

Introduction

The Suffolk County Council – Suffolk Minerals & Waste Local Plan (SMWLP) was adopted on 9 July 2020. Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 introduced in 2017, states that local planning authorities must review their plans within five years from the date of adoption. Review in this context means an assessment to determine whether updates to the plan are currently necessary. The National Planning Policy Framework (2024) states that “Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary.” The Council has completed the review assessment using the Planning Advisory Service (PAS) Toolkit Part 1, supported by an assessment of each policy contained in the Suffolk Minerals & Waste Local Plan. The review assessment concludes that a Local Plan review is needed.

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1: LOCAL PLAN REVIEW ASSESSMENT

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT: As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the ‘content’ requirements of the current NPPF, PPG, Written Ministerial Statements and the National Model Design Code (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence): The SMWLP was prepared and examined under the 2019 NPPF. Whilst there have been changes to the NPPF, many of the Minerals policies and the National Policy for waste remain and the overall aims of the NPPF remain consistent with the SMWLP.</p> <p>The policies have been considered in relation to the most recent National Planning Policy Framework (NPPF) (December 2024), as well as changes in the national Planning Practice Guidance (PPG) and Written Ministerial Statements.</p> <p>However, under the Levelling Up & Regeneration Act, the Government is expected to publish nationally-set Development Management policies which should then not be repeated in Local Plans. This is likely to mean that the policies expressed in the SMWLP would not be consistent with national policy.</p>

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A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p>PROMPT: Look at whether your local housing need figure, using the standard methodology, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth ambitions linked to economic development or infrastructure investment, strategies such as Housing Deals, or formal agreements to meet unmet need from neighbouring authority areas.</p>	N/A	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Not directly relevant to SMWLP. As the national housing methodology numbers has increased annual need across Suffolk by 64% (now 5,071 from 3,087), there is the potential impact on the need for additional minerals (mainly sand and gravel) that will take time to affect the 10-year average sales data.</p> <p>The correlation between minerals extraction and housing completions is not straightforward. In the current SMWLP, minerals demand is projected forward based on previous sales. Local Aggregate Assessments (LAAs) show that there is no need to change this approach.</p>
A3.	<p>You have a 5-year supply of housing land</p> <p>PROMPT: Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	N/A	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Not directly relevant to SMWLP.</p>

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A4.	<p>You are meeting housing delivery targets</p> <p>PROMPT: Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>	N/A	Not directly relevant to SMWLP. Again, however, this is something which is affecting the districts and borough and will inform the spatial strategy.
A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets; and (ii) commercial floorspace/jobs targets over the remaining plan period.</p> <p>PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.</p>	N/A	Not directly relevant to SMWLP. Evidence in AMR shows Plan objectives being achieved.

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A6.	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>PROMPT: A key employer has shut down or relocated out of the area.</p> <p>Unforeseen events (for example global economic shock) are impacting upon the delivery of the plan.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>There have been changes to the economy and various changes to economic conditions. When the SMWLP was being produced the OBR forecast for annual growth (over 10 years) was 1.6%, currently this is 1.7%.</p> <p>Employment and housing questions here are not directly relevant to Suffolk County Council, but they do impact the district and borough councils which in turn will mean greater sand and gravel requirements for future new housing and employment development. The SMWLP will also need to factor all of the other NSIPs beyond Sizewell C.</p> <p>Whilst there have been many unforeseen events since the adoption of the SMWLP, the conclusion is that the Plan has some flexibility to deal with these, but due to the revised district and borough housing numbers, a review will be necessary.</p>

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A7.	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT: You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The AMR 2023 includes reference to the effects of covid and the post-covid recovery as well as other changes in the baseline since the adoption of the SMWLP and evidence that the SMWLP is continuing to deliver minerals and waste development.</p> <p>Covid has affected all industries and individuals in some ways and whilst delivery of affordable housing is not directly relevant to the SMWLP, the effects of covid on the economy and upon minerals and waste industries (and production levels of both waste and mineral) are very relevant.</p> <p>Levels of waste and the composition of the waste have been affected by covid, but this has not affected viability of planned development per se.</p> <p>A mechanism for mineral need already exists in the form of the Managed Aggregate Supply System (MASS) and the production of Local Aggregate Assessments and participation in the Aggregate Working Party (AWP). MASS 2023 suggests there have been permitted reserves have fallen since 2021.</p>

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A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT:</p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>There are sites which have not yet been permitted, but these are not central to the spatial strategy of the SMWLP. It is not considered that the absence of these indicators is a major issue.</p> <p>The policy landscape for minerals is not preventing development from coming forward.</p> <p>Key site allocations are delivering, or on course to deliver, in accordance with the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p>
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p> <p>PROMPT:</p> <p>You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which could result in a likely</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>New guidance has emerged from Natural England on river catchment. Nutrient neutrality needs to be taken into account. Since the publication of practice guidance from Natural England, there is now a Written Ministerial Statement and Chief Planner letter about the nutrient neutrality issue (21st July 2022). It is suggested that changes will be made to the LURB. Water companies are to improve catchments by 2030. This issue can therefore be scoped out.</p> <p>The Suffolk Local Nature Recovery Strategy has recently been published, and consideration will need to be given to proposals and how they can contribute towards these outcomes.</p>

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	<p>significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider if your area is covered by advice from Natural England on nutrient neutrality and / or water neutrality which could impact on the delivery of housing. Nutrient neutrality is a means of ensuring that a development plan does not add to existing nutrient burdens within catchments. Water neutrality is a means of ensuring that plans do not increase the rate of water abstraction for drinking water supplies above existing levels in an area.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>		

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A10.	<p>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>This is mainly about housing, so it is not directly relevant to the SMWLP other than the spin off increase in housing requirements. The SMWLP has a flexible approach to speculative sites providing they meet policy criteria (for example Flixton sand and gravel extraction application 2023). It is considered that the main Review report in its mention of Duty to Co-operate issues has sufficiently covered this issue. This is not considered an issue that would require any changes to the SMWLP.</p>

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A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT: You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The AMR 2023 show that there are no areas of concern.</p>

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A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT: Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan's strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Plan sets out policies to be used for the determination of minerals and waste applications and for the safeguarding of minerals and waste sites. General policies GP1-4 are considered against the majority of planning applications which are determined and continue to play a role in making sure applications meet a wide range of criteria (including sustainable development and environmental criteria).</p> <p>Mineral policies MP1,2,5,6,7 focus more on the technical implementation and operation of minerals sites, are used to consider proposed minerals development. These policies are frequently used and in 2024 were triggered between 4-6 times which does relate to the number of relevant minerals applications in that time period. Mineral policies MP9-10 which relate to the safeguarding of minerals facilities (including ports and rail facilities) are 'triggered' less when determining minerals applications but are used very frequently when responding to District Authority consultations and neighbourhood plan consultations, they continue to play an important role in safeguarding minerals facilities across Suffolk.</p> <p>MP3 and MP4 which relate to borrow pits and agricultural reservoirs are much less frequently triggered, as borrow pits are not frequently sought after to support development. and most reservoirs do not seek to move extracted material off site, so they</p>

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			<p>are determined under PD rights or by the District Authority. However, these policies provide a control mechanism if proposals come forward.</p> <p>The most frequently triggered waste policies are WP1, WP3 which relate to management of waste and land use for waste sites. Safeguarding of waste sites (WP18) is also triggered frequently both when responding to consultation and considering development.</p> <p>The other Waste policies are triggered much less frequently, but this is not unexpected as they tend to be more focused on a specific type of waste facility (for example WP4 – Household waste recycling centres, and WP14 – Waste water treatment)</p> <p>There are some waste policies which are not triggered at all, but these tend to relate to niche waste sites or practices, for example WP6 – In vessel composting facilities, WP13 – excavation of landfill waste. However, these policies do provide a control mechanism for these types of development if they come forward. It is noted that since this plan was adopted there has been a greater emphasis from national and local government to consider environmental issues against development, notably the Environment Act 2021 which outlined Biodiversity Net gain and its wider duty. While we do have 'GP4 – General environmental criteria' which contains a range of environmental criteria to be considered, when the MWLP is reviewed it may be prudent to look into expanding some of the criteria captured in GP4 to be</p>

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			<p>addressed in a stand-alone policy (for example Biodiversity and air quality)</p> <p>The Plan policies are performing well, including at appeal. There have been few appeals since the adoption of the Plan, and these have been dismissed.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A13.	<p>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review emerging and adopted neighbouring authority development plans and their planning context. ● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan. ● Review any relevant neighbourhood plans. ● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities. ● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs. 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council regularly liaises with authorities within Suffolk and adjoining Suffolk. Currently no matters that would materially impact the SMWLP have been identified in adjoining authority's plans.</p> <p>Suffolk has been selected for the devolution priority programme, under which a mayoral authority would be put in place across Suffolk and Norfolk, with responsibilities for preparation of a Spatial Development Strategy. Alongside this, proposals for local government reorganisation are also underway which will see the current two-tier system of local government replaced with a unitary structure. The 'Local Government Reorganisation Interim Plan Feedback: Suffolk' letter from MHCLG to Chief Executives dated 2.5.2025 states that "The legal status of local plan is not impacted by local government reorganisation. Where reorganisation occurs, new unitary authorities are expected to promptly prepare a local plan covering the whole of their area. Until that new local plan is adopted, existing constituent local plans remain in force as part of the development plan for their area. New unitary authorities have the discretion to progress any emerging constituent local plans."</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review any manifesto commitments and review the corporate and business plan. ● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority. ● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on. 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council declared a climate emergency in March 2019, after the Submission of the SMWLP but prior to its adoption.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR LOCAL PLAN	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	No	<p>If <u>no</u> go to question A16.</p> <p>If <u>yes</u>, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of your local plan	Yes	<p>If yes, based on the above provide a summary of the key reasons <u>why</u> an update to the local plan is necessary in section A17 below and complete Section B below.</p>

A17.	<p><u>Decision:</u> Update local plan / No need to update local plan (delete as necessary)</p> <p>Reasons for decision on whether or not to update local plan (clear evidence and justification will be required where a decision not to update has been reached):</p> <p>The Government introduced a new standard method for assessing housing need in December 2024, through amendments to the Planning Practice Guidance on Housing and Economic Needs Assessment. The housing need calculated under the new standard method equates to 3,909 dwellings per year for Suffolk as set out in Appendix A. This represents a significant change in housing need. Therefore, under paragraph 34 of the NPPF, it is concluded that strategic policies relating to supply require review to boost sand and gravel necessary to support the housing delivery targets that the current district and borough councils plan for. The Council is committing to preparing a revised Suffolk Minerals and Waste Local Plan, beginning in 2026, and is publishing an updated Minerals and Waste Development Scheme which will be further updated as information is released on the new plan making guidance.</p> <p>The assessment also identifies a small number of other policies or parts of them which require updating and a number of policies that remain effective as drafted. There are also a number of policies where future updates would be desirable however under present circumstances these are not considered necessary, and through the application of planning judgement these policies remain effective.</p> <p>Other actions that may be required in addition to or in place of an update of the local plan</p> <p>In addition to the ongoing implementation of the SMWLP in advance of a new Local Plan being in place, the Council will also continue to monitor the delivery of the Plan.</p>		
	B. LOCAL PLAN UPDATE FACTORS	YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
B1	Your local plan update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	N/A	

B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your local plan update is likely to involve a change to this.	Yes	The revised Local Development Scheme proposes a full Local Plan review.
B3	Your local plan update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	Yes	The revised Local Development Scheme proposes a full Local Plan review.
	You have answered yes to one or more questions above.		You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.
	You have said no to <u>all</u> questions (B1 to B3) above		If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of some local plan policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.
B4	<p>Decision: Full Update of Local Plan / Partial Update of Local Plan (delete as necessary)</p> <p>Reasons for scope of update:</p> <p>A full Local Plan review is necessary because of the issues discussed to boost sand and gravel up to housing delivery targets. The housing need assessed under the revised standard method will require a significant uplift for the district and boroughs in the amount of housing planned for, which is a fundamental part of the supply the SMWLP will provide for.</p>		

Date of assessment:	November 2025
Assessed by:	Strategic Planning Team
Checked by:	Peter Freer – Planning Strategy Manager
Comments:	