

## Soundness Self-Assessment Checklist (May 2018)

*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:

- Research/fact finding: the choices made in the plan are backed up by facts.

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

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<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <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>The Local Plan [CD001] contains a clear vision (Section 2: Vision) which is a Council wide vision and underpinned by the Council Plan City Vision and the One Planet Council principles. The Vision and outcomes respond to the planning issues, challenges and opportunities facing York and highlighted through public consultation. The vision and outcomes are set out in terms of the following interconnected priorities:</p> <ul style="list-style-type: none"> <li>• Create a prosperous city for all;</li> <li>• Provide good quality homes and opportunities;</li> <li>• Protect the environment; and</li> <li>• Ensure efficient and affordable transport links.</li> </ul> <p>The Local Plan aims to deliver sustainable patterns and forms of development to support the City's ambition to be a city whose special qualities and distinctiveness are recognised worldwide. The Local Plan aims to support this ambition by ensuring that the city's placemaking and spatial planning policies reflect its heritage and cotemporary culture, contributing to the economic and social welfare of the community whilst conserving and enhancing its unique historic, cultural and natural environmental assets. The sections of the Local Plan support the delivery of these high level objectives whilst the Spatial Strategy responds to all of the main objectives (Spatial Strategy – Section 3, Publication Draft Local Plan)</p>

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		<p>The Local Plan is identified in the LDS 2017 [CD015]</p> <p><a href="https://www.york.gov.uk/downloads/file/14740/local-plan-2017">https://www.york.gov.uk/downloads/file/14740/local-plan-2017</a></p> <p>Work commenced on the Local Plan under the LDS 2012. Following withdrawal of the Core Strategy in 2012 the Council began work on an NPPF compliant Local Plan. A Preferred Options consultation was undertaken in June/July 2013 (SD005)</p> <p><a href="https://www.york.gov.uk/downloads/download/12/preferred-options-main-documents">https://www.york.gov.uk/downloads/download/12/preferred-options-main-documents</a></p> <p>A Further Sites Consultation was undertaken in June/July 2014. (SD015)</p> <p><a href="https://www.york.gov.uk/downloads/download/11/sites-consultation-report-2014-and-technical-appendices">https://www.york.gov.uk/downloads/download/11/sites-consultation-report-2014-and-technical-appendices</a></p> <p>Both these consultations informed the Publication Draft Local Plan (2014) (SD010) which was approved by the Council's Executive in September 2014 but at Council (9/10/14) a motion was passed halting the consultation and requesting further assessment of housing need and the supply to meet that need (SD014).</p> <p>At the local government elections in May 2015 a joint administration was formed between the Conservatives and Liberal Democrats and they</p>

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		<p>agreed to <i>'prepare an evidence based local plan which delivers much needed housing whilst focussing development on brownfield land and taking all practical steps to protect the green belt and the character of York'</i></p> <p>In July 2016 a report was taken to Councils Executive on the Preferred Sites Consultation(SD018). As part of the report an updated Local Development Scheme (LDS) was attached as Annex A which set out a project plan for the progression of the Local Plan over the next two years in addition to other related documents. It highlighted the intention to consult on a publication draft plan early in 2017 with submission to Government following in May 2017. The LDS was placed on the Council's website as part of the PSC consultation (July 2016)</p> <p><a href="https://www.york.gov.uk/downloads/file/11248/local_development_scheme_lds_2016">https://www.york.gov.uk/downloads/file/11248/local_development_scheme_lds_2016</a></p> <p><a href="https://www.york.gov.uk/downloads/download/3333/local_plan_preferred_sites_consultation_documents">https://www.york.gov.uk/downloads/download/3333/local_plan_preferred_sites_consultation_documents</a></p> <p>After the Preferred Sites Consultation concluded the Ministry of Defence (MOD) announced as part of its Defence Estate Strategy on 7<sup>th</sup> November 2016 the release of three substantial sites in York:</p>

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		<ul style="list-style-type: none"> <li>• Imphal Barracks, Fulford Road;</li> <li>• Queen Elizabeth Barracks, Strensall; and</li> <li>• Towthorpe Lines, Strensall.</li> </ul> <p>Technical work was carried out which established that the sites represented ‘reasonable alternatives’ and, therefore, should be considered as part of the Local Plan process. This was reported to Local Plan Working Group and Executive in January 2017 (SD026). The report highlighted that the assessment of the MOD sites and the requirement for additional public consultation would mean an additional six months to the LDS (2016) Local Plan timetable and an adjustment to the key milestones.</p> <p>LPWG:  <a href="http://democracy.york.gov.uk/ieListDocuments.aspx?Cid=128&amp;Mid=10227&amp;Ver=4">http://democracy.york.gov.uk/ieListDocuments.aspx?Cid=128&amp;Mid=10227&amp;Ver=4</a></p> <p>Executive:  <a href="http://democracy.york.gov.uk/ieListDocuments.aspx?Cid=733&amp;Mid=9309&amp;Ver=4">http://democracy.york.gov.uk/ieListDocuments.aspx?Cid=733&amp;Mid=9309&amp;Ver=4</a></p> <p>A report was taken to LPWG and Executive in July 2017 (SD027 A to E) on the Pre Publication Draft</p>

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		<p>Plan (Regulation 18). The report recommended that given the proposed level of change to the 2013 Preferred Options version of the Plan, notwithstanding the consultation on sites in 2016, a consultation on a full plan and policies would be recommended. At the Executive in July 2017 Officer's sought approval to undertake a full consultation on a Pre publication draft Local Plan (Reg 18). A revised LDS (2017) (CD015) was published which included an adjustment of key milestones from the 2016 version for Publication in February/March 2018 and Submission by end of May 2018.</p> <p><a href="https://www.york.gov.uk/downloads/file/14740/local-development-scheme-november-2017">https://www.york.gov.uk/downloads/file/14740/local-development-scheme-november-2017</a></p> <p>The Pre-Publication consultation was undertaken in September/October 2017 and an updated LDS was published as part of the consultation.</p> <p><a href="https://www.york.gov.uk/downloads/file/14740/local-development-scheme-november-2017">https://www.york.gov.uk/downloads/file/14740/local-development-scheme-november-2017</a></p> <p>The updated LDS advised that following consultation in September, subject to the number of representations received, it would be Officers intention to bring a publication draft document to Executive in January 2018. This would be subject to consultation in February 2018 with the intention of submitting a plan for Examination in April / May</p>



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		<p>2018.</p> <p>Policy options, spatial options and reasonable alternatives have been considered as part of the plans production and evaluated as part of the Sustainability Appraisal (CD008, 009 &amp; 010). Specifically, Section 2 and Appendices E,F and H-N of the Publication Draft SA.</p> <p>Section 5 of the Plan (Housing) sets out the phasing of sites within the Plan and includes an estimate of phasing within policy H1 (Housing Allocations) and a housing trajectory at figures 5.1 and 5.2.</p> <p>A Strategic Housing Land Availability Assessment (SD049) has been carried out which includes a detailed housing trajectory and details regarding the availability and deliverability of housing sites.</p> <p>Section 4 (Economy and Retail) of the Publication Draft Plan and specifically Policy EC1 sets out the employment allocations within the Plan. This is supported by the Employment Land Review (2016) SD064 and Employment Land Review Update (2017) SD063 which includes details regarding the availability and suitability of employment Land.</p> <p>Deliverability is a key consideration of the Plan and an appraisal of potential development sites has been undertaken to establish realistic assumptions about the availability, suitability and economic viability of land to accommodate future</p>

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		<p>development. A Local Plan Viability Assessment Update (CD018) has been undertaken to inform the policy requirements in the Publication Draft Local Plan. The viability testing shows that the cumulative impact of the policies in the Plan do not put implementation of the emerging plan at serious risk and would not unduly burden the delivery of residential and non-residential development in York.</p> <p>The Infrastructure Delivery Plan (SD128) contains information associated with infrastructure development for delivery of the Local Plan.</p>
<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> <ul style="list-style-type: none"> <li>—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</li> <li>—specific policies in this Framework indicate development should be restricted.</li> </ul>	<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 Local Plan has embedded the presumption in favour of sustainable development through seeking to locate development in the most sustainable locations. The Spatial Strategy of the Plan (Section 3) is driven by the need to achieve economic and housing growth whilst identifying the key principles that will shape the future development of the city. In summary these include:</p> <ul style="list-style-type: none"> <li>• Conserving and enhancing York’s historic and natural environment. This includes the city’s character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function;</li> <li>• Ensuring accessibility to sustainable modes of transport and a range of local services;</li> <li>• Preventing unacceptable levels of</li> </ul>

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		<p>congestion, pollution and/or poor air quality;</p> <ul style="list-style-type: none"> <li>• Ensuring flood risk is appropriately managed; and</li> <li>• Where available and viable encouraging the re-use of previously developed land.</li> </ul> <p>The Spatial Strategy objectives underpin the site selection methodology used to assess all development opportunities throughout plan production. This methodology is set out in the Site Selection Paper Main Report (SD072A) and the Preferred Site Consultation 2016 (SD018)</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 DP2 Sustainable Development defines sustainable development in planning terms developed from the Plan vision. The approach draws upon the issues identified in the SA Scoping Report (SD008 A &amp; B)</p> <p>Policy DP3 Sustainable Communities is an overarching policy setting development principles to underpin the Plan relating to the themes of the vision.</p> <p>Collectively the policies in the Plan will result in communities that are well connected, well served, environmentally sensitive and considerate of the local environment, economically thriving, well designed and built, active, inclusive and safe.</p>

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<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> <li>• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs.</li> <li>• Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.</li> </ul>	<p>The assessment of housing need is set out in the SHMA (2016) SD051, SHMA Addendum (2016) SD052 and SHMA Update (2017) SD050.</p> <p>The SHMA Update (2017) SD050 updated the demographic starting point for York based on the July 2016 household projections (CLG). This increased the demographic starting point from 783 (which was the demographic starting point for the 841 housing need figure as per the 2016 SHMA SD051) to 867 per annum. Guidance (NPPG) indicates that the official projections should be seen as a baseline only.</p> <p>On this basis the figure of 867 is the relevant baseline demographic figure for the 15 year period of the plan (2032/33) subject to any appropriate adjustments. There is nothing specific in guidance to advise how to look in the post plan period (2033/34 to 2037/38) at OAN as most authorities are not setting a greenbelt boundary. In order to create a robust position for examination it was considered to be most appropriate to continue with the 15 year needs estimate for the full Green Belt time period.</p> <p>The SHMA Update (2017) [SD050] also recommends that based on the assessment of market signals evidence and some recent Inspectors decisions that York should include a 10% market signals adjustment to the 867 figure. This would increase</p>

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		<p>the housing figure to 953 per annum. The market adjustment is based on an assessment of both market signals and affordable housing need. The SHMA Update (2017) (SD050) has considered a single adjustment to address both of these issues as they are intrinsically linked.</p> <p>In terms of past delivery and the context for reasonable market adjustment; from the effective start date of the plan the 1st April 2012 up until the latest monitoring date of 31st March 2017 there have been 3,432 net housing completions. This equates to an annual average of 686 dwellings. For context the 10 year average 2007 to 2017 is 575 dwellings per annum.</p> <p>Achieving both the demographic baseline and the SHMA figure will require a considerable uplift in delivery amounting to 26% increase in housing delivery from the 5 year average. Members of the Council's Executive at the meeting on 13th July 2017 resolved (SD027A) that on the basis of the housing analysis set out in paragraphs 82 - 92 of the July 2017 Executive Report (SD027B), the increased figure of 867 dwellings per annum, based on the latest revised sub national population and household projections published by the Office for National Statistics and the Department of Communities and Local Government, be accepted.</p>

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		<p>Executive also resolved that the recommendation prepared by GL Hearn in the SHMA Update (2017 SD050 to apply a further 10% to the above figure for market signals (to 953 dwellings per annum), is not accepted on the basis that Hearn’s conclusions were speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations.</p> <p>At Executive in January 2018 (SD028A) Members resolved to keep the housing requirement unchanged from the Pre-Publication Draft (2017) SD021 position. The Publication Draft Local Plan (CD001) includes a minimum housing target of 867 dwellings per annum from 2012 (the base date of the national household projections). This means that the Plan seeks to provide for an annual housing target of 923 dwellings per annum (867 + 56 p.a. undersupply adjustment) from 2017 to 2033 and a minimum of 867 p.a in the period 2033 to 2038. This is set out in the housing trajectory included within Section 5 of the Plan (Figures 5.1 and 5.2) and the detailed trajectory within the SHLAA (2018) (SD049)</p> <p>The Employment Land Review (ELR) July 2016 (SD064) uses projections by Oxford Economics (OE) dated May 2015 as the forecast for employment</p>

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		<p>land demand over the Local Plan period. These forecasts provided the starting point for determining the amount and type of employment land required to be identified in the Plan. The projections by Oxford Economics presented a baseline scenario for York forecasting a job growth of 10,500 jobs over the period 2014-2031. Two further scenarios were considered by OE; scenario 1 – higher migration and faster UK recovery, which identified an additional 4,900 jobs above the baseline over the same period and scenario 2 – re-profiled sector growth which identified 500 additional jobs above the baseline. Scenario 2 was endorsed as it reflected the economic policy priorities of the Council to drive up the skills of the workforce and encourage growth in businesses which use higher skilled staff.</p> <p>To sensitivity test the original 2015 OE projections, the latest Experian economic forecasts within the Regional Econometric Model (REM) were used. This update was published in the ELR Update (2017) (SD063)The conclusion of the ELR Update was that the original forecasts were still robust. At the Executive in July 2017 (SD027A) and January 2018 Members endorsed this position (SD028A).</p> <p>The Publication Draft Local Plan seeks to provide for a minimum of 650 additional jobs per annum which</p>

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		is set out within the Spatial Strategy (Policy SS1) and the Economy and Retail Section of the Plan (Section 4).
<b>NPPF Principles: Delivering sustainable development</b>		
<b>1. Building a strong, competitive economy (paras 18-22)</b>		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	<ul style="list-style-type: none"> <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>The Local Plan will enable York to realise its economic growth ambitions as set out within the York Economic Strategy (2016) SD070, contributing to a vibrant economy. This will include York fulfilling its role as a key driver in the Leeds City Region<sup>1</sup>, York, North Yorkshire and East Riding Local Enterprise Partnership (LEP) area and the functional York Sub Area. In doing this York will have a key role in leading economic growth and job creation within the local area.</p> <p>The role of the Local Plan in achieving this objective is to promote private sector employment growth through the provision of sites and infrastructure to deliver an annual provision of around 650 new jobs</p> <p>Technical work on economic growth has been carried out for the Council by Oxford Economic</p>

<sup>1</sup> The Leeds City Region is a city region in the North of England centred on Leeds, West Yorkshire. The activities of the city region are coordinated by the Leeds City Region Partnership. Since 2011 economic development has been supported by the Leeds City Region Local Enterprise Partnership (LEP)



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		<p>Forecasting and is included within the ELR (2016) SD064 and ELR Update (2017) [SD063]. This suggests that over the period 2017 to 2038 around 650 additional jobs could be created in the city per annum. The projection shows particularly strong growth in the professional and technical services, accommodation and food services and wholesale and retail sectors. This is consistent with the ambitions of the York Economic Strategy (2016)[SD070] as encapsulated in the Local Plan vision.</p>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<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>Policy EC1 (provision of employment Land) identifies land that is suitable to provide for the forecast growth in the York economy and protects this land from other uses. Specific policies are included in Section 3: Spatial Strategy to guide the implementation of development on the strategic employment sites (those 5ha or above) which include detailed planning principles.</p> <p>The overall forecast for growth in jobs that is set out in Policy SS1: Delivery Sustainable Growth for York has been disaggregated into the different economic sectors and converted into floorspace requirements using widely recognised job density and plot ratio assumptions. These calculations include an allowance for existing commitments arising from unimplemented planning permissions and additional provision to provide flexibility in choice of</p>

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		<p>premises and the loss of existing now outdated buildings. The detailed analysis that underpins this work can be found in the ELR (2016) [SD064]. The ELR Update (2017)[SD063] has adjusted floorspace requirements to take account of development between 2012-2017 and to reflect the revised plan period 2012-2038. A 5% vacancy factor and an additional 2 year land supply to allow for time for developments to be complete has also been added to calculations</p> <p>A Local Plan Viability Assessment Update (CD018) has been prepared. This sets out how in formulating the Local Plan we have had regard to the cumulative and individual impact of the policy requirements on the overall viability of the Plan. This includes viability testing of non-residential sites.</p>
<p><b>2. Ensuring the vitality of town centres (paras 23-37)</b></p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> <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 adjacent to town centres.</li> </ul>	<p>The Plan sets out a clear hierarchy of centres that are able to adequately service the day to day retail and community needs of the local population in as close a proximity to their homes as possible. This will help to promote sustainable shopping patterns as people should not have to travel far to meet their day to day needs, thereby reducing congestion in larger centres. This approach will help to ensure that lively, thriving places to visit and live are</p>

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		<p>created which provide for both the retail needs of the local population, as well as community facilities such as doctors surgeries and libraries. The creation of a network of centres to serve local needs is particularly important for less mobile and more vulnerable members of the community. It is therefore necessary for York City Centre to be supported by a network of district centres, local centres and neighbourhood parades.</p> <p>In order to determine the classification of each centre, an understanding of the distinct roles of district and local centres and neighbourhood parades was required. The existing centres in the City of York have been reviewed to identify the most appropriate role for those centres in a consolidated hierarchy of district and local centres and neighbourhood parades which is set out in the City of York Retail Study Update and Addendum (2014) [SD065, SD066, SD067]. A centre's status within the retail hierarchy is determined by a number of factors, these include floorspace, number, size and type of shops, the provision of non-retail facilities, characteristics of the centre, catchment area and proximity to other centres.</p> <p>Policies for the management and growth of town centres are set out in Section 4 of the Plan (Economy and Retail) including the retail hierarchy and sequential approach, and policies guiding development in the city centre, district and local centres and out of centre retail locations.</p>

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<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>The Local Plan Economy and Retail Section (Section 4) specifically policies R1 to R4 sets out our approach.</p> <p>The City Centre Inset (CD004C) policies map identifies the primary shopping area and primary and secondary frontages as specified in Policy R3 (York City Centre).</p> <p>In accordance with the NPPF, the focus for major new retail development and investment will be the city centre. The continued success of the city centre is important to the continued economic success of York and the wider region.</p> <p>The market share of the city centre has been gradually declining since 2000 and further out of centre developments and developments in neighbouring regional centre are likely to have a further impact upon this market share and reduce the overall vitality and viability of the centre. Policies in the Plan (R1 to R4) seeks to support the city centre retailing offer and enhance / maintain its market share and ensure that the city centre remains its primary retail destination as part of its multi layered offer.</p> <p>The York Retail Study Update and Addendum (2014) [SD065, SD066, SD067] identifies the future need for convenience and comparison floorspace.</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><b>3. Supporting a prosperous rural economy (para 28)</b></p>		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<ul style="list-style-type: none"> <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>	<p>Local Plan Policy E5 (Rural Economy) seeks to encourage a viable rural economy by allowing development in rural areas where it supports appropriate farm and rural diversification including office and leisure and permits camping and caravan sites where they are accessible and not detrimental to the landscape character.</p>
<p><b>4. Promoting sustainable transport (paras 29-41)</b></p>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p>	<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> <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</li> </ul>	<p>The Local Plan Transport and Communications section (Section 14) sets out the approach and policies to support and promote sustainable travel.</p> <p>Local Plan Policy T1 (Sustainable Access) supports development where it minimises the need to travel and maximises the use of more sustainable modes of transport</p> <p>Local Plan Policy T2 (Strategic Public Transport Improvements) sets out the public transport improvements that will be implemented or pursued to deliver planned growth and complement the Local Transport Plan.</p> <p>Local Plan Policy T3 (York Railway Station and Associated Operational Facilities) supports development that provides or facilitates increased capacity of and improved interchange and access at York Station, whilst conserving or enhancing its</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should 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>prepared, are they justified and necessary? (39)</p> <ul style="list-style-type: none"> <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>significance as a Grade II* station and maintaining the continued use of operational rail lines and facilities.</p> <p>Local Plan Policy T4 (Strategic Highway Network Capacity Improvements) sets out the strategic highway network capacity improvements that will be implemented or pursued to deliver planned growth and complement the Local Transport Plan.</p> <p>Local Plan Policy T5 (Strategic Cycle and Pedestrian Network Links and Improvements) sets out the strategic cycle and pedestrian route improvements that will be implemented to deliver planned growth and complement the Local Transport Plan.</p> <p>Local Plan Policy T6 (Development at or Near Public Transport Corridors, Interchanges and Facilities) supports development in locations close to such existing facilities provided there is no detriment or doesn't prejudice future expansion of such facilities. Conversely, the policy will not permit development where disused facilities could be reopened or reused as a transport corridor, wildlife corridor or linear park.</p> <p>Local Plan Policies T7 (Minimising and Accommodating Trips) and T8 (Demand Management) respectively seek to minimise the number of trips on the transport network and improve traffic flow and road safety and contribute to overall environmental quality (that is also more conducive to walking and cycling). Measures referred to in Policy T7 include transport assessments and travel plans. Policy T8 refers to up to date parking standards contained in a</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Supplementary Planning Document.</p> <p>Local Plan Policy T9 (Alternative Fuel Filling Stations and Freight Consolidation Centres) supports the development of alternative fuel filling stations and Use Class B8 freight consolidation centres.</p> <p>To support the Local Plan future year forecasting of the transport impacts of residential and non-residential allocations together with the inclusion of a number of infrastructure improvements that can be realistically expected has been undertaken and is set out in the Transport Topic Paper (2018) (SD076)</p> <p>Transport is one of the major cross-boundary issues identified. Specific parts of the Strategic Road Network and public transport routes are highlighted as showing the most potential for cross-boundary cooperation.</p> <p>City of York Council has liaised extensively with Highways England (and its predecessor the Highways Agency) to identify and mitigate the Local Plan's impacts on the Strategic Road Network (in this case the A64). Also with regard to the A64, City of York Council is along with its neighbouring districts to the north east, North Yorkshire County Council (NYCC), the York North Yorkshire and East Riding Local Enterprise Partnership (YNYERLEP) and Highways England, a joint-signatory to the <i>'Memorandum of Understanding for A64 Trunk Road York - Scarborough Improvement Strategy'</i></p> <p>City of York Council has also raised cross boundary transport issues and potential mitigation (if necessary) through various sub-regional member groups and officer groups as well as through</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>numerous one-to-one meetings with officers from neighbouring districts, NYCC, YNYERLEP and Highways England. In many cases changes were made to the Local Plan transport policies as a result of these discussions and representations made at various stages in the Plan's preparation.</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>Local Plan Policy C1 (Communications Infrastructure) seeks to approve, wherever possible, development proposals for high quality communications infrastructure that support the development of York's ultrafast connectivity – both fixed and wireless unless adverse impacts on the special character of York significantly outweigh the benefits. Policy C1 also seeks to remove/relocate visually intrusive masts particularly in the City centre, In addition, Policy C1 requires all new development to enable Next Generation Access (NGA) broadband.</p> <p>Some changes were made to Policy C1 as a result of one-to-one discussions with prescribed bodies and representations made by them at various stages in the Plan's preparation.</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 requirements; this should include an additional buffer of 5% or 20% (moved forward from later in</p>	<ul style="list-style-type: none"> <li>• Identification of: <ul style="list-style-type: none"> <li>a) five years or more supply of specific deliverable sites; plus the buffer as appropriate</li> </ul> </li> <li>• Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence'</li> </ul>	<p>The Local Plan proposes housing allocation to meet the objectively assessed needs of the city.</p> <p>Policy H1 sets out all the housing allocations including non strategic sites (less than 5ha) and</p>



# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<p>to justify their inclusion (48)</p> <ul style="list-style-type: none"> <li>• A SHLAA</li> </ul>	<p>strategic housing sites (5ha and above) including their estimated yield and delivery timeframe. Figure 5.1 and 5.2 include the housing trajectory demonstrating sufficient sites to provide five years worth of housing against the plan requirement.</p> <p>A detailed supply trajectory and a five year housing supply calculation is provided in the Strategic Housing Land Availability Assessment (SHLAA) 2018 (SD049)</p> <p>The Council accepts that there has been persistent under delivery of housing as defined in the NPPF and consequently has included enough land in the early years of the trajectory to ensure there is a 20% buffer in the 5 year supply. This land has been brought forward form later in the plan period. Progress on meeting delivery targets will be assessed through the authority monitoring report and the 20% buffer will be rolled forward within the 5 year supply until such time as the under delivery has been satisfactorily addressed.</p> <p>In taking a proportionate approach to identifying land for development in the emerging Local Plan sites above the site threshold 0.2ha have been identified as allocations within the plan. To ensure that we properly understand the potential for development on very small sites below this allocation threshold an assessment of the trends in the historic rate of windfall delivery along with changes of use and conversions has been carried out. This analysis is set out in the City of York Local Plan Windfall Allowance Technical Paper (2016) [SD055] and the 2017 update within the SHLAA</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>(SD049). The annual figure for windfalls is 169 dwellings per annum which is effectively a mean average for these two categories of windfalls calculated over a 10 year period. To avoid double counting and to allow time for sites to continue through the development process, windfalls are included from year three of the trajectory. Garden infill sites have been removed.</p> <p>To ensure sites are deliverable and viable against the cumulative policy costs of the Plan a Local Plan Viability Assessment Update (CD018) has been carried out to support the Plan. This shows that sites are deliverable against the policy requirements set out in the Plan.</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 please refer to policy H1 of the Plan, the housing trajectory at figures 5.1 and 5.2 and the detailed housing trajectory included within the SHLAA 2018 (SD049).</p> <p>To ensure sites are deliverable and viable against the cumulative policy costs of the Plan a Local Plan Viability Assessment (CD018) has been carried out to support the Plan. This shows that sites are deliverable against the policy requirements set out in the Plan.</p>
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year</p>	<ul style="list-style-type: none"> <li>• A housing trajectory</li> <li>• Monitoring of completions and permissions (47)</li> <li>• Updated and managed SHLAA. (47)</li> </ul>	<p>A housing trajectory is included within Section 5 (Housing) of the Plan at figures 5.1 and 5.2 and a detailed trajectory including a 5 year housing land</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
supply will be maintained. (47)		<p>calculation is set out in the SHLAA (SD049)</p> <p>Completions and consents are monitored regularly and published bi-annually on the Council's Local Plan monitoring website:</p> <p><a href="https://www.york.gov.uk/downloads/download/1274/annual_monitoring_reports">https://www.york.gov.uk/downloads/download/1274/annual_monitoring_reports</a></p> <p>The housing monitoring report for 2016/2017 which supports the Local Plan position at 1<sup>st</sup> April 2017 is included as a core document (CD014)</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>Local Plan policy H2 (Density of Residential Development) sets out the approach to housing density.</p> <p>Densities proposed have been tested through the work carried out to ensure the viability and deliverability of housing across the district (Local Plan Viability Assessment CD018). Delivering development at this range of densities will help maintain local 'walkable' services within communities and provide opportunity to secure the levels of public transport patronage that will ensure services are economically viable, present a realistic alternative to using the private car and can be maintained in the long term. The policy also recognises that the availability of public transport capacity may enable development density to be increased as development in the vicinity of public transport facilities, particularly transport hubs or interchanges, enables more sustainable trips to be made on the radial and orbital public transport networks.</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)</p>	<ul style="list-style-type: none"> <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 housing section of the Plan (Section 5) sets out a number of policies which plan for a mix of housing and the needs of different groups, this includes policies on the following:</p> <p>Policy H3 (Balancing the Housing Market) seeks to work towards a mix of housing as identified in the SHMA (2016) CD REF. Proposals are required to balance the housing market by including a mix of housing to reflect needs across the city including flats and smaller houses for those accessing the market for the first time, family housing of 2-3 beds and homes with features attractive to older people.</p> <p>Policy H4 (Promoting Self and Custom Build Housebuilding) states that proposals for self and custom build to be occupied as homes by the individual will be supported where they are in conformity with relevant local and national policy. It requires strategic sites (5ha and above) to include 5% of dwellings plots for sale to self and small/custom housebuilders subject to appropriate demand being identified and sets out criteria for assessment. These must be made available and marketed for 12 months. Communities preparing Neighbourhood Plans are also encouraged to consider the identification of sites for self and custom build. The policy is informed by the Council's Self Build Register.</p> <p>Policies H5 and H6 sets out the approach to gypsy and traveller and travelling showpeople provision. Further details on this and the evidence base that underpins the policy approach is set out in the section of this checklist on Planning Policy for</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Traveller Sites.</p> <p>Policy H7 sets out the Local Plan policy regarding provision of student housing and the requirement that the University of York and York St John University must address the need for any additional student housing which arises because of their future expansion in student numbers. It sets out criteria for the assessment of future planning applications and allocates a site (SH1) Land at Heworth Croft for student housing for York St John Students.</p> <p>Policy H8 sets out the policy in relation to houses in multiple occupation (HMOs). The evidence base exploring the spatial distribution and impact of HMOs, typically occupied by student households, indicates that it is necessary to control the number of HMOs to ensure that communities do not become imbalanced. This control is achieved through an Article 4 Direction which came into force on 20 April 2012. The Article 4 Direction removes permitted development rights and requires a planning application to be submitted to change a property into a HMO. Policy H8 and the Controlling the Concentration of HMOs SPD (2012, amended 2014) provide guidance on how these planning applications will be determined.</p> <p>Policy H9 (Older Persons Specialist Housing) seeks to enable the delivery of specialist (supported) housing and registered care housing for vulnerable people including the ageing population and sets out relevant criteria for assessing proposals. Strategic sites (5ha and above) should incorporate the appropriate provision of accommodation types for</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>older persons within their site masterplanning.</p> <p>Policy H10 sets out the approach to affordable housing provision which is underpinned by the Affordable Housing Viability Study (2011) SD057 and the Local Plan Viability Assessment Update (CD018)</p> <p>The policy requires 20% provision on browfield sites equal or greater than 15 dwellings and 30% on Greenfield sites equal or greater than 15 dwellings. Sites from 2-15 dwellings have a range of targets specified, underpinned by the viability testing from 2 to 20%. The policy sets out in detail the off-site financial contribution calculation and requires an open book appraisal in circumstances where a developer believes that due development viability that a site cannot meet the requirement set out in policy H10.</p> <p>Informed by the SHMA (2016) [SD051] the policy requires 80% social and affordable rented and 20% intermediate split.</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>Local Plan policy GB4 (Exception Sites for affordable housing in the greenbelt) sets out where and how affordable homes in the greenbelt will be considered including demonstrating identified need, retention at an affordable price in perpetuity, well related to existing settlement and associated amenities and where development reflects size of settlement in scale, form and character.</p> <p>The policy also allows for market homes to cross subsidise where it can be justified as necessary to make an exception scheme viable and there is</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		insufficient public subsidy available.
<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>Section 8 of the Local Plan (Place-making, heritage, design and culture) sets out a number of policies to ensure good placemaking. Good Place-making is a key driver of the Local Plan and it is recognised that this is underpinned by a clear understanding of what makes the city and surrounding villages in terms of design and cultural identify. This approach is underpinned by detailed evidence . Please refer to York Local Plan Submission Document List – Placemaking, Heritage and Culture section.</p> <p>The Heritage topic paper (2014) [SD103] sets out to define the characteristics that are of strategic importance to the significance of York and are key considerations for the enhancement and growth of the city. Detailed descriptions of the characteristics are contained within the topic paper but these are listed in table 8.1 of Section 8 of the Plan with links to the relevant policy within the Place-making section (Section 8) and this provides the underlying shape to the structure of this section.</p> <p>Key characteristics and relevant policies in Section 8 are as follows:</p> <ul style="list-style-type: none"> <li>Strong urban form – Policies D1(Placemaking) and D2 (Landscape and Setting)</li> <li>Compactness – Policies D1 and D2</li> <li>Landmark Monuments – Policies D3</li> </ul>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>(Cultural provision), D5 (Listed buildings) and D10 (York Walls)</p> <ul style="list-style-type: none"> <li>• Architectural Character – D1, D3, D4 (Conservation Areas), D5, D7 (significance of non-designated assets), D9 (City of York Historical Environment Record), D10, D11 (extensions and alterations to buildings), D12 (shopfronts) and D13 (advertisements)</li> <li>• Archaeological complexity – D6 (Archaeology), D9, D10</li> <li>• Landscape and Setting – D2, D7, D8 (Historic Parks and Gardens)</li> <li>• Future Characteristics – D1, D3. In some cases growth of a city area will result in the development of new areas with a change in the current use and overall character of a place creating the opportunity for new quality and characteristics of York to emerge.</li> </ul>
<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</li> </ul>	<p>Policy D1 (Placemaking) and D3 Cultural provision within Section 8 of the Plan sets out the design principles for the area and the criteria development should address.</p> <p>Section 6 of the Plan (Health and Well being) sets out policies to promote inclusive, healthy communities and includes policies relating to Protecting existing community facilities (HW1),</p>



# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</p>	<p>Provision of new community facilities (HW2), Built Sports facilities (HW3), Childcare provision (HW4), Healthcare services (HW5), Emergency Services (HW6) and Healthy Places (HW7). This section seeks to provide policies to underpin the aims of the One Planet York Council Programme and York's Joint Health and Well Being Strategy which inform the Plan vision.</p> <p>Policy HW7 (Healthy Places) requires new residential development proposals to provide a statement showing how design principles have been considered and incorporated to include well designed streetscapes that encourage residents to spend time outdoors, the provision of safe, easy to navigate and attractive public footpaths and cycle paths to encourage physical activity, good connections to neighbouring facilities and greenspaces. These principles build on Policy D1 (Placemaking) principles but have an emphasis on good design for mental and physical health.</p> <p>All new strategic sites (5ha and above) are required to undertake a Health Impact Assessment as set out in policy HW7 and also in the bespoke strategic site policies set out in the Spatial Strategy Section of the Plan (Section 3).</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</li> </ul>	<p>Policy HW1 (Protecting existing facilities) sets out how the Council will seek to work with local communities and voluntary sector organisations to help preserve and re-use community assets. All development proposals which involve the loss of existing community facilities or facilities last used for community purposes will not be supported</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</p>	<p>unless certain criteria set out in the policy area met including the re-provision of facilities with greater or equivalent capacity and quality either on site or in a location that equivalently or better serves the needs of the local community or it can be demonstrated that the facilities no longer serve a community function or in the case of commercial facilities are no longer financially viable.</p> <p>Policy HW2 (New community facilities) seeks to require all strategic development proposals (5ha or above) to undertake an audit of existing community facilities and their current capacity. Developments will be required to provide proportionate new or expanded community facilities to meet the needs of existing and future occupiers either on-site or through developer contributions.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<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>Section 9 of the Plan (Green Infrastructure) sets out a range of policies designed to plan positively for the creation, protection, enhancement and management of York's Green Infrastructure and the Plan seeks to conserve and enhance York's landscapes, geodiversity, biodiversity and natural environment. Specific policies include:</p> <p>GI1 – Green Infrastructure</p> <p>GI2 – Biodiversity and Access to Nature</p> <p>GI3 – GI Network</p> <p>GI4 – Trees and hedgerows</p> <p>GI5 – Protection of open space and playing fields</p> <p>GI6 – New openspace provision</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>GI7 – Burial and memorial grounds</p> <p>The Plan is informed by an assessment of specific needs both quantitatively and qualitatively in the Local Plan Open Space and Green Infrastructure Study (2014)SD086 and Update (2017) [SD085]</p> <p>Policy GI5 seeks to protect existing openspace, sports and recreational facilities from development with specific exceptions in line with paragraph 74 of NPPF.</p> <p>Policy GI3 (GI Network) seeks to protect and enhance the amenity, experience and surrounding biodiversity value of existing rights of way, national trails and open access land in line with paragraph 75 of NPPF.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> <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>	<p>No separate enabling policy is proposed however policy GI5 seeks to protect existing openspace and development proposals will not be permitted which would harm the character or lead to the loss of an existing openspace of environmental or recreational importance unless it can be satisfactorily replaced in the area of benefit and in terms of quantity, quality and access with equal or better standards.</p> <p>Production of neighbourhood plans is supported.</p>
<p><b>9. Protecting Green Belt land (paras 79-92)</b></p>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to</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</li> </ul> </li> </ul>	<p>Policy SS2 (The Role of York’s Greenbelt) within the Spatial Strategy section of the Plan (Section 3) sets out that the primary purpose of York’s greenbelt is</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>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>	<p>Belt. (81)</p> <ul style="list-style-type: none"> <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>	<p>to safeguard the setting and special character of York (as depicted on figure 3.1 of the Spatial Strategy section) and to deliver the spatial strategy. New building in the greenbelt is inappropriate unless one of the exceptions in policy GB1 (Development in the Greenbelt).</p> <p>The general extent of York’s greenbelt is shown on the key diagram (CD001)</p> <p>The detailed boundaries of the greenbelt are depicted on the policies map and follow readily recognisable physical features on the ground that are likely to endure such as streams, hedgerows and highways.</p> <p>To ensure a degree of permanence beyond the plan period sufficient land is allocated for development to meet the needs identified in the Plan and for a further minimum period of 5 years to 2038.</p> <p>The Plan seeks to identify sufficient land to accommodate York’s development needs across the plan period 2017-2033 and for 5 years beyond this to 2038 including allowing for some flexibility in delivery.</p> <p>Further information on the approach to York’s Greenbelt is set out in the topic paper – Approach to York’s Greenbelt (2018) (TP001)</p> <p>Local Plan policies GB1 to GB4 of Section 10 (Managing Development in the Greenbelt) set out the extent of the greenbelt, what are considered appropriate uses in the greenbelt and what may be considered.</p>

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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>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> <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>Section 11 of the Plan (Climate Change) outlines how York will tackle the challenges of climate change specifically through ensuring development that generates renewable/low carbon energy, uses natural resources prudently and is built to high standards of sustainable design and construction. The policies contained with this section are central to fulfilling the aspirations of One Planet Council in relation to environmental sustainability</p> <p>Policy CC1 encourages the development of renewable and low carbon energy generation. The City of York Council Renewable Energy Study (2014) [SD117] assessed the city’s potential for generating renewable energy and concluded that there is potential to generate renewable energy from a variety of available sources including wind, solar and hydro. The study also assessed the impacts of such potential on the city and recommends potential areas where renewable energy could be considered in the future (subject to further feasibility studies and full planning processes.)</p> <p>Energy storage is crucial to increasing the proportion of renewable and low carbon energy in the system. This is an emerging area and the Council will continue to work with relevant experts to</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>ensure that suitable energy storage opportunities are identified and brought forward.</p> <p>Part 1 of the Planning and Energy Act (2008) [SD038] gives powers to Local Planning Authorities to set policy to reduce carbon emissions in new developments. Point “a” gives powers to require that a proportion of energy used in a development is from renewable or low carbon sources. This was not amended in the Deregulation Act and therefore these powers remain.</p> <p>Whilst the Deregulation Act removed point ‘C’ which relates to powers to set targets to exceed the energy efficiency requirements of Building Regulations, it is possible that compliance with a carbon reduction target will be more cost effective with the deployment of enhanced energy efficiency measures rather than renewable and low carbon sources. The Council will therefore permit developments to comply with the target of at least a 28% reduction in carbon emissions through either enhanced energy efficiency measures, use of renewable and low carbon sources, or a mix of both, where appropriate.</p> <p>The target of 28% is aligned to the committee on climate change’s analysis of the fourth carbon budget of the Climate Change Act (2008), which determines the most cost-effective path for reducing emissions from buildings. This target</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>applies to all developments.</p> <p>Policy CC2 aims to ensure that all new developments achieve high standards of sustainable design and construction, by minimising greenhouse gas emissions, using resources efficiently, enhancing climate change resilience and promoting health and wellbeing. A sustainability statement will be required for all new residential and non-residential applications.</p> <p>Through Policy CC3 (District Heating and combined heat and power networks)the Plan strongly supports the use of decentralised energy in new developments, and particularly (C)CHP distribution networks, with the aspiration that this will help achieve the targets set in the Climate Change Action Plan for York. The Council will work with developers during pre-application discussions, in order to facilitate the development of district heating networks and buildings that are ‘connection ready’.</p> <p>The Leeds City Region Strategic Heat Programme Heat Network Opportunity Mapping Report (2014) [SD122] identified 91 financially viable district heating opportunities across the region, including in York. Two heat network schemes in York Central (ST5) and the surrounding City of York and surrounding the area of York Hospital have since been further developed in feasibility studies which</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>demonstrate financial viability. Therefore, there is a strong evidence base to support the viability of heat networks in York.</p> <p>Where developments fall within heat priority areas, as shown at Figure 11.1 of the Plan, the provision of new (C)CHP distribution networks should be considered feasible unless it can clearly be demonstrated otherwise for financial, technical or sustainability reasons.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> <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 section</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<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>Section 12 (Environmental Quality and Flood Risk) and specifically policies ENV4 (Flood risk) and ENV5 (Sustainable Drainage) sets out the plans policies with regard to flood risk and sustainable drainage. The Council will apply the risk-based sequential test approach set out in the NPPF. However, it may also consider development of land in areas known to be at risk from any form of flooding, and will take a</p>



# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>sequential risk-based approach to determining the suitability of land in such areas for development, to ensure that sites at little or no risk of flooding are developed in preference to areas at higher risk. The Council's SFRA [SD091] provides the basis for applying this test (and the exception test, as appropriate), to assess the nature of the proposed development against its flood risk vulnerability and its compatibility with this vulnerability.</p> <p>The level of detail provided within a flood risk assessment will depend on the scale of the development and flood risks posed. The Environment Agency's flood risk matrix gives standing advice on the scope and extent of flood risk assessments. More detailed policies for determining a planning application within the resultant flood zone classification are contained in the SFRA (or its successor). Guidance on the preparation of a flood risk assessment is also available in the SFRA.</p> <p>Flood risk mitigation measures will be assessed by the Council's flood risk management team on a site-by-site basis.</p> <p>Policy ENV5 sets out the requirements for developments in relation to sustainable drainage. The current City of York SFRA (2013) (SD091) seeks to restrict surface water runoff from new development to below the extant run-off rates. The</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>latest Defra climate change allowance guidance requires developers to assess the life of the development and its vulnerability over this time, developments in York will be required to provide between 15 and 50% increase in flood flows based on the likely climate change uplifts for the Humber River Basin District. Support is available in the Strategic Flood Risk Assessment.</p>
<p>Take account of marine planning (105)</p>	<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>York is an overlapping authority for the North East Inshore Marine area with approximately 1km within our administrative boundary on the River Ouse between Naburn Lock and the outer boundary of the City of York Local Authority boundary.</p> <p>The emerging policies for this marine area as set out in the UK Marine Policy Statement (2011) and the emerging Marine Plan for the North East Inshore Area are in general conformity with policies in the York Plan. In addition we have considered the functional links and effects on the River Humber as part of the Habitats Regulation Assessment.</p> <p>All issues in relation to the River Humber have been screened out as part of the HRA including:</p> <ul style="list-style-type: none"> <li>• Mobile species (breeding and non-breeding birds, grey seals and lamprey and bullhead populations; and</li> <li>• Recreation.</li> </ul>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Please refer to the Habitat Regulation Assessment (2018) [CD012] for further details.
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 to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.</li> </ul>	As above.
<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>Policies GI1 to 4 within section 9 of the Plan (Green Infrastructure) cover the protection, enhancement and management of York’s Green Infrastructure seeking to enhance York’s landscapes, geodiversity, biodiversity and natural environment.</p> <p>The Plan’s approach is to both continue to protect, enhance and extend where possible biodiversity habitats and landscapes; and also to support the multifunctional benefits of green infrastructure. These include opportunities for sport and recreation, creating safe and attractive walking, cycling and equestrian routes; the provision of ecosystem services such as improvements in air and water quality; cultural value; mitigation and adaptation to climate change, particularly in terms of flood storage in York; an enhanced backdrop and landscape to aid business and attract inward investment and boost the economy; to maintain York as an attractive place to live and promote well-</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>being; and, of course, to maintain and enhance biodiversity.</p> <p>York's network of green spaces could work like a connected park, linking the historic city centre to the city's neighbourhoods and countryside through a series of extended strays for walking and cycling, and making use of rivers. Better green infrastructure and cross-connections through York's neighbourhoods will also be encouraged. The Council will deliver a Green Infrastructure strategy in line with Policy GI1 and adopt this as a Supplementary Planning Document (SPD).</p> <p>Policy GI2 (Biodiversity and access to nature) seeks to conserve and enhance all sites and areas of biodiversity value in York. This supports the national approach of a hierarchy of sites as defined in the National Planning Policy Framework. City of York Biodiversity Audit (2010) (SD089) and Local Biodiversity Action Plan (2017) (SD080) identify the special sites and define their specific value and the best approach to retaining and enhancing this value. These documents should be used alongside Policy GI2 to determine planning applications that could potentially affect any site of biodiversity value.</p>
Prevent unacceptable risks from pollution and land	<ul style="list-style-type: none"> <li>Policy which seeks development which is</li> </ul>	

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
instability (109)	appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.	<p>There are a number of areas within York where the national health based air quality objectives are being exceeded. Despite the introduction of three Air Quality Action Plans (AQAPs) the annual average Nitrogen Dioxide (NO<sub>2</sub>) objective continues to be exceeded at many locations particularly within the inner ring road and city centre. The main source of air pollution in York is traffic. Given that air is not static and pollutants are generated across the city as people travel between places, emissions to air must be considered in a city wide context to address cumulative air quality impacts.</p> <p>York has developed an overarching Low Emissions Strategy (2012) (LES) [SD093] which aims to reduce tailpipe emissions from individual vehicles and encourage the uptake of alternative fuels and low emission vehicle technologies. City of York Council's Air Quality Action Plan 3 (2015) [SD096] sets out how York intends to continue to deliver this ambitious and pioneering LES and to work towards becoming an internationally recognised ultra-low emission city. Headline measures for consideration include provision of low emission infrastructure and reducing emissions from new development.</p> <p>Control of development through the planning process is one of the key delivery mechanisms by which potential adverse environmental impacts or adverse human health effects can be controlled. By allowing appropriate development and encouraging</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>good design, planning policies and decisions should minimise the adverse impacts of development and, where possible, enhance the natural and local environment. The approach is set out in policy ENV1 – Air Quality.</p> <p>Policy ENV2 (Managing Environmental quality) recognises that impacts on environmental quality are most likely to occur when a development is built in an inappropriate location. This may occur due to the existing environment making the site unsuitable or because a development and/or its use introduces new environmental impacts which result in loss of amenity. Environmental impacts may result in damage to the environment and affect people’s quality of life. As such, the Council will give considerable weight to ensuring that development proposals do not give rise to unacceptable environmental impacts or human health impacts.</p> <p>It is essential that any negative impacts on environmental quality arising from development proposals are fully assessed, including during the construction phase, and that steps are taken to reduce those impacts to an acceptable level. Development should avoid causing detrimental impacts on the</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>environment, however where an impact cannot be avoided mitigation measures should be incorporated into the proposals so that any impacts can be reduced to an acceptable level or controlled.</p> <p>A site may be contaminated if potentially polluting substances are present in, on or under the land. Land contamination is often associated with historical industrial activities or former landfill sites. Following a review of historic maps, trade directories, photographs and other records the Council has identified sites which have a past industrial use or have been used for waste disposal. The Council has a duty under Part 2A of the Environment Protection Act (1990) to investigate these potentially contaminated sites. It should be noted that the potentially contaminated sites are based on information currently available to City of York Council and additional potentially contaminated sites may exist.</p> <p>In line with policy ENV3 (Land contamination))Developers must submit an appropriate contamination assessment for sites that are identified as potentially contaminated or for sites where the proposed use would be particularly vulnerable to contamination such as housing with gardens. The level of detail required in the</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>assessment will be dependent on the potential contamination identified. As a minimum, a contamination assessment should include a Phase 1 investigation – which consists of a desk study, a site walkover and a conceptual site model. However, if contamination is known or suspected to an extent which may adversely affect the development, a Phase 2 investigation may be required to support the application.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)            Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<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 recovery of priority species</li> </ul>	<p>Policies GI1 to 4 within section 9 of the Plan (Green Infrastructure) cover the protection, enhancement and management of York’s Green Infrastructure seeking to enhance York’s landscapes, geodiversity, biodiversity and natural environment.</p> <p>Policy GI2 (Biodiversity and access to nature) seeks to conserve and enhance all sites and areas of biodiversity value in York. This supports the national approach of a hierarchy of sites as defined in the National Planning Policy Framework. City of York Biodiversity Audit (2010) [SD089] and Local Biodiversity Action Plan (2017) [SD080] identify the special sites and define their specific value and the best approach to retaining and enhancing this value. These documents should be used alongside Policy GI2 to determine planning applications that could potentially affect any site of biodiversity</p>



# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		value.
<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>Section 8 of the Local Plan (Place-making, heritage, design and culture) sets out a number of policies to ensure good placemaking. Good Place-making is a key driver of the Local Plan and it is recognised that this is underpinned by a clear understanding of what makes the city and surrounding villages in terms of design and cultural identify. This approach is underpinned by detailed evidence . Please refer to York Local Plan Submission Document List – Placemaking, Heritage and Culture section.The Heritage topic paper (2014) [SD103] sets out to define the characteristics that are of strategic importance to the significance of York and are key considerations for the enhancement and growth of the city. Detailed descriptions of the characteristics are contained within the topic paper but these are listed in table 8.1 of Section 8 of the Plan with links to the relevant policy within the Place-making section (Section 8) and this provides the underlying shape to the structure of this section.</p> <p>Key characteristics and relevant policies in Section 8 are as follows:</p> <ul style="list-style-type: none"> <li>• Strong urban form – Policies D1(Placemaking) and D2 (Landscape and Setting)</li> <li>• Compactness – Policies D1 and D2</li> <li>• Landmark Monuments – Policies D3 (Cultural provision), D5 (Listed buildings)</li> </ul>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>and D10 (York Walls)</p> <ul style="list-style-type: none"> <li>• Architectural Character – D1, D3, D4 (Conservation Areas), D5, D7 (significance of non-designated assets), D9 (City of York Historical Environment Record), D10, D11 (extensions and alterations to buildings), D12 (shopfronts) and D13 (advertisements)</li> <li>• Archaeological complexity – D6 (Archaeology), D9, D10</li> <li>• Landscape and Setting – D2, D7, D8 (Historic Parks and Gardens)</li> <li>• Future Characteristics – D1, D3. In some cases growth of a city area will result in the development of new areas with a change in the current use and overall character of a place creating the opportunity for new quality and characteristics of York to emerge.</li> </ul> <p>As a prescribed body Historic England have engaged with us during the preparation of the Plan and comments have been taken into account where appropriate.</p>
<p><b>13. Facilitating the sustainable use of minerals (paras 142-149)</b></p>		
<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</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</p>	<p>City of York is making good progress in sustainable waste management. The Council's waste management strategy is to reduce waste going to landfill through various initiatives such as the provision of a full kerbside recycling service. The tonnage disposed to landfill has fallen consistently</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>secure their long-term conservation (142) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>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>in recent years, and the recycling rate has increased. Other waste streams generated in City of York are commercial and industrial waste; construction, demolition and excavation waste; agricultural waste; hazardous waste; low-level non-nuclear radioactive waste; and waste water/sewage sludge. Policy WM1 sets out the Plans approach to Sustainable Waste Management.</p> <p>There are no existing mineral sites in York. The local aggregates assessment has not presented specific evidence on aggregate mineral requirements for the York area. Sand and gravel assessments were carried out in City of York area in 2013 and 2014 which concluded that the City of York has sand and gravel resources however they are highly variable in terms of their aggregate properties.</p> <p>There has been very limited interest expressed via the Minerals and Waste Joint Plan in relation to the exploration or development of mineral resources in York. The Minerals and Waste Joint Plan has examined the need for any provision across the Joint Plan area in detail and will allocate future sites or areas which reflect the evidence base and complies with national policy and guidance. In addition the Joint Plan will set out policies to assess any future applications for minerals development.</p> <p>The Joint Minerals and Waste Plan is currently in examination and the hearing sessions finished on</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		13 <sup>th</sup> April 2018.
<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 adopted the Statement of Community Involvement in 2007. This is core document CD016</p> <p>A comprehensive Consultation Statement (Regulation 22 C Statement) [CD013A-W] has been prepared which sets out the consultation undertaken at each stage of the Plan preparation. This includes which bodies and persons the Council invited to make representations under Regulation 18, how these bodies and persons were invited to make representations under Regulation 18, a summary of main issues raised pursuant to Regulation 18 and how these representations made pursuant to Regulation 18 have been taken into account.</p> <p>The statement also sets out in line with Regulation 22 (1) (c) v and vi representations made pursuant to Regulation 20 and a summary of the main issues raised in those representations.</p>
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence?</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</li> </ul>	<p>The Local Plan is based on a credible and robust comprehensive evidence base. There are numerous pieces of evidence that support the different</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<p>were produced by.</p> <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>elements of the Plan that have been prepared and updated as necessary to support emerging policies. The evidence base and Sustainability Appraisal have been prepared jointly between the Council and consultants.</p> <p>The Council has produced a list of Core Documents and Supporting Documents to support the Local Plan Submission, which is available on the Council's Local Plan Submission webpage; the Supporting documents underpinning the policies are listed by plan section for clarity.</p> <p><a href="http://www.york.gov.uk/localplansubmission">www.york.gov.uk/localplansubmission</a></p> <p>Within the plan, Section 1: Background draws upon evidence and statistics to provide the context to York. References to research, legislation and evidence base used to inform policy is, as far as possible, referenced throughout the plan and set out within the Bibliography.</p> <p>In addition, the Sustainability Appraisal (2018) [CD008 and CD009 A-D] draws upon the local evidence base and local, regional and national plans/programmes from a variety of sources to inform the sustainability issues and SA baseline. This has helped to identify the objectives taken forward in the SA Framework against which all policies, site allocations and their alternatives have been appraised.</p>
<p><i>Alternatives</i> Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been</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</li> </ul>	<p>The rationale behind the Council's identification of the preferred approach and alternative considered has been set out throughout plan production. The Sustainability Appraisal process has documented</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<p>include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</p> <ul style="list-style-type: none"> <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>the consideration of alternatives throughout to feed into decision-making with an SA presented as all consultation stages.</p> <p>Documents and stages of consultation include:</p> <ul style="list-style-type: none"> <li>• Site Selection Paper (2013) SD072 A and B/ Preferred Options Consultation (2013) [SD005 and SD006]</li> <li>• Further sites consultation (2014)[SD015 A and B and SD016]</li> <li>• Site Selection Paper Addendum (2014) [SD073]</li> <li>• Preferred Sites Consultation (2016) [SD018 and SD019] / Employment Land Review (2016) [SD064]</li> <li>• Strategic Housing Land Availability Assessment (2017) [SD053] / Employment Land Review Update (2017) [SD063] / Gypsy and Traveller Accommodation Assessment Update (2017)SD060 / Pre Publication (Reg 18) consultation (2017)[ SD021 and SD022 A-C]</li> <li>• SHLAA (2018) [SD049].</li> <li>• The Preferred Options Local Plan (2013) [SD005] included the alternative policy approaches to each policy within the main document for consultation with the public. The Sustainability Appraisal process at this stage appraised the preferred option alongside the alternative policy options (in Appendix 6) as well as all alternative sites considered (in Appendix 9) in the site selection process. [SD007])</li> <li>• The Further Sites Consultation (2014) [SD015 A and B and SD016] and Preferred Sites Consultation (2016) [SD018 and SD019] were focussed on updated evidence in relation</li> </ul>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>housing and employment growth options and the portfolio of potential sites for allocation. These documents set out the technical rationale for the growth targets and inclusion or rejection of sites as potential allocations.</p> <p>The SA for the Publication draft Local Plan (2018) [CD008 and CD009 A-D] presents a comprehensive audit trail in the following ways:</p> <ul style="list-style-type: none"> <li>• Section 2 of the main report summarises the development of the Local Plan between Issues and Options (2006) [SD002A] and Pre Publication stage (2017) [SD021 and SD022 A-C]. This section sets out in detail the options for the spatial strategy, housing and employment growth as well as the justification of options selected. It also summarises the site selection process and growth options.</li> <li>• Appendix H sets out the appraisal of all site allocations and alternative sites against the SA framework</li> <li>• Appendix I sets out a detailed appraisal of all strategic sites and alternatives strategic sites identified.</li> <li>• Appendix K sets out the Policy and site audit trail between Issues and Options (2006) to Pre Publication consultation (Reg 18) consultation (2017). This is split into 3 parts: Policies audit trail; strategic sites audit trail an general sites audit trail. For clarity, the policies audit trail references the applicable national policy and evidence base, SA commentary, summary of the consultation responses received and the</li> </ul>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>reasons for any changes. The sites appraisal references applicable site selection documents and stages of consultation.</p> <p>Elected Members at Executive have also made decisions influencing the contents of the plan:</p> <ul style="list-style-type: none"> <li>• Executive 26<sup>th</sup> January 2017 [SD026] – Decision made to consider MOD sites as potential site allocations.</li> <li>• Executive 13<sup>th</sup> July 2017 [SD027 B and C] – Officer report and Annexes 3 and 4 set out Officers analysis and recommendations in relation to housing /employment growth and the portfolio of site allocations as a result of the Preferred Sites Consultation and updated evidence base. The minutes to this meeting document Members decision, including to proceed with 867 dwellings per annum as a housing target.</li> <li>• Executive 25<sup>th</sup> January 2018 [SD028 B and C] – Officer report and Annex A set out Officers analysis and recommendations in relation to policy changes and site allocations as a result of Pre Publication consultation. Minutes to this meeting document Members decision.</li> </ul> <p>Each of the consultation statements also summarise the main issues raised and how these were taken into account.</p>
<p><b>Effective:</b> the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</p>		



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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>The Local Plan will be used to manage development through the determination of planning applications, making it clear where development is acceptable and to help provide certainty for the local community that the development is co-ordinated. Consequently, York's Local Plan is intended to provide overarching strategic policies, detailed policies for the purposes of Development Management and site allocations to meet growth needs. The vision and themes of the plan are therefore structured as follows:</p> <p><i>Spatial Portrait, Vision and Development Principles</i></p> <p>York's Local Plan vision and development principles is based on a sound understanding of York's unique character and local planning issues and challenges it faces as well as responding to the strategic framework for York, including the presumption in favour of sustainable development.</p> <p><i>Spatial Strategy</i></p> <p>The spatial strategy sets out the general spatial</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>principals that will underpin the distribution of future development in York. It considers a range of issues which will influence the spatial strategy and includes a section on York City Centre, York Central, Castle Gateway and the strategic sites (those that are 5 hectares (5ha) or more). It provides a spatial expression of the priorities of the Council and its partners.</p> <p><i>P o l i c i e s</i></p> <p>These are included in the sections below which are grouped under the relevant headings from the vision and reflect the themes of the Council Plan for York:</p> <ol style="list-style-type: none"> <li>1. Create a Prosperous City for All <ul style="list-style-type: none"> <li>- Section Economy and Retail</li> </ul> </li> <li>2. Provide Good Quality Homes and Opportunities <ul style="list-style-type: none"> <li>- Housing</li> <li>- Health and Wellbeing</li> <li>- Education</li> </ul> </li> <li>3. Protect the Environment <ul style="list-style-type: none"> <li><i>Built Environment</i> <ul style="list-style-type: none"> <li>- Placemaking, Heritage, Design and Culture</li> </ul> </li> <li><i>Natural Environment</i> <ul style="list-style-type: none"> <li>- Green Infrastructure</li> <li>- Managing Appropriate Development in the Green Belt</li> </ul> </li> <li><i>Natural Resources and Environmental Protection</i> <ul style="list-style-type: none"> <li>- Climate Change</li> <li>- Environmental Quality and Flood Risk</li> <li>- Waste and Minerals</li> </ul> </li> </ul> </li> </ol>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>4. Ensure Efficient and Affordable Transport Links - Transport and Communications</p> <p>The Plan’s vision and policies are appraised in the Sustainability Appraisal (2018) [CD008 and CD009] A-D. The main report summarises the outcomes (section 6) with the detailed appraisal set out in Appendices E, F and J. Specifically, Section 6.2: Vision and Outcomes Appraisal identifies that the vision and outcomes are compatible with the majority of SA objectives and none of the plan outcomes are assessed as being incompatible with the SA objectives. However, it does identify that where the plan aims to deliver growth, there may be potential for conflicts between those parts of the vision that support economic growth and social objectives and those that relate to the conservation and enhancement of the City’s built and natural environment; this is likely to depend on how the vision is realised through the draft Local Plan policies.</p> <p>To aid clarity regarding delivery, a ‘Delivery’ section against each policy is provided in the Plan to indicate who the key delivery partners are and how the policy will be implemented. In addition Section 15 of the plan: Delivery and Monitoring sets out in more detail the delivery of the Local Plan, partners and provision of essential infrastructure. Referenced in this section and included as a supporting document is the Infrastructure Delivery Plan (IDP) [SD128], which sets out in detail the required infrastructure and likely costs of implementation across the plan period. The IDP includes commentary on all social, transport, utility and</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>communications infrastructure and has been developed in conjunction with partners to ensure this reflects accurate assumptions.</p> <p>Indicative phasing and delivery of housing allocations is set out in Policy H1: Housing Allocations. More detail regarding the Housing Trajectory is set out within Section 4 of the Strategic Housing Land Availability Assessment (2018) [SD049].</p> <p>Policies T2, T4 and T5 within Section 14: Transport and communications of the Plan set out the indicative timescales for the delivery of key transport infrastructure.</p> <p>Section 15: Delivery and Monitoring sets out the monitoring strategy for the plan. Specifically Table 15.2 sets out the indicators for each policy showing how progress against the objectives and targets will be measured. It is intended that these targets and indicators form the basis of future Authority Monitoring Reports.</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> </ul>	<p>The main infrastructure requirements (primarily transport) are set out in the Local Plan Policy T2 (Strategic Public Transport Improvements), Policy T4 (Strategic Highway Network Capacity Improvements) and Policy T5 (Strategic Cycle and Pedestrian Network Links and Improvements).</p> <p>The City of York Local Plan Infrastructure Delivery Plan (IDP)[SD128] has been prepared to support the Local Plan Submission Draft. It helps to demonstrate that the Local Plan is deliverable, by showing that</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</li> </ul>	<p>the physical, social and green infrastructure essential to achieving the strategy can be provided and that potential risks to delivery have been considered, with contingencies identified. The IDP defines the strategic infrastructure types that are important in York and outlines the timescales and funding sources for provision as well as who will be responsible for delivery.</p> <p>The Infrastructure Delivery Schedule at Table 5.1 within the IDP summarises the findings of the IDP, setting out the infrastructure needs and schemes that have been identified for delivering the Local Plan. For a range of types of infrastructure, this work has found that accommodating the additional development proposed is expected to give rise to</p> <ul style="list-style-type: none"> <li>strategic infrastructure requirements - primarily for transport, but also for health and community facilities;</li> <li>other infrastructure at the community /neighbourhood level - principally transport and education, and</li> <li>infrastructure for accessing a development or mitigating its direct impacts – principally transport and education.</li> </ul> <p>Table 5.1 Identifies the Infrastructure components together with their estimated costs, broad delivery timescales (short, medium or long-term 5-year blocks) who is responsible for their delivery and funding, and policy references.</p> <p>The IDP also shows the infrastructure delivery profile against the housing trajectory to explore,</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>resolve and demonstrate the relationship between infrastructure needed to make development work and the rate of delivery of the development that pays (in part) for the infrastructure through developer contributions</p>
<p><i>Co-ordinated Planning</i> 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>The Regulation 22 Statement [CD013A-W] which summarises the responses to the Publication Consultation indicates where there has been support for the approach taken in the Local Plan.</p> <p>This is also set out in the Duty to Co-operate Statement (2018) [CD020]. This statement contains the two regional bodies endorsement of the approach taken by City of York Council.</p> <p>A comprehensive Duty to Cooperate Statement has been produced and sets out how we have met the Duty to Co-operate (CD020).</p> <p>As it has developed the Local Plan has been subject to on-going and constructive engagement with neighbouring authorities and relevant organisations. This has included:</p> <ul style="list-style-type: none"> <li>• the preparation and updating of a Duty to Cooperate Matrix (that has been generally circulated to the officer level groups for subsequent discussion and comment);</li> <li>• regular one-to-one officer meetings;</li> <li>• making representations, as appropriate, to</li> </ul>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>other authorities Local Plan documents, and vice versa; and</p> <ul style="list-style-type: none"> <li>regular technical discussions at sub-regional Member and officer groups.</li> </ul> <p>Through the meetings highlighted Officers have sought to gauge the appetite of neighbouring authorities for a sub-regional approach to delivering housing within the context of the Duty to Cooperate. Whilst this was not supported for the current round of Local Plans there may be some support to consider this in the future.</p> <p>The Duty requires active and constructive ongoing engagement which is expected to continue up to the point of submission. Details on how the Council has fulfilled the requirements under the Duty were included in the 'Demonstrating the Duty to co-operate (Interim Statement), September 2017' [CD024] published to support the Regulation 18 Pre-Publication Draft Consultation.</p> <p>Both the Leeds City Region Planning Portfolios Board and the North Yorkshire and York Spatial Planning and Transport Board (SP&amp;T Board) endorsed the approach taken by City of York Council</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>in meeting the requirements of the Duty to co-operate in the plan making process.</p> <p>The City of York Duty to co-operate Statement CDO20 has been updated since previous consultation to reflect the process of continuous engagement. This statement contains the two regional bodies endorsement of the approach taken by City of York Council.</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, circumstances?</li> <li>• Does the DPD include the remedial actions that will be taken if the policies need adjustment?</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 sustainability appraisal report describing how the council will monitor:               <ul 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> </ul> </li> <li>• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> <li>• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and</li> </ul>	<p>Section 15 of the Plan (Delivery and Monitoring) identifies the remedial actions which may be taken if the policies require adjustment. The Council will produce an authority monitoring report annually to assess the effectiveness of the policies and to identify when adjustment may be needed in the future.</p> <p>Table 15.2 of the Plan outlines the monitoring indicators for each policy showing how progress against the objectives and targets will be measured. Each of the policies within the Plan sets out key delivery partners and how it will be implemented.</p> <p>Key risks and contingencies are identified in section 15 of the Plan, these key risks are identified as:</p> <ul style="list-style-type: none"> <li>• Non-delivery of key development sites –;</li> <li>• Lack of sufficient funding;</li> <li>• Non-delivery of essential infrastructure;</li> </ul>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>how that would impact on other aspects of the strategy and on infrastructure provision</p> <ul style="list-style-type: none"> <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>and</p> <ul style="list-style-type: none"> <li>Delays in production of supporting planning documents.</li> </ul> <p>In response to the potential non-delivery of sites the Plan sets out that further engagement with landowners and developers will be undertaken to identify why a particular site is not coming forward and to develop ways to overcome this, working with partners to consider further measures to make sites more attractive to investors and to review alternative funding sources.</p> <p>The detailed housing supply trajectory included within the Strategic Housing Land Availability Assessment (SHLAA, 2017) [SD053] includes measures to increase the flexibility in supply such as including a 10% non-implementation discount to housing allocations and existing permissions.</p> <p>To fulfil the requirements of NPPF and to provide additional certainty the Plan seeks to allocate sufficient land for the full plan period, including the greenbelt period to 2037/38 to meet the minimum housing requirement as set out in policy SS1 of 867 dwellings per year. The Plan identifies sufficient land to meet development needs to 2038, including allowing for some flexibility in delivery and seeks to establish a green belt boundary enduring for at least 20 years.</p> <p>Sufficient land has also been included in the early years of the trajectory to ensure there is a 20% buffer in the five year supply. Progress on meeting these delivery targets will be assessed through the authority monitoring report and the 20% buffer will</p>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		be rolled forward within the 5 year supply until such time as the under delivery has been satisfactorily addressed.
<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 City of York Local Plan Submission Draft, April 2018 Statement to demonstrate compliance with the Duty to co-operate [CD020] has been prepared to support the Local Plan Submission Draft. This statement sets out the current situation with respect to ongoing engagement that has taken place in accordance with the Duty to co-operate throughout the preparation of the York Local Plan and an explanation of how that co-operation has influenced the plan, leading to positive outcomes and providing the foundation for proving that the relevant cross-boundary issues have been identified and addressed within the Local Plan, in line with the National Planning Policy Framework.</p> <p>More specifically, the statement</p> <ul style="list-style-type: none"> <li>• Identifies the geographic extent for co-operation</li> <li>• Identifies the functional extent for co-operation</li> <li>• Identifies the thematic extent for co-operation</li> <li>• Identifies those elements that can be eliminated from the Duty to co-operate</li> <li>• Identifies those strategic matters that require co-operation</li> <li>• Sets out the case for not producing a joint plan (or plans)</li> <li>• Provides a comprehensive record of the formal and informal consultations that have taken place during the preparation of the plan.</li> </ul>

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> <li>• Demonstrates resultant positive outcomes</li> </ul> <p>The Leeds City Region Planning Portfolios Board and the North Yorkshire and York Spatial Planning and Transport Board as member level boards in the two sub-regional areas in which the City of York is a constituent authority have both endorsed the approach taken by City of York Council in meeting the requirements of the Duty to co-operate in the plan making process</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>Section 15: Delivery and Monitoring sets out the monitoring strategy for the plan. Specifically Table 15.2 sets out the indicators for each policy showing how progress against the objectives and targets will be measured. A link between the indicators and Sustainability Appraisal Objectives is also made for clarity. It is intended that these targets and indicators form the basis of future Authority Monitoring Reports.</p> <p>Section 7.2 of the Sustainability Appraisal (2018) [CD008 and CD009 A-D] sets out the requirement to monitor the significant sustainability effects of implementing the plan. Appendix L identified a number of potential indicators that could be used for monitoring the sustainability impacts, the majority of which overlap with the monitoring indicators sets out in Section 15 of the Plan.</p>
<p><b><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies</i></b></p>		

# Soundness Self-Assessment Checklist (May 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<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>It is not considered that the Local Plan contains policies which are not consistent with national policy. The policies set out within the Local Plan are considered justified to aid the implementation of national policies at a local level.</p> <p>The plan has been developed to work in parallel with national policy and can readily respond to changes.</p>

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## Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

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Policy Expectations	Possible Evidence	Evidence Provided
<b>Policy A: Using evidence to plan positively and manage development (para 6)</b>		
Early and effective community engagement with both settled and traveller communities.	<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>	We have engaged with the traveller community during Local Plan preparation including regular meetings with the York Traveller Trust
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>	The publication of the government's revised version of Planning Policy for Traveller Sites (PPTS) in August 2015 (SD036), included a change to the definition of Travellers for planning purposes. The key change to this national policy was the removal of the term <i>persons...who have ceased to travel permanently</i> , meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a Gypsy and Traveller Accommodation Assessment (GTAA). Those households who do not meet the updated planning definition will form a

# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
		<p>subset of the wider housing need.</p> <p>In light of this change in national planning policy, the Council commissioned consultants ORS to undertake an update of the 2014 GTAA.</p> <p>The Gypsy and Traveller Accommodation Assessment Update (2017) SD059 was published as part of the Regulation 18 Pre Publication Draft Consultation in September 2017.</p> <p>Necessary revisions to the policy approach to gypsy and travellers in the local plan have been made to reflect the updated evidence base.</p> <p>The Duty to Co-operate Statement sets out how we have worked with neighbouring authorities.</p>

# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
<p><b>Policy B: Planning for traveller sites (paras 7-11)</b></p>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> <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>	<p>Table 5.3 of the Publication Draft Local Plan (page 109) CD001 is taken from the City of York Gypsy and Travellers Accommodation Assessment Update (2017) SD059 and summarises the number of households in York which do and do not meet the revised definition for travellers as per the Planning Policy for Travellers (2015) SD036.</p> <p>There are 3 households identified that meet the planning definition (including 10% of unknown need) and a further 44 that do not meet the planning definition (including 90% of unknown need).</p> <p>The proposed policy approach to address the needs of Gypsies, Travellers and Showpeople (Policies H5 and H6 of the Plan) is split into different parts. The first part states that the existing sites will be safeguarded unless it can be demonstrated that</p>



# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
		<p>they are no longer needed or that alternative provision is to be provided elsewhere. The second part sets out the approach for those households who have been identified in the GTAA Update as meeting the definition. The draft local plan policy states that the Council will identify additional site provision within the existing Local Authority sites. The third part addresses the needs of those households who do not meet the planning definition. The proposed approach is to meet the need either as a part of strategic site provision, through the provision of alternative land that meets the criteria set out in part (c) of the policy or through commuted sum payments arising from such development to contribute towards development of pitches elsewhere.</p> <p>The policy includes a hierarchy for the calculation of pitch requirements based on the number of dwellings on the strategic sites ranging from 2</p>

# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
		pitches on sites of between 100-499 dwellings to 6 pitches on sites of 2000 or more dwellings.
<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>This has been taken into account through the site selection process for the strategic housing sites allocated which will need to provide for those gypsy and travellers who do not meet the planning definition either on site, on an alternative site which meets the criteria set out within part c of policy H5 or through commuted sum payment.</p> <p>Site assessments for sites previously identified as potential sites for gypsy and traveller and travelling showpeople in earlier drafts of the Local Plan which were subsequently removed are detailed in the Gypsy, Roma Traveller and Travelling Showpeople Site Identification Study (2014) SD060</p>

# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
		<p>The remaining showpeople site allocation – Site SP1 The Stable, Elvington is allocated for 3 further plots over the plan period to cater for the future expansion of the existing family.</p> <p>The site assessment for this site is set out in the Gypsy, Roma Traveller and Travelling Showpeople Site Identification Study (2014) SD060 and through the Site Selection process specifically in the Further Sites Consultation (2014) (SD015 A and B) and the Preferred Sites Consultation (2016) SD018.</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>No rural exception sites proposed.</p>
<p><b>Policy E: Traveller sites in Green Belt (paras 14-15)</b></p>		

# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<ul style="list-style-type: none"> <li>Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.</li> </ul>	<p>The showpeople site allocation – Site SP1 The Stable, Elvington is allocated for 3 further plots over the plan period to cater for the future expansion of the existing family.</p> <p>Whilst the site was identified in the Regional Spatial Strategy (RSS) saved policies CD021 as within the general extent of York’s greenbelt the site is not included within the proposed defined Greenbelt as depicted on the Policies Map.</p> <p>Site assessments for sites previously identified as potential sites for gypsy and traveller and travelling showpeople in earlier drafts of the Local Plan which were subsequently removed are detailed in the Gypsy, Roma Traveller and Travelling Showpeople Site Identification Study (2014) SD060</p> <p>The site assessment for this site is set out in the Gypsy, Roma Traveller and Travelling Showpeople Site Identification</p>

# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
		Study (2014) and through the Site Selection process specifically in the Further Sites Consultation (2014) (SD015A and B) and the Preferred Sites Consultation (2016) SD018.
<b>Policy F: Mixed planning use traveller sites (paras 16-18)</b>		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	<ul style="list-style-type: none"> <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>	Site assessments for sites previously identified as potential sites for gypsy and traveller and travelling showpeople in earlier drafts of the Local Plan which were subsequently removed are detailed in the Gypsy, Roma Traveller and Travelling Showpeople Site Identification Study (2014) SD060
<b>Policy G: Major development projects (para 19)</b>		
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	<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>	N/A

# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
or temporary relocation of a traveller site.		

## 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

# Soundness Self-Assessment Checklist (May 2018)

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'.

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>2</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>3</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

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<sup>2</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>3</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 (May 2018)

- 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.



# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
<b>Key requirements under the Duty to Co-Operate</b>		
<p>Consistency between marine and terrestrial policy documents and guidance</p>	<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>York is an overlapping authority for the North East Inshore Marine area with approximately 1km within our administrative boundary on the River Ouse between Naburn Lock and the outer boundary of the City of York Local Authority boundary.</p> <p>The emerging policies for this marine area as set out in the UK Marine Policy Statement (2011) and the emerging Marine Plan for the North East Inshore Area are in general conformity with policies in the York Plan. In addition we have considered the functional links and effects on the River Humber as part of the Habitats Regulation Assessment.</p> <p>All issues in relation to the River Humber have been screened out as part of the HRA including:</p> <ul style="list-style-type: none"> <li>• Mobile species (breeding and non-breeding birds, grey seals and lamprey and bullhead populations; and</li> </ul>

# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> <li>• Recreation.</li> </ul> Please refer to the Habitat Regulation Assessment (2018) CD012 for further details.
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 cycle</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	N/A See above
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>	N/A See above
<b>Marine Policy Statement- Chapter 2: General Principles for Decision-Making<sup>4</sup></b>		

<sup>4</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 (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
<b>Sections 2.1 -2.2: The UK vision for the marine environment</b>		
<p>The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')</p> <p>Achieving the vision through marine planning</p>	<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 supporting text</li> </ul>	N/A See above
<b>Section 2.4: Considering benefits and adverse effects in marine planning</b>		
Consider benefits and adverse effects of plan policies	<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>	N/A See above
<b>Section 2.5: Economic, social and environmental considerations</b>	<ul style="list-style-type: none"> <li>•</li> </ul>	
Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water Framework Directive)	<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>	N/A See above
<b>Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities</b>		
<b>3.1 Marine Protected Areas</b>		

# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
<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>N/A See above</p>
<p><b>3.4 Ports and shipping</b></p>		
<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>N/A See above</p>
<p><b>3.8 Fisheries</b></p>		
<p>Consider potential economic, social and environmental impacts of other developments on fishing activity</p>	<ul style="list-style-type: none"> <li>• Where relevant, evidence that other policies minimise negative impacts on fishing activity and/or aquaculture</li> </ul>	<p>N/A See above</p>
<p><b>3.9 Aquaculture</b></p>		
<p>Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries</p>	<ul style="list-style-type: none"> <li>• Where relevant, evidence that the benefits of aquaculture industry development have been considered</li> </ul>	<p>N/A See above</p>

# Soundness Self-Assessment Checklist (May 2018)

Policy Expectations	Possible Evidence	Evidence Provided
<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>	
<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>	

## Appendix One

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

Adur  
Allerdale  
Arun  
Babergh  
Barking and Dagenham

Barrow-in-Furness  
Basildon  
Bassetlaw  
Bexley  
Blackpool

Boston  
Bournemouth  
Broadland  
Broads Authority  
Canterbury

Carlisle  
Castle Point  
Chelmsford  
Cheshire West and Chester  
Chichester

# Soundness Self-Assessment Checklist (May 2018)

Chorley	Halton	North Tyneside	Teignbridge
Christchurch	Hambleton	North York Moors National	Tending
City of London	Hammersmith and Fulham	Park	Test Valley
City of Brighton and Hove	Hartlepool	Northumberland	Thanet
City of Bristol	Hastings	Norwich	Thurrock
City of Kingston upon Hull	Havant	Poole	Tonbridge and Malling
City of Peterborough	Havering	Preston	Torbay
City of Plymouth	Horsham	Purbeck	Torrige
City of Portsmouth	Hounslow	Redcar and Cleveland	Tower Hamlets
City of Southampton	Huntingdonshire	Richmond upon Thames	Wandsworth
City of Westminster	Ipswich	Rochford	Warrington
Colchester	Isle of Wight	Rother	Waveney
Copeland	Isles of Scilly	Scarborough	Wealden
Cornwall	Kensington and Chelsea	Sedgemoor	West Devon
County Durham	King's Lynn and West Norfolk	Sefton	West Dorset
Dartford	Lake District National Park	Selby	West Lancashire
Doncaster	Lambeth	Shepway	West Lindsey
Dover	Lancaster	South Cambridgeshire	West Somerset
East Cambridgeshire	Lewes	South Downs National Park	Weymouth and Portland
East Devon	Lewisham	South Gloucestershire	Winchester
East Lindsey	Liverpool	South Hams	Wirral
East Riding of Yorkshire	Maidstone	South Holland	Worthing
Eastbourne	Maldon	South Lakeland	Wyre
Eastleigh	Medway	South Norfolk	York
Exeter	Middlesbrough	South Ribble	
Exmoor National Park	New Forest	South Somerset	
Fareham	New Forest National Park	South Tyneside	
Fenland	Newark and Sherwood	Southend-on-Sea	
Fylde	Newcastle upon Tyne	Southwark	
Gateshead	Newham	Stockton-on-Tees	
Gloucester	North Devon	Stroud	
Gosport	North East Lincolnshire	Suffolk Coastal	
Gravesham	North Lincolnshire	Sunderland	
Great Yarmouth	North Norfolk	Swale	
Greenwich	North Somerset	Taunton Deane	