

Uttlesford Local Plan

Development Strategy: Options Stage Methodology

**Planning Policy Working Group
13 July 2015**

Contents

1. Introduction	3
National Requirements	3
Vision.....	5
An Iterative Process.....	5
The Technical Process and the Decision-Making Process	6
2. Conceptual Options	7
Urban Intensification	7
Urban Extensions	7
Village Extensions	8
Infilling	9
Free-standing new settlements.....	9
Unreasonable Options	10
Conclusions: Conceptual options.....	10
3 Methodology – Options Stage	11
Establishing Reasonable Assumptions.....	11
Areas of Search	13
Scenario Building.....	13
Growth Levels.....	13
Sustainability Appraisal (SA).....	14
Beyond the Options Stage – Next Steps	14

Appendices

Appendix A: PAS Soundness Self-Assessment Checklist	15
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1. Introduction

- 1.1 Following receipt of the report of the Planning Inspector on the previous submission Local Plan in December 2014, and subsequent withdrawal of the plan in January 2015, Uttlesford Council has restarted the Local Plan formulation process, including reconsideration of the options for development. A high-level Work Plan and Risk Assessment have been prepared outlining the main challenges in putting together the Local Plan.
- 1.2 In formulating a new Local Plan, the central task is to ensure that it is underpinned by a sound development strategy. The development strategy is the mechanism by which a locally-led vision for the future of the District will be brought together with national requirements to produce a plan which the Council is confident will be found 'sound' by a Planning Inspector following Examination in Public, and will thereby attain legal weight for use in the consideration of planning applications.

National Requirements

- 1.3 National requirements are set out in the National Planning Policy Framework (NPPF). The NPPF approach to 'sustainable development' requires consideration of a huge range of requirements which all need to be balanced and seen as a whole:

Sustainable development and the NPPF

Paragraph 6: "The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system".

Paragraph 8: "To achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions."

- 1.4 The NPPF sets a very high bar in terms of expectations that Local Planning Authorities will meet objectively assessed housing needs. A significant number of Local Plans have been withdrawn following advice from an appointed Planning Inspector that insufficient effort has been made:

Making every effort to meet objectively assessed development needs

Paragraph 14: the “presumption in favour of sustainable development...should be seen as a golden thread running through plan-making and decision-taking”...“Local Plans should meet Objectively Assessed needs...unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taking as a whole”;

Paragraph 17: “every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.”

- 1.5 Although logically and succinctly expressed in the NPPF, the following requirements have proven very difficult for many Local Planning Authorities as they prepare their Local Plans. In the case of the previous Uttlesford Local Plan, the Inspector drew attention to failings in relation to both the justification of the submitted plan and its effectiveness:

Examining Local Plans (NPPF Paragraph 182)

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 1.6 It is during the formulation of the development strategy underpinning the Local Plan that the Council must consider whether these requirements have been met. The Planning Advisory Service (PAS) has produced a

helpful checklist, contained at **Appendix A**, which will assist the District Council in reaching an informed judgement as to whether these requirements have been met through the development strategy.

Vision

- 1.7 The other main component of the development strategy is the vision. Given the NPPF requirements outlined above, the vision must be a positive one for delivering growth and development. This means that District Councillors have a difficult role, as set out by the Planning Advisory Service:

The Leadership Role of District Councillors

District Councillors have a vital **leadership** role to play to produce a **robust** Local Plan for your area that has **buy in** from all parties. The key challenge is to listen to the views and aspirations of your constituents and **balance** this with the professional advice of your planning staff in order to **plan** for, and **meet**, the **development needs of your area**.

Source: PAS: Local Plans and Plan-Making – Presentation to Local Plans Steering Groups (April 2015)

- 1.8 In order to be meaningful, a vision for an area must engage directly with challenges including where growth and critical infrastructure will be delivered, as well as where growth will be restrained. In order to achieve this, the vision must be an integral part of the development strategy, and vice-versa.

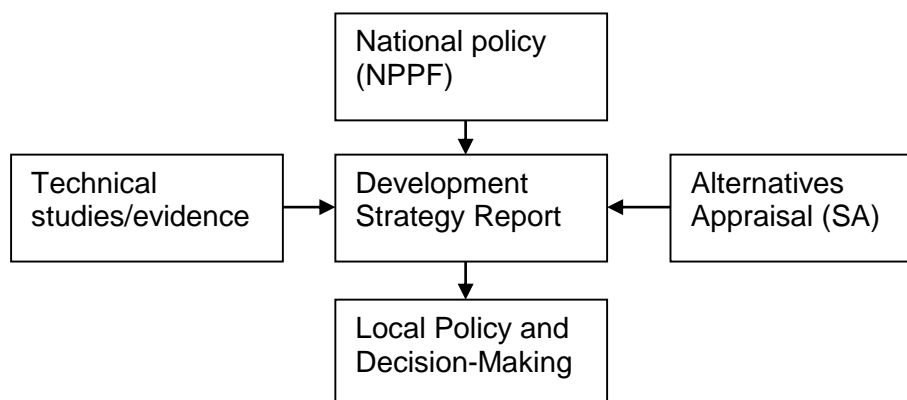
An Iterative Process

- 1.9 Formulation of a development strategy requires a gradual process of testing and refinement, commonly known in plan-making as an 'iterative' process. This process starts with very high-level test assumptions and then gradually applies more evidence and more techniques, leading to changes to the strategy.
- 1.10 As a result of this process, options which initially appear unfavourable may later be re-introduced, and options which initially appear favourable may drop out. It is crucially important the District Councillors in particular should understand this, and support the testing process. The Council must be careful not to prejudge where development will take place.
- 1.11 The iterative process also applies to the development of the vision, which cannot spring forth fully formed but advances gradually, in parallel with the emerging development strategy, and taking account of input from businesses and the community.

The Technical Process and the Decision-Making Process

- 1.12 In order to advance the development strategy a number of pieces of technical work have to be undertaken. These pieces of work are set out in the Work Plan but include the Green Belt Assessment, the Strategic Housing Land Availability Assessment, the Strategic Flood Risk Assessment and a number of others.
- 1.13 Technical work does not make policy decisions, and therefore is not subject to public consultation. However, depending on the nature of the technical study, limited engagement with key stakeholders such as Town and Parish Councils may assist with robustness and quality control.
- 1.14 The main policy decisions will be set out in a Development Strategy Report, which will draw together the various strands of technical work with recommendations based on planning judgement to provide a basis for the Council to make informed policy decisions. The Report is likely to be set out in a number of stages, at the Options, Preferred Options, and Submission stages, and will form the central narrative and audit trail as to how decisions were reached.
- 1.15 The development strategy set out in the report will be subject to Sustainability Appraisal (SA) by independent consultants. This appraisal will assist the Council in ensuring that the emerging Local Plan is justified, and has been assessed against reasonable alternatives. It may be that the SA of the Preferred Options will result in amendments to the emerging plan, or indeed a fundamental change in the strategy.

Figure 1: The Decision-Making Process



- 1.16 In their decision-making capacity District Councillors will be supported through the technical evidence and the requirements of the NPPF. Whilst evidence-based decision making is a crucial part of this, in practice planning decisions are rarely straightforward and it is important that Councillors are sufficiently aware of the process in order to make an informed judgement.

2 Conceptual Options

- 2.1 Before beginning to develop a methodology for undertaking strategy selection, it is helpful to undertake a brief review of the conceptual options. There are five basic options: urban intensification, urban extensions, infilling, village extensions, and free-standing new settlements.

Urban Intensification

- 2.2 In some parts of the country, particularly in former industrial cities, there are sometimes large areas of derelict land or vacant buildings which can be redeveloped. National policy encourages re-use of brownfield sites and permitted development rights have been extended to changes of use from employment to residential, making this considerably easier. However in many districts, including Uttlesford, recent years have seen the gradual redevelopment of the majority of obvious brownfield sites, and it is doubtful whether these will continue to play a significant role in future housing provision over forthcoming plan period.
- 2.3 A second aspect of urban intensification relates to density of development. In some parts of the country, notably in the London Plan, encouragement is given to higher density development, including high-rise development particularly in town centres are around transport interchanges such a tube and rail stations. In mostly rural districts such as Uttlesford, characterised chiefly by small villages and market towns, it is doubtful whether such a strategy would be appropriate.
- 2.4 Every Local Planning Authority is obliged to undertake a Strategic Housing Land Availability Assessment (SHLAA). Usually some relatively small urban sites suitable for redevelopment are identified through this assessment. It may be that a relatively modest contribution towards the OAN can be made through this source.

Urban Extensions

- 2.5 Urban extensions are developments to the edge of towns, ranging in scale from fairly small-scale to very large, in some cases of 10,000 or more homes together with a wide range of supporting infrastructure and employment opportunities. In recent years the majority of new development in the home counties has been delivered through urban extensions. Examples include Chelmsford and Bishop's Stortford North, which recently secured planning permission with construction due to start imminently.
- 2.6 The advantages of urban extensions are that they can provide sufficient scale to enable masterplanning and design of green space,

they may provide good access to existing centres of employment community and leisure facility, and also to the strategic transport network.

- 2.7 However in some cases the opportunities for urban extensions are limited and they can be perceived as incremental development without supporting infrastructure, which can put strain on the host settlement.
- 2.8 There are many cases where planned urban extensions adjoin or cross the administrative boundaries of Local Planning Authorities. In such cases joint working on cross-boundary strategic planning matters is essential, and required by the Duty to Co-Operate.

Village Extensions

- 2.9 These are similar in concept to urban extensions, but are much smaller in scale. Sometimes village extensions can relate well to an existing village, and can help to secure the long-term future viability of some village facilities, for example by using spare capacity in a village school. Village extensions can assist with provision of the 5-year housing land supply because they usually do not require significant lead-in time for provision of infrastructure or site preparation. They may score highly in terms of deliverability.
- 2.10 The disadvantages of most villages is that they are relatively remote from the full range of facilities and residents are heavily dependent on private car usage, which can cumulatively add to the strains on the wider transport network as well as local rural roads. To address these issues most Local Plans categorise villages according to the level of services and facilities and therefore suitability in principle for modest scale development. However in practice even villages with a relatively good range of facilities are capable of accommodating only a small amount of development.
- 2.11 Because of the small scale of villages relative to towns, these locations are often very sensitive to development and detailed consideration of the landscape setting and character is necessary in order to avoid substantial harm. In terms of the Local Plan work programme, it may be difficult to resource detailed study of a large number of small sites in multiple villages.
- 2.12 It is necessary for the District Council to reach a view on the overall approach to villages, taking into account the strategic nature of Local Plans, the relatively small contribution to development needs which may be made by the villages collectively, and the new powers and responsibilities investment in Parish Councils through Neighbourhood Planning. It may be that the District Council chooses to focus on providing allocations in only a very small number of villages based on sustainability criteria.

Infilling

- 2.13 This pattern of development contrasts with urban and village extensions in that it fills in gaps between existing development. In this sense there are similarities between infilling and urban intensification. Infill sites are often Greenfield. Infill sites are usually highly deliverable and can contribute towards the 5-year housing land supply.
- 2.14 In practice most infilling opportunities occur in villages. Infilling has the potential to change the character of a village and can result in substantial harm if infill sites are not carefully managed. Villages are often low density in character and can soon reach a threshold where, although this can be very hard to quantify. In Local Plans Village boundaries are usually very tightly drawn to prevent infilling. Whether certain infill sites are suitable depends on detailed knowledge of the site and the local village. In this respect many of the considerations which apply to village extensions above also apply to infilling.

Free-standing new settlements

- 2.15 New Towns, Eco-Towns, Garden Cities, Garden Villages are all examples free standing new settlements. In recent years the concept of Garden Cities has become popular, although in practice very few have been taken forward.
- 2.16 Proponents of new settlements argue that they are more sustainable because they enable infrastructure to be planned in, and enable comprehensive masterplanning and design, including provision for landscaping and green infrastructure as well as provision of a range of facilities. They may also have the advantage of taking development pressure off otherwise constrained existing settlements.
- 2.17 Whilst there were a significant number of new settlements developed in the post-war period, in particular the New Towns movement, these developments were backed by strong delivery vehicles backed by central government and significant funding.
- 2.18 The more recent history of new settlements is somewhat chequered. New settlements such as Northstowe near Cambridge have taken decades from the initial planning stages to delivery, even with the involvement of the national regeneration agency English Partnerships (later the Homes and Communities Agency). Of the Eco Towns programme only two of the original proposals are being carried forward, and progress with these is similarly slow. In relation to the current Garden Cities programme, the proposals for Ebbsfleet and Bicester have been in the planning stages for many years and it is questionable whether these adhere to genuine 'Garden City' principles.

- 2.19 One of the main concerns regarding new settlements from the point of view of Local Plan-makers therefore, is that Local Plan Inspectors are likely to be sceptical of plans which rely on such proposals to the exclusion of other developments. It could appear to an Inspector that instead of 'making every effort' to meeting housing needs, difficult decisions about planning for development are being deferred.
- 2.20 It is therefore considered unwise for Uttlesford District Council to proceed on the assumption that a new settlement approach alone is likely to form the basis of the new Local Plan, without an evidence base in place to demonstrate that all the options have been thoroughly tested.

Unreasonable Options

- 2.21 Exporting growth to other regions of the country is not considered reasonable, and there is currently no mechanism in place for this to take place. The government and the Planning Inspectorate are clear that Local Planning Authorities should not get distracted from planning to meet housing and development needs in their own areas.

Conclusions: Conceptual options

- 2.22 From the above review it is already clear that there will be no easy options in putting together a new Local Plan for Uttlesford District. It can also be seen that a decision to limit growth under one option, may increase pressure to find suitable locations under another option. So to limit growth in the villages may put pressure on the towns and vice-versa. New settlements may or may not assist in alleviating that pressure.
- 2.23 It should also be understood that at Examination in Public a Local Plans Inspector will be looking to see that the Local Planning Authority has made every effort to meet housing needs. From the point of view of Examination the ideal strategy is one comprising a 'mixed economy' of different types and scales of sites, which can provide a continuous supply of housing and development land throughout the plan period. A hybrid approach is characteristic of Local Plans found sound to date.

3 Methodology – Options Stage

- 3.1 This report addresses the early stages in formulation of the development strategy, from initial preparatory work through to the Options consultation, the first of three public consultations to be undertaken on the emerging Local Plan.
- 3.2 In planning terms, the purpose of the Options consultation is to broaden the Council’s understanding of a range of relevant planning issues related to each of the options set out in the consultation documents. It is to be hoped that new evidence will be presented through the consultation which can then be used in more detailed assessments to follow as the Council works towards the Preferred Options stage. The options consultation may also highlight other options which were not included in the consultation documents.
- 3.3 At the Option stage no detailed work will be undertaken in respect of deliverability. Assessment of potential infrastructure provision will need to be undertaken as more evidence is gradually accumulated.

Establishing Reasonable Assumptions

- 3.4 At this stage in the process it is important that the options should not be narrowed down too quickly before the evidence has been assembled and thoroughly tested. On the basis of initial work it would be too easy to drop options from further consideration, and this would then raise doubts about whether the authority was genuinely making every effort to meet objectively assessed needs.
- 3.5 For this reason, the initial stage in preparation of the development strategy is to establish a reasonable set of high level assumptions which can then be refined as more evidence is gradually accumulated through the strategy selection process.

Table 1: Initial high-level criteria

No.	Criterion	Explanation
1	Potential to contribute to effective cross-boundary strategic planning priorities.	This is a requirement of the Duty to Co-Operate enshrined in the Localism Act 2010 and is one of the main strategic planning priorities of Local Plans.
2	Potential to minimise the need to travel by car, for example by locating residential development near to jobs, shops, leisure opportunities, and other facilities.	Although it is recognised that in a complex economy car-based commuting will continue to play a significant role, and due to the rural nature of the district car-based commuting is high, the NPPF requires that the planning system

No.	Criterion	Explanation
		should attempt to provide opportunities to minimise the need to travel.
3	Potential access to the strategic highways and rail network.	Recognising that the rural road network is constrained and that despite efforts to encourage non-car travel a high proportion of trips will continue to be made by car. Access to the rail network can encourage out-commuting but some weight should be given to locations which are highly accessible by rail.
4.	Exclusion of areas with special protection, for example Registered Parks and Gardens and Sites of Special Scientific Interest.	The NPPF requires that LPAs should consider a hierarchy of protections. Registered Parks and Gardens and SSSIs are considered to be at the top of the hierarchy. However there is no established definition of 'buffer zones' and so any land outside the designation should be considered further in order to demonstrate that the Council has considered the context.
5.	Focus on key villages and "villages with a primary school and with some local services: e.g. village hall/pub/shop suitable for a scale of development that would reinforce its role as a local service centre" (known as Type A rural settlements in the 2014 submission Local Plan)	Extensive work on settlement classification has already been undertaken and this work was not called into question by the Local Plan Inspector ¹ . It is therefore not proposed to re-assess the village settlement classification. It is not considered practical to spend significant amounts of time assessing very small sites in Type B villages, beyond the work already programmed through the Strategic Housing Land Availability

¹ The Local Plan Inspector's report states: "3.24 The settlement classifications in table 2 of ULP are based broadly on the level of services available at each settlement. This is a more appropriate evidential base than the system underlying the classification of settlements in the present local plan. There will always be scope for debate about how much weight to apply to one factor or another and the appropriate categorisation for individual towns or villages where their services are at the margin between different classifications. However, the content of table 2 (and the resulting roles of the particular settlements) is generally soundly set out.

"3.25 Having said this, where it can be justified by relevant economic, social and environmental factors a case can sometimes be made to direct a greater or lesser amount of development to a settlement than would reflect its strict place in the settlement hierarchy. Some of the factors discussed during the hearing (eg locally identified demographic and other needs, local constraints and opportunities, patterns of bus services, and inter-relationships between particular settlements) can be relevant to such decisions and can be considered in taking the plan forward."

No.	Criterion	Explanation
		Assessment.

- 3.6 At this stage Green Belt is not considered an absolute constraint. An assessment of Green Belt will be undertaken to inform the Preferred Options stage of plan-making, and it will then be for a later stage of the development strategy work to consider whether the necessary exceptional circumstances exist to justify releasing any Green Belt land.
- 3.7 A matrix will be established to apply these five criteria in a consistent fashion. The matrix will then be interpreted spatially and represented on a diagrammatic map in order to clearly communicate the differences between the options. It is proposed that these maps will form the core of the Options consultation.

Areas of Search

- 3.8 The mapped areas will be represented as elliptical shapes to avoid misunderstandings as to the status, or attribution of any false precision to the exact locations or site boundaries. At this stage it is too early to draw conclusions about such detailed matters.
- 3.9 The scale of development proposed for testing at each of the areas of search is unknown at this stage. However, it is assumed that there will be a mix of large and small scale proposals carried forward for further testing. Indicatively, it is assumed that new settlement options could be up to 15,000 dwellings, that urban extensions will be much smaller and that villages will be smaller still.

Scenario Building

- 3.10 As part of the Options assessment it is important that there should be 'equal appraisal' of different options. This means that the total of each of the site-specific options must be the same. For example, it would not be sensible to set out Option A as a new settlement for 15,000 dwellings with Option B being allocations in the villages totalling 500 dwellings.
- 3.11 It is proposed that combinations of 'areas of search' will be combined into district-wide scenarios each totalling the same level of development.

Growth Levels

- 3.12 Two levels of development are proposed for the initial purposes of testing. The first scenario will be based on 580 dwellings per annum, the level suggested by the 2014 submission Local Plan Inspector's report.

- 3.13 A second scenario to test a higher level of development is also recommended. This is considered necessary for a number of reasons.
- 3.14 Firstly, it will ensure that the Council can demonstrate that it has planned positively for growth, and that it has a properly justified strategy, in accordance with NPPF requirements (Paragraph 182). Secondly, it will ensure that in the event that the level of objectively assessed need rises, or that the District needs to consider assisting other Districts with addressing their unmet housing needs, then this can be demonstrated to have been addressed. Finally, it is necessary to meet the requirements of the Strategic Environmental Assessment (SEA) Directive to consider reasonable alternative options. This work will evolve further through the Sustainability Appraisal.

Sustainability Appraisal (SA)

- 3.15 Having developed the above scenarios internally within the Council, the alternative scenarios will then be appraised separately by external sustainability consultants using the SA Framework set out in the SA Scoping Report. This is shown as the Stage 1 SA in the Work Plan.

Beyond the Options Stage – Next Steps

- 3.16 It is proposed that the mapped Areas of Search and Scenarios will be presented to the Planning Policy Working Group for discussion at the meeting on 27 July 2015. The Sustainability Appraisal of the Scenarios will be considered by the Working Group in the autumn.
- 3.17 The Scenarios and the Sustainability Appraisal of them will form the basis of a public consultation in the autumn/winter.
- 3.18 The Work Plan and Risk Assessment (July 2015) outlines the main tasks in undertaking the Local Plan through to the submission stage.
- 3.19 Work will be undertaken on the Strategic Housing Land Availability Assessment (SHLAA) to carry out a technical assessment of the sites submitted using a criteria-based approach. The SHLAA will inform the development strategy work but will not limit it to sites which have been put forward by landowners. Other workstreams on infrastructure planning and delivery will proceed in earnest, as part of a process of continuous engagement with key stakeholders to test all the options as far as possible.
- 3.20 Members can email comments on the approach to the development strategy to the Planning Policy Team at planningpolicy@uttlesford.gov.uk. Comments will be reported to future meetings of the Planning Policy Working Group.

Appendix A: PAS Soundness Self-Assessment Checklist

The following is an extract from the Self-Assessment checklist (March 2014) relating specifically to the development strategy component of Local Plans.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<p><i>Participation</i> Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	
<p><i>Research / fact finding</i> Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> • The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. <p>AND</p> <ul style="list-style-type: none"> • Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. <p>OR</p>	

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> • A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. <p>OR</p> <ul style="list-style-type: none"> • For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD). 	
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> • Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on 	

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	how sustainability appraisal has influenced the choice of strategy and the content of policies.	
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<ul style="list-style-type: none"> • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a 	

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<p>matrix).</p> <ul style="list-style-type: none"> • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> • Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area 	
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? 	<ul style="list-style-type: none"> • Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed. • Sections of the annual monitoring report and 	

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<p>sustainability appraisal report describing how the council will monitor:</p> <ol style="list-style-type: none"> a. the effectiveness of policies and what evidence is being collected to undertake this b. changes affecting the baseline information and any information on trends on which the DPD is based <ul style="list-style-type: none"> • Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances • Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision • Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. 	
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? • Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the 	<ul style="list-style-type: none"> • A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. • The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and 	

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>necessary commitment from the relevant organisation to the implementation of the policies?</p>	<p>evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.</p>	
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<ul style="list-style-type: none"> • Sections of the DPD setting out indicators, targets and milestones • Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal 	
<p><i>Consistent with national policy:</i> the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<ul style="list-style-type: none"> • Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement • Reports or copies of correspondence as to how representations have been considered and dealt with. 	

