Broads Local Plan Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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 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? 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? 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? Have reasonable alternatives to the quantum of development and overall spatial strategy been considered? 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?	• 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.	The Issues and Options version of the Local Plan set out the Issues and can be found here: http://www.broads-authority.gov.uk/__data/assets/pdf_file/0011/710849/Broads-New-Local-Plan-Issues-and-Options-Final-for-Consultation-Feb-2016.pdf. Also see the SWOT analysis in the Local Plan. Chapter 7. The Local Plan uses the Broads Plan's vision. Chapter 8. The Local Plan also contains objectives which do relate to the vision. Chapter 8. Each policy does relate to an objective and this is set out in Chapter 8. Regarding quantum of development, as set out in the Housing Topic Paper and the Local Plan itself, the Broads Authority has over provided in relation to need across the entire Local Planning Authority area. http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2 There is an assessment of each policy of the Local Plan against each other. http://www.broads-authority.gov.uk/planning/planning-

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		policies/development/future-local-plan/evidence-base2. The timescales for the objectives is within the plan period of 2015 to 2036.
The presumption in favour of sustainable development (NPPF paras 6-17) 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. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —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.	• 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). • 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)	Housing need is assessed in the Strategic Housing Market Assessment. See Housing Topic Paper and Employment Topic Paper. Found here: http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2
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.	• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk)	See model policy at section 9 of the Local Plan.
Objectively assessed needs 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. Note: Meeting these needs should be subject	• 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.	Housing need is assessed in the Strategic Housing Market Assessment. See Housing Topic Paper and Employment Topic Paper. These and other evidence can be found here: http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-

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to the caveats specified in Paragraph 14 of the NPPF (see above).		plan/evidence-base2 See Economy Section of the Local Plan (chapters 22 and 23). Environment section ranges from chapter 10 to 21. Housing chapter 25. Social aspects: chapters 27 to 30.
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),	• 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.	See Economy Section of the Local Plan (chapters 22 and 23). See Economy Topic Paper: http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • 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)	Policies that cover existing employment sites set criteria proposals should address. There are policies to guide development of new employment sites. See employment section of Local Plan.
2. Ensuring the vitality of town centres (paras 23-37)		
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)	• 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.	See retail evidence of Waveney and North Norfolk District Councils. A shared approach to shared centres has been adopted. See retail policies in the Local Plan. HOV5 and OUL3.

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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)	• 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.	
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	• 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.	See Economy Section of the Local Plan (chapters 22 and 23). See Economy Topic Paper: http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2
4. Promoting sustainable transport (paras 29-41)		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) 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) 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) 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) Opportunities for sustainable transport modes	• 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.	See Transport section of Local Plan: Chapter 21. Other relevant policies include SSA47, and SSROADS. Also Climate Change section chapter 13. Development Boundary policy of relevance: PUBDM34. The Norfolk Strategic Planning Framework is also of relevance. There are no Broads parking standards – refer to the District and or County standards.

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have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32) 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) Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35) 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) 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) The setting of car parking standards including provision for town centres. (39-40) 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)		
5. Supporting high quality communications infrastructure (paras 42-46)		
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) 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	• Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.	See policy DM18 on utilities infrastructure.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)		
6. Delivering a wide choice of high quality housing (paras 47-55)		
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)	• Identification of: 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	Pegasus, Stokesby, Hoveton and Hedera House allocations could be delivered within five years. The Broads Authority is not an under provider and therefore a buffer of 5% will be added. See HELAA http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2.
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15	The Utilities Site allocation will likely come forward from year 6 onwards. See Housing Trajectory in HELAA and Local Plan.
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)	• A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47)	See Annual Monitoring Report. http://www.broads-authority.gov.uk/planning/planning-policies/development/current-documents/supporting-documents-and-evidence See Housing and Residential Moorings Trajectory in HELAA and Local Plan.
Set out the authority's approach to housing density to reflect local circumstances (47).	• Policy on the density of development.	See design policy in chapter 26.
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)	• 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	See Housing Section 25. SHMA completed in 2017. Housing Topic Paper: http://www.broads-authority.gov.uk/planning/planning-policies/development/current-documents/supporting-documents-and-evidence See Affordable Housing Policy DM33.

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	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)	
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). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	• 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.	See Affordable Housing Policy DM33. See Rural Enterprise Dwelling policy DM37. Hedera House at Thurne and also Stokesby policies allocated land for dwellings in rural areas.
7. Requiring good design (paras 56-68)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	• 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	See design policy in chapter 26.
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).	• 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)	See design policy in chapter 26. See health policy in chapter 28.
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	• 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	See chapter 27 on visitor and community facilities.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	access to key services and infrastructure.	
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).	• 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 buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75)	Defer to District's standards. See chapter 11 on open space.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance 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)	See Local Green Space Assessment. http://www.broads-authority.gov.uk/planning/planning-policies/development/current-documents/supporting-documents-and-evidence. See policy SSLGS of the Local Plan.
9. Protecting Green Belt land (paras 79-92)		

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)
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 policy. (83)
When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)
Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)
	• Where Green Belt policies are included, these should reflect the need to:
	  o Enhance the beneficial use of the Green Belt. (81)
	  o Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)
	  o Specify that inappropriate development should not be approved except in very special circumstances. (87)
	  o Specify the exceptions to inappropriate development (89-90)
	  o Identify where very special circumstances might apply to renewable energy development. (91)
		No green belt in the Broads.

10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
Adopt proactive strategies to mitigate and adapt to climate change taking full account of	• Planning of new development in locations and ways which reduce greenhouse gas emissions.	See section 13 on climate change. See policy DM4 on flood risk. See policy

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flood risk, coastal change and water supply and demand considerations. (94)	• 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))	DM3 on water efficiency. See DM13 relating to energy demand and performance.
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)	• 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)	See Renewable Energy Topic Paper http://www.broads-authority.gov.uk/planning/planning-policies/development/current-documents/supporting-documents-and-evidence See chapter 17 relating to renewable energy.
Minimise vulnerability to climate change and manage the risk of flooding (99)	• 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) • Policies to manage risk, from a range of impacts, through suitable adaptation measures	See section 13 on climate change. See policy DM4 on flood risk. See policy DM3 on water efficiency.
Take account of marine planning (105)	• 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	See next section on Marine Planning.
Manage risk from coastal change (106)	• 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.	See policy SSCOASTS relating to the coast. This is consistent with the Shoreline Management Plan for the area.
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	• 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	This is fundamental to this local plan. See section 18 of the Local Plan. See SP4 which seeks to protect high quality agricultural land.

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	and scenic beauty of National Parks, the Broads and AONBs.	
Prevent unacceptable risks from pollution and land instability (109)	• 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.	See section 20 on light pollution. See policy DM1 on water quality and section 19 relating to Amenity.
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	• 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	See biodiversity section (16) and soils section (14) of the Local plan.
12. Conserving and enhancing the historic environment (paras 126-141)		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	• 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 • A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)	See heritage section of the Local Plan. Chapter 15.
13. Facilitating the sustainable use of minerals (paras 142-149)		
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) Minerals planning authorities should plan for a steady and adequate supply of industrial 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.	Where relevant, site allocation policies refer to minerals. See relevant policies.
Justified: The plan should be the most appropriate 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 Has the consultation process allowed for effective engagement of all interested parties?	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	Yes, See consultation statement. http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-

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		plan/examination-of-the-local-plan-for-the-broads-2018
Research / fact finding Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?	• 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. AND • 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. OR • 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. OR • 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).	Yes. See evidence base on website with dates. Dates tend to be from 2016. Also, each section or policy states what evidence has informed that section of the Local Plan. http://www.broads-authority.gov.uk/planning/planning-policies/development/current-documents/supporting-documents-and-evidence See assumptions section of the Local Plan. See section 8.
Alternatives 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? 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?	• Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.	See Sustainability Appraisal of Preferred Options and Publication version. This sets out the assessment of alternatives. Also see Preferred Options and the alternatives considered, why dismissed and why the preferred option taken forward for each policy.
Effective: *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.* To be 'effective' a DPD needs to:		

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• 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		
Deliverable and Coherent • 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?	• 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).	See objectives and policy table section 8. See assessment of each policy against each other http://www.broads-authority.gov.uk/planning/planning-policies/development/current-documents/supporting-documents-and-evidence. Objectives will be met over the Local Plan period. Housing and residential moorings policy have potential start dates in the reasoned justification. Also see monitoring and implementation framework section of the Local Plan. See responses from organisations set out in the Consultation Statement.
Infrastructure Delivery • 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	• 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.	Yes. See Local Infrastructure Study http://www.broads-authority.gov.uk/planning/planning-policies/development/current-documents/supporting-documents-and-evidence See Delivery and Implementation Framework in the Local Plan.

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policies?		See responses from organisations set out in the Consultation Statement.
Co-ordinated Planning Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?	• Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area	See Policy Context, section 5. See responses from other organisations in the area, set out in the Consultation Statement.

Flexibility
• Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?
• Does the DPD include the remedial actions that will be taken if the policies need adjustment?
	• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.
	• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:
	  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.
		Yes as policies tend to be criteria based.
		
		Yes, the Local Plan review will start 18 months after adoption and this is included in the Local Plan.
		
		See assumptions section of the Local Plan. See section 8.
		
		See Delivery and Implementation Framework in the Local Plan.

Co-operation • 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	• 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	See Duty to Cooperate Statement http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/examination-of-the-local-plan-for-the-broads-2018 See Delivery and Implementation

Broads Local Plan Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?	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 other consultees as appropriate.	Framework in the Local Plan.
Monitoring • 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?	• 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	See Delivery and Implementation Framework in the Local Plan.
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 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?	• 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.	Many policies relate to navigation and using the water which is not specifically included in the NPPF, but is a locally important issue. The heritage section refers to the public benefits of non-designated heritage assets. The Affordable Housing policy seeks off-site contributions for schemes between 6 and 10 dwellings. See consultation statement http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/examination-of-the-local-plan-

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		for-the-broads-2018

1. Planning policy for traveller sites

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement 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.	No Gypsy and traveller, Travelling Show People or Caravan need in the Broads.
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.	• 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.	Need for 63 residential moorings in the Broads. See Gypsy and Traveller, caravan and houseboat study and Residential Moorings Topic Paper. http://www.broads-authority.gov.uk/planning/planning-policies/development/current-documents/supporting-documents-and-evidence See policy DM35 re Gypsy and Travellers. See policy DM 36, new Residential Moorings (as well as allocations at Beccles, Brundall Gardens, Chedgrave and Loddon).
Policy B: Planning for traveller sites (paras 7-11)		
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. Set criteria to guide land supply allocations	• 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	See Gypsy and Traveller, caravan and houseboat study. http://www.broads-authority.gov.uk/planning/planning-policies/development/current-documents/supporting-

Policy Expectations	Possible Evidence	Evidence Provided
where there is identified need. Ensure that traveller sites are sustainable economically, socially and environmentally.	been identified. • Policy which takes into account criteria a-h of para 11	documents-and-evidence See policy DM35 re Gypsy and Travellers. See policy DM 36, new Residential Moorings (as well as allocations at Beccles, Brundall Gardens, Chedgrave and Loddon. There is no Gypsy and Traveller, Travelling Showpeople or residential caravan need in the Broads. There is a need for 63 residential moorings – see Topic Paper. http://www.broads-authority.gov.uk/planning/planning-policies/development/current-documents/supporting-documents-and-evidence
Policy C: Sites in rural areas and the countryside (para 12)		
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.		Included within criteria policy. See policy DM35 re Gypsy and Travellers.
Policy D: Rural exception sites (para 13)		
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.	• If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.	There is no identified need for Gypsy and Traveller sites in the Broads.

Policy Expectations	Possible Evidence	Evidence Provided
Policy E: Traveller sites in Green Belt (paras 14-15)		
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. 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.	• Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.	There is no green belt in the Broads.
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.	• 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	Included within criteria policy. See policy DM35 re Gypsy and Travellers.
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.	• 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.	Noted but not relevant to this Local Plan.

1. Integration of marine and terrestrial planning

Policy Expectations	Possible Evidence	Evidence Provided
Key requirements under the Duty to Co-Operate		
Consistency between marine and terrestrial policy documents and guidance	• 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.	See Local Plan versus Marine Plan Topic Paper. http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2 The MMO have been consulted from the start of the process. See consultation statement http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/examination-of-the-local-plan-for-the-broads-2018
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	• 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	The MMO have been consulted from the start of the process. Any appropriate changes suggested by the MMO have been incorporated. See consultation statement http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/examination-of-the-

Policy Expectations	Possible Evidence	Evidence Provided
		local-plan-for-the-broads-2018.
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	• 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 roles, and relevant marine plans	The Planning Team of the Broads Authority have not been asked to provide data to the MMO. The MMO has not provided data to the Planning Team of the Broads Authority. See Policy Context section of the Local plan at chapter 5.
Marine Policy Statement- Chapter 2: General Principles for Decision-Making[1]		
Sections 2.1 -2.2: The UK vision for the marine environment		
The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas') Achieving the vision through marine planning	• Reference in DPD where appropriate to UK vision for the marine environment • Contribution to the vision through local plan policies and supporting text	Reference made in supporting text to the Coast policy SSCOASTS.
Section 2.4: Considering benefits and adverse effects in marine planning		
Consider benefits and adverse effects of plan policies	• Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal	Many SA Objectives relate to the marine environment. There is a particular objective relating to coastal change OBJ5.
Section 2.5: Economic, social and environmental considerations		
Contribute to the objectives of relevant EU Directives (Marine Strategy Framework	• Reference to relevant EU Directives in DPD and sustainability appraisal	Assessed in literature review of the Sustainability Appraisal.

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[1] 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.

Policy Expectations	Possible Evidence	Evidence Provided
Directive and Water Framework Directive)	• 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	• 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	See Habitats Regulation Assessment : http://www.broads-authority.gov.uk/__data/assets/pdf_file/0018/1041813/Local-Plan-for-the-Broads-HRA-Publication-stage-31-08-17.pdf See SA . See Policies Maps which identify areas of importance for biodiversity http://www.broads-authority.gov.uk/broads-authority/committees/planning-committee/planning-committee-15-september-2018/maps.
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	• 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	No policies relating to this.
3.8 Fisheries		
Consider potential economic, social and environmental impacts of other developments on fishing activity	• Where relevant, evidence that other policies minimise negative impacts on fishing activity and/or aquaculture	Large scale fishing activities not relevant to the Broads. No specific policy relating to

Policy Expectations	Possible Evidence	Evidence Provided
		angling, but there are tourism policies in Section 23.
3.9 Aquaculture		
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	• Where relevant, evidence that the benefits of aquaculture industry development have been considered	Aquaculture not addressed in Local Plan.
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	• 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	See water quality policy DM1 Boat Wash Down policy DM2 and DM5.
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	• Where relevant, reference to marine tourism and recreation • Evidence that the potential for marine tourism and recreation has been recognised in plan-making	Tourism is important to the Broads. See Coast policy (SSCOASTS) and Sustainable Tourism section (23) of the Local Plan.