues for the early stage are in relation to:

- planning for community engagement
- planning the sustainability appraisal (including consultation with the statutory environment consultation bodies)
- identifying significant cross boundary and inter-authority issues
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.



Regulation 17 notes that a statement setting out which bodies and people the council invited to make representations under Regulation 18 is one of the proposed submission documents. In this tool, the term 'consultation statement' is used to describe this statement.

Section 33A of the Act (introduced by the Localism Act 2011) introduces a duty to cooperate as a mechanism to ensure that local planning authorities and other bodies engage with each other on issues which are likely to have a significant effect on more than one planning area. This pervades every stage of the plan preparation. A plan may be found unsound if a council cannot show that it has taken reasonable steps to comply with the duty.

Note: In this document the Proposed Submission Core Strategy and Policies Development Plan Document Review is referred to as the 'Core Strategy Review', and the Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document is referred to as the 'Site Allocations Plan'. Reference numbers in brackets (e.g. ICD01) refer to the Core Document Library.



Stage one: The beginning

Activity	Legal require- ment	Guidance reference	Additional notes	ossible evidence	
1. Is the DPD identified in the adopted LDS? Have you recorded the timetable for its production?	The Act section 15(2) and section 19(1)	NPPF para 153		 The adopted LDS at the time of commencement, publication and submiss the DPD The relevant authority monitoring report (if changes need to be explained) Core Strategy Review Commencement LDS: LDS 6, July 2012 (scheduled commencement for October 2012 – actual October 2012). Publication LDS: LDS 8th Edition, September 2014 (scheduled publication November-December 2014, actual December 2014 - March 2015) (ICD02 Submission LDS: LDS 9th Edition, October 2015 (scheduled submission December 15; expected actual December 2015 (ICD02a). Site Allocations Plan Commencement LDS: LDS 1, January 2005 (ICD02b) Publication LDS: LDS 8th Edition, September 2014 (scheduled publication November-December 2014, actual December 2014 - March 2015) (ICD02 Submission LDS: LDS 9th Edition, October 2015 (scheduled submission December 15; expected actual December 2015 (ICD02a). LDS 6, July 2012, combined the Site Allocations DPD and the IP-One Are Action Plan DPD (see paragraph 5.5 and 5.6). (ICD02c) 	. N/A for 2). for 2).
How will community	The Act section	NPPF paras 150,	If the SCI is up- to-date, use	Current 'in effect' LDS is the 9 th Edition, October 2015 (ICD02a) The SCI. Community engagement has been undertaken in accordance with the following:	/ith



Activity	Legal require- ment	Guidance reference	Additional notes	Possible evidence
be programmed into the preparation of the DPD?	Regulation 18	157	out any changes to community engagement as a result of changes in legislation.	Core Strategy Review Ipswich Statement of Community Involvement (SCI) Sept 2007 for the informal consultation stage January 2014 (ICD01); Ipswich SCI Review March 2014 (SUCD27) for publication stage. Site Allocations Plan Town and Country Planning (Local Development) (England) Regulations 2004 for the early front loading including issues and options June 2006 and March 2007. Ipswich Statement of Community Involvement (SCI) Sept 2007 for the preferred options consultation 2008 (ICD01) and the informal consultation stage January 2014; Ipswich SCI Review March 2014 (SUCD27) for publication stage. iii. Consultation Statements have been published for the Core Strategy Review and the Site Allocations Plan dated November 2014, September 2015 and December 2015 (Core Document Library SUCD15 to 20). iii. Executive reports – at each stage, the reports considered by the Council's Executive set out the approach to community consultation. E.g. see report to Executive 4 th November 2014 (item 5, reference E/14/45) sections 7 and 8 https://democracy.ipswich.gov.uk/documents/g1350/Public%20reports%20pack%2004th-Nov-2014%2018.00%20Executive.pdf?T=10
3. Have you considered the	Regulation 18	NPPF paras 4.25 -4.26	Regulation 2 defines the general and	 i. The SCI SCI September 2007 (Appendix 3) (ICD01) and SCI Review March 2014 (Appendix 1) (SUCD27) outline the specific and general consultation bodies



Activity	Legal require- ment	Guidance reference	Additional notes	Possible evidence
appropriate bodies you should consult?			specific consultation bodies. The possible evidence may duplicate each other. Only use what you need to.	that the Council should consult. The Council also maintains a Local Plan database containing up to date contact details of key consultees. It is updated after every consultation exercise. ii. Reports and decisions setting out the approach to specific and general consultation bodies Executive and/or council reports about the local plan set out the approach to consultation (see e.g. report to Executive 4 th November 2014 (item 5, reference E/14/45) sections 7 and 8 https://democracy.ipswich.gov.uk/documents/g1350/Public%20reports%20pack%2004th-Nov-2014%2018.00%20Executive.pdf?T=10 iii. Consultation statement – separate consultation statements have been published for the Core Strategy Review and Site Allocations Plan dated November 2014, September 2015 and December 2015. E.g. para 4.1 of the Core Strategy Review Consultation Statement November 2014 indicates that the specific consultation bodies were written to (SUCD15 to 20).
4. How you will co-operate with other local planning authorities, including counties, and prescribed bodies, to identify and address any issues or strategic	The Act section 33A(1)(a) and (b), section 33A(3)(d) (e) & (4) The Act Section 20(5)(c)	NPPF paras 178 to 181 (which comprise the guidance referred to in the Act section 33A(7))	Section 33A(4) defines a "strategic matter". Under section 33A(6) the required engagement includes considering joint approaches to	 i. Reports and decisions setting out the approach to be taken ii. Consultation statement The SCI Review 2014 (SUCD27) identifies the consultation bodies in relation to the Duty to Co-operate. A 'Statement of Compliance with the Duty to Co-operate' was published in November 2014 alongside the proposed submission draft DPDs (LPCD37). The Statement identifies the key strategic issues for Ipswich Local Plan and what work has been undertaken to address the issues with neighbouring authorities, Suffolk County Council, NALEP, and others. The Duty to Cooperate Statement



Activity	Legal require- ment	Guidance reference	Additional notes	Possible evidence
priorities that will have a significant impact on at least two planning areas?	Regulation 4	Under NPPF Para 182, to be 'Effective' a plan should be based on effective joint working on cross- boundary strategic priorities. Strategic priorities are listed at NPPF Para 156	the plan making activities (including the preparatory activities) and considering whether to agree joint local development documents under section 28. The bodies prescribed by section 33A(1)(c) are set out at Regulation 4(1).	was updated at August 2015 (LPCD46) and December 2015 (SUCD21).
5. How you will co-operate with any local enterprise partnerships (LEP) or local nature partnerships	The Act section 33A(1)(c) and section 33A(9), section 33A(3)(d)	NPPF paras 178 to 181	Section 33A(4) defines a "strategic matter". Strategic priorities are listed at NPPF	i. Reports and decisions setting out the approach to be taken.ii. Consultation statementSee 4 above.



Activity	Legal require- ment	Guidance reference	Additional notes	Possible evidence
(LNP) to identify and address any issues or strategic priorities that will have a significant impact on at least two planning areas?	and (e) The Act section 20(5)(c). Regulation 4		Para 156. Regulation 4(2) prescribes LEPs and LNPs for the purposes of section 33A(9). Under section 33A(6) the required engagement includes consulting on joint approaches to relevant activities.	
6. Is baseline information being collected and evidence being gathered to keep the matters which affect the development of the area under	The Act section13	NPPF paras 158 - 177		 i. Documents dealing with collection of baseline information ii. Relevant technical studies iii. The annual monitoring report Relevant documents are as follows for both DPDs: Core Document Library (which includes key evidence studies) – available online https://www.ipswich.gov.uk/content/core-document-library-local-plan-documents SA Scoping Report October 2013 and update letter September 2014 both in the Core Document Library (refs. LPCD24 and LPCD25) Appendix B sets out baseline data. Authority Monitoring Reports (published annually) – latest December 2015



Activity	Legal require- ment	Guidance reference	Additional notes	Possible evidence
review?				for monitoring year April 2014-March 2015, (reference ICD03a)
				 Topic Papers published to support the draft proposed submission DPDs in December 2014 (LPCD28-35) and updated October 2015 (LPCD38-45):
				Housing topic paper
				Ipswich Garden Suburb topic paper
				Employment topic paper
				Infrastructure topic paper
				Green Infrastructure Provision topic paper
				Development Management Policies topic paper
				Town Centre and Retail topic paper
				Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document topic paper.
				SA reports also set out baseline data in appendices (SUCD9 and 10).
7. Is baseline	The Act	NPPF		i. Sustainability report scoping document
information being	section19(5	paras 165 and 167		ii. Sustainability appraisal report
collected and evidence being		Strategic Environme ntal Assessme nt Guide, chapter 5		Yes – see number 6 above for Sustainability Appraisal (SA) scoping reports.
gathered to set the framework for the				Interim SA Report published for each DPD December 2013 (Core Document Library refs. LPCD22 Site Allocations Plan Interim SA; LPCD19 Core Strategy Focused Review Interim SA).
sustainability appraisal?				Publication stage SA reports (incorporating SEA) published December 2014 (Core Strategy Review LPCD47; Site Allocations Plan LPCD49).



Activity	Legal require- ment	Guidance reference	Additional notes	Possible evidence	
				Submission stage SA reports published December 2015 (SUCD9-10).	
8. Have you consulted the statutory environment consultation bodies for five weeks on the scope and level of detail of the environmenta I information to be included in the sustainability appraisal report?	Regulations 9 and 13 of The Environmen tal Assessment of Plans and Programme s Regulations 2004 No 1633.	NPPF paras 165 and 167 SEA Guide chapter 3	The Strategic Environmental Assessment consultation bodies are also amongst the 'specific consultation bodies' which are defined in Regulation 2).	Copies of the consultation letters sent to and any responses from the bodies Yes. SA scoping consultation took place 25 th October – 28 th November 2013. Organisations contacted included the three statutory bodies (Natural England, English Heritage, Environment Agency) plus organisations which were known to have an interest or who would potentially have a view on the baseline data identified in the SA appendix (e.g. crime data, health data, environmental data): • Local authorities – Suffolk County Council, Suffolk Coastal District Council, Babergh / Mid Suffolk District Council; • New Anglia LEP and Wild Anglia; • Anglian Water • Suffolk Wildlife Trust • Save our Country Spaces and Northern Fringe Protection Group • Ipswich Society • Sustrans • National Grid • Suffolk Constabulary • NHS & East Suffolk Clinical Commissioning Group Also a further 5 weeks' consultation conducted 3 rd September – 7 th October 2014 further to the Council's decision to undertake a full Core Strategy review rather than a focused review (same consultees). Scoping Report comments and responses are summarised in Appendix D (Core	



Activity	Legal require- ment	Guidance reference	Additional Possible evidence notes	
				Strategy Focused Review) and C (Site Allocations DPD) to the Interim SA reports, December 2013 (LPCD19 and LPCD22).
				A Sustainability Appraisal audit trail table is attached as Appendix 1 to this checklist.



Stage two: Plan preparation - frontloading phase

Information assembled during this phase contributes to:

- showing that the procedures have been complied with
- demonstrating cooperation with statutory cooperation bodies
- developing alternatives and options and appraising them through sustainability appraisal and against evidence.

The council should record actions taken during this phase as they will be needed to show that the plan meets the legal requirements. They will also show that a realistic and reasonable approach has been taken to plan preparation.



Stage two: Plan preparation

Plan preparation refers to Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012. This relates to the following stages of plan preparation:

Core Strategy Review:

Call for Ideas (consultation February – March 2013)

Draft Core Strategy and Policies Development Plan Document Focused Review (consultation January – March 2014)

Site Allocations Plan¹:

Issues gathering (consultation 2005)

Issues and Option (consultation June – July 2006)

Further Issues and Options (consultation February – March 2007)

Preferred Options (consultation January – March 2008)

Call for Sites (consultation February – March 2013) (following combining of the two previous plans)

Draft Site Allocations and Policies (Incorporating IP-One Area action Plan) DPD (consultation January – March 2014)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
the specific consultation bodies? the general consultation bodies that have an interest in the subject of the DPD and invited them to make	Regulation 18(1) and (2)(a) (b)	NPPF paras 159 – 173	Specific and general consultation bodies are defined in Regulation 2.	 i. Consultation statement ii. Copies of documents consulting these bodies iii. Record of discussions iv. Copies of representations made v. A brief statement setting out the reasons why any bodies have been omitted from or included in consultation See November 2014 Pre-Submission Consultation Statements (SUCD15 and 18). The Consultation Statements detail all consultations undertaken under Regulation 18 including who was consulted, how the consultation was carried out, summaries of

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¹ Note the first four stages were undertaken in respect of separate Site Allocations and IP-One Area Action Plan Development Plan Documents



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
representations about its contents?				representations made and how the Council has responded to the key issues raised.
				For the Site Allocations plan the comments received at Issues and Options stage are detailed in the Comments Analysis Papers (see LPCD04 and LPCD05a). All other comments are contained within the November 2014 Consultation Statements (SUCD15 and 18).
				Discussions with key bodies are referred to in the Duty to Cooperate Statement which has been through three iterations (LPCD37, LPCD46, and SUCD21).
				Copies of correspondence can be made available if required.
				'Specific Consultation Bodies', as defined in Regulation 2 of the 2012 Regulations ² , have all been consulted at each stage where their operations are relevant to the Ipswich Local Plan (as per Regulation 18(2)(a) of these Regulations). Note that the initial stages of production of the Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD were conducted under the Town and Country Planning (Local Development) (England) Regulations 2004 and subsequent amendments, and those bodies listed as 'Specific Consultation Bodies' within those Regulations were consulted where relevant. The Council's local plan mailing list includes almost 200 entries for specific

² Town and Country Planning (Local Planning) (England) Regulations 2012



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				consultation bodies, some of whom are contacted by letter and some by e-mail. ³ An extract from the mailing list could be made available if necessary.
2. Are you inviting representations from people resident or carrying out business in your area about the content of the DPD?	Regulation 18(1) and (2)(c)	NPPF paras 159 – 173		 i. Consultation statement ii. Copies of documents consulting these persons iii. Record of discussions iv. Copies of representations made The November 2014 Pre-Submission Consultation Statements (SUCD15 and SUCD18) show how people resident or carrying out business in the area were consulted. At each consultation carried out under Regulation 18, the Council has consulted all those on its planning policy consultation database at the time of consultation (this currently includes approximately 2,500 names). This includes residents and businesses who have asked to be included on the database or who have responded to previous planning policy consultations.
3. Are you engaging with stakeholders responsible for delivery of the strategy?	Regulation 18	NPPF para 155	NPPF paras 160- 171 4.29 give examples of relevant bodies which should be consulted.	 i. Consultation statement ii. Copies of documents consulting these people iii. Record of discussions The Council contacted landowners of sites proposed for allocation during 2008, 2011 and 2013 to ascertain their future intentions for the sites. This informed the inclusion of sites and the indication of whether sites would be likely to come forward during the short, medium or long term. Landowners have been contacted again prior to submission, in November 2015, to ascertain whether their intentions for the sites remain unchanged.

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³ IBC Local Plan mailing list at July 2015 consists of 89 entries for 'specifics – letter' and 110 for 'specifics-e-mail'



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				The Council maintains regular contact with Suffolk County Council, including through the Ipswich Policy Area Board. Particular areas of the strategy resulting from engagement with the County Council include proposals relating to the need for a new primary school and requirements for transport.
				The Council has engaged with the Environment Agency over the delivery of the tidal barrier which is programmed to be in place in 2017.
				The Council works with neighbouring local authorities through the Ipswich Policy Area Board. This is described in the Duty to Cooperate Statement in relation to key strategic issues. The Board papers are also published online https://www.ipswich.gov.uk/content/ipswich-policy-area and included in the Core Document Library (SCD42).
				Further information is contained in the Duty to Cooperate statement (LPCD37).
4. Are you taking into	Regulation 18(3)	NPPF	Evidence from	i. Consultation statement
account representations		para 155	participation is part of the justification.	ii. Any reports on the selection of alternatives and options for the DPD
made?			Show how you have taken representations into account.	The November 2014 Pre-Submission Consultation Statements (SUCD15 and SUCD 18) show how the comments made have been taken into account.
				In respect of comments on the Strategic Environmental Assessment / Sustainability Appraisal, the audit trail table at Appendix 1 shows where the Council has responded to these as the summaries and IBC responses are recorded in various documents.



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
5. Does the consultation contribute to the development and sustainability appraisal of alternatives?	The Act section19(5) Regulations 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF paras 165 – 168 SEA Guide, chapter 3		 i. Consultation statement ii. Any reports on the selection of alternatives and options for the DPD iii. Sustainability appraisal report Consultation on Issues and Options took place in 2006 (LPCD03 and LPCD05). These papers presented a series of options (alternatives) upon which comments were invited. The comments received on these options are detailed in the Comments Analysis Papers (LPCD04 and LPCD05a) and these informed the production of the Preferred Options which were consulted on in November 2007. Following the Preferred Options consultation January to March 2008, responses received in relation to the suitability of some sites put forward (particularly garden land) led to the progression of an alternative spatial strategy which included land at the Ipswich Garden Suburb. At Preferred Options (November 2007) and informal draft plans stage (regulation 18 stage) (January – March 2014) comments were invited on the Sustainability Appraisal, including of alternatives, which have been taken into account in progressing the plans and in further rounds of Sustainability Appraisal. See
6. Is the participation:	The Act	NPPF		SA/SEA/HRA Audit Trail at Appendix 1. i. Consultation Statement
following the	section19(3)	para 155		ii. The SCI
principles set out				iii. The relevant sustainable community strategies
in your SCI? • integrating involvement with				At each stage consultation has been carried out in accordance with the SCI in place at the time - Ipswich Statement of Community Involvement (SCI) Sept 2007 (for Preferred Options



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
the sustainable community				and the informal consultation stage January 2014) (ICD1); Ipswich SCI Review March 2014 (for publication stage) (SUCD27).
 strategy? proportionate to the scale of issues involved in the DPD? 				Area Forums were a key mechanism for the delivery of the Sustainable Community Strategy 2008 – 2010. Consultation at Issues and Options and Preferred Options stages involved the Area Forums, and at later stages the Area Committees. See the November 2014 Pre-Submission Consultation Statements (SUCD15 and SUCD18). The adopted Core Strategy (2011) was aligned with the vision of the 2008 Community Strategy. The Community Strategy has not been revisited.
				The requirement for a local authority to produce a sustainable community strategy was repealed on 26 May 2015 by the Deregulation Act 2015 (section 100).
				The Council has widely advertised consultation at each stage as well as providing opportunities for the public to discuss proposals with officers at exhibitions, which is proportionate to the plans representing the key planning documents for Ipswich. At each stage, the measures taken to publicise the plan and engage with the public include:
				Contacting people on the Local Plan mailing list
				 Using the Council's website Ensuring the consultation documents are available in libraries
				Using the Council's free newspaper which is delivered to households, 'The Angle' where publication dates allow
				A public notice in the local press
				Presentations/notes to each Area Committee



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
 7. Are you keeping a record of: the individuals or bodies invited to make representations? how this was done? the main issues raised? 	The Act section20(3) Regulation 17	NPPF paras 158 - 171	You will need to submit a statement of representations under Regulation 22 (1) (c): see Submission stage below. Regulation 35 deals with the availability of documents and the time of their removal.	 For site allocation proposals, erecting site notices At least one exhibition and 'drop in' event held in a venue which is fully accessible (and usually a series of such events dispersed across the Borough) Issuing press releases. i. Consultation statement ii. Reports by the council on the consultation iii. Copies of representations and relevant correspondence iv. Technical reports on the engagement process The individuals and bodies invited to make representations at each stage are contained on the Council's Local Plan consultation database. The November 2014 Pre-Submission Consultation Statements (SUCD15 and 18) detail the ways in which individuals and bodies were consulted at each and a summary of each comment made. For the Site Allocations plan (and the IP-One Area Action Plan) the comments received at Issues and Options stage are detailed in the Comments Analysis Papers (see LPCD04 and LPCD05a).
8. Are you inviting representations on issues that would have significant impacts on both your areas from another local planning authority? Or county issues from an	The Act section 33A(1)(a) (b) and (c), section 33A(3)(d) & (e) section 33A(4) section 33A(9) The Act section	NPPF paras 178 to 181	Section 33A(3)(d) and (e) requires cooperation on significant cross- boundary issues before and during plan preparation.	 i. Consultation statement ii. Reports by the council on the consultation iii. Copies of representations and relevant correspondence iv. Technical reports on the engagement process Adjoining planning authorities (Babergh District Council, Mid Suffolk District Council and Suffolk Coastal District Council) and Suffolk County Council have been consulted at each stage of plan preparation.



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
affected county council that is not a planning authority? Or significant cross- boundary issues and strategic priorities of a body prescribed under Section 33A(1)(c)?	20 (5)(c)		Section 33A(2) requires you to engage constructively, actively and on an ongoing basis.	The Duty to Co-operate Statement contains more details of how the Council has worked with other authorities to address strategic and cross-boundary issues (LPCD37, LPCD46, SUCD21).
9. Are you inviting representations on cross-boundary issues and strategic priorities from a local enterprise partnership (LEP) or a local nature partnership (LNP)?	The Act section 33A(1)(c) and Section 33A(9). The Act section 20(5) (c). Regulation 4	NPPF paras 178 to 181	Section 33A(3)(d) and (e) requires cooperation on significant cross-boundary issues before and during plan preparation. Section 33A(2) requires you to engage constructively, actively and on an ongoing basis.	 ii. Consultation statement iii. Reports by the council on the consultation iiii. Copies of representations and relevant correspondence iv. Technical reports on the engagement process The New Anglia LEP was established in 2010 and therefore post-dates the earlier consultations. The Council's involvement with the LEP is detailed in the Duty to Co-operate Statement (SUCD21) and the LEP has also been directly contacted as part of the formal stages of consultation (draft and proposed submission). The Wild Anglia Local Nature Partnership has also been consulted as part of the formal stages of consultation (draft and proposed submission). Wild Anglia is not currently set up in a way that enables engagement with individual local plans, however the Council has taken account of the Wild Anglia manifesto in preparing the plans (SCD36).
Are you developing a framework for monitoring the effects of the DPD?	The Act section 35 Regulation 34	NPPF paras 165 - 1687	It is a matter for each council to decide what to include in their monitoring reports	 i. Sustainability appraisal report ii. The authority monitoring report iii. Reports or documents setting out the appraisal and monitoring framework



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
	Regulation 17 of The Environmental Assessment of Plans and Programmes Regulations 2004 No1363	SEA Guide, Chapter 5	while ensuring they are prepared in accordance with relevant UK and EU legislation" Chief Planning Officer letter 30 March 2011 withdrawing ODPM guidance.	Chapter 11 of the Proposed Submission Core Strategy Review (SUCD1) sets out a range of indicators for monitoring the delivery and effects of the plans' objectives. Chapter 6 of the Proposed Submission Core Strategy and Policies Sustainability Appraisal (December 2014) (LPCD47) sets out the proposals for monitoring the plans' significant effects. This will be reported through the Authority Monitoring Report each year (ICD03a).



Stage three: Plan preparation - formulation phase

This stage has many legal matters, for process and content, to address. The council should be beginning to formulate the preferred strategy for the local plan or supplementary planning document with which the council chooses to address Regulation 18 requirements, using the information gathered and previous collaborative work with stakeholders.

Para 182 of the NPPF makes it clear that explicit consideration of alternatives is a key part of the plan making process.

You should evaluate the reasonable alternatives identified in 'stage two: frontloading phase – plan preparation' phase against the:

- completed body of information from evidence gathering
- · results of sustainability appraisal
- findings from community participation
- findings from engagement with statutory cooperation bodies.

This may be written up as a preferred strategy report. The results of participation on the preferred strategy and an accompanying sustainability report will enable the council to gauge the community's response and receive additional evidence about the options. The council can then decide whether, and how, the preferred strategy and policies should be changed for publishing the finished DPD.

Alternatives developed from the evidence and engagement during the frontloading stage need to be appraised to decide on the preferred strategy. Participation will also need to be carried out on it.

These matters need to be considered, and dealt with, in good time, and not left until publication. Supporting documents will assist in providing evidence that decisions on alternatives and strategy are soundly based. These documents will, in due course, become part of the proposed submission documents in stage four.

The council should tell all parties that this is the main participation opportunity on the emerging plan. The publication stage is a formal opportunity for anyone to comment on an aspect of the DPD's soundness, and to propose a change to the plan accordingly. The more effectively this message is put across, the lower the chance of late changes being brought forward following publication.



Stage three: Plan preparation – writing the plan

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
1. Are you preparing reasonable alternatives for evaluation during the preparation of the DPD?	Regulation 12 (2) of The Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633	NPPF paras 152 - 182 SEA Guide, Chapter 5	The sustainability appraisal report and supporting documents relevant to the preparation of the DPD are part of the proposed submission documents (see Regulation 17).	Documents supporting decisions on alternatives and any preferred strategy Core Strategy Review – Consideration has been given to alternative strategies, as outlined in section 4 of the Proposed Submission SA Report (Dec 2014) (LPCD47). Consideration was given to alternatives of core policies and the development management policies as part of the production of the 2011 adopted Core Strategy (see Preferred Options Sustainability Appraisal November 2007 – LPCD09, including the 'no policy' options assessed in the August 2008 Sustainability Appraisal – LPCD12), and as part of the review as outlined in the Draft Core Strategy Focused Review Interim SA Report (Dec 2013) (LPCD19). Site Allocations – Alternative approaches were considered at Issues and Options stage (see LPCD03 and LPCD05) and subject to sustainability appraisal to inform preferred options choices. Alternatives were also assessed through the Sustainability Appraisal process at preferred options stage (see Preferred Options Sustainability Appraisal November 2007 – LPCD09). Alternative uses for the sites proposed for allocation were assessed in the Draft Site Allocations Interim SA Report (Dec 2013) (LPCD22). The Proposed Submission SA report explains the implications of the limited amount of land within the Borough for considering alternative sites. Policies added at more recent stages of the development of the Site Allocations DPD have been assessed against a 'no policy' alternative in the Proposed Submission Site Allocations



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				SA report (SUCD10). The Topic Papers also address alternatives where appropriate, for example the paper 'Reviewing the Ipswich Housing Figures' considers alternative approaches to identifying the Borough's objectively assessed housing need (topic paper October 2015 updates LPCD38 to LPCD45).
 2. Have you assessed alternatives against: consistency with national policy? general conformity with the regional spatial strategy where still in force? 	The Act section19 (2), section 24	NPPF para 151	For London boroughs and local authorities where regional strategies are still in force general conformity is tested formally later but you need to consider it during preparation of the DPD.	 i. Supporting documents ii. Correspondence with Mayor of London (London Boroughs and Mayoral Development Corporations only) Alternatives have been assessed against the Sustainability Objectives as outlined under (1) above. The Sustainability Objectives have been informed by consideration of national policy, as outlined in the Scoping Reports (March 2006 LPCD03b) and October 2013 LPCD24 plus September 2014 update LPCD25). Regional Spatial Strategy is no longer in force and the authority does not lie within London.
 3. Are you having regard to (where relevant): adjoining regional spatial strategies? the spatial development 	The Act sections19 (2) and 24 (1) and (4) Regulation 10 and 21		Where the regional strategy has been revoked you should record that fact.	 i. Supporting documents ii. Correspondence with the Mayor of London, relevant Welsh or Scottish regional planning bodies (as appropriate) iii. CLG notice of revocation of the regional strategy The East of England Regional Strategy was revoked in full on 3rd January 2013.



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
strategy for London?				
Planning Policy for Wales?				
 the National Planning Framework for Scotland? 				
Are you co- operating with other	The Act section 33A(2)(a)	NPPF paras 181 and 185		Supporting documents Correspondence with LPA/County Council
local planning authorities including counties, to address significant cross boundary issues?	Section 33A(6)(a)(b)			The Duty to Co-operate Statement (original LPCD37, most recent SUCD21) outlines how the Council is continuing to co-operate on a range of issues. Policies CS6 and CS7 support joint planning in the future to address housing need later in the
Have you discussed doing joint local development documents?	Section 20(5) (c)			plan period. Both IBC (ICD02a – see paragraphs 4.8-4.9) and Suffolk Coastal District Council (SCD41) have updated Local Development Schemes to refer to joint working on strategic planning post-2016. Ipswich Policy Area Board notes also evidence ongoing discussions with neighbouring authorities (SCD42).
5. Are you cooperating with a person prescribed for the purposes of Regulation 33A(1)(c) to address significant	33A(2)(a), section 33A(6)(a) The Act section	NPPF paras 181 and 182	The bodies prescribed by The Act section 33A(1)(c) are set out at Regulation 4 (1).	 i. Supporting documents ii. Correspondence with prescribed bodies See Duty to Co-operate Statement (SUCD21) which outlines how the Council is continuing to co-operate on a range of issues with a number of organisations.
cross boundary issues including	20 (5) (c)			



Ac	tivity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
	preparing joint approaches?	Regulation 4			
6.	Are you cooperating with having regard to the activities of the LEP and LNP?	The Act section 33A(2)(b) and section 33A(9). Regulation 4 (2)	NPPF para 181 and 182		 i. Supporting documents ii. Correspondence with LEP/LNP See Duty to Co-operate Statement (LPCD 37 and SUCD21) which outlines how the Council is continuing to co-operate on a range of issues. The LEP's Strategic Economic Plan (SCD02) and the New Anglia Growth Deal (SCD03) form part of the evidence base for the plans. Growing Places funding via the LEP is helping to deliver the Ipswich tidal barrier http://www.newanglia.co.uk/growing-places-fund/ - see Core Strategy policy CS18.
7.	Are you having regard to: • your sustainable community strategy or of other authorities whose area comprises part of the area of the council? • any other local development documents adopted by the council?	The Act section19(2)			 i. Supporting documents ii. The sustainable community strategies iii. Relevant local development documents iv. Correspondence with the local strategic partners The Council's Sustainable Community Strategy covering the period 2008-2010 was published in 2008 and has not been revisited or updated. The requirement for a local authority to produce a sustainable community strategy was repealed on 26 May 2015 by the Deregulation Act 2015 (section 100). Consideration has been given to the Suffolk Sustainable Community Strategy 2008 – 2028 (SCD07) (see Diagram 1 page 4 of Submission Core Strategy) and also through the review of plans as part of the Sustainability Appraisal. The Site Allocations Plan reflects the strategic approach set



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				out in the Submission Core Strategy Review DPD.
8. Do you have regard to other matters and relevant strategies relating to: • resources • the local/regional economy • the local transport plan and transport plan and services • waste strategies • hazardous substances	The Act section19(2) Regulation 10		As well as the matters and strategies listed in the Act and Regulations there are likely to be other matters identified in planning policy statements, regional and local strategies that you will need to have regard to in preparing the DPD.	 i. Supporting documents ii. Correspondence with the relevant bodies Diagram 1 page 4 of Submission Core Strategy provides some context to the emerging Local Plan (SUCD1). Transport, economy and water resources are addressed through the Duty to Co-operate Statement including how the plan relates to the Local Transport Plan and New Anglia LEP strategies (SUCD21). Waste is considered through SA objective ET3 (SUCD9). Suffolk County Council, the Waste Planning Authority, confirms that plans are broadly consistent with the Suffolk Waste Core Strategy (e.g. representation reference 681). Hazardous substances – The Council maintains records of the location of hazardous substances permits and would consult the Health and Safety Executive at the planning application stage where relevant to a proposal. Other main issues addressed through the plans include protecting and enhancing historic assets, gypsies and travellers and green infrastructure, and housing delivery, which are detailed in the Duty to Co-operate statement (SUCD21).
Are you having regard to the need	The Act section19(1A)	NPPF paras 93 -108		Supporting documents Policy CS1 of the Core Strategy Review addresses climate



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
to include policies on mitigating and adapting to climate change?				change matters and puts them at the centre of the plan (SUCD1). More detailed policies take this further e.g. DM1 on energy and water, DM4 on sustainable drainage and flood risk, and DM10 on shading (all SUCD1).
10. Have you undertaken the sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?	The Act section19(5) Regulation 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF para 182 SEA Guide, Chapter 5	Regulation13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633 sets out the consultation procedures.	 i. Reports on the sustainability of alternatives ii. Record of work undertaken on sustainability appraisal iii. Supporting documents See evidence under question 1 above. The SA reports have been consulted on at each stage.
11. Are you setting out reasons for any preferences between alternatives?	Regulation 8(2)	NPPF para 182	This will include Information from the sustainability appraisal.	 i. Any reports setting out alternatives and choices considered ii. Supporting documents See section 4 of Proposed Submission Core Strategy SA Report (Dec 2014) (LPCD47) and Section 3 of Proposed Submission Site Allocations SA Report (Dec 2014) (LPCD49). Also, for the Site Allocations DPD, the reasons for selecting the chosen policy approaches were set out in the Preferred Options documents (LPCD07 and LPCD08). The Topic Papers also address alternatives where appropriate, for example the paper 'Reviewing the Ipswich Housing Figures' considers alternative approaches to identifying the Borough's objectively assessed housing need and the reason for selecting the approach taken (LPCD38, October 2015 update).
12. Have you taken into	Regulations 17,	NPPF paras	Records on the	i. Correspondence from those making representations



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
account any representations made on the content of the DPD and the sustainability appraisal? Are you keeping a record?	18(3) and 22 (1) (c) (iv) Regulation 13(4) of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	150, 155, 157 and 159-171	sustainability appraisal should also include recording any assessment made under the Habitats Directive.	ii. Reports on issues raised iii. Consultation statement iv. Sustainability appraisal report See Appendix C of Proposed Submission Core Strategy SA Report (Dec 2014) (LPCD47) and Appendix C of Proposed Submission Site Allocations SA Report (Dec 2014) (LPCD49) and the submission SA reports SUCD9 and 10. See also the Sustainability Appraisal audit trail tables at Appendix 1 to this document.
13. Where sites are to be identified or areas for the application of policy in the DPD, are you preparing sufficient illustrative material to: • enable you to amend the currently adopted policies map? • inform the community about the location of proposals?	Regulations 5 (1)(b) and 9	NPPF para 157	Regulation 2 defines the terms 'submission' and 'adopted' proposals map. A map showing changes to the adopted policies map is part of the proposed submission documents defined in Regulation 17.	 i. Adopted policies map ii. Any reports on proposals to amend the policies map iii. Illustrative material that shows how the policies map will be amended or replaced A revised policies map and IP-One Area Inset Map illustrate all the proposals and policies on an Ordnance Survey base (SUCD5 and 6 and as updated SUCD7 and 9). More detailed illustrative site plans have been included for each allocation in Appendix 3 to the Sites DPD at each stage (LPCD21, SUCD3). Site proposals made through the Site Allocations Plan were also advertised through multiple site notices posted at locations close to the sites affected. A sample site notice is attached at Appendix 2.



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
14. Are the participation arrangements compliant with the SCI?	The Act, section 19(3) Regulation 18	NPPF paras 150 and 155		 i. The SCI ii. Consultation statement Yes, the arrangements for the consultation January-March 2014 complied with the requirement of the then SCI (2007) (ICD01). See Consultation Statements November 2014 (SUCD15 and 18).



Stage four: Publication

Under Regulation 20, the period for formal representations takes place **before** the DPD is submitted for examination in accordance with a timetable set out in the statement of the representations procedure which is made available at the council's office and published on its website.

When moving towards publication stage, the council should consider the results of participation on the preferred strategy and sustainability appraisal report and decide whether to make any change to the preferred strategy. In the event that changes are required, the council will need to choose either to:

- do so and progress directly to publication OR
- produce and consult on a revised preferred strategy.

The latter may be appropriate where the changes to the DPD bring in changed policy or proposals not previously covered in community participation and the sustainability appraisal. It avoids having to treat publication as if it were a consultation, which it is not. It also provides insurance in relation to compliance with the Strategic Environmental Assessment Regulations. Legally, during any participation on a revised preferred strategy, you should:

- comply with the requirements of the SCI
- update the sustainability appraisal report.

The council should then produce the DPD in the form in which it will be published. This includes removing material dealing with the evaluation of alternatives and the finalisation of the text. The council should be happy to adopt the DPD in this form, and satisfied that it is sound and fit for examination.

The six weeks publication period is the opportunity for those dissatisfied (or satisfied) with the DPD to make formal representations to the inspector about its soundness. Only people proposing a change to the plan can expect to be heard at examination.

The possibility of change under certain circumstances (which should be exceptional) is allowed for in the new procedures, and is described in 'stage five: submission'.



Stage four: Publication

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
Have you prepared the sustainability appraisal report?	The Act section19(5) Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF paras 165 - 168 SEA Guide Chapter 5		Yes, a sustainability appraisal report was prepared for each of the DPDs and changes were made to the plans as a consequence. The sustainability appraisal reports and the schedules of resulting changes were published alongside the publication draft DPDs on the Council's consultation module and available in libraries Dec 2014 – March 2015. Documents: Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations December 2014 (LPCD36). Strategic Environmental Assessment and Sustainability Appraisal – Proposed Submission Core Strategy and Policies DPD Nov 2014 (LPCD47) Strategic Environmental Assessment and Sustainability Appraisal – Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Nov 2014 (LPCD49.
Have you made clear where and within what	Regulation 17, 19, 20 and 35		The period must not be less than 6	i. Notice of consultation published 12 December 2014 in local press; on the



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
period representations must be made?			weeks from when you publish under Regulations 19 and 35 (see below).	Council's web site; enclosed with letters to local plan mailing list, clearly stating how representations should be made and the deadline of 5/3/15 (a period of 12 weeks); and paper copy delivered with paper copies of documents to each library. ii. Report to Council 19 th November 2014 set out the approach to consultation and the twelve week consultation period. See also consultation statements September 2015 SUCD16 and 19). The public notice is attached at Appendix 3. The letter and web page can be made
				available on request.
3. Have you made copies of the following available for inspection:the proposed submission	Regulation 19(a)		Regulation 17 gives definitions.	 i. See Q.2 above (and Appendix 3) – the notice of consultation included the statement of representations procedure and was enclosed with every letter, posted on the web site and published in the local press.
documents?the statement of the representations procedure?				ii. The proposed submission documents were published electronically on the Council's web site and in hard copy distributed to libraries across the Borough.



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				iii. See also note to library staff attached at Appendix 4.
 4. Have you published on your website: the proposed submission documents? the statement of the representations procedure? statement and details of where and when documents can be inspected? 	Regulations 19 and 35		Regulations 2 and 17 give definitions.	Yes – see web page https://www.ipswich.gov.uk/content/proposed-submission-core-strategy-and-policies-development-plan-document-review which links through to the e-consultation module where the documents are located.
 5. Have you sent to each of the specific consultation bodies invited to make representations under Regulation 18(1): A copy of each of the proposed submission documents The statement of the 	Regulation 19(b)		Regulations 2 and 17 give definitions.	i. The letter that was sent out to all consultees included the Notice of Consultation. This clearly identified where documents could be inspected (including online) and how and when representations should be submitted (statement of representations procedure). It was considered unnecessary and too costly to send all the specific consultation bodies a full paper set of the documents,



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
representations procedure?				given the number of places and ways in which they were made available (including the offer of a set on CD). Indeed, some such bodies prefer now to receive notifications and links electronically rather than through the post.
6. Have you sent to each of the general consultation bodies invited to make representations under Regulation 18(1):	Regulation 19(b)		Regulations 2 and 17 give definitions.	i. See Q5 above – everyone received the same information.
 the statement of the representations procedure? 				
 where and when the documents can be inspected? 				
7. Have you requested the opinion of the Mayor of London (if a London Borough or Mayoral DC)	The Act section 24		The request must be made on the day you publish the documents	N/A as outside London.
on the general conformity of the DPD spatial development	Regulation 21		under Regulation 19(a) and a response must be	



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
strategy?			made within six weeks from the request (Regulation 21).	



Stage five: Submission

At the submission stage, the council should receive and collate any representations made at publication stage. You don't have to report these representations to councillors but there may be requirements deriving from other legislation, Standing Orders or council procedures that must be considered. Or you might just think it is a good idea to report on it anyway.

If they are reported it should be on the facts of the representations made, not the results of a consultation process by the council. They should not be treated as a consultation or an opportunity to make changes or answer representations. NB: under the 2012 Regulations there is no longer any requirement to give notice by local advertisement.

You should ensure you are in legal compliance with the SCI, the Habitats Directive and the Strategic Environmental Assessment Directive in any additional work. Any formal publication of additional or changed matters would need to allow at least a six-week period for representations to be made.

There are different approaches that could be taken to changes. You should be satisfied that you remain fully compliant with the legal requirements if any changes are made (and any consequential effects on the DPD as a whole).

Apart from notification of the examination, this tool does not deal with the legal requirements that need to be followed after submission.

Stage five: Submission

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
Has the DPD been prepared in accordance with the LDS? Does the DPD's listing and description in the LDS match the document?	The Act section 19(1)		The Act section 15(2) sets out the matters specified in the LDS. As at January 2013, no further matters are prescribed in the	i. The LDSii. Explanation of any changes from the milestones set out in the LDSiii. Relevant authority monitoring reports



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
Have the timescales set out in the LDS been met?			Regulations.	 Core Strategy Review Submission LDS: LDS 9th Edition October 2015 (scheduled submission for December 2015; expected actual December 2015,) (ICD02a). Site Allocations DPD (incorporating IP-One AAP) Submission LDS: LDS 9th Edition October 2015 (scheduled submission for December 2015; expected actual December 2015,) (ICD02a). Current 'in effect' LDS is the 9th Edition, October 2015 (ICD02a)
2. Has the DPD had regard to any sustainable community strategy for its area (like a county and district)?	The Act section 19(2)	NPPF para 182		 i. The sustainable community strategy(ies) ii. Reference to sections of the DPD showing how regard has been had to them The requirement for a local authority to produce a sustainable community strategy was repealed on 26th May



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				2015 by the Deregulation Act 2015 (section 100). The Council's Sustainable Community Strategy covering the period 2008-2010 was published in 2008 and has not been revisited or updated. It was taken into account in preparing the adopted Core Strategy. Consideration has been given to the Suffolk Sustainable Community Strategy 2008 – 2028 (SCD07) (see Diagram 1, page 4 of Submission Core Strategy SUCD1) and also through the review of plans as part of the Sustainability Appraisal (SUCD9). The Site Allocations DPD reflects the strategic approach set out in the Submission Core Strategy Review DPD.
3. Is the DPD in compliance with the SCI (where one exists)? Has the council carried out consultation as described in the SCI?	The Act section 19(3) Regulation 22(1)(c)		Before the SCI is formally amended to take into account the changes in the regulations, you may need to set out how the community engagement that you carried out met	 i. The SCI ii. The Regulation 22(1)(c) statement i. The SCI. Community engagement has been undertaken in accordance with the following:



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
			the regulations (as amended).	Ipswich SCI Review March 2014 (SUCD27) is the SCI which covers the submission stage and consultation proposed on main modifications prior to submission.
				ii. Updated Pre-submission Consultation Statements have been published for the Core Strategy Review and the Site Allocations Plan dated December 2015 (SUCD17 and 20).
				These have been updated to include representation summaries and a list of the main issues raised as a result of the Regulation 19 public consultation undertaken December 2014-March 2015 (SUCD16 and 19) and Pre-Submission Main Modifications consultation October-November 2015 (SUCD17 and 20).
4. Have you identified and addressed any issues which are likely to have a significant impact on at least two planning areas?	The Act section 33A(1) and section 20(5)	NPPF paras 181 and 182	Under NPPF para 182, the plan should be based on effective joint working on cross-boundary strategic priorities to be found	Statement identifying any strategic cross-boundary issues or impacts on county matters addressed in the document and explaining the approach taken to co-operate with the



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
In doing so, have you co- operated with other local planning authorities, county councils where they are not a planning authority, LEPs, LNPs and the prescribed bodies in identifying and addressing any strategic cross- boundary issues? If you have not agreed on the approach is there a justification?			'Effective'.	relevant bodies. Supporting correspondence and reports e.g. draft Memorandum of Understanding, shared and agreed evidence. Proposed Pre-Submission Modifications to address the main issues raised and national policy changes were reported to the Council on 23 rd September 2015: https://democracy.ipswich.gov.uk/documents/g1492/Public%20reports%20pack%2023rd-Sep-2015%2018.00%20Council.pdf?T=10 The Duty to Co-operate Statement has been updated at December 2015 (SUCD21).
5. Has the DPD been subject to sustainability appraisal? Has the council provided a final report of the findings of the appraisal?	The Act section 19(5) Regulation 22(1)(a)	NPPF para 165 SEA Practical Guide, chapter 5		Sustainability appraisal report Both the DPDs have been subject to SA, and the SA Reports published for public consultation at Regulation 19 stage (as full reports and non- technical summaries) (LPCD47 and 49).



requirement	Guidance reference	Additional notes	Possible evidence
			The Council decided to make some main modifications to the plans prior to submission. The SA reports have been updated to identify any implications of the modifications and the update published alongside the modifications consultation for comment (LPCD48 and 50).
The Act section 19(2) and Schedule 8	NPPF para 151		 i. Correspondence with PINS? ii. PAS Soundness self assessment checklist A combined PAS Soundness Self-assessment Checklist has been completed for the two DPDs and is available to view in the Core Document Library (SUCD23).
The Act section 24(1)(a) and 24(4) Regulation 21	NPPF para 218 footnote 41	In London the requirement is for general conformity with the spatial development strategy (The London Plan).	 i. Correspondence with or representations from Mayor of London (where appropriate) ii. Confirmation of (where appropriate) conformity from the Mayor or that no Regional Strategy is in place The East of England Regional Strategy was revoked in full on 3rd
	The Act section 19(2) and Schedule 8 The Act section 24(1)(a) and 24(4)	The Act section 19(2) and Schedule 8 The Act section 24(1)(a) and 24(4) NPPF para 218 footnote 41	The Act section 19(2) and Schedule 8 The Act section 24(1)(a) and 24(4) NPPF para 218 footnote 41 In London the requirement is for general conformity with the spatial development strategy (The London Plan)



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
borough or a mayoral development corporation has it requested an opinion from the Mayor of London on the general conformity of the plan with the spatial development strategy?				January 2013. Ipswich is not located within London.
8. Has the council published the prescribed documents, and made them available at their principal offices and their website? Has the council notified the relevant statutory and non-statutory bodies, and all persons invited to make representations on the plan? Does the DPD contain a list of superseded saved policies?	The Act section 20(2), 20(3) and 20(5)(b) Regulations 8 and 19	NPPF para 182	Requirements relating to publication of the prescribed documents are listed later in this table.	 i. The documents prescribed at Regulation 22(1) ii. Relevant authority monitoring reports iii. Records of the actions undertaken (see below) The prescribed documents are (Reg 22): a. The SA Report b. Submission policies map c. A statement setting out who was invited to make representations under regulation 18, main issues raised and how they were addressed; and the number of representations made under regulation 20 and a summary of



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				main issues raised;
				d. Copies of representations made in accordance with regulation 20; and
				e. Such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.
				These documents will be submitted to the Secretary of State in December 2015. All the submission documents can be found in the Core Document Library Submission Documents (SUCD) section.
				Notification of the relevant statutory and non-statutory bodies, and all persons invited to make representations on the plan was undertaken at Regulation 19 stage and for the Pre-Submission Main Modifications.
				For submission notification will be sent out w/c 14 th December 2015.



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				The Core Strategy Review includes a list of superseded policies at Appendix 2 (Table 9).
				A Pre-Submission Additional Modification has been made to add such a list as a new Appendix 4 to the Site Allocations Plan (SUCD26).
9. Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted policies map? If yes, have you prepared a submission policies map?	Regulations 5(1) (b), 9 (1), 17 & 22(1)			 i. Submission policies map ii. Brief statement if a submission policies map is not required See above, a Submission Local Plan Policies Map and IP-One Area Inset have been prepared for submission to the Secretary of State – these illustrate policies and proposals on an OS background (SUCD5 and 6).
10. Is the DPD consistent with any other adopted DPDs for the area? If the DPD is intended to supersede any adopted development plan policies, does it state that fact and	Regulation 8(3) and (4) Regulation 8(5)		Development Plan is defined in Section 38 of the Act.	 i. The core strategy ii. Documents or reports demonstrating conformity Core Strategy Review paragraph 1.14 indicates that it will update the adopted plan. Core Strategy Review



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
identify the superseded policies?				Appendix 2 and Site Allocations Plan proposed Appendix 4 (see above) indicate which saved policies have been superseded by the plans. The Core Strategy Review and Site Allocations Plan are consistent and will together form the Ipswich Local Plan.
 11. Have you prepared a statement setting out: Which bodies and persons were invited to make representations under Regulation 18? How they were invited? A summary of the main issues raised? How the representations have been taken into account? 	The Act section 20 (3) Regulation 22(1)(c)		This will bring forward material from the Consultation statement (see Stage 2 above).	 i. Consultation statement ii. The Statement as required in Regulation 22(1)(c) See Consultation Statements published November 2014 (SUCD15 and 18).
12. Have you prepared a statement giving: • the number of	The Act section 20(3)			The Statement as required in Regulation 22(1)(c) This information has been added to
representations made under Regulation 22?	Regulation 22(1)(c)			the Consultation Statements published September 2015 (SUCD16



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
 a summary of the main issues raised? OR that no representations 				and 19).
were made? 13. Have you collected together all the representations made under Regulation 28?	The Act section 20(3) Regulation 22(1)(e)			Copies of the representations The representations submitted under regulation 20 have all been entered onto the Council's e-consultation module and can be viewed online.
14. Have you assembled the relevant supporting documents?	The Act section 20(3) Regulation 22(1)(g)			All necessary evidence and records of decisions relevant to the DPD The Core Document Library is already available on the Council's website.
15. Has your council approved the DPD for submission?			Check the LPA's constitution/standing orders for the authorisation process appropriate for the type of DPD.	Report and resolution of the appropriate council body Decision by Council 23 rd September 2015.
16. Have you sent the Secretary of State (the Planning Inspectorate) both a paper copy and an	The Act section 20(1) and 20(3) Regulations 22(1)		Regulation 35 deals with the availability of documents and the time of their removal.	Record of sending Reasons why documents cannot be sent electronically



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
 email of the following: the DPD? the submission policies map (unless there are no site allocation policies)? the documents prescribed in Regulation 22(1)? 	and 22(2)		Electronic copies of some of the representations and supporting documents may not be practicable. Regulation 35 deals with the availability of documents and the time of their removal.	Sent by courier Monday 14 th December 2015.
 17. Have you made the following available at the same places where the proposed submission documents were to be seen: The DPD? The documents prescribed in Regulation 22(1)? 	Regulation 22(3)		You should do this as soon as reasonably practicable after submission.	Record of where and when made available W/c 14 th December 2015
 18. On your website, have you published the: DPD? submission policies map? sustainability appraisal 	Regulation 22(3) and 35(1)(b)		You should do this as soon as reasonably practicable after submission.	Record of publication W/c 14 th December 2015



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
report? • Regulation 22(1)(c) statement?				
 supporting documents (where practicable) ? 				
 representations made under Regulation 20 (where practicable) ? 				
 statement as to where and when the DPD and the documents are available? 				
19. For each general consultation body invited to make representations under Regulation 18(1), have you sent:	Regulation 22(3)(b)		You should do this as soon as reasonably practicable after submitting to the Secretary of State.	 i. Copies of correspondence ii. Record of sending W/c 14th December 2015
 notification that the documents prescribed in Regulation 22(3)(a)(i)-(iii) are available for inspection 				
 where and when they can be inspected? 				
20. Have you given notice to	Regulation		You should do this as soon	i. Copies of correspondence



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
persons who have requested to be notified that submission has taken place?	22(3)(c)		as reasonably practicable after submitting to the Secretary of State.	ii. Record of sending W/c 14 th December 2015
 21. If an examination is being held, at least six weeks before its opening has the Programme Officer: published the time and place of the examination and the name of the person appointed to carry out the examination on your website? notified those who have made representations on the published DPD which have not been withdrawn of these details? 	The Act section 20 Regulations 24 and 35			 i. Record of publication of information ii. Record of sending iii. Copies of correspondence iv. Copy of advertisement To be arranged in due course.



APPENDIX 1 Ipswich Borough Council Strategic Environmental Assessment / Sustainability Appraisal – Audit Trail

Core Strategy and Policies DPD

Stage of Plan preparation	Stage of SEA/SA	Relevant Report	Consultation	Core Doc Library Ref	Where are comments and our responses documented?	Core Doc Library Ref
Considering options and assessing draft plan	Assessing Options (and assessment of draft Core	Sustainability Appraisal of Draft Submission Core Strategy and Policies (Aug 2009) (Plus updates November 2010 and	October – December 2009 Updates part of	LPCD12 November	Ipswich Borough Council Core Strategy and Policies Development Plan Document	N/A
(Regulation 18) (relevant to	Strategy subject to Review)	July 2011) Plus further options considered	adopted Core Strategy Examination	2010 LPCD14a	Regulation 30 (1) (e) Statement (March 2010)	
Regulation 18 of Core Strategy review)		as part of Core Strategy Review in reports listed below.		July 2011 LPCD14	The comments received were considered as part of the Examination into the adopted Core Strategy.	
Regulation 18	Scoping	Draft Core Strategy and Policies Development Plan Document Focused Review and Draft Site Allocations and Policies (incorporating IP- One Area Action Plan) Development Plan Document Sustainability Appraisal Scoping Report (October 2013)	October – November 2013	LPCD24	Appendix D of Strategic Environmental Assessment and Sustainability Appraisal Focused Review of the Core Strategy and Policies Development Plan Document Interim SA Report	LPCD19
Draft Plan (Regulation 18)	Assessment of Draft Plan	Strategic Environmental Assessment and Sustainability Appraisal Focused Review of the Core Strategy and Policies	January – March 2013	LPCD19	Appendix C of Strategic Environmental Assessment and Sustainability Appraisal of Proposed Submission	LPCD47



Stage of Plan preparation	Stage of SEA/SA	Relevant Report	Consultation	Core Doc Library Ref	Where are comments and our responses documented?	Core Doc Library Ref
		Development Plan Document Interim SA Report			Core Strategy and Policies DPD Review (December 2014)	
Proposed Submission Plan (Regulation 19)	Scoping	Scoping Update Letter	September - October 2014	LPCD25	Appendix C of Strategic Environmental Assessment and Sustainability Appraisal of Proposed Submission Core Strategy and Policies DPD Review (December 2014)	LPCD47
Proposed Submission Plan (Regulation 19)	Assessment of Proposed Submission Plan	Proposed Submission Core Strategy and Policies DPD Review Sustainability Appraisal Report (December 2014) Mitigation measures identified in the above were taken forward in the plan as detailed in Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations (December 2014) (LPCD36)	December 2014 – March 2015	LPCD47	Proposed Submission Core Strategy and Policies DPD Review Sustainability Appraisal Report – SA Report Addendum – Pre- Submission Main Modifications (October 2015)	LPCD48
		Proposed Submission Core Strategy and Policies DPD Review Sustainability Appraisal Report – SA Report Addendum – Pre-Submission Main	October – November 2015	LPCD48	n/a Note: All SA comments received in relation to	



Stage of Plan preparation	Stage of SEA/SA	Relevant Report	Consultation	Core Doc Library Ref	Where are comments and our responses documented?	Core Doc Library Ref
		Modifications (October 2015)			the Proposed Submission Core	
		The above two reports have been combined to form one SA Report for submission under Regulation 22(1)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.	Consultation undertaken as per above	SUCD09	Strategy SA and the Pre- Submission Main Modifications SA Addendum submitted to the Planning Inspectorate for Examination. SA comments are also summarised in the consultation statements (SUCD15-SUCD17)	



Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD

Stage of Plan preparation	Stage of SEA/SA/HRA	Relevant Report	Consultation	Core Doc Library Ref	Where are comments and our responses documented?	Core Doc Library Ref
Regulation 18	Scoping	Sustainability Appraisal – Draft Objectives and Indicators	May – June 2005	LPCD03a	Sustainability Appraisal Incorporating Strategic Environmental Assessment Scoping Report (March 2006)	LPCD03b
Regulation 18	Scoping	Sustainability Appraisal Incorporating Strategic Environmental Assessment Scoping Report for the Ipswich Local Development Framework (March 2006)	Targeted consultation March – April 2006	LPCD03b	Summary of responses were contained within the report to Executive dated 1/8/2006.	LPCD03c
Regulation 18	Assessment of options	Sustainability Appraisal Incorporating Strategic Environmental Assessment for the Ipswich Local Development Framework Preferred Options (November 2007)	Jan – March 2008	LPCD09	Summary of SA comments and Council response	LPCD09a
Regulation 18	Scoping	Draft Core Strategy and Policies Development Plan Document Focused Review and Draft Site Allocations and Policies (incorporating IP- One Area Action Plan) Development Plan Document Sustainability Appraisal Scoping Report (October 2013)	October – November 2013	LPCD24	Appendix D of Strategic Environmental Assessment and Sustainability Appraisal Focused Review of the Site Allocations Interim SA Report	LPCD21



Regulation 18	Assessment of draft policies and site allocations	Strategic Environmental Assessment and Sustainability Appraisal Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Interim SA	January – March 2013	LPCD22	Appendix C of Strategic Environmental Assessment and Sustainability Appraisal of Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD (December 2014)	LPCD39
Proposed Submission Plan (Regulation 19)	Scoping	Scoping Update Letter	September - October 2014	LPCD25	Appendix C of Strategic Environmental Assessment and Sustainability Appraisal of Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD (December 2014)	LPCD49
Proposed Submission Plan (Regulation 19)	Assessment of draft policies and site allocations	Strategic Environmental Assessment and Sustainability Appraisal of Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD (December 2014)	December 2014 – March 2015	LPCD49	Sustainability Appraisal of Pre-Submission Main Modifications - Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD (October 2015)	LPCD50
		Mitigation measures identified in the above were taken forward in the plan as detailed in Annex to Proposed Submission Sustainability Appraisal Reports –		LPCD50	n/a Note: All SA comments	



Addressing Recommendations (December 2014) (LPCD36) Sustainability Appraisal of Pre-Submission Main Modifications - Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD (October 2015) The above two reports have been combined to form one SA Report for submission under Regulation	October – November 2015 Consultation undertaken as per above	SUCD10	received in relation to the Proposed Submission Site Allocations SA and the Pre-Submission Main Modifications SA Addendum submitted to the Planning Inspectorate for Examination. SA comments are also summarised in the consultation statements	
22(1)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.	above		(SUCD18-SUCD20)	



Appendix 2 Sample Site Notice posted to alert residents to proposals affecting sites nearby (at regulation 18 stage)

IPSWICH BOROUGH COUNCIL

PUBLIC NOTICE

THIS IS A PROPOSED SITE ALLOCATION NOTICE AND <u>NOT</u> A NOTICE OF A PLANNING APPLICATION

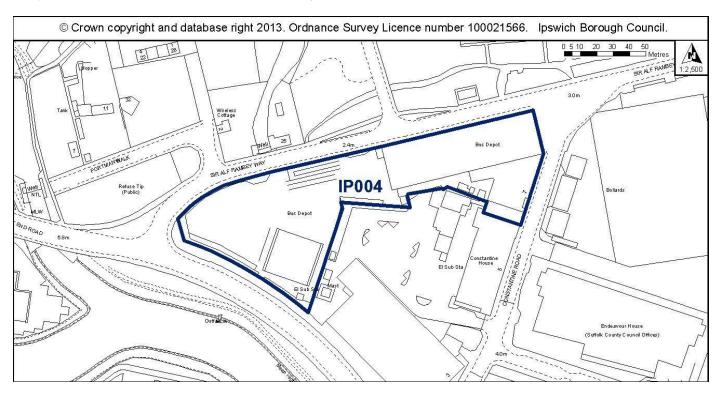
Site ref: IP004 (UC004) Sir Alf Ramsey Way / West End Road

Site area: 1.07ha

Proposed use: 50% Housing (59 dwellings at high density)

50% Employment (B1 Office)

Proposed Site Allocation - Allocation Policy DM39 & DM42



Members of the public can inspect the <u>Draft Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document</u> online via the Council's website at <u>www.ipswich.gov.uk</u>, or any of the Council Libraries, Contact Centre or Grafton House (by appointment) during the public consultation period which runs between *Monday 13th January – Monday 10th March*. **All comments on the proposed allocations must be made in writing, and be received either electronically via the Ipswich Borough Council website, or by email / letter to the addresses below by 5pm on the 10th March.**





DATE OF PUBLIC NOTICE 10th January 2014

Development and Public Protection Ipswich Borough Council Grafton House, Russell Road Ipswich IP1 2DE (01473) 432019

email: planning and regeneration@ipswich.gov.uk

website:www.ipswich.gov.uk



Appendix 3 - Public Notice, Regulation 19 stage.

Ipswich Borough Council Local Plan
Planning and Compulsory Purchase Act 2004
Town & Country Planning (Local Planning) (England) Regulations 2012 (Regs 19 & 20)
Notice of Consultation

- (1) Proposed Submission Core Strategy and Policies Development Plan Document (DPD)
 Review
- (2) Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD

Ipswich Borough Council hereby gives notice of its consultation on the Proposed Submission Core Strategy and Policies Development Plan Document (DPD) Review and Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD. The consultation will run for twelve weeks commencing at 9am on Friday 12th December 2014 and concluding at 5pm on Thursday 5th March 2015. The Council is seeking views on the two proposed documents. Should you wish to make a comment, these may only be made in writing and are encouraged via the Council's local plan consultation module on the website at www.ipswich.gov.uk/consultations. Forms are also available via the website and in hard copy at drop-in exhibitions and the locations listed below and can be e-mailed or posted to Town Planning Business Support, at the address below by **5pm** on **Thursday 5th March 2015**.

Inspection of documents:

The documents will be available to view from Friday 12th December on the Council's website (www.ipswich.gov.uk/consultations) and at the following locations (please note times will vary over the Christmas and New Year period):

the Christmas and New Year period):
☐ The Customer Services Centre, Town Hall, Cornhill, Ipswich (weekdays 8.30am to 5.30pm);
☐ The Ipswich County Library, Northgate Street, Ipswich (Mon, Weds, Thurs 9.00am to 6.00pm
Tues, Fri 9.00am to 7.00pm; Sat 8.30am to 5.00pm and Sun 10.00am to 4.00pm);
☐ Branch libraries across Ipswich (Chantry, Gainsborough open Mon-Sun various opening
nours; Rosehill, Stoke, Westbourne open Tues-Sun various opening hours);
☐ Grafton House Reception, 15-17 Russell Road, Ipswich (Mon-Fri 8.30am to 5.00pm).

Copies of the consultation documents will be available free on CD, subject to availability, from the exhibitions or at Grafton House by request. Paper copies will be available at cost of printing plus P&P.

Drop-in exhibitions:

Officers will be available to answer questions at the drop-in exhibitions, which will be held as follows:

Town Hall, Pickwick Room: Tuesday 20th January (11am – 4pm), and Wednesday 21st January (11am – 4pm)

Ìpswich Sports Club, Henley Road: Friday 23rd January (11am – 4pm), and Saturday 24th January (11am – 4pm)

The Meeting Place, Limerick Close: Wednesday 11th February (3pm – 8pm)

All Hallows Church Hall, Landseer Road Thursday 12th February (3pm – 8pm)

Colchester Road Baptist Church: Friday 13th February (3pm – 8pm)

St Peters Church, Stoke Park Drive: Tuesday 17th February (3pm – 8pm)

Town Hall, Pickwick Room: Friday 20th February (11am – 4pm), and Saturday 21st February (11am – 4pm)



Area Committee meetings will be held in January. Please check the Council meetings section of the Council website (www.ipswich.gov.uk) and local press for more information.

Date of notice: December 2014

e-mail: planningandregeneration@ipswich.gov.uk
Town Planning Business Support

Town Planning Business Support Development and Public Protection Ipswich Borough Council Grafton House, Russell Road Ipswich IP1 2DE



Appendix 4 Note to Library Staff Regulation 19 Stage

Note to staff at the libraries and the Customer Services Centre

<u>Ipswich Borough Council Local Plan Consultation – 12th December 2014 – 5th March 2015</u>

Ipswich Borough Council is undertaking a public consultation on two local planning documents, their supporting documentation listed below and two Ipswich Local Plan policies maps, which set out the location of proposals in the plan on an Ordnance Survey base map.

- Proposed Submission Core Strategy and Policies development plan document (DPD) review (November 2014)
 - Sustainability Appraisal
 - Appropriate Assessment
- Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD (November 2014)
 - Sustainability Appraisal
 - o Appropriate Assessment
- Local Plan Policies Map
- Local Plan Policies (inset) Map

The public have been invited to make comments on these documents. To allow the public to get involved in the consultation we need the documents to be available for public inspection in libraries across Ipswich and the Customer Services Centre. The documents that have been handed to you are to be kept on display for reference use only, from Friday 12th December to Thursday 5th March 2015 at 5pm. Alternative formats of the documents are available on request.

If a member of the public wishes to make a comment, we would prefer this was done using the online system available via www.ipswich.gov.uk/consultations, where documents are also available to view electronically.

If a member of the public wishes to submit their comments in writing rather than electronically then please hand out one of the comments forms provided plus accompanying notes.

In addition to the documents above, the following documents have been published for information as required by the 2012 Planning Regulations:

- Pre-submission Consultation Statement
- Core Document Library (available to view at the County Library and on-line)

A Statement of Compliance with the Duty to Co-operate has also been published as required by the Localism Act 2011 for information.

If any of the documents go missing or you require more comments forms please contact Felicia Blake on 01473 432019 so that we can arrange a replacement. Please also phone this number if you have any questions about the consultation.

Thank you for your help during this consultation process.