

Bath & North East
Somerset Council

Placemaking Plan Soundness Checklist

April 2016

Bath and North East Somerset - *The place to live, work and visit*

Placemaking Plan Soundness Self-Assessment Checklist (2016)

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

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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 www.pas.gov.uk) should be completed to ensure that this aspect is covered.

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

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>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.</p>		
<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<p>The Placemaking Plan forms part 2 of the Local Plan and has been prepared in the context of the adopted Core Strategy (July 2014), which is Part 1 of the Local Plan and sets out the strategic planning policy framework for the District.</p> <p>Paras 4 to 11 explain that the Placemaking Plan seeks to deliver the strategic Vision for the District as set out in the Core Strategy. The Core Strategy identifies the broad housing and employment numbers, and strategic locations for development. It also sets out 7 strategic objectives. The Placemaking Plan will help deliver the housing and employment requirements established in the Core Strategy and its strategic objectives:</p> <ul style="list-style-type: none"> - Pursue a low carbon and sustainable future in a changing climate - Protect and enhance the District's natural, built and cultural assets and provide green infrastructure - Encourage economic development, diversification and prosperity - Invest in our city, town and local centres - Meet housing needs - Plan for development that promotes health and well being - Deliver well connected places accessible by sustainable means of transport <p>The scope and content of the Placemaking Plan is summarised in the Local Development Scheme 2015 - 2019.</p> <p>The Placemaking Plan will deliver better places by facilitating the delivery of high quality, sustainable and well located development supported by the timely provision of necessary infrastructure.</p> <p>See also response under the question relating to whether the Plan is <i>Deliverable and Coherent</i> on p.23 below.</p>	
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change,</p>	<p>As explained above, the Placemaking Plan forms part 2 of the Local Plan and has been prepared in the context of the adopted Core Strategy (Part 1 of the Local Plan) which sets out the strategic planning policy framework for the District. The Placemaking Plan seeks to deliver the strategic Vision for the District as set out in the Core Strategy.</p> <p>The Core Strategy identifies the broad housing and employment numbers, and strategic locations for</p>	

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<p>unless:</p> <ul style="list-style-type: none"> —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or —specific policies in this Framework indicate development should be restricted. 	<p>development. It also sets out 7 strategic objectives. The Placemaking Plan will help deliver the strategic housing and employment requirements established in the Core Strategy and its strategic objectives. In terms of flexibility the Core Strategy housing requirement of around 13,000 homes between 2011 and 2029 is significantly greater than the objectively assessed need (OAN) identified through the Strategic Housing Market Assessment (SHMA). The OAN has been boosted in the Core Strategy to facilitate the provision of affordable housing. In addition, the Council is able to identify a 5 year supply of housing land plus a 20% buffer.</p> <p>In facilitating delivery of the Core Strategy and focussing on detailed site/policy issues the Placemaking Plan responds to a wide range of locally-specific evidence which addresses economic, social and environmental issues and which collectively identifies the key challenges, opportunities and constraints faced by Bath & North East Somerset.</p> <p>All evidence underpinning the Core Strategy is listed in the Core Documents List prepared for the Core Strategy Examination (available on the Council's website).</p> <p>Building on this the Placemaking Plan is underpinned by objective assessments of development needs for a number of key forms of development (including needs for different types of employment floorspace; retail capacity; and student accommodation requirements – see supporting evidence listed below). Supporting evidence includes:</p> <ul style="list-style-type: none"> - Retail Study 2014 – Stage 1 Interim Report, GVA for Bath & North East Somerset Council (November 2014) - Retail Study 2014 – Stage 2 Report_GVA for Bath & North East Somerset Council (July 2015) - Industrial Market Review, Lambert Smith Hampton (December 2015) - Office Market Review, Lambert Smith Hampton (October 2015) - Student Numbers and Accommodation Requirements in Bath - Rationale for Land Use Options within the Central Area and Enterprise Area, Bath & North East Somerset Council (November 2014) <p>As a result of the range of requirements identified and the limited land supply in Bath the Placemaking Plan does not seek to meet all of these needs related to Bath. There are insufficient sequentially appropriate and sustainable sites within the city that could be acceptably accommodate the full needs identified. Therefore, through the Placemaking Plan meeting the full need for general & affordable housing and employment floorspace has been prioritised. Land use mix options were tested through the Placemaking Plan Options document and the sustainability appraisal process.</p>	

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<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<p>Policy SD1 in the Core Strategy (Vol 1, p.55) reflects the principles of the presumption in favour of sustainable development. The policies in the Placemaking Plan have been developed within the context for sustainability principles as demonstrated through the Sustainability Appraisals associated with each stage of the plan-making process (see Core Documents List for the Placemaking Plan).</p>	
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<p>Policies in the Core Strategy address the objectively assessed needs for the District for the period 2011 - 2029. Policies in the Placemaking Plan set out detailed development and design principles for identified and allocated development sites, as well as a range of policies for managing development and protecting valued assets across the District. Mixed use development is promoted on appropriate allocated development sites.</p> <p>Technical papers underpinning the Core Strategy are listed in the Core Documents List prepared for the Core Strategy Examination (available on the Council's website).</p>	
NPPF Principles: Delivering sustainable development		
Building a strong, competitive economy (paras 18-22)		
<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),</p>	<p>The Placemaking Plan takes forward and facilitates delivery of the economic vision set out in the Core Strategy which is to 'Encourage economic development, diversification and prosperity'. The Placemaking Plan does this through site allocations (especially in the Bath Enterprise Area prioritising employment space provision; Keynsham and the Somer Valley) and District-wide Development Management policies. The following policies address this issue:</p> <ul style="list-style-type: none"> - ED.1A Office Development (Vol 1, p.180) - ED.1B Change of use & redevelopment of B1 (A) office to residential use (Vol 1, p.182) - ED.1C Change of use and redevelopment of B1 (A) office use to other town centre uses (Vol 1, p.183) - ED.2A Strategic (*) and other primary industrial estates (Vol 1, p.187) - ED.2B Non-Strategic Industrial Sites (Vol 1, p.188) 	
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of</p>	<p>These matters are addressed through the following policies:</p> <ul style="list-style-type: none"> - B1: Bath Spatial Strategy (Vol 2, p.9) 	

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infrastructure, services or housing (21)	<ul style="list-style-type: none"> - KE1: Keynsham Spatial Strategy (Vol 3, p.7) - SV1: Somer Valley Spatial Strategy (Vol 4, p.13) RA1 Development in the villages meeting the listed criteria (Vol 1, p.34) - RA2 Development in villages outside the Green Belt not meeting Policy RA1 criteria (Vol 1, p.34) - Core Strategy Policy CP13 Infrastructure Provision (Vol 1, p.245) - ED.2A Strategic (*) and other primary industrial estates (Vol 1, p.187) - ED.2B Non-Strategic Industrial Sites (Vol 1, p.188) <p>Key supporting evidence informing the Placemaking Plan includes:</p> <ul style="list-style-type: none"> - B&NES Viability Assessment, BNP Paribas Real Estate (November 2015) - Industrial Market Review, Lambert Smith Hampton (December 2015) - Infrastructure Delivery Programme (January 2016) <p>Other relevant evidence underpinning the Core Strategy is listed in the Core Documents List prepared for the Core Strategy Examination (available on the Council's website).</p>	
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)	<p>These matters are addressed through the following policies:</p> <p><u>Core Strategy</u></p> <ul style="list-style-type: none"> - CP12 Centres and Retailing (Vol 1, p.200) <p><u>Placemaking Plan</u></p> <ul style="list-style-type: none"> - CR1 Sequential Test (Vol 1, p.203) - CR2 Impact Assessments (Vol 1, p.204) - CR3 Primary Shopping Areas and Primary Shopping Frontages (Vol 1, p.206) - CR4 Dispersed Local Shops (Vol 1, p.207) <p>Supporting evidence includes:</p> <ul style="list-style-type: none"> - Retail Study 2014 – Stage 1 Interim Report, GVA for Bath & North East Somerset Council (November 2014) - Retail Study 2014 – Stage 2 Report_GVA for Bath & North East Somerset Council (July 2015) - Bath Hotel Futures Study 2015, The Hotel Development Company (July 2015) 	
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)	The Placemaking Plan identifies a number of sites, both within and on the edge of city/town centres and more widely across the District. The Plan aims to guide development of these sites and encourages mixed use development. Appropriately located sites can accommodate a range of town centre uses and the Plan provides guidance on the quantum of different uses that can be accommodated. The development & design requirements for allocated sites provide some flexibility in terms of land use mix in order to respond to market and community requirements. As noted above there is insufficient land within Bath to	

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	<p>appropriately accommodate all of the identified need on sequentially acceptable sites and therefore, the provision of economic uses has been prioritised.</p> <p>In addition to site specific policies/allocations these matters are addressed through the following policies:</p> <p><u>Core Strategy</u></p> <ul style="list-style-type: none"> - CP12 Centres and Retailing (Vol 1, p.200) <p><u>Placemaking Plan</u></p> <ul style="list-style-type: none"> - CR1 Sequential Test (Vol 1, p.203) - CR2 Impact Assessments (Vol 1, p.204) - CR3 Primary Shopping Areas and Primary Shopping Frontages (Vol 1, p.206) - CR4 Dispersed Local Shops (Vol 1, p.207) <p>Supporting evidence in addition to that noted above:</p> <ul style="list-style-type: none"> - Review of the district and local centre boundaries, (November 2015) - Defining Primary Shopping Areas and Primary Shopping Frontages in B&NES, (November 2015) 	
Supporting a prosperous rural economy (para 28)		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<p>These matters are addressed through the following policies:</p> <p><u>Core Strategy</u></p> <ul style="list-style-type: none"> - RA3 Community Facilities (Vol 1, p.156) <p><u>Placemaking Plan</u></p> <ul style="list-style-type: none"> - Policy RE1 Employment uses in the countryside (Vol 1, p.191) - RE2 Agricultural development (Vol 1, p.192) - RE3 Farm diversification (Vol 1, p.193) - RE4 Essential dwellings for rural workers (Vol 1, p.194) - RE5 Agricultural land (Vol 1, p.195) - RE6 Re-use of rural buildings (Vol 1, p.196) - RE7 Visitor accommodation (Vol 1, p.197) 	
Promoting sustainable transport (paras 29-41)		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and</p>		<p>Whilst the strategic approach to promoting sustainable travel is set out in the Core Strategy, the policy framework for addressing transport related matters for Bath & North East Somerset is articulated in the Placemaking Plan through the following policies:</p> <ul style="list-style-type: none"> - ST1 Promoting sustainable travel (Vol 1, p.213) - ST2 Sustainable Transport Routes (Vol 1, p.213) - ST2A Recreational Routes (Vol 1, p.214)

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<p>opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should</p>	<ul style="list-style-type: none"> - ST3 Transport infrastructure (Vol 1, p.216) - ST4 Rail freight facility (Vol 1, p.216) - ST5 Traffic Management Proposals, 217) - ST6 Park and Ride (Vol 1, p.218) - ST7 Transport requirements for managing development (Vol 1, p.220) - Schedule 1 – Parking standards for Disabled people (Vol 1, p.225) - Schedule 2 – Parking Standards (for vehicles and cycles) (Vol 1, p.226) <p>Supporting evidence includes:</p> <ul style="list-style-type: none"> - Getting Around Bath – The Transport Strategy for Bath - Draft Keynsham Transport Strategy, Mott MacDonald for Bath & North East Somerset Council (2015) - Bath EA: Transport Strategy: S-Paramics Modelling (CH2M) (2015) - Updated S-Paramics Modelling/Phasing work (CH2M) (2016) - Access to Bath from the East: Forecasting for A4 Eastern Park and Ride (Mott MacDonald) - Bath & North East Somerset Car Parking Standards, Bath & North East Somerset Council (November 2015) - Review of Proposed Parking Standards, Mott MacDonald (December 2015) - Transport Evidence Explanatory Note 1: Parking Standards - Bath - Transport Evidence Explanatory Note 2: Expansion of Park and Ride - Pedestrian and Cycle Routes (Outside of Town Centre) and Appendices CH2M for Bath & North East Somerset Council (August 2015) - Assessment of Future Car Parking Demand, CH2M for Bath & North East Somerset Council (September 2015) - Avon Mill Lane link assessment (CH2M) - Transport Evidence Explanatory Note 3: Keynsham Highway Infrastructure - Saltford Station: Feasibility Study, CH2M 2014 - Public Realm and Movement Strategy, B&NES Council / City ID (July 2010) 	

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<p>be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		
Supporting high quality communications infrastructure (paras 42-46)		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<p>These matters are addressed through the following Placemaking Plan policies:</p> <ul style="list-style-type: none"> - LCR7A Telecommunications development (Vol 1, p.168) - LCR7B Broadband (Vol 1, p.170) 	
Delivering a wide choice of high quality housing (paras 47-55)		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<p>In the context of the Core Strategy housing requirement of around 13,000 homes between 2011 and 2029 the Council has identified a five-year deliverable housing land supply as required, including a 20% buffer.</p> <p>Evidence: Five Year Housing Land Supply and Housing Trajectory</p>	
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<p>The Council has identified a 15-year housing land supply to meet the Core Strategy requirement. In addition to the Strategic Site Allocations in the Core Strategy, a large proportion of this comprises the</p>	

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	<p>allocation of sites through the Placemaking Plan. There is also an allowance for an element of development to come forward from windfall sites and / or as part of mixed use developments, including those in city and town centres.</p> <p>Evidence: HELAA (incorporating Housing Trajectory)</p>	
<p>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)</p>	<p>The Council has prepared a housing trajectory illustrating the way in which planned housing development is expected to come forward to meet the overall plan requirement.</p> <p>Evidence: Housing Trajectory</p>	
<p>Set out the authority's approach to housing density to reflect local circumstances (47).</p>	<p>Placemaking Plan Policy D.2 (Vol 1, p.86) covers the issue of density and seeks to ensure residential density must be compatible with character and higher net densities will be encouraged in accessible locations with good local facilities, to make efficient use of land.</p>	
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)</p>	<p>These matters are addressed through the following policies:</p> <p><u>Core Strategy</u></p> <ul style="list-style-type: none"> - CP9 Affordable Housing (Vol 1, p.138) which sets out the Council's policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified. - CP10 Housing Mix (Vol 1, p.144) - CP11 Gypsies, Travellers and Travelling Showpeople (Vol 1, p.153) <p><u>Placemaking Plan</u></p> <ul style="list-style-type: none"> - H1 Housing and facilities for the elderly, people with other supported housing or care needs (Vol 1, p.143) - H2 Houses in Multiple Occupation, (Vol 1, p145) - H3 Residential Use in Existing Buildings ((Vol 1, p.146) - H4 Self-Build (Vol 1, p.146) - H5 Retention of Existing Housing Stock ((Vol 1, p.147) - H6 Moorings (Vol 1, p.150) - H7 Housing accessibility (Vol 1, p.151) - H8 Affordable Housing Regeneration Schemes (Vol 1, p.151) <p>Evidence:</p> <ul style="list-style-type: none"> - Student Numbers and Accommodation Requirements in Bath (December 2015) - University of Bath Environmental Capacity Report, Landmark Consultants (2000) - University of Bath Masterplan (external website) University of Bath (2009 and 2014) 	

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<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> - Housing Accessibility Needs Assessment (January 2016) <p>These matters are addressed through the following policies:</p> <p><u>Core Strategy Policies:</u></p> <ul style="list-style-type: none"> - RA1 Development in the villages meeting the listed criteria (Vol 1, p.34) - RA2 Development in villages outside the Green Belt not meeting Policy RA1 criteria (Vol 1, p.34) - RA4 Rural exceptions sites (Vol 1, p.140) <p><u>Placemaking Plan Policies:</u></p> <ul style="list-style-type: none"> - D.7 infill and backland development (Vol 1, p.90) - RE4 Essential dwellings for rural workers (Vol 1, p.194) - RE6 Re-use of rural buildings (Vol 1, p.196) - NE2B Extension of residential curtilages In the countryside (Vol 1, p.109) 	
1. Requiring good design (paras 56-68)		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<p>These matters are addressed through the following policies:</p> <p><u>Core Strategy Policy CP6 (1)</u></p> <p><u>Environmental Quality (Vol 1, p.81)</u></p> <p><u>Placemaking Plan policies</u></p> <ul style="list-style-type: none"> - D.1 General Urban Design Principles (Vol 1, p.85) - D.2 Local Character & Distinctiveness (Vol 1, p.86) - D.3 Urban Fabric (Vol 1, p.87) - D.4 Streets and Spaces(Vol 1, p.88) - D.5 Building Design (Vol 1, p.88) - D.6 Amenity (Vol 1, p.89) - D.7 Infill & Backland Development (Vol 1, p.90) - D.8 Lighting (Vol 1, p.92) - D.9 Advertisements & Outdoor Street Furniture (Vol 1, p.94) - D.10 Public Realm (Vol 1, p.95) <p><u>Supporting evidence includes:</u></p> <ul style="list-style-type: none"> - Public Realm and Movement Strategy, B&NES Council / City ID (July 2010) - Bath Pattern Book including Lighting Strategy (November 2015) - Draft Bath Conservation Area Design Guide – Signage and Tables and Chairs,(November 2015) - Bath Morphology Study, Karl Kroph (November 2014) - Rationale for Land Use Options within the Central Area and Enterprise Area_(November 2014) 	
Promoting healthy communities (paras 69-77)		

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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).	<p>The Core Strategy and Placemaking Plan together set out a policy framework which promotes community interaction and the creation of sustainable public spaces, primarily through, for example:</p> <ul style="list-style-type: none"> - Extending the role of town centres beyond a traditional retail offer - Protecting community facilities and services where this is sustainable - Promoting places designed for people – to be safe, comfortable, varied and attractive - that offer opportunities for interaction - Promoting a design-led approach to incorporating green infrastructure into new development - Ensuring development makes connections by foot, cycle, public transport and by car and that streets and spaces must be legible and easy to move around <p>These principles extend to the formulation of the Design Principles for the Site Allocations (Vols 2-5)</p>	
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	<p>These matters are addressed through the following Placemaking Plan policies:</p> <ul style="list-style-type: none"> - LCR1 Safeguarding local community facilities (Vol 1, p.155) - RA3 Community Facilities and Shops (Vol 1, p.156) - LCR1A Public houses (Vol 1, p.157) - LCR2 New or replacement community facilities (Vol 1, p.158) - LCR3 Sites safeguarded for primary school use (Vol 1, p.159) - LCR3A Primary school capacity (Vol 1, p.160) - LCR4 Allocation of land for cemeteries (Vol 1, p.161) - LCR8 Protecting allotments (Vol 1, p.173) - LCR9 Increasing the Provision of Local Food Growing (Vol 1, p.174) - Core Strategy Policy CP13 Infrastructure Provision (Vol 1, p.245) 	
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).	<p>These matters are addressed through the following Placemaking Plan policies:</p> <ul style="list-style-type: none"> - LCR5 Safeguarding existing sport and recreational facilities (Vol 1, p.163) - LCR6 New and replacement sports and recreational facilities (Vol 1, p.165) - ST1 Promoting sustainable travel (Vol 1, p.213) - ST2 Sustainable Transport Routes (Vol 1, p.213) - ST2A Recreational Routes (Vol 1, p.214) <p>Supporting evidence includes:</p> <ul style="list-style-type: none"> - Green Space Strategy 2015 – 2029 (November 2015) - Draft Built Facilities Strategy, Bath and North East Somerset Council (May 2014) 	
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local	<p>The Placemaking Plan includes Policy LCR6A (Vol 1, p.166) which enables the protection of Local Green Spaces.</p> <p>All Local Green Spaces nominated by local communities that met the criteria in para 77 of the NPPF are shown on the Policies Map and protected by Policy LCR6A.</p>	

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Green Space' (76-78).	<p>Supporting evidence for this policy:</p> <ul style="list-style-type: none"> - Local Green Space Summary Report (December 2015) - Local Green Space Designations Evidence Reports (2016) for spaces in Bath; Keynsham; Somer Valley; and Rural Areas 	
2. Protecting Green Belt land (paras 79-92)		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p>	<p>Through the Core Strategy it was established that no exceptional circumstances existed to warrant altering the Green Belt boundary to provide for development opportunities other than at the four allocated Strategic Sites. These matters are therefore addressed through the following policies:</p> <p><u>Core Strategy policies:</u></p> <ul style="list-style-type: none"> - CP8 Green Belt (Vol 1, p.123) - B3a: Land adjoining Odd Down, Bath Strategic Site Allocation (Vol 2, p.134) - KE3a: Land adjoining East Keynsham Strategic Site Allocation (Vol 3, p.38) - KE3b: Safeguarded Land at East Keynsham (Vol 4, p.39) - KE4: Land adjoining South West Keynsham Strategic Site Allocation (Vol 4, p.41) - RA5 – Land at Whitchurch Strategic Site Allocation (Vol 5, p.57) 	
<p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p>	<p><u>Placemaking Plan policies:</u></p> <ul style="list-style-type: none"> - GB2 Development in Green Belt villages (Vol 1, p.125) - GB3 Extensions and alterations to buildings in the Green Belt (Vol 1, p.126) <p>Supporting evidence includes:</p> <ul style="list-style-type: none"> - Green Belt Review (Stage 1), Ove Arup & Partners Ltd (April 2013) - Requests for land to be removed from the Green Belt - Analysis and recommendations (November 2014) - Placemaking Plan (Pre-Submission Draft) - Requests for land to be removed from the Green Belt: Analysis and recommendations (December 2015) 	
<p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)</p>		
Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<p>These matters are addressed through the following policies:</p> <ul style="list-style-type: none"> - CP1 Retrofitting Existing Buildings (Vol 1, p.58) - CP2 Sustainable Construction (Vol 1, p.59) - CP3 Renewable Energy (Vol 1, p.60) - SCR1 On-site renewable energy requirement (Vol 1, p.63) - SCR2 Roof Mounted/Building Integrated Scale Solar PV (Vol 1, p.63) - SCR3 Ground Mounted Solar Arrays (Vol 1, p.64) 	

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	<ul style="list-style-type: none"> - SCR5 Water Efficiency (Vol 1, p.66) <p>Supporting evidence:</p> <ul style="list-style-type: none"> - Renewable Energy Target Evidence Report (November 2015) 	
Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)	<p>These matters have been addressed through the following policies:</p> <ul style="list-style-type: none"> - SCR4 Community Renewable Energy Schemes (Vol 1, p.65) - CP4 District Heating (Vol 1, p. 68) <p>Supporting evidence:</p> <ul style="list-style-type: none"> - Community Energy Strategy (Draft) (November 2015) - EA District Heating Feasibility Report (November 2015) 	
Minimise vulnerability to climate change and manage the risk of flooding (99)	<p>These matters have been addressed through the following policies:</p> <ul style="list-style-type: none"> - CP5 Flood Risk Management (Vol 1, p.73) - SU1 Sustainable Drainage (Vol 1, p.76) <p>Supporting evidence:</p> <ul style="list-style-type: none"> - Surface Water Management Plan Bath & North East Somerset Council (November 2015) - West of England SUDS Developers Guide, West of England Authorities (March 2015) - Renewable Energy Target Evidence Report Bath & North East Somerset Council (November 2015) 	
Manage risk from coastal change (106)	N/A Bath & North East Somerset is not a coastal authority.	
Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	<p>These matters have been addressed through the following policies:</p> <p><u>Core Strategy policy:</u> CP6 Environmental Quality(3) & (4) (p.81)</p> <p><u>Placemaking Plan policies:</u></p> <ul style="list-style-type: none"> - NE3 Sites, species and habitats (Vol 1, p.112) - NE4 Ecosystem Services (Vol 1, p.113) - NE5 Ecological networks (Vol 1, p.114) - CS CP7 Green Infrastructure (Vol 1, p.118) - NE1 Development and Green Infrastructure (Vol 1, p.121) - NE6 Trees and woodland conservation (Vol 1, p.115) - NE2 conserving and enhancing the landscape and landscape character (Vol 1, p.105) - NE2A Landscapes setting of settlements (Vol 1, p.108) - NE2B Extension of residential curtilages In the countryside (Vol 1, p.109) - RE5 Agricultural land (Vol 1, p.195) 	

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	<p>Supporting evidence:</p> <ul style="list-style-type: none"> - Landscape Setting of Settlements (Policy NE2A) December 2015 - Placemaking Plan Housing Development Boundaries Review_(December 2015) 	
Prevent unacceptable risks from pollution and land instability (109)	<p>These matters have been addressed through the following Placemaking Plan policies:</p> <ul style="list-style-type: none"> - PCS1 Pollution and nuisance (Vol 1, p.128) - PCS2 Noise and vibration (Vol 1, p.129) - PCS3 Air quality (Vol 1, p.130) - PCS4 Hazardous substances(Vol 1, p.130) - PCS5 Contamination (Vol 1, p.131) - PCS6 Unstable land (Vol 1, p.132) - PCS7 Water Source Protection Zones (Vol 1, p.133) - PCS7A Foul sewage infrastructure (Vol 1, p.134) - PCS8 Bath Hot Springs(Vol 1, p.134) 	
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>		
	<p>These matters have been addressed through the following policies:</p> <p><u>Core Strategy Policy:</u></p> <ul style="list-style-type: none"> - CP6 Environmental Quality (4) <p><u>Placemaking Plan Policies:</u></p> <ul style="list-style-type: none"> - NE3 Sites, species and habitats (Vol 1, p.112) - NE5 Ecological networks (Vol 1, p.114) 	
<p>Conserving and enhancing the historic environment (paras 126-141)</p>		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	<p>These matters have been addressed through the following policies:</p> <p><u>Core Strategy Policy:</u></p> <ul style="list-style-type: none"> - CP6 Environmental Quality (2) <p><u>Placemaking Plan Policies:</u></p> <ul style="list-style-type: none"> - H1 Historic Environment (Vol 1, p.99) - H2 Somersetshire Coal Canal and the Wansdyke (Vol 1, p.101) <p>The Council holds and maintains an up to date Historic Environment Record (HER) (Vol 1, para 228) which includes non-designated assets. All nationally designated historic assets are shown on the Policies Map plus the up to date Conservation Area boundaries.</p>	
<p>Facilitating the sustainable use of minerals (paras 142-149)</p>		
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since	<p>These matters as relevant to Bath & North East Somerset are addressed through the following policies:</p> <p><u>Core Strategy Policy:</u></p> <p>CP8a Minerals (Vol 1, p.236)</p>	

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<p>minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p>	<p><u>Placemaking Plan Policies:</u></p> <ul style="list-style-type: none"> - M1 Mineral Safeguarding Areas (Vol 1, p.237) - M2 Minerals Allocations (Vol 1, p.238) - M3 Aggregate Recycling Facilities (Vol 1, p.239) - M4 Winning and working of minerals (Vol 1, p.239) - M5 Energy Minerals (Vol 1, p.242) <p><u>Supporting evidence:</u></p> <ul style="list-style-type: none"> - Minerals Position Statement (2012) - Energy Minerals Topic Paper (June 2014) 	
<p>Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</p>		
<p>To be 'justified' a DPD needs to be:</p>		
<ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<p>Participation</p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The following Consultation Statements set out clearly how and what consultation and engagement has taken place in the preparation of the Placemaking Plan and how participation in the process was encouraged in line with the Council's SCI, the Neighbourhood Planning Protocol (updated 2014):</p> <ul style="list-style-type: none"> - Regulation 18 Consultation Statement (December 2015) - Regulation 22 (1) (c) Consultation Statement (April 2016) <p>The consultation process on the Placemaking Plan has made use of a wide range of engagement techniques, and the Council is satisfied that this has allowed for the effective engagement of all interested parties.</p>	
<p>Research / fact finding</p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<p>The Placemaking Plan is justified by a sound and credible evidence base which is fully up to date. Key evidence relied on has been prepared or updated since the adoption of the Core Strategy in 2014 – see the Core Documents List for the Placemaking Plan. This is in addition to the Sustainability Appraisal which informed the formulation of each policy and site allocation.</p> <p>The Placemaking Plan builds on and seeks to deliver the strategic direction/objectives and development requirements established by the Core Strategy. Therefore, the key assumptions that were made in preparing the Core Strategy are relevant. Additional evidence base work relating to development needs (e.g. retail and employment uses) and to test the viability of the site allocations (see Core Documents List and references above) has been undertaken to inform the Placemaking Plan. A range of assumptions have</p>	

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		been made in preparing this evidence and these are explained and justified within the relevant evidence base documents.
<p>Alternatives</p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<p>The Placemaking Plan takes forward the strategic direction established by the Core Strategy (Local Plan Part 1), and therefore has not been prepared on the basis of needing to devise a new strategy or considering a full range of fundamental strategic options.</p> <p>However, the plan making process has been informed by a detailed consideration of the options available within the Core Strategy framework, in terms of policy direction for Development Management policies and site allocations.</p> <p>Where a balance has had to be struck in taking a decision between competing alternatives, in particular the priority development needs to be met utilising limited land supply within Bath, the reasons for the chosen priority have been explained.</p> <p>The primary means for identifying and assessing reasonable options and alternatives have been through the :</p> <ul style="list-style-type: none"> - Sustainability Appraisal (including of alternatives set out in the Options document), which identifies specific issues and recommendations on alternatives, and how the SA / SEA process has informed this. - Regulation 18 Consultation Statement (December 2015) which explains the Council's position in relation to the issues raised through the consultation and its rationale in adopting the approach proposed in the Placemaking Plan 	
<p>Effective: the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		
<i>Deliverable and Coherent</i>	As the Council has always made clear, the Core Strategy and the Placemaking Plan are complementary	

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<ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<p>planning policy documents, and should be read as one. For that reason documents they have now been combined. When the Local Plan is read in its entirety, the Council is satisfied that the relationship between the Placemaking Plan policies and the overall Vision and Objectives is clear. The Vision and Objectives for the whole of the Local Plan (Part 1, Core Strategy and Part 2, Placemaking Plan) are contained in the Core Strategy.</p> <ul style="list-style-type: none"> - Spatial Vision (Vol 1, p.16) - Strategic Objectives (Vol 1, pp. 18-20) <p>Responding to the Vision and Objectives, the Core Strategy sets out the overall spatial strategy (Vol 1, Policy DW1, p.29)</p> <p>The Locational Policy Framework indicates which key strategic development enabling policies relate to which areas within the District (Vol 1, p.30)</p> <p>The Placemaking Plan has been deliberately structured around the same chapters and policy themes as the Core Strategy. The subsequent combination of the two documents will enable the user to clearly understand how the policies in the Placemaking Plan relate to those in the Core Strategy, and hence to the delivery of the overall objectives and vision. This has also obviated the need to repeat information already contained in the Core Strategy if the two documents had remained separate. The Council is satisfied that there are no gaps within the policy framework set out.</p> <p>The Council is satisfied that the policies are internally consistent, and are aligned with the priorities and objectives set out in the Core Strategy. It is acknowledged that in some instances different policies may suggest competing priorities. The Council considers that the determination of the appropriate balance between these is a normal part of the decision making process. The Council is therefore confident that the Local Plan as a whole (Parts 1 and 2) provides a robust framework within which sound decisions can be made.</p>	
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<p>Both the Core Strategy and the Placemaking Plan are supported by a comprehensive assessment of the infrastructure implications of the proposed level and distribution of development. The Infrastructure Delivery Programme has been informed by engagement with delivery partners and an assessment of anticipated funding sources. The main strategic infrastructure implications of the Local Plan arise from the overall scale and distribution of development envisaged, which has been determined in the Core Strategy. The Core Strategy therefore contains a comprehensive assessment of the required approach to providing infrastructure in order to deliver the Plan's objectives and sets out the delivery framework for the Local Plan in its entirety:</p> <ul style="list-style-type: none"> - Table 3 Key District-wide Infrastructure (Vol 1, p.37) 	

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	<ul style="list-style-type: none"> - Delivery framework following each Core Strategy Core Policy (Vol 1) - Infrastructure Delivery framework following each place based chapter (Vols 2-5) 	
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for development and the use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<p>The Local Plan as a whole (Part 1, Core Strategy and Part 2, Placemaking Plan) places a strong emphasis on its role as a spatial plan which sits within a wider suite of local strategies and activity. A range of other Council strategies and initiatives, including the Fit for Life strategy and those related to climate change, economic development and regeneration, housing, education and cultural development. These strategies have influenced the evolution of the Placemaking Plan and contributed significantly to the aspirations for development sites and the planning requirements that are set out. See in particular, paras 2, 10 – 14.</p> <p>Expressions of support and representations from bodies responsible for other strategies affecting the area are summarised in the Regulation 18 Consultation Statement (December 2015) and Regulation 22 (1) (c) Consultation Statement (April 2016).</p>	
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<p>It is considered that the Local Plan as a whole is sufficiently flexible to deal with changes in circumstances, and to avoid becoming out of date (see also ‘Presumption in favour of sustainable development’ section on pages 5 and 6 above). The general approach to policy formulation has deliberately not included any unnecessary detail which may be subject to change even if the overall planning strategy remains appropriate. This includes adopting a flexible approach to the level of development requirements for site allocations where the Council wishes to actively promote and guide development that meets its planning objectives, but does not wish to be prescriptive as to the specific form of development – see site allocations in Placemaking Plan Vols 2 – 5.</p> <p>The Authority’s Monitoring Report (AMR) undertaken on an annual basis is the principle means of monitoring the implementation and effectiveness of policies. If policies are shown to not be effective in meeting the Plan’s objectives this will be addressed through Plan review (as set out in the Core Strategy). The latest AMR can be viewed on the Council’s website (dedicated webpage).</p> <p>The Local Plan is intended to be sufficiently flexible that changing circumstances will not automatically require a formal review, provided the overall strategy and objectives remain appropriate other than through the planned partial and full review of the Core Strategy.</p>	
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? • Is it clear who is intended to implement each part of 	<p>The Duty To Cooperate Statement provides full information on this issue.</p> <p>The Core Strategy sets out the main delivery and monitoring framework for the Local Plan as a whole. This includes details of the bodies expected to lead the implementation of the policies in the Core Strategy and by extension, those in the Placemaking Plan. The Infrastructure Delivery Programmes for both the Core Strategy and the Placemaking Plan set out how the required infrastructure associated with the planned development is to be delivered and by whom (see the Core Documents Lists for both the Core Strategy</p>	

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the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?	and the Placemaking Plan).	
<p>Monitoring</p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the on-going monitoring of the implementation of the plan, through the annual monitoring report? 	<p>The Core Strategy sets out the main delivery targets and monitoring framework for the Local Plan as a whole (Vol 1, pp.44-50). This includes details of the bodies expected to lead the implementation of the policies in the Core Strategy and by extension, those in the Placemaking Plan. The Infrastructure Delivery Programmes for both the Core Strategy and the Placemaking Plan set out how the required infrastructure associated with the planned development is to be delivered and by whom (see the Core Documents Lists for both the Core Strategy and the Placemaking Plan).</p> <p>The Core Strategy contains a housing trajectory. The Council updates the housing trajectory annually as part of its regular assessment of the housing land supply related to meeting the strategic housing requirement.</p> <p>The Authority's Monitoring Report (AMR) monitors each of the policy areas forming the Local Plan in accordance through the 2012 Regulations.</p> <p>Monitoring of significant effects is undertaken through the main AMR process. The Sustainability Appraisal Report highlights the significant effects that require monitoring.</p>	
<p><i>Consistent with national policy:</i> the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p> <p><i>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.</i></p>		
<ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<p>The Placemaking Plan has been prepared to be consistent with national policy. The policies do not repeat national policy.</p>	