

Soundness Self-Assessment Checklist (March 2014)

This note was prepared by AMEC and URS on behalf of the Planning Advisory Service. It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework. A separate checklist looks at legal compliance.

In summary – the key requirements of plan preparation are:

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
- Is it deliverable?
- Is it flexible?
- Will it be able to be monitored?
- Is it consistent with national policy?

The Tests of Soundness at Examination

The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 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:

1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

This means that the Development Plan Document (DPD) should be 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. The NPPF, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

This means that the DPD should be based on a robust and credible evidence base involving:

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- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

4. Consistent with national policy: enabling the delivery of sustainable development

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy www.planningportal.gov.uk). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

In addition, the Legal Compliance checklist (a separate document, see www.pas.gov.uk) should be completed to ensure that this aspect is covered.

The Duty to Co-operate will also be assessed as part of the examination process.

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<i>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.</i>		

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<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> • Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. • Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. • The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. • 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. 	<p>Vision and objectives are taken from the Aligned Core Strategy (ACS), as are the themes. Purpose of the Land and Planning Policies DPD (LAPP) is to deliver the Core Strategy within Nottingham City.</p> <p>Infrastructure delivery planning at publication stage, and subsequently updated where necessary.</p> <p>Site Proformas detail education, health, transport providers etc. views on how they intend to satisfy the needs generated by the proposed quantum of development.</p> <p>There is detail in the Nottingham City Local Development Scheme (LDS), (March 2018) about the scope and content of the DPD.</p> <p>Each policy has been drafted to ensure minimum conflict with other policies, or with the objectives of the ACS. The policies are internally consistent.</p> <p>The Sustainability Appraisal for the ACS Includes details of the housing growth options tested.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p>	<ul style="list-style-type: none"> • An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to 	<p>The LAPP meets the agreed</p>

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<p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or —specific policies in this Framework indicate development should be restricted. 	<p>delivery (see ‘Section 3 Effective’, below).</p> <ul style="list-style-type: none"> • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area) 	<p>contribution to the objectively assessed housing and employment needs as set out in the Core Strategy</p> <p>The spatial strategy is based on urban concentration with regeneration.</p> <p>Yes, the LAPP is fully justified by evidence of need and is supported by a robust and up to date evidence base. There is sufficient flexibility, for instance anticipated housing completions exceed the Plan requirement. The housing provision and policies for the provision of office floorspace and employment land are expressed as minimums providing some flexibility.</p> <p>Broxtowe, Gedling, Rushcliffe and Nottingham Retail Study, 2015</p> <p>Employment Background Paper/ Employment Land Forecast study</p> <p>Nottingham City Strategic Housing Land Availability Assessment (SHLAA)</p> <p>Housing Background Paper</p>

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		Strategic Housing Market Assessment
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk) 	<p>Core Strategy Policy A: Presumption in Favour of Sustainable Development</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate. 	<p>The LAPP targets are those contained in the ACS which is fully justified by evidence of need. It is considered that the Core Strategy meets the agreed contribution to the objectively assessed cross-boundary development needs of the area.</p> <p>Employment Background Paper/ Employment Land Forecast study</p> <p>Housing Background Paper</p> <p>Infrastructure Delivery Plan, Submission Version, March 2018 (partial update)</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Duty to Cooperate Statement, April 2018
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	<ul style="list-style-type: none"> Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate. 	Strategy based upon Core Strategy Policy 4: Employment Provision and Economic Development which seeks to strengthen and diversify the local economy. Emphasis is placed on moving to a more knowledge based economy and supporting Nottingham's role as a Science City is a key aspect of this. This is consistent with the priorities of the Local Enterprise Partnership (D2N2) e.g. involved the LEP in the production of Employment Land Forecasting Study: Nottingham Core HMA and Nottingham Outer HMA Final Report, August 2015
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. 	There are a range of LAPP policies aimed at enhancing the environment and securing appropriate services, infrastructure and housing to support

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	<ul style="list-style-type: none"> An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22) 	<p>employment growth. The Infrastructure Delivery Plan, Submission Version, March 2018 (partial update) identifies the infrastructure required to meet the spatial objectives and growth anticipated by the LAPP. Employment Provision and Economic Development Policies include:</p> <p>EE1: Providing a range of Employment Sites, EE2: Safeguarding Existing Business Parks/Industrial Estates</p> <p>EE3: Change of Use to Non-Employment Uses, EE4: Local Employment and Training Opportunities</p> <p>There is an emphasis placed on office development in particular to support the science and knowledge based economy. The economic strategy promotes Nottingham as a science city and supports the knowledge/creative and high technology cluster throughout the Plan area.</p> <p>The office floorspace and employment</p>

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		<p>land provisions are expressed as minimum figures and are therefore can flexible in relation to unforeseen requirements. Policies seek a range of suitable sites for new employment. This includes appropriate provision for all employment sectors including non B class uses which can be accommodated on employment sites where appropriate.</p> <p>Employment Background Paper</p> <p>Employment Land Forecasting Study: Nottingham Core HMA and Nottingham Outer HMA Final Report, August 2015</p>
<p>2. Ensuring the vitality of town centres (paras 23-37)</p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres. 	<p>ACS Policy 5: Nottingham City Centre promotes the City Centre as the Region’s principal shopping, leisure and cultural destination significantly increasing retail and leisure floorspace and safeguarding primary shopping frontages. Policy 6: Role of Town and</p>

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		Local Centres defines the network and hierarchy of centres in the plan area. The Policy Map identifies primary and secondary frontages and centre boundaries and the policies contained in the Role of the City, Town, District and Local Centres section of the LAPP aim to maintain or enhance their vitality and viability
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	<ul style="list-style-type: none"> • An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages identified and allocated. 	<p>Yes the ACS is based on evidence set out in the Retail Background paper and Employment background paper. Primary frontages and Primary Shopping Areas are dealt with in the LAPP. Secondary frontages are generally those frontages within the PSA that are not Primary Frontages.</p> <p>Broxtowe, Gedling, Rushcliffe and Nottingham Retail Study, 2015</p> <p>Retail Background Paper</p> <p>Employment Land Forecasting Study: Nottingham Core HMA and Nottingham Outer HMA Final Report, August 2015</p> <p>Employment Background Paper</p>
3. Supporting a prosperous rural economy (para 28)		

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<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<ul style="list-style-type: none"> Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities. 	N/A
<p>4. Promoting sustainable transport (paras 29-41)</p>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for</p>	<ul style="list-style-type: none"> Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. If local (car parking) standards have been prepared, are they justified and necessary? (39) Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan. 	<p>Yes the LAPP takes an integrated approach to locating development in accessible locations in accordance with Core Strategy Policy 2: Spatial Strategy. Significant generators of travel including shops, services and facilities are to be located within or adjoining town centres or other accessible locations.</p> <p>The Greater Nottingham Councils have been working jointly with adjoining authorities and the transport providers. The Local Transport Plans for Nottingham and Nottinghamshire prepared by the two Highways Authorities are fully aligned and have been taken into account. They seek to reduce the need to travel by car by focusing development in the most suitable locations, minimising congestion and pollution and making the best use of existing infrastructure assets. The two Highways Authorities have also been involved in and support the transport modelling</p>

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<p>major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>exercise and mitigation strategy.</p> <p>The Strategy proposes a number of strategic sites that will have a mix of uses including housing and employment that will help reduce the need to travel.</p> <p>Detailed car parking standards are set out in LAPP</p> <p>The Infrastructure Delivery Plan, Submission Version, March 2018 (partial update) identifies the sustainable transport infrastructure required to meet the spatial objectives and growth anticipated by the LAPP.</p> <p>Transport Issues are highlighted in the Site Development Principles contained in the LAPP and also covered in the Site Delivery Schedules.</p> <p>LAPP Policies TR1: Parking and Travel Planning, and TR3: Cycling are aimed at managing travel demand. LAPP Policy TR2: The Transport Network seeks to resist development which would prejudice the efficient and safe operation of the existing highway network or future improvements to the transport network identified through the Local Transport Plan process.</p>

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5. Supporting high quality communications infrastructure (paras 42-46)		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> • Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44. 	<p>LAPP Policy IN1: Telecommunications seeks to ensure that acceptable provision can be made for information communications technology.</p>
6. Delivering a wide choice of high quality housing (paras 47-55)		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> • Identification of: <ol style="list-style-type: none"> a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) • A SHLAA 	<p>The Council has a strong track record of housing delivery with delivery above Local Plan targets being achieved until development stalled due to the economic downturn. The Council therefore consider that an additional buffer of 5% is appropriate.</p> <p>Evidence of windfall sites in the 5 year housing supply for Nottingham and is set out in the latest relevant Housing Land Availability Report (2017) February 2018</p>

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		<p>The ACS allocates strategic sites and</p> <p>Non strategic sites are delivered in accordance with the locational guidance in the ACS (Policy 2) through the preparation of the LAPP. The SHLAA identifies potential housing sites for consideration through the site allocations process.</p> <p>Past housing delivery is set out in the Housing Background Paper .</p> <p>There is in excess of an identified 5 year land supply</p>
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	<ul style="list-style-type: none"> • Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 	LAPP Policy SA1: Site Allocations details the developable sites allocated for housing over the plan period and demonstrates a 9.4% buffer on the Core Strategy Housing Requirement.
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	The original Housing trajectory is set out in the Core Strategy. Historic housing delivery is set out in the Housing Background Paper and in the Housing Land Availability Report the

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		<p>Housing Trajectory is also updated on an annual basis. A Council housing strategy has been previously been prepared (2013-15) and a new version (2018-21) is currently intended to be endorsed in June 2018.</p>
<p>Set out the authority's approach to housing density to reflect local circumstances (47).</p>	<ul style="list-style-type: none"> • Policy on the density of development. 	<p>LAPP Policy DE2: Context and Place Making criteria b) seeks to secure high quality development of an appropriate density to respect the local context.</p> <p>LAPP Policy RE1: Facilitating Regeneration seeks to secure an appropriate density of development commensurate with the regeneration ambitions for the area.</p> <p>Site Assessments have given rise to an estimated density range which takes into consideration, the anticipated housing types, the characteristics of the site and densities achieved in the surrounding area/on similar sites.</p>
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)</p>	<ul style="list-style-type: none"> • Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50) • Policy on affordable housing and consideration for the need for 	<p>The LAPP determines an appropriate mix of housing for example giving priority to securing more family housing, in line with ACS Policy 8.</p> <p>The ACS includes targets for affordable housing to be negotiated by each authority. A threshold is set</p>

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	<p>on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)</p>	<p>out in the LAPP.</p> <p>The need for affordable housing has been objectively assessed and information is also included within the Strategic Housing Market Assessment</p> <p>ACS Policy 5: Nottingham City Centre, Policy 8: Housing Size, Mix and Choice and Policy 9: Gypsies, travellers and Travelling Showpeople seek to secure an appropriate mix and balance of housing across the area, including family, affordable, specialist and student housing.</p> <p>LAPP Policy HO1: Housing Mix, HO3: Affordable Housing, and HO4 Specialist and Adaptable Housing and HO5 Locations for Purpose Built Student Accommodation seek to deliver this locally. There is an emphasis on the need for family housing in Nottingham and to also secure self and custom build housing.</p> <p>Strategic Housing Market Assessment</p>

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<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> • Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new isolated homes listed at para 55. 	N/A
7. Requiring good design (paras 56-68)		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<ul style="list-style-type: none"> • Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues 	<p>ACS Policy 10: Design and Enhancing Local Identity and Policy 11: The Historic Environment provide strategic design guidance. The LAPP also contains design policies aimed at securing high quality design and enhancing local identity.</p> <p>Policies include:</p> <p>DE1: Building Design and Use, DE2: Context and Place Making, DE4: Creation and Improvement of Public Open Spaces in the City Centre, DE5: Shopfronts, DE6: Advertisements.</p> <p>There are also other policies that seek to secure high quality of development such as Policy HE1: Proposals affecting designated and non-designated heritage assets.</p>

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8. Promoting healthy communities (paras 69-77)		
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).	<ul style="list-style-type: none"> • Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69) 	<p>Many of the LAPP sites are for a mix of uses and/or a mix of dwellings</p> <p>LAPP Policy DE1: Building Design and use, criteria b) seeks to enhance community safety, crime protection and street activity.</p> <p>Policy DE4: Creation and Improvement of Public Open Spaces in the City Centre also seeks to promote community interaction through enhanced public spaces.</p>
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	<ul style="list-style-type: none"> • Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure. 	Policies contained in the Local Services and Healthy Lifestyles and Role of City, Town and District sections of the LAPP seek to protect/secure the provision of services and facilities to support anticipated growth.
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	<ul style="list-style-type: none"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational 	ACS Policy 16: Green Infrastructure, Parks and Open space seeks to protect existing and potential Green

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	<p>buildings and land from development, with specific exceptions. (74)</p> <ul style="list-style-type: none"> • Protection and enhancement of rights of way and access. (75) 	<p>Infrastructure corridors and assets.</p> <p>Parks and Open Spaces are protected from development and deficiencies addressed in the LAPP under policies:</p> <p>EN1: Development of Open Space, EN2: Open Space in New Development, Policy EN3: Playing Fields and Sports Grounds, EN4: Allotments, EN5: Development Adjacent to Waterways, EN6 Biodiversity.</p> <p>The City Council uses a 'toolkit' to consider open space issues raised by new development.</p> <p>It has identified specific needs and quantitative and qualitative deficits or surpluses of open space, sports and recreational facilities. A Playing Pitch Assessment / Area Commentaries and Facilities Strategy have been produced.</p> <p>The City Council has an Adopted Playing Pitch Strategy and a Sport & Physical Activities Strategy It has also published a 'Breathing Space – Revitalising Nottingham's Open and Green Spaces' (2010) document which sets out the vision for the City's Open</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>and Green Spaces.</p> <p>There are policies for open space, recreation and leisure</p> <p>LAPP Policy DE2: Context and Place Making criteria a) requires development to avoid obstructing or adversely affecting a Public Right of Way.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78) 	<p>At the time of writing of the LAPP, no local community within Nottingham has proposed designating any Local Greenspace. Should any local communities wish to designate Local Greenspace in the future, this will be achieved through a Neighbourhood Plan or Local Plan review.</p>
<p>9. Protecting Green Belt land (paras 79-92)</p>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement</p>	<ul style="list-style-type: none"> • Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> ○ Enhance the beneficial use of the Green Belt. (81) ○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) ○ Specify that inappropriate development should not be approved except in very special circumstances. (87) ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	<p>ACS Policy 3: The Green Belt retains the principle of the Nottingham/Derby Green Belt.</p> <p>The Green Belt Background Paper, January 2016 highlights a number of minor boundary changes which correct errors, reflect changes (such as development) that have occurred since the last local plan, or better link the boundary to defensible boundaries. There is only one instance</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>		<p>where it is considered appropriate to review the Green Belt Boundary to accommodate new development, at the former Fairham College in Clifton (PA59).</p>
<p>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> • Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building’s sustainability which are consistent with the Government’s zero carbon buildings policy . (95)) 	<p>ACS Policy 1: Climate Change, Policy 2: The Spatial Strategy and Policy 14: Managing Travel Demand cover these issues.</p> <p>Climate change policies contained in the LAPP, most specifically Policy CC3: Water.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> • A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97) 	<p>Core Strategy Policy 1: Climate Change</p> <p>LAPP Policy CC2: Decentralised Energy and Heat Networks encourages the connection to existing decentralised energy and heat network as shown on the Policies Map.</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<ul style="list-style-type: none"> • Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) 	<p>ACS - Policy 1: Climate Change reflects national policy on flooding in order to</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> • Policies to manage risk, from a range of impacts, through suitable adaptation measures 	<p>avoid flood risk</p> <p>The LAPP Climate Change policies, in particular Policy CC3: Water address this</p>
Take account of marine planning (105)	<ul style="list-style-type: none"> • Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation • Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development • Integrate as appropriate marine policy objectives into emerging policy • Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	N/A
Manage risk from coastal change (106)	<ul style="list-style-type: none"> • Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	N/A
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	<ul style="list-style-type: none"> • A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. • Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs. 	<p>ACS Policy 16: Green Infrastructure, Parks and Open Spaces and Policy 17: Biodiversity seek to protect valued landscapes and establish a network of regional and sub regional green infrastructure corridors identified on the Key Diagram.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>There are no nationally designated special landscape areas. Policies in the Green Infrastructure, Parks and Open Space and Biodiversity sections of the LAPP define the Open Space Network where development will be resisted (Policy EN1: Development of Open Space), secure open space in new development (Policy EN2: Open Space in New Development), and along waterways (Policy EN5: Development Adjacent to Waterways) and increase biodiversity wherever possible (Policy EN6: Biodiversity).</p>
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<ul style="list-style-type: none"> • Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity. 	<p>LAPP policy IN2: Land Contamination, Instability and Pollution aims to protect existing and future citizens and the environment from the effects of pollution, both existing and that originating from new development. Policy IN3: Hazardous Installations and Substances seeks to control sites where hazardous substances could be present.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> • Identification and mapping of local ecological networks and geological conservation interests. • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species 	<p>ACS Policy 16: Green Infrastructure, Parks and Open Spaces and Policy 17: Biodiversity seek to protect valued landscapes and establish a network of regional and sub-regional green infrastructure corridors identified on</p>

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>the key diagram.</p> <p>Planning for biodiversity in the ACS plan area crosses local authority boundaries at a landscape scale where the strategic focus is on areas and networks of habitats and species consistent with the UK and Nottinghamshire Biodiversity Action Plans.</p> <p>Policies in the Green Infrastructure, Parks and Open Space and Biodiversity sections of the LAPP define the Open Space Network where development will be resisted (Policy EN1: Development of Open Space), secure open space in new development (Policy EN2: Open Space in New Development), and along waterways (Policy EN5: Development Adjacent to Waterways) and increase biodiversity wherever possible (Policy EN6: Biodiversity).</p>
<p>12. Conserving and enhancing the historic environment (paras 126-141)</p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> • A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets 	<p>ACS Policy 11: The Historic Environment seeks to conserve and/or enhance the historic environment and heritage assets.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) 	<p>LAPP policies specific to the historic environment include Policy HE1: Proposals Affecting Designated and Non-Designated Heritage Assets and Policy HE2: Caves. Proposals will be supported where they conserve and enhance a heritage asset (including caves) and its setting.</p> <p>Nottingham City Council, Heritage Strategy, March 2015</p>
13. Facilitating the sustainable use of minerals (paras 142-149)		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>The City Council is the minerals authority and the policy map includes Minerals Safeguarding Areas. Policy MI1: Minerals Safeguarding seeks to resist the unnecessary sterilisation of mineral resources. Minerals issues are also covered by LAPP Policy MI2: Restoration, After-use and After-care and Policy MI3: Hydrocarbons</p>
<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. 		

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Participation</i></p> <p>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>The main evidence is set out in the Report of Consultation.</p> <p>The consultation process has allowed for effective engagement of all interested parties and has been undertaken in accordance with the Council's adopted Statement of Community Involvement and the relevant Town and Country Planning Regulations. The key consultation stages were as follows:</p> <p>An issues and options document was consulted upon between 26/9/11-21/11/11.</p> <p>Consultation on additional sites between 5/3/12-30/4/12.</p> <p>A Preferred Option Local Plan was consulted on 7/10/13-2/12/13.</p> <p>2 additional sites were also consulted on: Owners, neighbouring occupiers and residents between 22/8/14 and 3/10/14 and Statutory Consultees between 17/9/14 and 29/10/14.</p> <p>A Nottingham City Land and Planning</p>

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Policies Development Plan Document (Local Plan Part 2), Publication Version, January 2016 consultation was undertaken 29/1/15 – 11/3/16.</p> <p>A site (Horizon Factory) was consulted on 28/9/16-9/11/16.</p> <p>A Revised Publication Version LAPP, September 2017 consultation took place between 29/9/17-10/11/17</p>
<p><i>Research / fact finding</i></p> <p>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?</p> <p>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> <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>The LAPP is fully justified by the evidence. This includes technical studies, consultations and sustainability appraisal findings. Specific evidence is referred to throughout the LAPP and sources are identified in the text.</p>
<p><i>Alternatives</i></p>	<ul style="list-style-type: none"> • Reports and consultation documents produced in the early stages 	<p>The preparation of the LAPP was an</p>

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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>	<p>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.</p> <ul style="list-style-type: none"> • 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 how sustainability appraisal has influenced the choice of strategy and the content of policies. 	<p>iterative process whereby options were identified, consulted upon and tested against sustainability criteria and also justified in the light of the evidence base. This process resulted in the policy options set out in the Publication Draft, and subsequently, the Revised Publication Local Plan which is considered by the Council to be the most appropriate approach given the reasonable alternatives considered.</p> <p>The main audit trail is made up of the various consultation documents and Council reports and is detailed in the Sustainability Appraisal and Report of Consultation which were prepared in tandem.</p>
<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 		

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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 matrix). 	<p>The ACS explains in general terms the links between it and the Nottingham’s Sustainable Community Strategy - The Nottingham Plan to 2020, whilst Appendix D sets out more specifically the relationships between each policy and the priorities of each authority’s SCS. The vision and priorities of each authority’s SCS are summarised. The overall character of the plan area is summarised. A spatial portrait is given in the ACS</p> <p>ACS Policy 2: The Spatial Strategy sets out the spatial vision.</p> <p>The spatial objectives are also set out in the ACS.</p> <p>The council has therefore clearly identified the issues that the LAPP is seeking to address, and it is clear what the LAPP is trying to achieve.</p> <p>A Housing Trajectory was included in the Aligned Core Strategy and this has been updated and is included in Nottingham City’s Housing Land Availability Report 2017, February 2018</p>

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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? 	<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>An IDP was produced for the ACS and one has been produced for the LAPP</p> <p>Critical Strategic Infrastructure requirements are set out in Appendix B of the ACS</p> <p>The Infrastructure Delivery Plan, Submission Version, March 2018 (partial update) assesses the range of infrastructure requirements, their phasing, costs and implications on plan wide viability</p> <p>Site Proformas identify how infrastructure/service providers intend to meet the needs generated by the anticipated growth.</p> <p>Infrastructure providers have been involved in the Duty to Cooperate Statement, April 2018 and views are also included in the Report of Consultation.</p> <p>Viability studies were undertaken in relation to the Core Strategy and LAPP.</p>
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial</p>	<ul style="list-style-type: none"> • Sections of the DPD that reflect the plans or strategies of the local authority and other bodies 	<p>The Aligned Core Strategies are the product of much joint working</p>

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>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"> • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area 	<p>between the various Councils across the HMA and with other organisations. Various parts of the ACS reflect the plans or strategies of other bodies. These include the strategic priorities of the LEP and the Local Transport Plans, including close cooperation with the highway authorities and the Highways Agency. The IDPs for the ACS and LAPP have been prepared with the assistance of all the main infrastructure and utility providers and organisations such as the Environment Agency have had significant input into the LAPP policies and site allocations. .</p> <p>The LAPP fully takes into account the priorities of Nottingham's Sustainable Community Strategy - The Nottingham Plan to 2020</p> <p>The LAPP therefore does go beyond traditional land use planning to reflect the concept of spatial planning.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a 	<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 	<p>Policy Analysis documents were</p>

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>variety of, or unexpected changes in, circumstances?</p> <ul style="list-style-type: none"> • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<p>reviewed.</p> <ul style="list-style-type: none"> • Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul 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 • 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>prepared alongside the ACS.</p> <p>Key Monitoring Indicators are included in the ACS and these set out clear targets/indicators to assess objectives. There are a range of triggers included that would result in a number of actions intended to ensure that the ACS is able to be flexible enough to respond to changing circumstances. Similarly, the LAPP includes a Monitoring Framework. The Authority Monitoring Report will monitor the effectiveness of the policies. Five years from the adoption the LAPP policies will be reviewed to ensure that they are continuing to meet the strategic objectives.</p>
<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 necessary commitment from the relevant organisation to the implementation of the policies? 	<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 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 	<p>A Duty to Co-operate Statement was produced for the ACS, and the LAPP.</p> <p>Greater Nottingham is made up of the administrative areas of Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe Councils and the Hucknall part of Ashfield. These authorities, with the support of Derbyshire and Nottinghamshire County Councils worked together to produce an aligned set of policies and principles on how the city region can</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	other consultees as appropriate.	develop between 2011 and 2028.
<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>Key Monitoring Indicators are included in the ACS and these set out clear targets/indicators to assess objectives. There are a range of triggers included that would result in a number of actions intended to ensure that the ACS is able to be flexible enough to respond to changing circumstances. Similarly, the LAPP includes a Monitoring Framework. The Authority Monitoring Report (AMR) will monitor the effectiveness of the policies. Five years from the adoption the LAPP policies will be reviewed to ensure that they are continuing to meet the strategic objectives.</p> <p>The Infrastructure Delivery Plan, Submission Version, March 2018 (partial update) also contains targets</p> <p>There will also be monitoring as indicated in the Sustainability Appraisal Framework and SA Scoping Report Responses</p>
<p><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></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 Self-Assessment Checklist (March 2014)

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. 	<p>No. The submission LAPP has been positively prepared and is based on objectively prepared up to date and relevant evidence. It is consistent with the National Planning Policy Framework.</p>

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Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

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Policy Expectations	Possible Evidence	Evidence Provided
<p>Policy A: Using evidence to plan positively and manage development (para 6)</p>		
<p>Early and effective community engagement with both settled and traveller communities.</p>	<ul style="list-style-type: none"> • Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups. 	<p>Travellers groups have been consulted as part of the preparation of the Aligned Core Strategy and the LAPP e.g. a Stakeholder Workshop 18/6/14 and views considered. The ACS (Policy 9) seeks to ensure sufficient sites are identified through the allocation of sites in other development plan documents in accordance with an up to date evidence base. Policy 9 is a criteria based policy intended to cover any need that arises for such accommodation over the plan period.</p> <p>The Council has engaged with travellers during the evidence gathering stage and preparation of the LAPP. The councils in Nottinghamshire worked up an agreed methodology for assessing need.</p>

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Policy Expectations	Possible Evidence	Evidence Provided
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<ul style="list-style-type: none"> • Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions. 	<p>The Council has reviewed and updated evidence of need</p> <p>Yes the core strategies are aligned. There is a common evidence base covering most of Nottinghamshire including the ACS Plan area which is based on a consistent methodology.</p> <p>An aligned up to date assessment has been undertaken</p>
<p>Policy B: Planning for traveller sites (paras 7-11)</p>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> • Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 11 	<p>Broxtowe, Gedling, Nottingham and Rushcliffe Gypsy and Traveller Accommodation Assessment, January 2016</p> <p>Engagement with the Travelling Showpeople demonstrated their desire to remain at a site at Western Boulevard (PA22). Accordingly, this site was removed from the proposed allocations in order to allow them to remain.</p>

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Policy Expectations	Possible Evidence	Evidence Provided
Policy C: Sites in rural areas and the countryside (para 12)		n/a
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		
Policy D: Rural exception sites (para 13)		n/a
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	<ul style="list-style-type: none"> • If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity. 	
Policy E: Traveller sites in Green Belt (paras 14-15)		n/a
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<ul style="list-style-type: none"> • Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process. 	

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Policy Expectations	Possible Evidence	Evidence Provided
Policy F: Mixed planning use traveller sites (paras 16-18)		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	<ul style="list-style-type: none"> • Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. • N.B. Mixed use should not be permitted on rural exception sites 	n/a
Policy G: Major development projects (para 19)		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	<ul style="list-style-type: none"> • Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community. 	n/a

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Integration of marine and terrestrial planning

As the UK marine area and marine plan area boundaries extend up to the level of mean high water spring tides while terrestrial planning boundaries generally extend to mean low water spring tides (including estuaries), the marine plan area will physically overlap with that of some terrestrial plan. Local authorities with any tidal frontage, even if far inland and not conventionally regarded as coastal, must therefore take full account of the MMO, the MPS and marine plans under S.58 of the Marine and Coastal Access Act and the Duty to Co-operate in Section 110 of the Localism Act 2011. A full list of the local planning authorities whose areas overlap with the UK marine area appears in Appendix One.

Furthermore, the Duty to Co-Operate requires all local planning authorities, even if landlocked, to take account, where relevant, of the MMO's plans and activities when preparing their Local Plans. Finally, the NPPF requires LPAs to take the MPS into account under the tests of soundness (specifically, to test if an emerging DPD is consistent with national policy, which includes the MPS).

The Marine and Coastal Access Act 2009 (the Act) provided for the introduction of a marine planning system for England's inshore and offshore marine area, establishing the Secretary of State as the Marine Planning Authority for these areas. The Act also provided for the establishment of the Marine Management Organisation (MMO) and for the Secretary of State to delegate various planning functions. The planning functions including preparation and review were delegated to the MMO in 2010. The Act also provided for the adoption of the UK Marine Policy Statement (MPS). The MPS was adopted on 18 March 2011 and provides the policy framework for marine planning and for all decisions likely to affect the marine area.

There are eleven plan areas in English waters, for each of which a Marine Plan will be prepared by the MMO and adopted by the Secretary of State for the Environment, Food and Rural Affairs.

In practical terms, all activities undertaken in the marine area require land based infrastructure, without which our ability to benefit economically and socially from activities in the marine area would be extremely limited.

The UK Government's vision for the marine environment, as articulated in the MPS, is:

'clean, healthy, safe, productive and biologically diverse oceans and seas'.

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In the absence of a marine plan prepared by the MMO and adopted by the Secretary of State the MPS is the relevant marine policy document. Where a marine plan has been adopted both the MPS and the Marine Plan are relevant marine policy documents for the marine plan area.

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all¹ public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions²

In addition, the MPS seeks integration of marine planning and the terrestrial planning system through:

- Consistency between marine and terrestrial policy documents and guidance
- Liaison between respective responsible authorities for terrestrial and marine planning, including in plan development, implementation and review stages
- Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions

These aims are further supported by footnote 36 in the NPPF.

¹ Like the Duty to Co-Operate, no distinction is made by the Marine and Coastal Access Act between public authorities with a tidal frontage and those without. Emphasis is placed on the likelihood of the decision being made affecting the marine area.

² For example, decisions about what representations they should make as a consultee or about what action they should carry out themselves.

Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
Key requirements under the Duty to Co-Operate		
Consistency between marine and terrestrial policy documents and guidance	<ul style="list-style-type: none"> • Demonstration of consistency of aim between relevant local plan policies and marine policy documents (i.e. the MPS and any relevant adopted marine plans) • Proof of collaborative working with the MMO and that the MPS has been taken into account. 	n/a
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	<ul style="list-style-type: none"> • Early and effective policy development engagement undertaken, including discussions with the MMO • Evidence of iteration of policies and plans as a result of engagement with the MMO • Evidence of engagement with the MMO in relation to monitoring, implementation and throughout the policy cycle • Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	n/a
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	<ul style="list-style-type: none"> • Evidence that the LPA has shared or provided relevant data to the MMO that can help inform Marine Plans or MPS review • Demonstration that local plan policy has been underpinned by data provided by the MMO or the MPS • Explicit cross-referencing in local plan to MPS, the MMO, their 	n/a

Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
	roles, and relevant marine plans	
Marine Policy Statement- Chapter 2: General Principles for Decision-Making³		
Sections 2.1 -2.2: The UK vision for the marine environment		n/a
The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas') Achieving the vision through marine planning	<ul style="list-style-type: none"> Reference in DPD where appropriate to UK vision for the marine environment Contribution to the vision through local plan policies and supporting text 	n/a
Section 2.4: Considering benefits and adverse effects in marine planning		n/a
Consider benefits and adverse effects of plan policies	<ul style="list-style-type: none"> Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal 	n/a
Section 2.5: Economic, social and environmental considerations	<ul style="list-style-type: none"> 	n/a
Contribute to the objectives of relevant	<ul style="list-style-type: none"> Reference to relevant EU Directives in DPD and sustainability 	n/a

³ As the Marine Policy Statement was not targeted specifically at terrestrial planning authorities, some of its sections are, in practice, relevant to marine planning authorities only and/or there is already a comprehensive policy framework governing terrestrial development (e.g. energy infrastructure), Where this is considered to be the case, i.e. where it is considered likely that a terrestrial planning DPD would be found sound without referencing that section, the section in question has been omitted from this checklist.

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Policy Expectations	Possible Evidence	Evidence Provided
EU Directives (Marine Strategy Framework Directive and Water Framework Directive)	appraisal <ul style="list-style-type: none"> • Consideration of contribution of DPD policies to the objectives of relevant EU Directives 	
Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities		
3.1 Marine Protected Areas		
Incorporate identified areas and features of importance for nature conservation Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts	<ul style="list-style-type: none"> • Identification of relevant areas and features of importance for nature conservation within relevant marine plan area(s) • Consideration of impacts of policy and/or terrestrial development on those areas and features of importance • Measures to mitigate, monitor and manage negative impacts on those areas and features of importance 	n/a
3.4 Ports and shipping		
Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety Protect the efficiency and resilience of continuing port operations	<ul style="list-style-type: none"> • Evidence that policy with potential impact on ports and shipping minimises negative impacts on sector • Where relevant, evidence that economic, employment and transport policies are protective of ports and shipping sector 	n/a
3.8 Fisheries		
Consider potential economic, social	<ul style="list-style-type: none"> • Where relevant, evidence that other policies minimise negative 	n/a

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Policy Expectations	Possible Evidence	Evidence Provided
and environmental impacts of other developments on fishing activity	impacts on fishing activity and/or aquaculture	
3.9 Aquaculture		
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	<ul style="list-style-type: none"> Where relevant, evidence that the benefits of aquaculture industry development have been considered 	n/a
3.10 Surface water management and waste water treatment and disposal		
Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment	<ul style="list-style-type: none"> Reference to and consideration of the co-existence of waste water infrastructure with other marine activities, including the potential for waste water infrastructure to mitigate marine impacts through design or location 	n/a
3.11 Tourism and recreation		
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and local communities	<ul style="list-style-type: none"> Where relevant, reference to marine tourism and recreation Evidence that the potential for marine tourism and recreation has been recognised in plan-making 	n/a

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Appendix One

This is an alphabetical list of all local planning authorities in England whose area overlaps with the UK marine area.

Adur	City of Westminster	Havant	North Tyneside
Allerdale	Colchester	Havering	North York Moors National Park
Arun	Copeland	Horsham	Northumberland
Babergh	Cornwall	Hounslow	Norwich
Barking and Dagenham	County Durham	Huntingdonshire	Poole
Barrow-in-Furness	Dartford	Ipswich	Preston
Basildon	Doncaster	Isle of Wight	Purbeck
Bassetlaw	Dover	Isles of Scilly	Redcar and Cleveland
Bexley	East Cambridgeshire	Kensington and Chelsea	Richmond upon Thames
Blackpool	East Devon	King's Lynn and West Norfolk	Rochford
Boston	East Lindsey	Lake District National Park	Rother
Bournemouth	East Riding of Yorkshire	Lambeth	Scarborough
Broadland	Eastbourne	Lancaster	Sedgemoor
Broads Authority	Eastleigh	Lewes	Sefton
Canterbury	Exeter	Lewisham	Selby
Carlisle	Exmoor National Park	Liverpool	Shepway
Castle Point	Fareham	Maidstone	South Cambridgeshire
Chelmsford	Fenland	Maldon	South Downs National Park
Cheshire West and Chester	Fylde	Medway	South Gloucestershire
Chichester	Gateshead	Middlesbrough	South Hams
Chorley	Gloucester	New Forest	South Holland
Christchurch	Gosport	New Forest National Park	South Lakeland
City of London	Gravesham	Newark and Sherwood	South Norfolk
City of Brighton and Hove	Great Yarmouth	Newcastle upon Tyne	South Ribble
City of Bristol	Greenwich	Newham	South Somerset
City of Kingston upon Hull	Halton	North Devon	South Tyneside
City of Peterborough	Hambleton	North East Lincolnshire	Southend-on-Sea
City of Plymouth	Hammersmith and Fulham	North Lincolnshire	Southwark
City of Portsmouth	Hartlepool	North Norfolk	Stockton-on-Tees
City of Southampton	Hastings	North Somerset	

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Stroud
Suffolk Coastal
Sunderland
Swale
Taunton Deane
Teignbridge
Tendring
Test Valley
Thanet
Thurrock
Tonbridge and Malling
Torbay
Torrige
Tower Hamlets
Wandsworth
Warrington
Waveney
Wealden
West Devon
West Dorset
West Lancashire
West Lindsey
West Somerset
Weymouth and Portland
Winchester
Wirral
Worthing
Wyre
York