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Local Plan for the Bradford District

# Shipley and Canal Road Corridor Area Action Plan (SCRCAAP)-Publication Draft

**Soundness Self-Assessment Checklist** 

#### Note:-

This soundness checklist has been prepared by AMEC on behalf of the Planning Advisory Service (PAS) in January 2013 for the purposes of undertaking a self assessment of the tests the soundness of a Plan.

The City of Bradford Metropolitan District Council has used this checklist to demonstrate how the Shipley and Canal Road Corridor Area Action Plan (SCRCAAP) meets the tests of soundness as set out in the 2004 Act, relevant Planning Regulations and the national Planning Policy Framework (NPPF). <u>The document is a working draft up until Submission.</u>



### Soundness Self-Assessment Checklist (Update December 2014)

This note was prepared by AMEC 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 has 12 principles through which it 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:

- 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.
- 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). 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 <u>www.pas.gov.uk</u>) 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.

Soundness Test and Key Requirements Possible Evidence Evidence Evidence

**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.

| Vision and Objectives<br>Has the LPA clearly identified what the issues<br>are that the DPD is seeking to address? Have<br>priorities been set so that it is clear what the<br>DPD is seeking to achieve? | <ul> <li>Sections of the DPD and other documents which set out (where<br/>applicable) the vision, strategic objectives, key outcomes<br/>expected, spatial portrait and issues to be addressed.</li> </ul>                          | Section 1 and 2 of the SCRCAAP. Each<br>individual sub-area chapter also sets<br>out the spatial characteristics, visions<br>and growth/development aspiration<br>for the relevant area. |
|---|---|--|
| Does the DPD contain clear vision(s) and<br>objectives which are specific to the place? Is<br>there a direct relationship between the<br>identified issues, the vision(s) and the<br>objectives?          | <ul> <li>Relevant sections of the DPD which explain how policies derive<br/>from the objectives and are designed to meet them.</li> </ul>   | Section 3-each thematic policy<br>chapter highlights relevant AAP<br>objectives that the policy seeks to take<br>forward in order to deliver the vision                                  |
| Is it clear how the policies will meet the<br>objectives? Are there any obvious gaps in the<br>policies, having regard to the objectives of the<br>DPD?<br>Have reasonable alternatives to the quantum of | <ul> <li>The strategic objectives of the DPD, and the commentary in the</li> </ul>  | for the SCRCAAP.<br>AAP Objectives set out to deliver the<br>vision.   |
| development and overall spatial strategy been<br>considered?<br>Are the policies internally consistent?   | DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another.  | Section 4 –Implementation and  |
| Are there realistic timescales related to the objectives?<br>Does the DPD explain how its key policy  | <ul> <li>Sections of the DPD which address delivery, the means of delivery<br/>and the timescales for key developments through evidenced<br/>infrastructure delivery planning.</li> </ul>   | Delivery.<br>Background paper [SCRC/SD/014] and  |
| objectives will be achieved?  | <ul> <li>Confirmation from the relevant agencies that they support the<br/>objectives and the identified means of delivery.</li> </ul>  | Statement of Consultation<br>[SCRC/SD/008]   |
|   | <ul> <li>Information in the local development scheme, or provided<br/>separately, about the scope and content (actual and intended) of<br/>each DPD showing how they combine to provide a coherent policy<br/>structure.</li> </ul> | Local Development Scheme   |
| The presumption in favour of sustainable<br>development (NPPF paras 6-17)<br>Local Plans should meet objectively assessed   | • An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below).  | District wide evidence: Strategic<br>Housing Land Availability Assessment<br>(SHLAA) [PS/GOO4i], Strategic Housing   |

| needs, with sufficient flexibility to adapt to                                  |  | Market Assessment (SHMA) [EB/050],  |
|---|--|---|
| rapid change, unless:   |  | Employment Land Assessment  |
| <ul> <li>—any adverse impacts of doing so would</li> </ul>                      |  | [EB/027], Bradford District Retail and  |
| significantly and demonstrably outweigh the                                     |  | Leisure Study Update [EB/034],  |
| benefits, when assessed against the policies in                                 |  | Strategic Flood Risk Assessment   |
| this Framework taken as a whole; or   |  | [EB/048], Transport Study   |
| —specific policies in this Framework indicate development should be restricted. | <ul> <li>An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</li> </ul> | AAP evidence: Strategic Flood Risk<br>Assessment L2[SCRC/SD/030],, AAP<br>Ecological Assessment [SCRC/SD/014],<br>AAP Green Infrastructure Study<br>[SCRC/SD/028], AAP Transport<br>Study[SCRC/SD/029], AAP<br>Infrastructure Delivery Plan<br>[SCRC/SD/027], AAP Viability<br>Assessment [SCRC/SD/032], Heritage<br>Impact Assessment [SCRC/SD/023]<br>Appraisals: Sustainability<br>Appraisal[SCRC/SD/003], Habitat<br>Regulation Assessment Screening<br>[SCRC/SD/019], Equalities Impact<br>Assessment Screening [SCRC/SD/014],<br>Health Impact Assessment |
|   |  | [SCRC/SD/020]<br>The quantum of development   |
|   |  | proposed reflects the contents of the   |
|   |  | Housing Requirement Study and   |
|   |  | SHMA update. The approach to  |
|   |  | distribution is explained in CS   |
|   |  | paragraphs 5.3.39 to 5.3.64 and a   |
|   |  | Background Paper. The distribution is   |
|   |  | Background Paper. The distribution is   |

|   |  | specifically linked to the CS strategic<br>core policies and in particular the<br>settlement hierarchy which<br>concentrates development in the main<br>urban areas where population growth<br>and housing need is greatest and<br>where accessibility to jobs and<br>services can be maximised.<br>The quantum of Employment land is<br>explained in CS paragraph 5-1-15 and<br>also in the Background paper.        |
|---|--|---|
| Policies in Local Plans should follow the<br>approach of the presumption in favour of<br>sustainable development so that it is clear that<br>development which is sustainable can be<br>approved without delay. All plans should be<br>based upon and reflect the presumption in<br>favour of sustainable development, with clear<br>policies that will guide how the presumption<br>should be applied locally. | <ul> <li>A policy or policies which reflect the principles of the presumption<br/>in favour of sustainable development (see <u>model policy at</u><br/><u>www.planningportal</u>.</li> </ul> | The Council considers the policies and<br>principles contained within the Area<br>Action Plan are consistent with<br>national policy including presumption<br>in favour of sustainable development.<br>There are no instances where policies<br>depart from national policy.<br>Appendix 1 of SCRC AAP Publication<br>Draft Background Paper 2016 (SCRC-<br>SD-014) sets out how the AAP policies<br>link to the NPPF |
| Objectively assessed needs  | Background evidence papers demonstrating requirements based  | Population and household forecasts  |
| The economic, social and environmental needs<br>of the authority area addressed and clearly<br>presented in a fashion which makes effective<br>use of land and specifically promotes mixed use<br>development, and take account of cross-<br>boundary and strategic issues.<br>Note: Meeting these needs should be subject  | on population forecasts, employment projections and community needs.   | together with employment<br>projections from the Experian<br>Regional Econometric Model (REM)<br>were core to the development of<br>scenarios within the Bradford Housing<br>Requirement Study & Addendum<br>report. Employment land  |
| to the caveats specified in Paragraph 14 of the NPPF (see above).   |  | requirements also had regard to employment projections – see  |

|   | •   | Technical papers demonstrating how the aspirations and<br>objectives of the DPD are related to the evidence, and how these<br>are to be met, including from consultation and associated with<br>the Duty to Co-operate. | Bradford Employment Land Review &<br>Updates [EB/027]. Further information<br>contained within Background Paper<br>and Evidence Base Reports.<br>[SCRC/SD/014]<br>Background Paper and Evidence Base<br>Reports [SCRC/SD/014]  |
|---|-----|---|--|
| NPPF Principles: Delivering sustainable develop   | men | t   |  |
| 1. Building a strong, competitive economy (paras 18-22)   |     |   |  |
| Set out a clear economic vision and strategy for<br>the area which positively and proactively<br>encourages sustainable economic growth (21), | •   | Articulation of a clear economic vision and strategy for the plan<br>area linked to the Economic Strategy and LEP Strategy where<br>appropriate.  | This is incorporated within the overall<br>vision (section 1) of the AAP which<br>aligns with the Bradford Economic<br>Strategy 2011-2013, The Community<br>Strategy, and informed by the<br>Bradford Local Economic Assessment,<br>Understanding Bradford District<br>Report and the retail and Leisure<br>Study 2013. The Challenges faced by<br>the Shipley and Canal Road Corridor<br>and the Strategy to address the need<br>for economic developments are drawn<br>out in the relevant AAP Chapter e.g.<br>'Achieving Sustainable Economic<br>Growth'. |
| Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure,                     | •   | A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental   | Each thematic policy chapter (section<br>3) sets the context for identifying the<br>relevant need and outlines positive  |

| services or housing (21)  | <ul> <li>An up-to-date assessment of the deliverability of allocated<br/>employment sites, to meet local needs, (taking into account that<br/>LPAs should avoid the long term protection of sites allocated for<br/>employment use where there is no reasonable prospect of an<br/>allocated site being used for that purpose) para (22)</li> </ul> | and flexible policies to help deliver<br>regeneration, environmental<br>enhancement, infrastructure<br>provision, housing and economic<br>growth as well as specialist<br>development in a managed and<br>sustainable manner.<br>Infrastructure Delivery plan [SCRC-SD-<br>027] also identifies key infrastructure,<br>in particular transport investment.<br>The Employment land Review<br>[EB/026] undertakes a detailed<br>analysis of all the existing employment<br>sites and the contribution they can<br>make to the economic strategy. |
|---|---|--|
| 2. Ensuring the vitality of town centres  |   | Reference is also made to deliverability in CS paragraph 5-1-18.   |
| (paras 23-37)   |   |  |
| Policies should be positive, promote<br>competitive town centre environments, and set<br>out policies for the management and growth of<br>centres over the plan period (23) | • 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            | CS Strategic Core Policy 4 (SC4),<br>supporting the hierarchy of<br>settlements and gives strategic<br>guidance on their development.  |
|   | proposals which cannot be accommodated in or adjacent to town centres.  | AAP Policies SCRC/SE1, SCRC/SE3,<br>SCRC/SE4 and SCRC/SE5 seek to<br>maintain and enhance town centre<br>vitality and also give development<br>management guidance on town centre<br>uses.   |
| Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial,   | • An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses.  | AAP allocates sites promoting retail,<br>leisure, office and other employment  |

| office, tourism, cultural, community services<br>and residential development needed in town<br>centres (23)                              |   | generating uses. The process of<br>formulating policies is informed by the<br>need as identified in evidence base<br>reports e.g. Bradford Retail and<br>Leisure Study [EB/034], Employment<br>Land Review [EB/026] etc.  |
|--|---|---|
|  | <ul> <li>Primary and secondary shopping frontages identified and allocated.</li> </ul>  | AAP Policy SCRC/SE5<br>The AAP is supported by Retail and<br>Leisure Study which identified future<br>need for Shipley town centre and<br>recommends approach to town entre   |
|  |   | boundary and PSA for managing<br>future retail growth.<br>Shipley sub area Development  |
|  |   | Framework identifies proposed site<br>allocations including mixed use town<br>centre re-development opportunities.<br>Shipley East (SE1) is identified for<br>residential led mixed use including<br>retail- the site has extant planning<br>permission for a food store which is<br>expected to meet the future retail<br>needs for Shipley over the plan period |
|  |   | therefore no further expansion sites have been identified within the AAP.   |
| 3. Supporting a prosperous rural economy (para 28)   |   |   |
| Support sustainable economic growth in rural<br>areas. Planning strategies should promote a<br>strong rural economy by taking a positive | 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 much tourism and laisure developments, and support sustainable much tourism and laisure developments. | N/A<br>The AAP boundary covers part of the  |
| areas. Planning strategies should promote a  | sustainable growth of rural businesses; promote the development   |   |

|   | services and facilities.   | City of Bradford and does not include any rural areas.   |
|---|--|--|
|   |  | The AAP Policy Framework identifies<br>that the Canal Road Corridor is an<br>important transport corridor, which<br>provides a key link between Bradford<br>city centre, Shipley and Airedale. The<br>Airedale Corridor which links Bradford<br>to Shipley and Keighley is a significant<br>priority regeneration area within the<br>Leeds City Region. SCRC AAP Policy<br>ST1 identifies key transport<br>improvement measures including<br>transport projects which will support<br>the 'Connecting Airedale' strategy |
| 4. Promoting sustainable transport (paras 29-<br>41)  |  |  |
| Facilitate sustainable development whilst<br>contributing to wider sustainability and health<br>objectives. (29)<br>Balance the transport system in favour of<br>sustainable transport modes and give people a<br>real choice about how they travel whilst<br>recognising that different policies will be<br>required in different communities and<br>opportunities to maximise sustainable<br>transport solutions will vary from urban to rural<br>areas. (29)<br>Encourage solutions which support reductions<br>in greenhouse gas emissions and congestion | <ul> <li>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.</li> <li>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.</li> <li>A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.</li> </ul> | Policy SCRC/ST1 promotes joint<br>working with the Highways Agency,<br>Metro and Network Rail.<br>AAP objective 9 promotes Canal Road<br>as a key strategic transport route and<br>maximise sustainable transport<br>options by developing critical road<br>and public transport infrastructure,<br>including improvements to Canal Road<br>and Shipley and Frizinghall stations<br>and creating safe and attractive cycle   |
| (29) including supporting a pattern of<br>development which, where reasonable to do<br>so, facilitates the use of sustainable modes of  |  | and pedestrian routes linked to the<br>Linear Park and Canal Road<br>Greenway, connecting Shipley and  |

| transport. (30)   |   |   | Bradford.   |
|---|---|---|---|
| Local authorities should work with<br>neighbouring authorities and transport<br>providers to develop strategies for the<br>provision of viable infrastructure necessary to<br>support sustainable development. (31)   | • | Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. | Policy SCRC/ST1, SCRC/ST3 and<br>SCRC/ST5 encourage maximising the<br>uses of sustainable modes of<br>transport.  |
| Opportunities for sustainable transport modes<br>have been taken up depending on the nature<br>and location of the site, to reduce the need for<br>major transport infrastructure. (32)   |   |   | Policies SCRC/ST1, SCRC/ST3,<br>SCRC/ST4 and SCRC/ST5 seek to<br>reduce the need to travel and  |
| Ensure that developments which generate<br>significant movement are located where the<br>need to travel will be minimised and the use of<br>sustainable transport modes can be maximised<br>(34)  | • | If local (car parking) standards have been prepared, are they justified and necessary? (39)                             | encourage use of the public transport<br>network which in turn will promote<br>creating a balance between housing<br>and economic growth.               |
| Plans should protect and exploit opportunities<br>for the use of sustainable transport modes for<br>the movement of goods or people. (35)   | • | Identification and protection of sites and routes where   | Policies SCRC/ST3 and SCRC/ST5<br>encourage development to be<br>appropriately located to ensure that   |
| Policies should aim for a balance of land uses so<br>that people can be encouraged to minimize<br>journey lengths for employment, shopping,<br>leisure, education and other activities. (37)  |   | infrastructure could be developed to widen transport choice<br>linked to the Local Transport Plan.                      | the need to travel is reduced, the use<br>of sustainable travel is maximised, and<br>the impact of development on the<br>existing transport networks is |
| For larger scale residential developments in<br>particular, planning policies should promote a<br>mix of uses in order to provide opportunities to<br>undertake day-to-day activities including work<br>on site. Where practical, particularly within<br>large-scale developments, key facilities such as<br>primary schools and local shops should be<br>located within walking distance of most<br>properties. (38) |   |   | minimal.<br>Policy SCRC/ST7 makes link to CS<br>Appendix 4 which sets out car parking<br>standards.   |
| The setting of car parking standards including provision for town centres. (39-40)  |   |   | Policy SCRC/ST2 seeks to protect an<br>alignment of potential future<br>implementation of Shipley Eastern   |
| Local planning authorities should identify and  |   |   | Relief Road scheme.   |

| protect, where there is robust evidence, sites   |  |
|--|--|
| and routes which could be critical in developing | Policy SCRC/ST6 aims at maintaining    |
| infrastructure to widen transport choice. (41)   | the Canal Road Greenway from any       |
|  | potential adverse impact of future     |
|  | development within the corridor.       |
|  | Policy SCRC/ST8 also seeks to protect  |
|  | the route/alignment of Bradford canal  |
|  | in order to accommodate future         |
|  | ambitions of reinstating the canal.    |
|  | Infrastructure Delivery plan           |
|  | [SCRC/SD/027] identifies key           |
|  | infrastructure in particular transport |
|  | investment. Key infrastructure         |
|  | requirements are also identified in    |
|  | relevant site allocation statements    |
|  | especially when such infrastructure is |
|  | deemed to be crucial for the delivery  |
|  | of the proposed development on that    |
|  | site.                                  |
|  | The AAP identifies a range of mixed    |
|  | use site allocations, including        |
|  | residential led mixed use development  |
|  | at New Bolton Woods (NBW1) in the      |
|  | Centre Section sub area which is a     |
|  | large scale residential site. The AAP  |
|  | promotes a mix of uses and new         |
|  | neighbourhood centre within this site  |
|  | in order to give residents             |
|  | opportunities to undertake day-to-day  |
|  | activities on site and to minimise the |

|   |   |  | need to travel.   |
|---|---|--|---|
| 5. Supporting high quality communications<br>infrastructure (paras 42-46)   |   |  |   |
| Support the expansion of the electronic<br>communications networks, including<br>telecommunications' masts and high speed<br>broadband. (43)<br>Local planning authorities should not impose a<br>ban on new telecommunications development<br>in certain areas, impose blanket Article 4<br>directions over a wide area or a wide range of<br>telecommunications development or insist on<br>minimum distances between new<br>telecommunications development and existing<br>development. (44) | • | Policy supporting the expansion of electronic communications<br>networks, including telecommunications and high speed<br>broadband, noting the caveats in para 44. | As part of the wider Local Plan, the<br>Council's Development Management<br>Policies includes guidance on<br>telecommunications. Policies in the<br>AAP are focussed on issues unique to<br>the area; hence it was considered that<br>a SCRC specific policy on this matter<br>was not required.<br>The Council doesn't have policies<br>imposing any restriction on building<br>new telecommunication networks<br>within SCRC.<br>Infrastructure Delivery Study<br>[SCRC/SD/027] |
| <ol> <li>Delivering a wide choice of high quality<br/>housing (paras 47-55)</li> </ol>  |   |  |   |
| Identify and maintain a rolling supply of specific<br>deliverable sites sufficient to provide five years'<br>worth of housing against their housing<br>requirements; this should include an additional<br>buffer of 5% or 20% (moved forward from later<br>in the plan period) to ensure choice and<br>competition in the market for land. 20% buffer<br>applies where there has been persistent under<br>delivery of housing(47)   | • | Identification of:<br>a) five years or more supply of specific deliverable sites;<br>plus the buffer as appropriate  | Five year land supply assessment<br>included within the SHLAA. Latest<br>position identified as a 2.3 years<br>worth supply.<br>A strategy for major land releases to<br>meet housing need over the short and<br>longer term is set out in the Core<br>Strategy. The Shipley and Canal Road<br>Corridor is identified as a key housing<br>growth area in the Core Strategy. The<br>AAP is in conformity with the Core   |

|   | <ul> <li>Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)</li> <li>A SHLAA</li> </ul> | Strategy and it allocates a range of<br>sites capable of delivering various<br>types and tenure of houses and<br>thereby contributing to the housing<br>requirement.<br>Initiatives already underway to bring<br>forward sites including significant<br>progress in the New Bolton Woods<br>scheme and the Bolton Wood Quarry<br>site. There is also a very strong<br>developer's interest on residential<br>development evident from the high<br>number of pre-app queries and<br>discussions the Council have had in<br>recent months.<br>The phasing of sites likely to<br>contribute to the provision of new<br>housing is set out in Policy HO4 of the<br>Core Strategy.<br>No windfall element included in the<br>SHLAA or 5 year land supply.<br>SHLAA produced and then updated in<br>2013. Second update [PS/G004i]<br>SHLLA – July 2015. |
|---|---|--|
| Identify a supply of developable sites or broad<br>locations for years 6-10 and, where possible,<br>years 11-15 (47). | <ul> <li>Identification of a supply of developable sites or broad locations<br/>for: a) years 6-10; b) years 11-15</li> </ul>   | The AAP has identified a range of sites<br>within the AAP Area and outlines<br>indicative delivery timeframes<br>(short/medium/long) for proposed  |

|  |   | uses on each of the sites.  |
|--|---|---|
| Illustrate the expected rate of housing delivery<br>through a trajectory; and set out a housing<br>implementation strategy describing how a five<br>year supply will be maintained. (47) | A housing trajectory  | The AAP is in conformity with the Core<br>Strategy which includes a housing<br>trajectory in Appendix 7.  |
|  | <ul> <li>Monitoring of completions and permissions (47)</li> </ul>                            | The Annual Monitoring Report sets<br>out the Council's housing permissions<br>and completions.  |
|  | • Updated and managed SHLAA. (47)   | SHLAA produced and then updated in<br>2013. Second update [PS/G004i]<br>SHLLA – July 2015   |
| Set out the authority's approach to housing density to reflect local circumstances (47).   | Policy on the density of development.   | CS Policy HO5 sets out the Council's<br>approach to density of Housing<br>Schemes. It states that to ensure<br>delivery of housing growth in the most<br>sustainable way, developers will be<br>required developments to make the<br>best and most efficient use of land.   |
|  |   | AAP Policy SCRC/H2 also includes a<br>density criterion for residential<br>development within the SCRC. It<br>requires such development in the area<br>to achieve a minimum density of 40-<br>100 dwellings per hectare, depending<br>on the location and with some<br>flexibility considered due to<br>compelling local circumstances. |
| Plan for a mix of housing based on current and future demographic and market trends, and   | • Policy on planning for a mix of housing (including self-build, and housing for older people | CS Policy HO8 on Housing Mix ensures<br>that a mix and balance of housing is  |

| needs of different groups (50) and caters for<br>housing demand and the scale of housing<br>supply to meet this demand. (para 159) |  | provided to meet the needs of the district's growing and diverse population.   |
|--|--|--|
|  |  | AAP Policy SCRC/H2 also sets out the<br>approach to delivery of new housing<br>in the area. This makes provision for a<br>range of housing types and tenures to<br>cater for all sectors of the community<br>and secure the creation of sustainable<br>SCRC communities; |
|  | • SHMA   | AAP Policies have been informed by   |
|  | <ul> <li>Identification of the size, type, tenure and range of housing)<br/>required in particular locations, reflecting local demand. (50)</li> </ul>   | the original SHMA produced in 2010<br>and SHMA update in 2013.   |
|  | • Evidence for housing provision based on up to date, objectively assessed needs. (50)   |  |
|  | <ul> <li>Policy on affordable housing and consideration for the need for<br/>on-site provision or if off-site provision or financial contributions<br/>are sought, where these can these be justified and to what extent<br/>do they contribute to the objective of creating mixed and<br/>balanced communities. (50)</li> </ul> | CS Policy HO11 on Affordable Housing<br>will ensure that there is a sufficient<br>supply of good quality and<br>appropriate mix affordable housing<br>distributed throughout the district,<br>particularly in the areas of highest<br>need.                              |
|  |  | Affordable Housing Economic Viability<br>Assessment  |
|  |  | AAP Viability Assessment<br>[SCRC/SD/032]  |
|  |  | Housing Requirement Study  |

| In rural areas be responsive to local<br>circumstances and plan housing development<br>to reflect local needs, particularly for affordable<br>housing, including through rural exception sites<br>where appropriate (54). | <ul> <li>Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs.</li> <li>Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)</li> </ul> | N/A  |
|---|---|--|
| In rural areas housing should be located where<br>it will enhance or maintain the vitality of rural<br>communities.   | • Examples of special circumstances to allow new isolated homes listed at para 55.  |  |
| 7. Requiring good design (paras 56-68)  |   |  |
| Develop robust and comprehensive policies<br>that set out the quality of development that<br>will be expected for the area (58).  | <ul> <li>Inclusion of policy or policies which seek to increase the quality of<br/>development through the principles set out at para 58 and<br/>approaches in paras 59-61, linked to the vision for the area and<br/>specific local issues</li> </ul>  | Core Policy SC9 sets out high level<br>design principles.<br>AAP Policy SCRC/NBE6: Ensuring High<br>Quality Design provides a design led<br>approach to new development and<br>public realm interventions. It says<br>development proposals should be of<br>high quality design, respect the site<br>and its setting, and help create<br>distinctive neighbourhood within the<br>SCRC.<br>Policy SCRC/CC2 seeks to reduce<br>environmental impact of major<br>developments through encouraging<br>good design and layout.<br>Site proposals accompanying each<br>AAP site allocation also include<br>relevant design statements which are<br>expected to inform the design and<br>delivery of proposed uses on the |

|   |  | particular sites.   |
|---|--|---|
| 8. Promoting healthy communities (paras 69-<br>77)  |  |   |
| Policies should aim to design places which:<br>promote community interaction, including<br>through mixed-use development; are safe and<br>accessible environments; and are accessible<br>developments (69). | <ul> <li>Inclusion of a policy or policies on inclusive communities.</li> <li>Promotion of opportunities for meetings between members of<br/>the community who might not otherwise come into contact with<br/>each other, including through mixed-use developments which<br/>bring together those who work, live and play in the vicinity; safe<br/>and accessible environments where crime and disorder, and the<br/>fear of crime, do not undermine the quality of life or community<br/>cohesion; and accessible developments, containing clear and<br/>legible pedestrian routes, and high quality public space, which<br/>encourage the active and continual use of public areas. (69)</li> </ul> | The vision and objectives of the Plan<br>seek to provide a range of facilities,<br>services and places that support<br>sustainable local communities and the<br>needs of current and future residents<br>of the SCRC.<br>The Plan recognises that the area is<br>capable of delivering a diverse mix of<br>housing and economic growth that<br>would create an interesting area and<br>provide opportunities for better<br>accessibility, quality of life and<br>community cohesion.<br>Promoting Healthy, Strong and<br>Inclusive Communities along the<br>Corridor is identified as a key theme in<br>the AAP Policy Framework under<br>which Policies SCRC/HSC1,<br>SCRC/HSC2, and SCRC HSC3 are<br>identified.<br>The Plan policies also promote key<br>principles required to create<br>sustainable neighbourhoods. Some of<br>these policies include promoting retail<br>development of appropriate scale<br>(SCRC/SE4), maintaining vitality and |

|  |  | viability of existing retail centres<br>(SCRC/SE5, SCRC/SE6), improving<br>connections between neighbourhoods<br>across the corridor (SCRC/ST1,<br>SCRC/ST5), promoting active and<br>healthy lifestyle through good design<br>(SCRC/NBE6), promotion of recreation<br>and leisure uses (SCRC/NBE1), and<br>enhancing walking, cycling and public<br>realm experience of all users<br>(SCRC/ST1, SCRC/ST5). The plan also<br>seeks to identify opportunities to<br>create new publicly accessible open<br>and green spaces within development<br>sites and by supporting the mitigation<br>of any potential loss through better<br>quality and quantity of such facilities<br>(SCRC/HSC2).<br>AAP HIA [SCRC/SD/022]<br>GI Study [SCRC/SD/028] |
|--|--|---|
| Policies should plan positively for the provision<br>and use of shared space, community facilities<br>and other local services (70). | <ul> <li>Inclusion of a policy or policies addressing community facilities<br/>and local service.</li> <li>Positive planning for the provision and integration of community<br/>facilities and other local services to enhance the sustainability of<br/>communities and residential environments; safeguard against the<br/>unnecessary loss of valued facilities and services; ensure that<br/>established shops, facilities and services are able to develop and<br/>modernize; and ensure that housing is developed in suitable<br/>locations which offer a range of community facilities and good<br/>access to key services and infrastructure.</li> </ul> | AAP objectives and policies emphasise<br>the importance of high quality<br>inclusive design by ensuring<br>developments encourage social<br>interaction and where appropriate<br>provide opportunities for members of<br>the community to meet and come into<br>contact with each other.<br>The AAP site allocations further  |

|  |  | encourage a range of developments<br>that would remedy identified<br>deficiencies in local infrastructure and<br>services including open space,<br>community and education facilities.<br>Sites are also selected which are<br>accessible to a range of services and<br>community facilities thereby reducing<br>the need to travel.  |
|--|--|---|
|  |  | Policies SCRC/H2, SCRC/SE5,<br>SCRC/SE6, SCRC/NBE1, SCRC/NBE6,<br>SCRC/HSC2 and SCRC/HSC3<br>particularly encourage improved<br>access to good quality homes, jobs,<br>shopping, cultural facilities, health and<br>education provision and community<br>facilities for a growing residents,<br>visitors and workers in the SCRC.   |
| Identify specific needs and quantitative or<br>qualitative deficits or surpluses of open space,<br>sports and recreational facilities; and set locally<br>derived standards to provide these (73). | <ul> <li>Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)</li> <li>A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74)</li> <li>Protection and enhancement of rights of way and access. (75)</li> </ul> | CS Policy EN1 outlines the<br>Council's approach on safeguarding all<br>current and past open spaces,<br>including parks and gardens, natural<br>and semi-natural greenspaces, green<br>corridors, amenity and local<br>greenspace, outdoor sports facilities,<br>provision for children, allotments, civic<br>spaces and also areas of water which<br>offer opportunities for sport and<br>recreation. |
|  |  | The GI study highlights the deficiency  |

|  |   | of Green/public open space in the<br>SCRC. AAP Policy SCRC/NBE1,<br>SCRC/NBE2 and SCRC/NBE3 aim to<br>address this issue by identifying<br>opportunities for key<br>biodiversity/green/blue infrastructure<br>interventions that would deliver public<br>realm and open space improvement. |
|--|---|--|
|  |   | Policy SCRC/HSC 2 identities areas of<br>open space including playing fields,<br>recreation open space and allotments<br>which should be assessed in line with<br>CS Policy EN1 as sites which should<br>provide new or improved open space  |
|  |   | CS Appendix 9 Sets the local open space standards  |
|  |   | Playing Pitch Strategy and Open Space<br>Assessment (2006) identifies specific<br>needs and deficit/surpluses' of open<br>space across the District which is<br>broken down by Parliamentary<br>Constituencies.  |
| Enable local communities, through local and<br>neighbourhood plans, to identify special<br>protection green areas of particular importance<br>to them – 'Local Green Space' (76-78). | • 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) | CS Policy EN1 (D) sets out high level<br>policy for Local Green Spaces.<br>Local communities have been<br>consulted throughout the production<br>of the document,. No Local Green<br>Space has been proposed in the AAP.   |

| 9. Protecting Green Belt land (paras 79-92)  |  |  |
|--|--|--|
| Local planning authorities should plan<br>positively to enhance the beneficial use of the<br>Green Belt, such as looking for opportunities to<br>provide access; to provide opportunities for<br>outdoor sport and recreation; to retain and<br>enhance landscapes, visual amenity and<br>biodiversity; or to improve damaged and<br>derelict land. (81)<br>Local planning authorities with Green Belts in<br>their area should establish Green Belt<br>boundaries in their Local Plans which set the<br>framework for Green Belt and settlement<br>policy. (83)<br>When drawing up or reviewing Green Belt<br>boundaries local planning authorities should<br>take account of the need to promote<br>sustainable patterns of development. (84)<br>Boundaries should be set using 'physical<br>features likely to be permanent' amongst other<br>things (85) | <ul> <li>Where Green Belt policies are included, these should reflect the need to:         <ul> <li>Enhance the beneficial use of the Green Belt. (81)</li> <li>Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)</li> <li>Specify that inappropriate development should not be approved except in very special circumstances. (87)</li> <li>Specify the exceptions to inappropriate development (89-90)</li> <li>Identify where very special circumstances might apply to renewable energy development. (91)</li> </ul> </li> </ul> | Not relevant to SCRC AAP.<br>As a strategic matter, green belt<br>policies have been established<br>through the Core Strategy and Green<br>belt Boundaries will be considered<br>through the Allocations DPD and no<br>alterations are proposed within the<br>AAP.   |
| 10. Meeting the challenge of climate change,<br>flooding and coastal change (paras 93-108)   |  |  |
| Adopt proactive strategies to mitigate and<br>adapt to climate change taking full account of<br>flood risk, coastal change and water supply and<br>demand considerations. (94)   | <ul> <li>Planning of new development in locations and ways which reduce greenhouse gas emissions.</li> <li>Support for energy efficiency improvements to existing building.</li> <li>Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy. (95))</li> </ul>  | The Core Strategy sets out how the<br>Council tackles climate change<br>through promoting higher<br>environmental standards. It<br>encourages all developments to meet<br>the highest feasible environmental<br>standards that are financially viable<br>and requires all developments to take<br>measures to minimise the effects of,<br>and adapt to, climate change |

|   |  | (CS policy SC2). It also promotes<br>sustainable travel (CS policy TR1 and<br>TR3), dealing with flood risk (CS Policy<br>EN7) and Protection of environment<br>(CS policy EN8).  |
|---|--|---|
|   |  | CS Policy EC4 encourages BREEAM<br>standards while CS Policy HO9 sets out<br>the standards for housing<br>development. All developments<br>in the SCRC will be assessed against<br>the sustainability policies and<br>guidance in the Core Strategy.  |
|   |  | AAP Policy SCRC/CC1 sets out criteria<br>for dealing with flood risk. Policy<br>SCRC/CC2 promotes maximisation of<br>opportunities for energy efficiency<br>and carbon reduction. Policy SCRC/ST3<br>and SCRC/ST5 encourages measures<br>that would encourage modal shift<br>away from car. |
| Help increase the use and supply of renewable<br>and low carbon energy through a strategy,<br>policies maximising renewable and low carbon<br>energy, and identification of key energy<br>sources. (97) | <ul> <li>A strategy and policies to promote and maximise energy from renewable and low carbon sources,</li> <li>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)</li> </ul> | CS Policy SC2 and Policy EN6 seek to<br>promote use of renewable energy.<br>AAP Policy CC2 requires all<br>development to explore opportunities<br>to maximise energy efficiently and   |
|   | <ul> <li>Identification of where development can draw its energy supply<br/>from decentralised, renewable or low carbon supply systems and<br/>for co-locating potential heat customers and suppliers. (97)</li> </ul>   | implement and maximise renewable<br>energy generation where feasible and<br>viable.   |

| Minimise vulnerability to climate change and<br>manage the risk of flooding (99) | <ul> <li>Account taken of the impacts of climate change. (99)</li> <li>Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</li> <li>Policies to manage risk, from a range of impacts, through suitable adaptation measures</li> </ul>  | CS Policies SC1 and SC2 seek to set<br>the principles for climate change and<br>flood risk management approach.<br>Both CS Policy HO7 (7) and AAP Policy<br>SCRC/CC1 set out detailed principles<br>for site selection including flood risk<br>sequential approach and adaptation<br>measures.<br>CS Policy EN7 sets out approach to<br>flood risk management.<br>AAP Policy approach supported by<br>SFRA level 1 and 2. |
|--|--|---|
| Manage risk from coastal change (106)  | <ul> <li>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.</li> <li>Provision for development and infrastructure that needs to be relocated from such areas, based on SMPs and Marine Plans, where appropriate.</li> </ul> | Not applicable  |
| 11. Conserving and enhancing the natural environment (paras 109-125)             |  |   |
| Protect valued landscapes (109)  | <ul> <li>A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.</li> <li>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.</li> </ul>                | AAP Policy SCRC/NBE1, SCRC/NBE2<br>and SCRC/NBE4 seek to protect locally<br>valued biodiversity and green assets<br>and support the delivery of key<br>biodiversity and green/blue<br>infrastructure interventions as<br>identified in the Green Infrastructure<br>study and the Ecological Assessment.   |

|   |   | CS Policy SC6 seeks to protect green<br>spaces and corridors while Policy EN2<br>seeks to achieve biodiversity<br>enhancement and to protect areas of<br>biodiversity importance across the<br>district.  |
|---|---|---|
| Prevent unacceptable risks from pollution and<br>land instability (109) | <ul> <li>Policy which seeks development which is appropriate for its<br/>location having regard to the effects of pollution on health, the<br/>natural environment or general amenity.</li> </ul> | CS Policy EN8 sets out the approach to<br>managing Environmental Protection<br>Policy in the District including in<br>relation to air quality and land.<br>The AAP references CS Policy EN8 in<br>the AAP Policy Framework in regards<br>to land and air quality. The AAP also<br>references the Low Emissions Strategy<br>which identifies Air Quality<br>Management areas in close proximity<br>to the AAP boundary. Development<br>proposals will be assessed in<br>accordance with Core Strategy Policy<br>EN8 and the Low Emission Strategy for<br>Bradford and associated guidance<br>documents<br>The AAP identifies relevant site<br>allocation statements where,<br>proposals will be required to fully<br>consider ground conditions, in line<br>with the requirements of paragraphs<br>120-121 of the NPPF and CS Policy<br>EN8: |

| Planning policies should minimise impacts on<br>biodiversity and geodiversity (117)<br>Planning policies should plan for biodiversity at<br>a landscape-scale across local authority<br>boundaries (117) | <ul> <li>Identification and mapping of local ecological networks and geological conservation interests.</li> <li>Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species.</li> </ul> | AAP Policy SCRC/ST1, SCRC/ST3 and<br>SCRC/ST5 aim to reduce the demand<br>for travel, encourage and facilitate the<br>use of sustainable travel modes<br>including walking and cycling, limit<br>traffic growth and reduce congestion.<br>SCRC/CC2 encourages low carbon<br>living and requiring new development<br>to use resources sustainable and<br>reduce its environmental impact.<br>AAP Policy SCRC/NBE1, SCRC/NBE2<br>and SCRC/NBE4 support the delivery<br>of key biodiversity and green/blue<br>infrastructure interventions as<br>identified in the Green Infrastructure<br>study and the Ecological Assessment.<br>CS Policy SC6 seeks to protect green<br>spaces and corridors while Policy EN2<br>seeks to achieve biodiversity<br>enhancement and to protect areas of<br>biodiversity importance across the<br>district. |
|--|---|--|
| 12. Conserving and enhancing the historic environment (paras 126-141)  |   |  |
| Include a positive strategy for the conservation<br>and enjoyment of the historic environment,<br>including heritage assets most at risk (126)   | <ul> <li>A strategy for the historic environment based on a clear<br/>understanding of the cultural assets in the plan area, including<br/>assets most at risk.</li> </ul>  | CS Policy EN3 on Historic<br>Environment Sets out the detailed<br>principals for the protect and   |

| 13. Facilitating the sustainable use of minerals<br>(paras 142-149)   | <ul> <li>A map/register of historic assets</li> <li>A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</li> </ul>   | <ul> <li>management of heritage assets<br/>designated and non designated</li> <li>AAP Policy SCRC/NBE5 also sets out<br/>guidance promoting preservation and<br/>enhancement of historic assets as well<br/>as their character and settings within<br/>the SCRC area.</li> <li>The requirements relating to key listed<br/>and unlisted heritage assets are set<br/>out in relevant site allocation<br/>statements in the sub area<br/>Development Frameworks</li> <li>Conservation area Boundaries and the<br/>Saltaire Worlds Heritage site Buffer<br/>zone boundary are identified on the<br/>AAP policies map under Policy<br/>SCRC/NBE5.</li> </ul> |
|---|--|--|
| It is important that there is a sufficient supply<br>of material to provide the infrastructure,<br>buildings, energy and goods that the country<br>needs. However, since minerals are a finite<br>natural resource, and can only be worked<br>where they are found, it is important to make<br>best use of them to secure their long-term<br>conservation (142)<br>Minerals planning authorities should plan for a<br>steady and adequate supply of industrial<br>materials (146) | 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. | CS Policy EN12 sets out the strategy<br>approach to minerals safeguarding in<br>the District.<br>AAP Policy SCRC SE7 sets out the<br>approach to minerals safeguarding in<br>the AAP area and requires<br>development proposals to give full<br>consideration to the extraction of<br>mineral resources prior to<br>development taking place, in   |

|  | accordance with Core Strategy Policy<br>EN12  |
|--|---|
|  | New Bolton Woods quarry was<br>previously allocated in the RUDP 2005<br>as an existing minerals extraction site.  |
|  | The site owners have indicated that<br>the quarry is approaching the end of<br>its life and is available for<br>redevelopment within the plan period.<br>The site is identified for residential<br>redevelopment in the Centre Section<br>sub area Development framework<br>(BWQ). The AAP sets out in the site<br>allocation statement that<br>redevelopment of the site the site will<br>need to provide for the prior<br>extraction of any remaining high<br>quality stone reserves in accordance<br>with CS Policy EN12 |
| Justified: The plan should be the most appropriate | te strategy, when considered against the reasonable alternatives, based on proportionate evidence.  |

To be 'justified' a DPD needs to be:

• 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.

| Participation<br>Has the consultation process allowed for | The consultation statement. This should set out what consultation was<br>undertaken, when, with who and how it has influenced the plan. The<br>statement should show that efforts have been made to consult hard | Engagement Plans from all stages of production. SCI |
|---|--|---|
| effective engagement of all interested parties?           | to reach groups, key stakeholders etc. Reference SCI   | Statement of Consultation.                          |
|   |  | Easy access event, drop in sessions,                |

|   |   | online survey etc   |
|---|---|---|
| Research / fact finding<br>Is the plan justified by a sound and credible<br>evidence base? What are the sources of  | • 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.   | Sustainability Appraisals from all stages of production.  |
| evidence? How up to date, and how convincing<br>is it?<br>What assumptions were made in preparing the<br>DPD? Were they reasonable and justified?   | <ul> <li>AND</li> <li>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.</li> <li>OR</li> <li>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.</li> <li>OR</li> <li>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).</li> </ul> | Main evidence used to inform policies<br>are set out in SCRCAAP Publication<br>Draft – Evidence Base Para 1.9-1.18<br>and Appendix B<br>The Background paper [SCRC/SD/014]<br>provides reference for each piece of<br>evidence and which policies they have<br>informed.<br>All main studies have been made<br>available on line.<br>Statement of Consultation- sets out<br>council's responses and actions in<br>response to representations |
| Alternatives<br>Can it be shown that the LPA's chosen<br>approach is the most appropriate given the<br>reasonable alternatives? Have the reasonable<br>alternatives been considered and is there a<br>clear audit trail showing how and why the<br>preferred approach was arrived at? Where a<br>balance had to be struck in taking decisions<br>between competing alternatives, is it clear how<br>and why the decisions were taken?<br>Does the sustainability appraisal show how the<br>different options perform and is it clear that | <ul> <li>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.</li> <li>An audit trail of how the evidence base, consultation and SA have influenced the plan.</li> <li>Sections of the SA Report showing the assessment of options and alternatives.</li> </ul>  | [SCRC/SD/008]Issues and Options (2013)Publication Draft (2015)Sustainability Appraisal reports<br>supporting each of the above stages.Background Paper [SCRC/SD/014]Summary of RepresentationsStatement of Consultation sets out<br>how the community have been given   |

| sustainability considerations informed the content of the DPD from the start?   | <ul> <li>Reports on how decisions on the inclusion of policy were made.</li> <li>Sections of the consultation document demonstrating how options were developed and appraised.</li> <li>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.</li> </ul> | opportunity to influence options,<br>including through response to Issues<br>and Options Paper. It also includes the<br>Council's response to the<br>representations showing how<br>consultation has influenced the Plan.<br>This process has allowed for the<br>alternatives to be raised and<br>considered. |
|---|---|---|
| <i>Effective:</i> the plan should be deliveral priorities.  | ble over its period and based on effective joint working on a   | cross-boundary strategic  |
| To be 'effective' a DPD needs to:   |   |   |
| Be deliverable  |   |   |
| Demonstrate sound infrastructure deliv  | ery planning  |   |
| Have no regulatory or national planning   | barriers to its delivery  |   |
| <ul> <li>Have delivery partners who are signed up to it</li> <li>Be coherent with the strategies of neighbouring authorities</li> </ul> |   |   |
|   |   |   |

- Demonstrate how the Duty to Co-operate has been fulfilled
- Be flexible
- Be able to be monitored

| <ul> <li>Deliverable and Coherent</li> <li>Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious</li> </ul> | <ul> <li>Sections of the DPD which address delivery, the means of delivery<br/>and the timescales for key developments and initiatives.</li> </ul>      | The AAP Policy Framework identifies<br>under each separate policy theme the<br>Strategic Objectives which the policies |
|--|---|--|
| gaps in the policies, having regard to the objectives of the DPD?  | <ul> <li>Confirmation from the relevant agencies that they support the<br/>objectives and the identified means of delivery, such as evidence</li> </ul> | relate to.   |
| • Are the policies internally consistent?  | that the plans and programmes of other bodies have been taken   | Section 4 sets out Implementation and  |
| • Are there realistic timescales related to the objectives?  | into account (e.g. Water Resources Management Plans).   | delivery section including monitoring and viability.   |
| • Does the DPD explain how its key policy  | Information in the local development scheme, or provided  | Statement of consultation.   |

| objectives will be achieved?  | <ul> <li>separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> <li>Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).</li> </ul>   | Section 4 includes outcomes,<br>indicators and targets tables are<br>included for each key policy area.<br>Local Development Scheme updated<br>in June 2014  |
|---|--|--|
|   |  | Local Infrastructure Plan- relevant agencies plans   |
| <ul> <li>Infrastructure Delivery</li> <li>Have the infrastructure implications of the policies clearly been identified?</li> <li>Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</li> <li>Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?</li> </ul> | <ul> <li>A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.</li> <li>A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.</li> <li>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.</li> <li>Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</li> </ul> | Local Infrastructure Plan<br>AAP Infrastructure Delivery Study<br>[SCRC/SD/027]<br>Implementation and Delivery Section<br>CS Policies ID4. and ID5 set out<br>approach to implementation<br>AAP Viability (DTZ) shows how viability<br>has been addressed. |
| <i>Co-ordinated Planning</i><br>Does the DPD reflect the concept of spatial<br>planning? Does it go beyond traditional land<br>use planning by bringing together and<br>integrating policies for development and the<br>use of land with other policies and programmes<br>from a variety of agencies / organisations that<br>influence the nature of places and how they                              | <ul> <li>Sections of the DPD that reflect the plans or strategies of the local authority and other bodies</li> <li>Policies which seek to pull together different policy objectives</li> <li>Expressions of support/representations from bodies responsible for other strategies affecting the area</li> </ul>   | Section 1 sets out the policy context.<br>Statement of Consultation<br>[SCRC/SD/008].<br>Background report and duty to<br>cooperate information.   |

| function?   |   |  |
|---|---|--|
| <ul> <li>Flexibility</li> <li>Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</li> <li>Does the DPD include the remedial actions that will be taken if the policies need adjustment?</li> </ul>   | <ul> <li>Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.</li> <li>Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul> <li>a. the effectiveness of policies and what evidence is being collected to undertake this</li> <li>b. changes affecting the baseline information and any information on trends on which the DPD is based</li> </ul> </li> <li>Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> <li>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</li> <li>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.</li> </ul> | This is dealt in section 4 which sets out<br>the monitoring framework supported<br>and gives an indication as to how<br>performance will be judged against<br>outcomes and possible triggers for<br>plan review.<br>This is covered in CS Housing<br>Implementation and Delivery Strategy<br>– Appendix 6. |
| <ul> <li>Co-operation</li> <li>Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?</li> <li>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</li> </ul> | <ul> <li>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.</li> <li>The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy</li> </ul>   | Background paper sets out outline of<br>approach to Duty to Cooperate. A<br>further detailed DtC paper will be<br>produced for submission.   |

| there evidence that there is the necessary<br>commitment from the relevant organisation to<br>the implementation of the policies?  | outcomes of co-operation; how decisions were reached and why;<br>and evidence of having effectively co-operated to plan for issues<br>which need other ogransations to deliver on, common objectives<br>for elements of strategy and policy; a memorandum of<br>understanding; aligned or joint core strategies and liaison with<br>other consultees as appropriate.  |   |
|--|---|---|
| <ul> <li>Monitoring</li> <li>Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)?</li> <li>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?</li> <li>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?</li> </ul> | <ul> <li>Sections of the DPD setting out indicators, targets and milestones</li> <li>Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>Reference to any other reports or technical documents which contain information on the delivery of policies</li> <li>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</li> </ul> | This is dealt in section 4 which sets out<br>the monitoring framework supported<br>and gives an indication as to how<br>performance will be judged against<br>outcomes and possible triggers for<br>plan review.<br>SA reports<br>Ongoing AMR |

**Consistent with national policy:** the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

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.

| • Does the DPD contain any policies or proposals which are not consistent with | • | Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons.                         | The Council considers the policies and principles contained within the Area |
|--|---|---|---|
| national policy and, if so, is there local justification?                      | • | Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from     | Action Plan are consistent with national policy. There are no instances     |
| • Does the DPD contain policies that do not add                                |   | national policy.  | where policies depart from national   |
| anything to existing national guidance? If so, why have these been included?   | • | Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of | policy.   |
|  |   | community involvement.  | The Council considers that national<br>policy is only referred to (where    |
|  | • | Reports or copies of correspondence as to how representations   | policy is only referred to (where   |

|  | have been considered and dealt with. | relevant), to provide context for      |
|--|--------------------------------------|--|
|  |                                      | particular policies. National guidance |
|  |                                      | has not been duplicated in this plan.  |

#### 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

| Policy Expectations   | Possible Evidence   | Evidence Provided   |
|---|---|---|
| Policy A: Using evidence to plan positively and manage development (para 6)   |   |   |
| Early and effective community engagement<br>with both settled and traveller communities.  | • Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.   | CS supported by an up to date<br>Gypsy and Traveller<br>Accommodation Assessment<br>The SCRC Area Action<br>Plan does not include a specific<br>site allocation for traveller<br>accommodation. Should a need<br>for this be identified, this will be<br>addressed through review of<br>the Local Plan as appropriate in<br>recognition of any<br>requirements. |
| Co-operate with travellers, their representative<br>bodies and local support groups, other local<br>authorities and relevant interest groups to<br>prepare and maintain an up-to-date<br>understanding of likely permanent and transit<br>accommodation needs of their areas. | <ul> <li>Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan.</li> <li>Collaborative working with neighbouring local planning authorities.</li> </ul> | CS supported by an up to date<br>Gypsy and Traveller<br>Accommodation Assessment<br>[PS/GOO4f]<br>N/A   |
| Policy B: Planning for traveller sites (paras 7-  | <ul> <li>A robust evidence base to establish accommodation needs to<br/>inform the preparation of your local plan and make planning<br/>decisions.</li> </ul>   |   |

| Policy Expectations  | Possible Evidence  | Evidence Provided  |
|--|--|--|
| 11)  |  |  |
| Set pitch targets for gypsies and travellers and<br>plot targets for travelling showpeople which<br>address the likely permanent and transit site<br>accommodation needs of travellers in your<br>area, working collaboratively with<br>neighbouring LPAs. | <ul> <li>Identification, and annual update, of a supply of specific,<br/>deliverable sites sufficient to provide 5 years worth of sites against<br/>locally set target. Identification of a supply of specific, developable<br/>sites or broad locations for growth for years 6-10, and, where<br/>possible, for years 11-15.</li> </ul> | CS supported by an up to date<br>Gypsy and Traveller<br>Accommodation Assessment<br>[PS/GOO4f] |
| Set criteria to guide land supply allocations where there is identified need.  | <ul> <li>An assessment of the need for traveller sites, and where an unmet<br/>need has been demonstrated a supply of specific, deliverable sites<br/>been identified.</li> </ul>  | N/A  |
| Ensure that traveller sites are sustainable economically, socially and environmentally.  | • Policy which takes into account criteria a-h of para 11  |  |
| Policy C: Sites in rural areas and the countryside (para 12)   |  |  |
| When assessing the suitability of sites in rural<br>or semi-rural settings LPAs should ensure that<br>the scale of such sites do not dominate the<br>nearest settled community.  |  | N/A  |
| Policy D: Rural exception sites (para 13)  |  |  |
| If there is a lack of affordable land to meet<br>local traveller needs, LPAs in rural areas, where<br>viable and practical, should consider allocating<br>and releasing sites solely for affordable<br>travellers sites.                                   | • If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.  | N/A  |

| Policy Expectations  | Possible Evidence   | Evidence Provided |
|--|---|-------------------|
| Policy E: Traveller sites in Green Belt (paras<br>14-15)   |   |                   |
| Traveller sites (both permanent and<br>temporary) in the Green Belt are inappropriate<br>development.<br>Exceptional limited alteration to the defined<br>Green Belt boundary (which might be to<br>accommodate a site inset within the Green<br>Belt) to meet a specific, identified need for a<br>traveller site should be done only through<br>the plan-making process. | <ul> <li>Green Belt boundary revisions made in response to a specific<br/>identified need for a traveller site, undertaken through the plan<br/>making process.</li> </ul>  | N/A               |
| Policy F: Mixed planning use traveller sites<br>(paras 16-18)  |   |                   |
| Local planning authorities should consider,<br>wherever possible, including traveller sites<br>suitable for mixed residential and business<br>uses, having regard to the safety and amenity<br>of the occupants and neighbouring residents.  | <ul> <li>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.</li> <li>N.B. Mixed use should not be permitted on rural exception sites</li> </ul> | 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   | • Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site   | N/A               |

| Policy Expectations   | Possible Evidence                                   | Evidence Provided |
|---|---|-------------------|
| for relocation of the community if a major<br>development proposal requires the permanent<br>or temporary relocation of a traveller site. | or sites suitable for re-location of the community. |                   |

End