

## Soundness Self-Assessment Checklist (March 2014)

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

**In summary – the key requirements of plan preparation are:**

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

### **The Tests of Soundness at Examination**

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

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): “The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is ‘sound’ “, namely that it is:

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

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

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

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

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

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

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

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

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

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

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

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

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

In addition, the Legal Compliance checklist (a separate document, see [www.pas.gov.uk](http://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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Please Note: In the tables which follow, the Proposed Submission Core Strategy and Policies Development Plan Document Review is referred to as the draft Core Strategy Review and the Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) development plan document is referred to as the draft Site Allocations Plan.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><b><i>Positively Prepared:</i></b> 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>		

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<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them.</li> <li>• 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.</li> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery.</li> <li>• 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.</li> </ul>	<p>Issues are identified as follows:</p> <ul style="list-style-type: none"> <li>• Draft Core Strategy Review Chapter 5, particularly 5.24 'Key Challenges for Ipswich over the Plan Period'.</li> <li>• Draft Site Allocations Plan Chapter 2, particularly 2.9 to 2.11 'Key issues for the Site Allocations Plan'.</li> </ul> <p>The vision and objectives for Ipswich are set out in the draft Core Strategy Review Chapter 6. Paragraphs 6.9 to 6.21 explain how the vision and objectives will be achieved. Many of the plan's strategic 'CS' policies indicate which specific objectives they help to achieve. Objectives to deliver growth are time limited.</p> <p>The sustainability appraisal of the draft Core Strategy review and the Site Allocations Plan considers the compatibility of the objectives <a href="http://ipswich.jdi-consult.net/localplan/readdoc.php?docid=15&amp;chapter=3#topofdoc">http://ipswich.jdi-consult.net/localplan/readdoc.php?docid=15&amp;chapter=3#topofdoc</a>, and reasonable alternatives. The SA report for the draft Site Allocations Plan assesses alternative uses considered for sites (Appendix D) <a href="http://ipswich.jdi-consult.net/localplan/readdoc.php?docid=16&amp;chapter=11&amp;docelemid=d39802#d39802">http://ipswich.jdi-consult.net/localplan/readdoc.php?docid=16&amp;chapter=11&amp;docelemid=d39802#d39802</a>.</p> <p>The Housing and Employment Topic Papers</p>

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		<p>address alternative growth scenarios and explain why those chosen to form the basis of the plan's housing and employment targets were the most realistic.</p> <p>Delivery</p> <p>The housing allocation policy in the draft Site Allocations Plan, SP2, and the policy safeguarding sites with residential planning permission for future residential uses, SP3, include an indication as to their expected delivery timescale (short, medium or long term). The SHLAA (Core document library reference ICD11) is based on information from landowners or developers about delivery timetables.</p> <p>Core Strategy Review Tables 8A and 8B identify infrastructure needs and the lead bodies and funding sources for their delivery. More detailed work is underway to prepare a delivery plan for the infrastructure at the Ipswich Garden Suburb.</p> <p>Chapter 4 of the Local Development Scheme for Ipswich 9<sup>th</sup> Edition October 2015 (ICD02a) <a href="https://www.ipswich.gov.uk/content/local-development-scheme">https://www.ipswich.gov.uk/content/local-development-scheme</a> outlines each of the local development documents including development plan documents and supplementary planning documents.</p>

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<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <p>—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</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<ul style="list-style-type: none"> <li>• 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).</li> <li>• An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</li> <li>• Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)</li> </ul>	<p>The evidence base is available through the Core Document Library  <a href="https://www.ipswich.gov.uk/content/core-document-library-local-plan-documents">https://www.ipswich.gov.uk/content/core-document-library-local-plan-documents</a>.</p> <p>There is also a series of topic papers available which supported the Regulation 19 consultation December 2014 to March 2015. They address, housing, employment, infrastructure, green infrastructure, Ipswich Garden Suburb, Development Management, Town Centre and Retail and the Site Allocations. These are available on the Council’s web site  <a href="https://www.ipswich.gov.uk/content/consultation-proposed-submission-core-strategy-and-policies-development-plan-document-review">https://www.ipswich.gov.uk/content/consultation-proposed-submission-core-strategy-and-policies-development-plan-document-review</a> (library references LPCD28 to 35).</p> <p>The topic papers were updated in October 2015 to support the Pre-Submission Main Modifications public consultation (LPCD38 to 45).</p> <p>In particular, the housing and employment topic papers explain how the housing and employment targets have been arrived at and how alternatives have been considered and rejected as unrealistic.</p> <p>The Executive report of 4<sup>th</sup> November 2014  <a href="https://democracy.ipswich.gov.uk/documents/g1350/Public%20reports%20pack%2004th-Nov-2014%2018.00%20Executive.pdf?T=10">https://democracy.ipswich.gov.uk/documents/g1350/Public%20reports%20pack%2004th-Nov-2014%2018.00%20Executive.pdf?T=10</a> explains</p>

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		<p>how the context for calculating the objectively assessed need for housing and economic development has moved on since the adoption of the Core Strategy in 2011.</p> <p>The SA reports for the Draft Core Strategy Review and draft Site Allocations Plan include an appraisal of alternatives and indicate how the plan needed to be changed to reduce any sustainability impacts.</p> <p>The 'Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations December 2014' indicates how the SA recommendations have been incorporated into the two draft plans (LPCD 36) (<a href="http://ipswich.jdi-consult.net/documents/pdfs18/Annex%20to%20Proposed%20Submission%20Sustainability%20Appraisal%20Reports.pdf">http://ipswich.jdi-consult.net/documents/pdfs18/Annex%20to%20Proposed%20Submission%20Sustainability%20Appraisal%20Reports.pdf</a> ).</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> <li>• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see <a href="http://www.planningportal.gov.uk">model policy at www.planningportal.gov.uk</a>)</li> </ul>	<p>Policy CS1 of the Draft Core Strategy Review, Sustainable Development – Climate Change, sets out the presumption in favour of sustainable development in accordance with the National Planning Policy Framework.</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</p>	<ul style="list-style-type: none"> <li>• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs.</li> <li>• Technical papers demonstrating how the aspirations and</li> </ul>	<p>The housing and employment topic papers explain how the housing and employment targets have been arrived at <a href="https://www.ipswich.gov.uk/content/consultati">https://www.ipswich.gov.uk/content/consultati</a></p>

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<p>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>objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.</p>	<p><a href="#">on-proposed-submission-core-strategy-and-policies-development-plan-document-review</a> (LPCD28-35 January 2015 editions and LPCD38-45 October 2015 updated editions).</p> <p>Policy CS2 of the Draft Core Strategy Review requires major developments in the town centre, Ipswich Village and district centres to incorporate a mix of uses, to help achieve integrated, vibrant and sustainable communities.</p> <p>The Duty to Cooperate Statement explains how work is underway with neighbouring authorities and key agencies to ensure the delivery of the plan (LPCD37 now superseded by SUCD21).</p>
<b>NPPF Principles: Delivering sustainable development</b>		
<b>1. Building a strong, competitive economy (paras 18-22)</b>		
<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),</p>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<p>Draft Core Strategy Review policy CS2 sets out the spatial strategy for employment generating uses, including office, industry, retail and tourism uses. CS13 Planning for Jobs Growth sets out the jobs target and the strategy for B Class land uses. The Employment Topic Paper describes the context for the plan policies, and both the Topic paper and plan refer to the New Anglia LEP and the Greater Ipswich City Deal as means to support the delivery of economic objectives. The draft Site Allocations Plan allocates sites for B class uses and a detailed</p>



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		<p>development management policy DM25 in the draft Core Strategy Review protects existing employment areas.</p> <p>The Employment Topic Paper January 2015 is available through the Core Document Library reference LPCD30 and also an updated edition October 2015 LPCD40.</p>
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> <li>• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</li> <li>• 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)</li> </ul>	<p>DM25 is a criteria-based policy which protects existing employment sites and areas, but allows some flexibility as to their re-use, where appropriate.</p> <p>The employment land allocations are made through policy SP5 of the draft Site Allocations Plan. They are based on a quality assessment made through the Haven Gateway Employment Land Study 2009 (SCD11).</p> <p>Some former employment sites have been re-allocated for alternative uses, for example at White Elm Street (site IP066).</p>
<b>2. Ensuring the vitality of town centres (paras 23-37)</b>		
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)	<ul style="list-style-type: none"> <li>• 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</li> </ul>	<p>Draft Core Strategy Review policy CS2 The Location and Nature of Development sets out the spatial strategy for the town centre as the focus for residential development and community facilities, major retail development, office, hotel, culture and leisure development. It also identifies district centres as the focus for</p>

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	<p>adjacent to town centres.</p>	<p>new residential development and community facilities. It also requires mixed use in major developments within the town and district centres.</p> <p>Policies DM20 to DM23 set out a detailed development management approach to centres and DM21 lists the local centres which, with the district centres, serve people’s day to day convenience shopping needs.</p> <p>The two policies maps delineate all the relevant boundaries: the town centre, Central shopping Area, retail frontages, and district centres (SUCD5 and 6). They also identify the location of the local centres.</p> <p>The approach to retail and town centre uses is also set out in the Retail and Town Centre topic paper (LPCD34 and updated LPCD44).</p> <p>The Council has also signed up to the Ipswich Vision ‘Turning our Town Around’ (ICD79) which goes beyond local plan matters to deliver town centre improvements.</p>
<p>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)</p>	<ul style="list-style-type: none"> <li>• An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses.</li> <li>• Primary and secondary shopping frontages identified and allocated.</li> </ul>	<p>Draft Core Strategy Review policy CS14 Retail Development and Main Town Centre Uses indicates how the need for additional retail floorspace will be addressed, and the draft Site Allocations Plan policy SP10 allocates a site for major new retail development (SP7 addresses leisure).</p>

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		<p>The Retail and Town Centre topic paper provides the background (LPCD34 and updated LPCD44) and the evidence base can be found in the Core Document Library (see ICD15-ICD21a).</p> <p>Primary and secondary shopping frontages are defined through policy DM20 and illustrated on the policies map and this is supported by maps included in a supplementary planning guidance note.</p>
<b>3. Supporting a prosperous rural economy (para 28)</b>		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	<ul style="list-style-type: none"> <li>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.</li> </ul>	Draft Core Strategy Review policy DM34 and Pre-Submission Main Modification(SUCD1 and 2) sets out the approach to development in the countryside through a criteria-based policy, however only a relatively small area of Ipswich Borough is defined as such therefore it is not a major issue for the Local Plan.
<b>4. Promoting sustainable transport (paras 29-41)</b>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural</p>	<ul style="list-style-type: none"> <li>Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31.</li> <li>Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35.</li> </ul>	<p>Draft Core Strategy Review policies CS2, CS5 and CS20 set out a strategy which prioritises the sustainable location of new development, mixed use development and the use of sustainable modes of transport.</p> <p>The Core Strategy is based on transport modelling evidence undertaken in 2010 (Core Document Library ICD48a), which is in the</p>

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<p>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</p>	<ul style="list-style-type: none"> <li>• A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.</li> <li>• Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.</li> <li>• If local (car parking) standards have been prepared, are they justified and necessary? (39)</li> <li>• Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</li> </ul>	<p>process of being updated (ICD48b is an interim transport evidence paper).</p> <p>Both draft plans explicitly support the County Council's Travel Ipswich scheme (e.g. Draft Site Allocations Plan policy SP17, draft Core Strategy Review policy CS5).</p> <p>Draft Core Strategy policy CS10 plans a major urban extension on the northern edge of Ipswich. New community facilities, open spaces, and local and district centres are planned as an integral part of the development, linked by a new railway bridge, in order to meet residents' needs. The policy is supported by a more detailed Supplementary Planning Document, which has been adopted as interim guidance pending the Core Strategy Review. The SPD sets out a transport strategy which aims to ensure that the Ipswich Garden Suburb is fully integrated into the town, retains travel demand within the development and prioritises walking, cycling and the use of public transport (ICD55).</p> <p>The Employment Topic Paper (LPCD40 October 2015 update) considers the balance between the housing and employment figures, based on evidence from the East of England Forecasting Model which considers both (see ICD12-ICD13a Core Document Library).</p> <p>Suffolk Guidance for Parking (November 2014) was adopted by the Council in February 2015,</p>

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<p>on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>following a full public consultation on draft standards and has been updated in November 2015 following Government changes to parking policy. (SCD15). It supports Core Strategy Review policy DM18.</p>
<p><b>5. Supporting high quality communications infrastructure (paras 42-46)</b></p>		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> <li>• Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.</li> </ul>	<p>There is not a specific policy but the provision of electronic communications through new developments, including the Ipswich Garden Suburb development, is covered through policy CS17 and Appendix 5 (which refers to super-fast broadband for example).</p> <p>It is considered that the NPPF provides sufficient detail to determine other applications which may arise.</p>
<p><b>6. Delivering a wide choice of high quality housing (paras 47-55)</b></p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing</p>	<ul style="list-style-type: none"> <li>• Identification of:               <ol style="list-style-type: none"> <li>a) five years or more supply of specific deliverable sites; plus the buffer as appropriate</li> </ol> </li> </ul>	<p>The Council published a SHLAA Update Report in November 2013 (ICD09 and ICD11) and a Housing Land Availability Report in 2014</p>

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<p>requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> <li>• Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)</li> <li>• A SHLAA</li> </ul>	<p>(ICD10). Together these evidence documents set out the housing land supply side, including windfall.</p> <p>Policy CS7 of the Core Strategy Review indicates the objectively assessed housing need, quantifies the amount of land that needs to be allocated and states where the land supply will come from (i.e. new brownfield and greenfield site allocations, windfall sites, neighbouring areas). The Site Allocations Plan makes site allocations for residential and residential-led mixed use.</p> <p>The Authority Monitoring Report (ICD03a) sets out the housing trajectory and calculates the five year housing land supply including a 5% buffer.</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<ul style="list-style-type: none"> <li>• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</li> </ul>	<p>As above. The Council's Duty to Cooperate Statement (LPCD37 updated to LPCD46 and subsequently SUCD21) explains how the need for land outside the Borough boundary but within the Ipswich Policy Area will be dealt with for the final 5 years of the fifteen year plan period. Local Development Scheme Reviews for Suffolk Coastal District Council (SCD41) and Ipswich Borough Council (ICD02a) commit to joint strategic planning work to address housing land supply.</p>
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five</p>	<ul style="list-style-type: none"> <li>• A housing trajectory</li> <li>• Monitoring of completions and permissions (47)</li> </ul>	<p>The Council has a published housing trajectory as part of the Authority Monitoring Report 2015 (ICD03a), a published Housing Land Availability</p>

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year supply will be maintained. (47)	<ul style="list-style-type: none"> <li>Updated and managed SHLAA. (47)</li> </ul>	<p>Report 2014 which monitors delivery (ICD 10) and an updated SHLAA November 2013 (ICD09 and ICD11).</p> <p>The housing allocations policy SP2 of the Site Allocations Plan also sets out the anticipated delivery timescale (short, medium or long term) for the allocated housing sites. This and the SHLAA reflect the most recent conversations held with landowners and prospective developers, where known.</p>
Set out the authority's approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> <li>Policy on the density of development.</li> </ul>	<p>Core Strategy Review Policy CS2 sets out the strategic approach to density (high in centres, lower further away from centres) and Policy DM30 sets out the Council's expectations of high, medium and low density development.</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)	<ul style="list-style-type: none"> <li>Policy on planning for a mix of housing (including self-build, and housing for older people</li> <li>SHMA</li> <li>Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50)</li> <li>Evidence for housing provision based on up to date, objectively assessed needs. (50)</li> <li>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 and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)</li> </ul>	<p>The Council's policies have been informed by a joint SHMA published in 2008 which was substantially updated by further work in 2012 (SCD13 and SCD12 respectively).</p> <p>Core Strategy Review policy CS8 Housing Type and Tenure requires a mix of housing to be provided in major schemes and also addresses self-build, custom build and co-housing developments.</p> <p>The Borough's objectively assessed housing needs figures are set out and explained in the Housing Topic Paper (LPCD38, October 2015 update). Although the Borough has an ageing population, this is less pronounced in Ipswich</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>than in neighbouring local authority areas.</p> <p>Affordable housing is addressed through policies CS12 and DM34 of the Core Strategy Review (SUCD1). An Affordable Housing Position Statement (ICD07) sets out a more detailed breakdown of the types of affordable housing needed in the Borough.</p>
<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"> <li>• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs.</li> <li>• Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)</li> <li>• Examples of special circumstances to allow new isolated homes listed at para 55.</li> </ul>	<p>Ipswich Borough contains a small area of countryside, which contains no villages. Therefore a rural exceptions housing policy would not be appropriate. A Countryside policy DM34 has been included to apply the NPPF policy to the local situation. DM34 sets out criteria for development in the countryside.</p>
<b>7. Requiring good design (paras 56-68)</b>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<ul style="list-style-type: none"> <li>• 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</li> </ul>	<p>The Core Strategy Review places great emphasis on high quality design, through strategic policy CS2 (clause h) and development management policies, such as DM5 Design and Character, and DM6 Tall Buildings. The Core Strategy policies are also supported by Conservation Area Character Appraisals (ICD63 to 73) and more detailed supplementary planning documents including a Local List SPD (ICD61), Space and Design Guidelines SPD (ICD31) and the Ipswich Urban Character SPD (ICD62).</p>



## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><b>8. Promoting healthy communities (paras 69-77)</b></p>		
<p>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>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies on inclusive communities.</li> <li>• 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)</li> </ul>	<p>Core Strategy Review policy DM5 also covers the integration of residential, working and community environments and the promotion of safe and secure communities through good design.</p> <p>Strategic policy CS2 The Location and Nature of Development promotes vibrant and sustainable communities through mixed use development, while CS8 requires a mix of house types in major developments.</p> <p>A Pre-Submission Main Modification proposes an addition to clause a. of CS2 which requires development to support community development.</p> <p>CS10 requires community and open space, provision at the Ipswich Garden Suburb.</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies addressing community facilities and local service.</li> <li>• Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and</li> </ul>	<p>Strategic policy CS2 The Location and Nature of Development sets out the spatial strategy for the distribution of residential and community uses, town centre uses, employment uses, and open space and leisure uses.</p> <p>Development management policy DM32 Protection and Provision of Community Facilities protects existing community facilities from inappropriate redevelopment.</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	infrastructure.	New community facilities are proposed through Site Allocations policy SP7
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	<ul style="list-style-type: none"> <li>• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)</li> <li>• A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74)</li> <li>• Protection and enhancement of rights of way and access. (75)</li> </ul>	<p>Policy is informed by an Open Space, Sport and Recreation Facilities Study and Playing Pitch Strategy 2009 (ICD43 and ICD75). These have been updated by the Council’s Parks and Open Spaces Service to reflect changes to open spaces sport and recreation facilities since 2009 and reclassify some open spaces.</p> <p>There are also relevant IBC policies and strategies including the Open Space and Biodiversity Policy (ICD23), Allotment Strategy (ICD74) and Children’s Play Strategy (ICD78).</p> <p>Core Strategy Review policy CS16 sets out the strategic approach to open space, sport and recreation.</p> <p>Core Strategy Review Development management policies DM28 and DM29 protect open space, sport and recreation facilities and require their provision in new developments. Standards for provision are set out in Appendix 6. Please note that the Council proposed a Pre-Submission Main Modification which substantially re-wrote DM29 (SUCD2).</p> <p>Policy DM17 protects rights of way.</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).	<ul style="list-style-type: none"> <li>• 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)</li> </ul>	The Borough has no Local Green Spaces as defined through the NPPF (76-77) and no proposals have come forward to date within the Borough. Any proposals to come forward would be considered in the context of the NPPF. There are currently no Neighbourhood Plans proposed or in preparation.
<b>9. Protecting Green Belt land (paras 79-92)</b>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<ul style="list-style-type: none"> <li>• Where Green Belt policies are included, these should reflect the need to:               <ul style="list-style-type: none"> <li>○ Enhance the beneficial use of the Green Belt. (81)</li> <li>○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)</li> <li>○ Specify that inappropriate development should not be approved except in very special circumstances. (87)</li> <li>○ Specify the exceptions to inappropriate development (89-90)</li> <li>○ Identify where very special circumstances might apply to renewable energy development. (91)</li> </ul> </li> </ul>	The Borough contains no green belt land. The small area of open countryside is protected through policy DM34 Countryside in accordance with the NPPF.

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<b>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</b>		
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)	<ul style="list-style-type: none"> <li>• Planning of new development in locations and ways which reduce greenhouse gas emissions.</li> <li>• Support for energy efficiency improvements to existing building.</li> <li>• Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy . (95)</li> </ul>	<p>The plan is informed by a Strategic Flood Risk Assessment (SFRA) and Flood Risk Sequential Statement (ICD33, ICD39, ICD40).</p> <p>The first policy of the plan, CS1 Sustainable Development – Climate Change, sets out an approach which incorporates energy and water conservation and efficiency and promoting modal switch for travel. CS1 is subject to a Pre-Submission Main Modification to ensure consistency with the new optional requirement for water use which has been introduced through the Building Regulations.</p> <p>Development management policies DM1 and DM2 added more detail in relation to Code for Sustainable Homes, BREEAM and renewable and local carbon energy. However, the national policy context in relation to domestic energy efficiency has changed. Under the March 2015 Planning Update Ministerial Statement, the Code for Sustainable Homes has been withdrawn by the Government and optional water standards have been introduced. The Government has recently stated through its 'Fixing the Foundations' paper that it no longer intends to proceed with 'allowable solutions' or the increases in energy efficiency requirements proposed for 2016, which together would have formed the zero carbon homes policy. Thus modifications to DM1, and to the supporting</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		text of DM2, have been proposed through Pre-Submission Modifications to ensure that the policy remains consistent with national policy on the matter.
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)	<ul style="list-style-type: none"> <li>• A strategy and policies to promote and maximise energy from renewable and low carbon sources,</li> <li>• Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</li> <li>• 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)</li> </ul>	<p>See above, in particular Policy DM2 Decentralised Renewable or Low Carbon Energy.</p> <p>Suitable areas for renewable and low carbon energy sources and supporting infrastructure have not been identified because the nature of the Borough (urban and under-bounded) is such that extensive developments such as solar or wind farms are highly unlikely to occur. However, development-scale and building-scale measures are encouraged e.g. at Ipswich Garden Suburb through the supplementary planning document (see for example SPD paragraphs 2.61-2.63) (ICD55).</p>
Minimise vulnerability to climate change and manage the risk of flooding (99)	<ul style="list-style-type: none"> <li>• Account taken of the impacts of climate change. (99)</li> <li>• Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</li> <li>• Policies to manage risk, from a range of impacts, through suitable adaptation measures</li> </ul>	<p>The plan is informed by a Strategic Flood Risk Assessment (SFRA) and Flood Risk Sequential Statement (ICD33, ICD39, ICD40). Policy CS18 supports the delivery of the tidal barrier which will address flood risk and enable sites to come forward for development.</p> <p>The first policy of the plan, CS1 Sustainable Development – Climate Change, sets out an approach which incorporates energy and water conservation and efficiency and promoting modal switch for travel.</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Development management policy DM4 Development and Flood Risk (which is supported by a supplementary planning document (ICD38)) ensures that flood risk is taken into account in the planning of individual developments.</p> <p>Impacts of the Plans on climate change have been considered through the Sustainability Appraisal process. The SA concludes that whilst growth is likely to increase emissions, the plans have a strong focus on ensuring new development is accessible by public transport, walking and cycling and that new development is appropriately sited (SUCD9 and 10).</p>
Take account of marine planning (105)	<ul style="list-style-type: none"> <li>• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation</li> <li>• Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development</li> <li>• Integrate as appropriate marine policy objectives into emerging policy</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	<p>Marine planning is relevant to Ipswich insofar as the Orwell Estuary would come under marine planning policy. However the Marine Plan for this section of coast has not yet been prepared. The Core Strategy refers to marine planning under policy CS4 paragraph 8.49 and 8.52 (as modified).</p> <p>The Duty to Cooperate Statement acknowledges the Marine Management Organisation as a key agency (SUCD21).</p>
Manage risk from coastal change (106)	<ul style="list-style-type: none"> <li>• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas.</li> <li>• Provision for development and infrastructure that needs</li> </ul>	<p>The Strategic Flood Risk Assessment is the most relevant document, as the element of coast within Ipswich is tidal estuary, which is vulnerable to tidal flooding (ICD33). This is the primary consideration in land use planning</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.	terms.
<b>11. Conserving and enhancing the natural environment (paras 109-125)</b>		
Protect valued landscapes (109)	<ul style="list-style-type: none"> <li>• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.</li> <li>• Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.</li> </ul>	<p>Draft Core Strategy Review policy DM34 sets out the approach to development in the countryside through a criteria-based policy, which addresses matters including best and most versatile agricultural land and the Suffolk Coast and Heaths AONB. However, only a relatively small area of Ipswich Borough is defined as countryside, therefore it is not a major issue for the Local Plan.</p> <p>The Council is proactive in protecting and promoting green corridors for recreation and green travel, and wildlife corridors to enable the movement of species between areas of habitat. See strategic policies CS4 and CS16, and development management policies DM31 The Natural Environment and DM33 Green Corridors.</p>
Prevent unacceptable risks from pollution and land instability (109)	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	Policy DM26 of the Core Strategy Review addresses amenity and pollution issues. Land stability is not a major issue in the Borough and therefore this would be addressed through reference to the NPPF.
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority	<ul style="list-style-type: none"> <li>• Identification and mapping of local ecological networks and geological conservation interests.</li> <li>• Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the</li> </ul>	As above, the Council is proactive in promoting an ecological network approach to habitats and biodiversity, to enable the movement of species between areas of habitat. See strategic policy

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
boundaries (117)	recovery of priority species	CS4 and development management policy DM31 The Natural Environment and also a leaflet about the Ecological network (ICD83). DM31 also addresses geology. Policy DM31 is supported by an illustrative plan, Plan 5 Ipswich Ecological Network.
<b>12. Conserving and enhancing the historic environment (paras 126-141)</b>		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	<ul style="list-style-type: none"> <li>• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</li> <li>• A map/register of historic assets</li> <li>• A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</li> </ul>	<p>The approach to heritage is set out through strategic Core Strategy Review policy CS4 and development management policies DM8 and DM9.</p> <p>Through Pre-Submission Main Modifications, the Council has expanded and added detail to the local plan policies CS4 and DM8, in order to reflect national policy changes and respond to advice from Historic England and Suffolk County Council Archaeology Service. Policy CS4 now sets out a more detailed strategic approach to protecting heritage assets and this is supported by an amended policy DM8.</p> <p>Policy DM5 promotes distinctiveness and is supported by the Ipswich Urban Character SPD (ICD62).</p> <p>Policy DM9 Buildings of Townscape Interest is supported by a Local List SPD (ICD61).</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<b>13. Facilitating the sustainable use of minerals (paras 142-149)</b>		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>The Borough Council is not the minerals planning authority for Ipswich. This is addressed through the Suffolk Minerals Core Strategy which was adopted by the County Council on 25<sup>th</sup> September 2008 (SCD34).</p> <p>A Pre-Submission Additional Modification adds reference to the site sheet for site IP037 Island Site to the safeguarded minerals handling facility (SUCD26).</p>
<p><b>Justified:</b> <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The most appropriate strategy when considered against reasonable alternatives.</li> </ul>		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>The Council has a published Statement of Community Involvement Review March 2014, which has been complied with in undertaking public engagement and consultation (SUCD27).</p> <p>Two Pre-Submission Consultation Statements were published in November 2014 to accompany the proposed submission consultation under regulation 19, one for the Core Strategy Review and one for the Site Allocations Plan. Each outlines the plan preparation process that has taken place and summarises the main issues that have been</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		raised as a result of public engagement, together with the Council's response. They were updated in September 2015 and December 2015 (SUCD15 to 20).
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> <li>• 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.</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>• Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).</li> </ul>	<p>The Council has prepared and published online a core document library, which is divided into national, strategic, Ipswich, Local Plan and submission document sections. This lists all the evidence documents that have been used to inform the plans.</p> <p><a href="https://www.ipswich.gov.uk/search/site/core%20document%20library">https://www.ipswich.gov.uk/search/site/core%20document%20library</a></p> <p>There are references throughout the plan(s) to how evidence has informed policy, for example the SHLAA in relation to policy CS7 (para 8.81) and the SHMA in relation to policy CS8 (para 8.84).</p> <p>The topic papers also perform an important role in explaining how the plan policies and proposals relate to the evidence (LPCD38 to 45 for the October 2015 updates).</p> <p>The SA reports include an appendix setting out baseline data, which is updated with each iteration, as appropriate (SUCD9 and 10 for the submission SA reports; LPCD19, 22, 24, 25, 47, 48 for previous iterations). Appendix 1 to the legal compliance checklist sets out an audit trail for the SA process for both development plan</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>documents.</p> <p>Some new evidence has also been commissioned, such as an update to the 2010 Ipswich Transport Model with Suffolk County Council, and a joint Employment Land Need study with neighbouring authorities. As new evidence is published and considered in relation to the plan, it will be added to the core document library.</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA’s chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> <li>• Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</li> <li>• An audit trail of how the evidence base, consultation and SA have influenced the plan.</li> <li>• Sections of the SA Report showing the assessment of options and alternatives.</li> <li>• Reports on how decisions on the inclusion of policy were made.</li> <li>• Sections of the consultation document demonstrating how options were developed and appraised.</li> <li>• Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.</li> </ul>	<p>Core Strategy Review</p> <p>The Housing Topic Paper explains how different growth scenarios have been considered in order to arrive at a figure that best represents Ipswich’s objectively assessed housing need. On jobs, the East of England Forecasting Model has been used to evidence the scale of growth (ICD12-ICD13a). The model also tests different scenarios to provide a range of possible figures and aid understanding of how other factors, e.g. migration, can impact on jobs. The baseline forecast has been used as the most appropriate and realistic at present.</p> <p>As an urban borough which is under bounded, spatial options for accommodating objectively assessed housing and economic need are extremely limited. The Housing Topic Paper indicates how options around varying densities and planning more strategically across the Ipswich Policy Area have been considered.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Site Allocations Plan</p> <p>Alternative uses for potential site allocations and the IP-One Area were considered at any early stage of plan preparation (Issues and Options, June 2006 and Further Issues and Options for Sites March 2007) (LPCD03 to LPCD06).</p> <p>Sustainability Appraisal Process</p> <p>The SA process has been integral to the consideration of alternatives as set out below.</p> <p>Core Strategy Review – Detailed consideration has been given to alternative strategies, as outlined in section 4 of the Proposed Submission SA Report SUCD9. Consideration was given to alternatives of core policies and the development management policies as part of the production of the 2011 adopted Core Strategy (see Preferred Options Sustainability Appraisal November 2007 – LPCD09, including the ‘no policy’ options assessed in the August 2009 Sustainability Appraisal – LPCD12), and as part of the review as outlined in the Draft Core Strategy Focused Review SA Report (Dec 2013) (LPCD19).</p> <p>Site Allocations – Alternative approaches were considered at Issues and Options stage (see LPCD03 and LPCD05) and subject to</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>sustainability appraisal to inform preferred options choices. Alternatives were also assessed through the Sustainability Appraisal process at preferred options stage (see Preferred Options Sustainability Appraisal November 2007 – LPCD09). Alternative uses for the sites proposed for allocation were assessed in the SA report of the Draft Site Allocations DPD (Dec 2013) (LPCD19). The Proposed Submission SA report explains the implications of the limited amount of land within the Borough for considering alternative sites (SUCD10). Policies added at more recent stages of the development of the Site Allocations DPD have been assessed against a ‘no policy’ alternative in the Proposed Submission Site Allocations SA report (SUCD10).</p> <p>SA has been carried out from the earliest stages of plan preparation. An example of how the SA findings have been responded to through the plans’ content is set out in the Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations, December 2014 (LPCD36). The Submission SA reports are included in the Core Document Library SUCD9 and 10.</p> <p>Appendix 1 to the legal compliance checklist sets out an audit trail for the SA process for both development plan documents.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><b>Effective:</b> <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> <li>• Be deliverable</li> <li>• Demonstrate sound infrastructure delivery planning</li> <li>• Have no regulatory or national planning barriers to its delivery</li> <li>• Have delivery partners who are signed up to it</li> <li>• Be coherent with the strategies of neighbouring authorities</li> <li>• Demonstrate how the Duty to Co-operate has been fulfilled</li> <li>• Be flexible</li> <li>• Be able to be monitored</li> </ul>		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> <li>• 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?</li> <li>• Are the policies internally consistent?</li> <li>• Are there realistic timescales related to the objectives?</li> <li>• Does the DPD explain how its key policy objectives will be achieved?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.</li> <li>• 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).</li> <li>• 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.</li> <li>• Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).</li> </ul>	<p>Chapter 10 of the Core Strategy Review addresses implementation. It acknowledges that joint work with bodies such as the New Anglia LEP will be essential. Chapter 11 includes targets and indicators for monitoring purposes. The strategies of partner organisations which are needed to support delivery are included in the Core Document Library, for example the New Anglia Strategic Economic Plan and Growth Deal (SCD02 and SCD03).</p> <p>Many of the strategic Core Strategy Review policies indicate which of the plan's objectives they contribute to achieving.</p> <p>The site allocations are supported by SHLAA</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>data (ICD11) and, in relation to the larger or more complex sites such as the Island Site IP037, a commitment is made to prepare a master plan, which would provide more detail to assist delivery.</p> <p>The Duty to Co-operate Statement covers the main strategic and cross boundary matters and organisations (SUCD21).</p> <p>The Council's current in effect Local Development Scheme October 2015 (ICD02a) states that strategic planning for the next period after the Core Strategy Review is adopted will be carried out through a joint or aligned Local Plan Review with the Ipswich Policy Area local planning authorities.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> <li>• Have the infrastructure implications of the policies clearly been identified?</li> <li>• Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</li> <li>• Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.</li> <li>• A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.</li> <li>• Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues.</li> <li>• Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</li> </ul>	<p>Core Strategy Review policies CS10 and CS17 address infrastructure needed at the Ipswich Garden Suburb and in association with other developments. Tables 8A and 8B of the Core Strategy Review identify the major infrastructure needed. 8A (borough-wide needs) identifies expected costs and timescales, where known. 8B identifies the trigger points for delivery.</p> <p>The Duty to Cooperate Statement documents work with partners to support delivery (SUCD21).</p> <p>Whole plan viability testing has been carried</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> <li>• Sections of the DPD that reflect the plans or strategies of the local authority and other bodies</li> <li>• Policies which seek to pull together different policy objectives</li> <li>• Expressions of support/representations from bodies responsible for other strategies affecting the area</li> </ul>	<p>out (LPCD26).</p> <p>Yes. Some examples are:</p> <ul style="list-style-type: none"> <li>• The first policy, CS1 Sustainable Development – Climate Change, sets out measures that the Council can undertake through all its areas of activity in order to address climate change.</li> <li>• Policy CS4 Protecting our Assets covers matters such as designating local nature reserves and supporting the Greenways Project. The ecological network outlined through policy DM31 links with work the Council’s Parks and Ranger Services are undertaking as evidenced through the ecological network leaflet ICD82.</li> <li>• Policy CS13 is the land use element of a strategy for economic growth which relies on non-land use measures such as apprenticeships delivered through the Greater Ipswich City Deal (SCD05) or support delivered through the New Anglia LEP (SCD02, 03).</li> </ul> <p>The Duty to Co-operate statement also covers some of these multi-agency matters (SUCD21).</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> <li>• Is the DPD flexible enough to respond to a variety of, or unexpected changes in,</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.</li> <li>• Sections of the annual monitoring report and</li> </ul>	<p>The Topic Papers set out the approach taken to the strategic matters in the plan (LPCD38 to 45 for the October 2015 updates). They cover the</p>



## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>circumstances?</p> <ul style="list-style-type: none"> <li>• Does the DPD include the remedial actions that will be taken if the policies need adjustment?</li> </ul>	<p>sustainability appraisal report describing how the council will monitor:</p> <ol style="list-style-type: none"> <li>a. the effectiveness of policies and what evidence is being collected to undertake this</li> <li>b. changes affecting the baseline information and any information on trends on which the DPD is based</li> </ol> <ul style="list-style-type: none"> <li>• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> <li>• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</li> <li>• Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.</li> </ul>	<p>following topics:</p> <ul style="list-style-type: none"> <li>• Housing</li> <li>• Ipswich Garden Suburb</li> <li>• Employment</li> <li>• Infrastructure</li> <li>• Green Infrastructure Provision</li> <li>• Development Management Policies</li> <li>• Town Centre and Retail</li> <li>• Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan.</li> </ul> <p>Chapter 6 of the Core Strategy Review sets out the Council’s vision and objectives for the Borough and explains how it is envisaged that they will be achieved. Chapter 11 sets out the targets and indicators against which the implementation of the plan will be measured and these are picked up and reported on in the annual Authority Monitoring Report (see also ICD03a).</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Chapter 12 sets out the approach to monitoring and review.</p> <p>The nature of the Borough, as an under-bounded, largely urban area, means that realistic spatial options are limited. In terms of land, the chief flexibility in the longer term would stem from joint working with neighbouring areas. This is addressed (see below) through the Duty to Co-operate Statement and the Local Development Scheme October 2015 (SUCD21 and ICD02a).</p>
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> <li>• Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?</li> <li>• Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>• A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why.</li> <li>• The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy 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.</li> </ul>	<p>The Duty to Co-operate Statement sets out how the Council has worked (and continues to do so) with neighbouring authorities and other key agencies in planning to address the strategic issues facing Ipswich and its housing market area (SUCD21).</p> <p>A key mechanism through which strategic matters are addressed and joint evidence is commissioned and gathered is the Ipswich Policy Area (IPA), which operates through an officer group and a councillor board. The IPA Board consists of representatives from Ipswich Borough Council, Suffolk Coastal District Council, Babergh District Council, Mid Suffolk District Council and Suffolk County Council. At present, the Board has an advisory role only and no decision making powers, thus decisions are taken through the committee processes of the</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>constituent authorities. This allows for aligned work to be carried out.</p> <p>The Council's current in effect Local Development Scheme October 2015 (ICD02a) states that strategic planning for the next period after the Core Strategy Review is adopted will be carried out through a joint or aligned Local Plan Review with the Ipswich Policy Area local planning authorities. The Suffolk Coastal District Council Local Development Scheme makes a similar commitment (SCD41).</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> <li>• Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)?</li> <li>• Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</li> <li>• Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out indicators, targets and milestones</li> <li>• Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>• Reference to any other reports or technical documents which contain information on the delivery of policies</li> <li>• Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal</li> </ul>	<p>Chapter 11 of the Core Strategy Review sets out the key strategic targets and indicators for the Local Plan, and Chapter 12 the approach to monitoring and review.</p> <p>The annual Authority Monitoring Report (AMR) reports on each of these (ICD03a).</p> <p>The Council is committed to working with neighbouring authorities to monitor jobs growth. A joint employment needs study is currently in preparation. Currently the Council uses the East of England Forecasting Model (EEFM) which looks at recorded trend information and makes forecasts.</p> <p>The Core Strategy Review and Site Allocations Plan SA reports set out a monitoring framework (see e.g. Table 6-1 in the Core Strategy Review SA (LPCD49 and 50). There is some overlap with</p>

## Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		the indicators already used to monitor the adopted Core Strategy's implementation. Monitoring significant effects identified through the SA process is being incorporated into the AMR (ICD03a).
<p><b><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></b></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> <li>• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification?</li> <li>• Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons.</li> <li>• Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy.</li> <li>• Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement.</li> <li>• Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement</li> <li>• Reports or copies of correspondence as to how representations have been considered and dealt with.</li> </ul>	<p>The plans are consistent with national policy as demonstrated above.</p> <p>The evidence base for the plans is set out in the Core Document Library and baseline data is also included in the Sustainability Appraisal reports (SUCD9 and 10).</p> <p>There has been engagement with the Marine Management Organisation. The plans refer to marine matters where relevant. Pre-Submission Modifications have been proposed to address matters identified (SUCD25).</p>

# Soundness Self-Assessment Checklist (March 2014)

## Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
<p><b>Policy A: Using evidence to plan positively and manage development (para 6)</b></p>		
<p>Early and effective community engagement with both settled and traveller communities.</p>	<ul style="list-style-type: none"> <li>• Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.</li> </ul>	<p>The needs of the traveller community have been assessed through a joint Gypsy, Traveller and Travelling Showpeople Accommodation Assessment commissioned with neighbouring local authorities plus Waveney (SCD18). This has included liaison by the consultants with the traveller community.</p> <p>A Suffolk-wide consultation began in August 2014 which identified potential sites for short stay gypsy and traveller provision. However, the consultation was cancelled due to further sites being put forward.</p> <p>At an early stage of plan preparation, IBC proposed a potential long stay site on the edge of the Borough between Ipswich and Bramford. However, the local settled community raised objections which included safety (including road safety), amenity and concentrating sites in one area of the Borough and therefore the Council concluded that it was unsuitable.</p> <p>The Suffolk-wide work has now resumed with a call for sites consultation taking place from September to November 2015.</p>

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
		All potential sites are currently being assessed and further consultation on the outcome is anticipated early in 2016.
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.	<ul style="list-style-type: none"> <li>• Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan.</li> <li>• Collaborative working with neighbouring local planning authorities.</li> <li>• A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.</li> </ul>	See above.
<b>Policy B: Planning for traveller sites (paras 7-11)</b>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified.</li> <li>• Policy which takes into account criteria a-h of para 11</li> </ul>	Core Strategy Review policy CS11 Gypsy and Traveller Accommodation sets out criteria for the location of Gypsy and Traveller sites and a commitment to find provision within the Ipswich Policy Area. Paragraph 8.144 reports the number of pitches needed, and 8.115 to continuing the joint work detailed above to making provision across Suffolk. This is considered the best approach given that Ipswich is under-bounded and options within the Borough are limited. A more strategic approach is expected to better support

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
		<p>delivery where the pitches are needed.</p> <p>The Pre-Submission Main Modifications to the Site Allocations Plan propose that policy SP4 Land Protected for Gypsy and Traveller Sites is combined with Core Strategy policy CS11 Gypsy and traveller accommodation to avoid potential confusion that could arise from having two policies in two different plans.</p>
<p><b>Policy C: Sites in rural areas and the countryside (para 12)</b></p>		
<p>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.</p>		<p>See policy CS11 clause b. vi.</p>
<p><b>Policy D: Rural exception sites (para 13)</b></p>		
<p>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.</p>	<ul style="list-style-type: none"> <li>• If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.</li> </ul>	<p>The Borough does not contain enough countryside to warrant a rural exception sites approach.</p>
<p><b>Policy E: Traveller sites in Green Belt (paras 14-15)</b></p>		
<p>Traveller sites (both permanent and</p>	<ul style="list-style-type: none"> <li>• Green Belt boundary revisions made in response to a</li> </ul>	<p>The Borough contains no green belt.</p>



## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
<p>temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<p>specific identified need for a traveller site, undertaken through the plan making process.</p>	
<p><b>Policy F: Mixed planning use traveller sites (paras 16-18)</b></p>		
<p>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.</p>	<ul style="list-style-type: none"> <li>• Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another.</li> <li>• N.B. Mixed use should not be permitted on rural exception sites</li> </ul>	<p>See policy CS11 clause b.ii.</p>
<p><b>Policy G: Major development projects (para 19)</b></p>		
<p>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.</p>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>N/A</p>

# Soundness Self-Assessment Checklist (March 2014)

## Soundness Self-Assessment Checklist

### Integration of marine and terrestrial planning

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

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

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

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

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

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

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

## Soundness Self-Assessment Checklist (March 2014)

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

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all<sup>1</sup> public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions<sup>2</sup>

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

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

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

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

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

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
<b>Key requirements under the Duty to Co-Operate</b>		
Consistency between marine and terrestrial policy documents and guidance	<ul style="list-style-type: none"> <li>• Demonstration of consistency of aim between relevant local plan policies and marine policy documents (i.e. the MPS and any relevant adopted marine plans)</li> <li>• Proof of collaborative working with the MMO and that the MPS has been taken into account.</li> </ul>	<p>Work has yet to commence on the Marine Management Plan for the section of coast that includes the Orwell Estuary.</p> <p>The Council has met with an officer of the MMO and received training on the MMO's work.</p> <p>Pre-Submission Additional Modifications are proposed to the Core Strategy Review in response to comments from the Marine Management Organisation (SUCD25).</p> <p>The Council has met with an officer of the MMO and received training on the MMO's work.</p>
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	<ul style="list-style-type: none"> <li>• Early and effective policy development engagement undertaken, including discussions with the MMO</li> <li>• Evidence of iteration of policies and plans as a result of engagement with the MMO</li> <li>• Evidence of engagement with the MMO in relation to monitoring, implementation and throughout the policy</li> </ul>	See above.

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
	<p>cycle</p> <ul style="list-style-type: none"> <li>Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	<ul style="list-style-type: none"> <li>Evidence that the LPA has shared or provided relevant data to the MMO that can help inform Marine Plans or MPS review</li> <li>Demonstration that local plan policy has been underpinned by data provided by the MMO or the MPS</li> <li>Explicit cross-referencing in local plan to MPS, the MMO, their roles, and relevant marine plans</li> </ul>	<p>The MMO has not to date asked IBC for data. Work has yet to commence on the Marine Management Plan for the section of coast that includes the Orwell Estuary. However, officer contact with the MMO has been made and an appropriate level of liaison agreed.</p> <p>The Core Strategy Review refers to the marine planning regime (paragraph 8.49) and the forthcoming South East Inshore Marine Plan.</p>
<b>Marine Policy Statement- Chapter 2: General Principles for Decision-Making<sup>3</sup></b>		
<b>Sections 2.1 -2.2: The UK vision for the marine environment</b>		
The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse	<ul style="list-style-type: none"> <li>Reference in DPD where appropriate to UK vision for the marine environment</li> <li>Contribution to the vision through local plan policies and</li> </ul>	Core Strategy Review policy CS4/paragraph 8.49 sets out the function of the South East inshore

<sup>3</sup> 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.

## Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
<p>oceans and seas')</p> <p>Achieving the vision through marine planning</p>	<p>supporting text</p>	<p>Marine Plan.</p>
<p><b>Section 2.4: Considering benefits and adverse effects in marine planning</b></p>		
<p>Consider benefits and adverse effects of plan policies</p>	<ul style="list-style-type: none"> <li>• Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal</li> </ul>	<p>The SA and Habitats Regulations Assessment reports for the Core Strategy Review and Site Allocations DPD focus on the particular interactions of the plans (in terms of scale of growth overall and particular sites) with the part of the Orwell Estuary which falls within the Borough and is designated a Special Protection Area. This is considered to be the primary consideration.</p>
<p><b>Section 2.5: Economic, social and environmental considerations</b></p>		
<p>Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water Framework Directive)</p>	<ul style="list-style-type: none"> <li>• Reference to relevant EU Directives in DPD and sustainability appraisal</li> <li>• Consideration of contribution of DPD policies to the objectives of relevant EU Directives</li> </ul>	<p>Appendix A to the SA report of the Core Strategy Review refers to the Water Framework Directive (SUCD9).</p>

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Policy Expectations	Possible Evidence	Evidence Provided
<b>Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities</b>		
<b>3.1 Marine Protected Areas</b>		
<p>Incorporate identified areas and features of importance for nature conservation</p> <p>Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts</p>	<ul style="list-style-type: none"> <li>• Identification of relevant areas and features of importance for nature conservation within relevant marine plan area(s)</li> <li>• Consideration of impacts of policy and/or terrestrial development on those areas and features of importance</li> <li>• Measures to mitigate, monitor and manage negative impacts on those areas and features of importance</li> </ul>	<p>The South East Inshore Marine Plan has yet to be prepared. In the meantime, the plans and their SA and AA reports focus on potential impacts on the Orwell Estuary SPA (SUCD9 and 10, ICD82).</p> <p>Measures to mitigate any effects are being put in place, e.g. a management plan for Bridge Wood – see Core Strategy Review policy CS16 clauses d. and h.</p>
<b>3.4 Ports and shipping</b>		
<p>Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety</p> <p>Protect the efficiency and resilience of continuing port operations</p>	<ul style="list-style-type: none"> <li>• Evidence that policy with potential impact on ports and shipping minimises negative impacts on sector</li> <li>• Where relevant, evidence that economic, employment and transport policies are protective of ports and shipping sector</li> </ul>	<p>The importance of Ipswich Port is acknowledged through Core Strategy Review policy DM25, see paragraphs 9.153-9/154.</p>
<b>3.8 Fisheries</b>		
<p>Consider potential economic, social and environmental impacts of other</p>	<ul style="list-style-type: none"> <li>• Where relevant, evidence that other policies minimise</li> </ul>	<p>N/A</p>

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Policy Expectations	Possible Evidence	Evidence Provided
developments on fishing activity	negative impacts on fishing activity and/or aquaculture	
<b>3.9 Aquaculture</b>		
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	<ul style="list-style-type: none"> <li>Where relevant, evidence that the benefits of aquaculture industry development have been considered</li> </ul>	N/A
<b>3.10 Surface water management and waste water treatment and disposal</b>		
Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment	<ul style="list-style-type: none"> <li>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</li> </ul>	The AA of the Core Strategy Review considered whether the scale of growth in the Borough would lead to reduced water quality, from increased discharges of sewage and surface water drainage, or from pollution incidents, either during, or after, construction. It concludes that there would be no significant effects on the SPA (SUCD11 and 12).
<b>3.11 Tourism and recreation</b>		
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and local communities	<ul style="list-style-type: none"> <li>Where relevant, reference to marine tourism and recreation</li> <li>Evidence that the potential for marine tourism and recreation has been recognised in plan-making</li> </ul>	This is considered in the context of Orwell Country Park and its proposed extension into land at Pond Hall Farm – policy SP8 of the draft Site Allocations Plan. Again the main potential impact considered is the potential disturbance



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Policy Expectations	Possible Evidence	Evidence Provided
		to birds in the Orwell Estuary SPA. A visitor survey study has therefore been undertaken to inform the plan in relation to the Orwell Country Park extension proposed through the Site Allocations Plan Policy SP8 (ICD82).

### Appendix One

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

Adur	Chorley	East Lindsey	Havant
Allerdale	Christchurch	East Riding of Yorkshire	Havering
Arun	City of London	Eastbourne	Horsham
Babergh	City of Brighton and Hove	Eastleigh	Hounslow
Barking and Dagenham	City of Bristol	Exeter	Huntingdonshire
Barrow-in-Furness	City of Kingston upon Hull	Exmoor National Park	Ipswich
Basildon	City of Peterborough	Fareham	Isle of Wight
Bassetlaw	City of Plymouth	Fenland	Isles of Scilly
Bexley	City of Portsmouth	Fylde	Kensington and Chelsea
Blackpool	City of Southampton	Gateshead	King's Lynn and West Norfolk
Boston	City of Westminster	Gloucester	Lake District National Park
Bournemouth	Colchester	Gosport	Lambeth
Broadland	Copeland	Gravesham	Lancaster
Broads Authority	Cornwall	Great Yarmouth	Lewes
Canterbury	County Durham	Greenwich	Lewisham
Carlisle	Dartford	Halton	Liverpool
Castle Point	Doncaster	Hambleton	Maidstone
Chelmsford	Dover	Hammersmith and Fulham	Maldon
Cheshire West and Chester	East Cambridgeshire	Hartlepool	Medway
Chichester	East Devon	Hastings	Middlesbrough

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New Forest	South Somerset
New Forest National Park	South Tyneside
Newark and Sherwood	Southend-on-Sea
Newcastle upon Tyne	Southwark
Newham	Stockton-on-Tees
North Devon	Stroud
North East Lincolnshire	Suffolk Coastal
North Lincolnshire	Sunderland
North Norfolk	Swale
North Somerset	Taunton Deane
North Tyneside	Teignbridge
North York Moors National Park	Tendring
Northumberland	Test Valley
Norwich	Thanet
Poole	Thurrock
Preston	Tonbridge and Malling
Purbeck	Torbay
Redcar and Cleveland	Torridge
Richmond upon Thames	Tower Hamlets
Rochford	Wandsworth
Rother	Warrington
Scarborough	Waveney
Sedgemoor	Wealden
Sefton	West Devon
Selby	West Dorset
Shepway	West Lancashire
South Cambridgeshire	West Lindsey
South Downs National Park	West Somerset
South Gloucestershire	Weymouth and Portland
South Hams	Winchester
South Holland	Wirral
South Lakeland	Worthing
South Norfolk	Wyre
South Ribble	York



planning advisory service

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