



Forest Heath

District Council

Forest Heath District Council

**Single Issue Review (SIR) of Core Strategy Policy
CS7 Overall Housing Provision and Distribution**

**PAS Local Plan Legal Compliance and Soundness
Self-Assessment Checklists
(March 2017)**

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1. Local Plan Legal Compliance Checklist

This checklist has been updated for PAS by SNR Denton. It supersedes the previous checklist and is based on **Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012**. It should be used with the Soundness Self Assessment Checklist (also updated January 2013).

Remember that the evidence you provide to support your plan should be relevant and proportionate. Please don't use this checklist as a reason to assemble more than is needed.

Glossary:

"Act" means the **Planning and Compulsory Purchase Act 2004 (as amended)**

"NPPF" means the **National Planning Policy Framework** published March 2012

"Regulations" means the **Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012**

LDS means **Local Development Scheme**

SCI means **Statement of Community Involvement**

DPD means **Development Plan Document**

1.1 Stage one: The early stages

Where the 'possible evidence' column refers to a document that will not be complete until a later stage (for example, the sustainability appraisal report), documents that will contribute to that report are relevant at the earlier stages. This way, the submitted report provides the evidence at submission, with an audit trail back to its source.

In terms of legal compliance, the main issues for the early stage are in relation to:

- planning for community engagement
- planning the sustainability appraisal (including consultation with the statutory environment consultation bodies)
- identifying significant cross boundary and inter-authority issues
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

Regulation 17 notes that a statement setting out which bodies and people the council invited to make representations under Regulation 18 is one of the proposed submission documents. In this tool, the term 'consultation statement' is used to describe this statement.

Section 33A of the Act (introduced by the Localism Act 2011) introduces a duty to cooperate as a mechanism to ensure that local planning authorities and other bodies engage with each other on issues which are likely to have a significant effect on more than one planning area. This pervades every stage of the plan preparation. A plan may be found unsound if a council cannot show that it has taken reasonable steps to comply with the duty.

Stage one: The beginning

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
1. Is the DPD identified in the adopted LDS? Have you recorded the timetable for its production?	The Act section 15(2) and section 19(1)	NPPF para 153		The SIR timetable is identified in the FHDC Local Development Scheme (LDS) 2016-2017 November 2016 update. Previous consultation stages were undertaken in line with previous iterations of the LDS, including the Forest Heath District Council and St Edmundsbury Borough Council Joint Local Development Scheme June 2016.
2. How will community engagement be programmed into the preparation of the DPD?	The Act section 19(3) Regulation 18	NPPF paras 150, 155 and 157	If the SCI is up-to-date, use that. If not set out any changes to community engagement as a result of changes in legislation.	Public consultation on the SIR has been carried out in accordance with the Forest Heath District Council & St Edmundsbury Borough Council Statement of Community Involvement (SCI) Adopted - February 2014. This document sets out the intention to produce the SIR document, identifies public consultation as part of the procedure for producing the Local Plan and Sustainability Appraisal documents, and sets out the methods for community engagement.
3. Have you considered the appropriate bodies you should consult?	Regulation 18	NPPF paras 4.25 - 4.26	Regulation 2 defines the general and specific consultation bodies. The possible evidence may duplicate each other.	The Forest Heath District Council & St Edmundsbury Borough Council Statement of Community Involvement (SCI) Adopted - February 2014, identifies that the

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
			Only use what you need to.	Council will try to engage with all statutory consultees, Parish and Town Councils and neighbouring Parish Town Councils where appropriate, Suffolk County Council and neighbouring District / County Councils where appropriate, local bodies and organisations, and individuals and organisations who have expressed an interest in or a willingness to be involved in the plan-making process (such as interested members of the public, landowners and developers). A list of the statutory consultees engaged is included within the Statement of Consultation Regulation 22 (March 2017), and the previous Statement of Consultation Regulation 19 (January 2017) in Annex A.
4. How you will co-operate with other local planning authorities, including counties, and prescribed bodies, to identify and address any issues or strategic priorities that will have a significant impact on at least two planning areas?	The Act section 33A(1)(a) and (b), section 33A(3)(d) (e) & (4) The Act Section 20(5)(c) Regulation 4	NPPF paras 178 to 181 (which comprise the guidance referred to in the Act section 33A(7)) Under NPPF Para 182, to be 'Effective' a plan should be based on effective joint working on	Section 33A(4) defines a "strategic matter". Under section 33A(6) the required engagement includes considering joint approaches to the plan making activities (including the preparatory activities) and considering whether to agree joint local development documents under section	The Duty to Cooperate Report – (March 2017) summarises how the duty has been fulfilled with a range of consultees including district and county councils and Statutory Consultees. Additionally, the numerous stages of public consultation represented an opportunity for engagement with such prescribed bodies under the duty to cooperate.

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
		cross-boundary strategic priorities. Strategic priorities are listed at NPPF Para 156	28. The bodies prescribed by section 33A(1)(c) are set out at Regulation 4(1).	
5. How you will co-operate with any local enterprise partnerships (LEP) or local nature partnerships (LNP) to identify and address any issues or strategic priorities that will have a significant impact on at least two planning areas?	The Act section 33A(1)(c) and section 33A(9), section 33A(3)(d) and (e) The Act section 20(5)(c). Regulation 4	NPPF paras 178 to 181	Section 33A(4) defines a "strategic matter". Strategic priorities are listed at NPPF Para 156. Regulation 4(2) prescribes LEPs and LNPs for the purposes of section 33A(9). Under section 33A(6) the required engagement includes consulting on joint approaches to relevant activities.	The Duty to Cooperate Report – (March 2017) summarises contact made with the LEP and LNPs as outlined where relevant. Additionally, the numerous stages of public consultation represented an opportunity for engagement with such prescribed bodies, which were dutifully notified of such consultation periods in accordance with the SCI.
6. Is baseline information being collected and evidence being gathered to keep the matters which affect the development of the area under review?	The Act section 13	NPPF paras 158 - 177		The Forest Heath District Council Local Plan Monitoring Report (2013/14 & 2014/2015) - April 2016 sets out the extent to which existing planning objectives are achieved, and provides evidence to support the development of new policy approaches in the district. In addition, the following specific evidence base reports have been undertaken:

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				<ul style="list-style-type: none"> • Sustainability Appraisal of the SIR (AECOM) • Habitats Regulations Assessment of the SIR 2017 (LUC) • Forest Heath Single Issue Review of CS7 and Site Allocations Local Plan – Air Quality Assessment regarding Breckland Special Area of Conservation (SAC) and Breckland Special Protection Area (SPA) (February 2017) • Forest Heath District Council Local Plan Monitoring Report for 2013/14 and 2014/15 – 2016 (FHDC) • Forest Heath draft Infrastructure Delivery Plan (supporting the SIR of Core Strategy Policy CS7 and Site Allocations Local Plan) – 2017 (FHDC) • Forest Heath Five Year Housing Land Supply – 2016 (FHDC) • Cambridgeshire (excluding Fenland), Kings Lynn & West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Needs Assessment (GTANA) – 2016 (Opinion Research

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				Services) <ul style="list-style-type: none"> • Settlement Boundary Review – 2017 (FHDC) • SHLAA – 2016 (FHDC) • Market Signals and OAHN report – 2016 (Peter Brett Associates) • OAHN and update report – 2016 (Cambridgeshire County Council Research Group) • Landscape and Heritage Study – 2017 (FHDC) • Accessible Natural greenspace Study – 2017 (FHDC) • Review of Core Strategy CS2 Nesting Attempts Buffer – 2016 (Footprint Ecology) • Wildlife Audits (for Brandon, Mildenhall, Newmarket, Lakenheath, Red Lodge, Beck Row, Exning, Kentford and West Row) – 2015 (Suffolk Wildlife Trust) • FH Water Cycle Study – 2016, and Hatchfield Farm Impact Addendum – 2016 (Arcadis) • Deliverability of SIR Housing Numbers in relation to the Natura 2000 Constraint

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				<p>Buffers – 2016 (FHDC)</p> <ul style="list-style-type: none"> • FH Economic Viability Assessment – 2016 (Three Dragons and Troy Planning & Design) • Forest Heath Employment Land Review – 2016 (Nathanial Lichfield & Partners) • West Suffolk Retail & Leisure Study 2016: Forest Heath – 2016 (Carter Jonas) • Forest Heath Transport Technical Note Update – 2016 (AECOM) • A11 Growth Corridor – Feasibility Study: Delivering the Economic Growth / Potential of the A11 Corridor – Executive Summary (Bruton Knowles) • Economic Impact of the Horse Racing Industry in Newmarket – 2014 (SQW) • Local, national and international impacts of the Horseracing Industry in Newmarket - 2015 (Deloitte)
7. Is baseline information being collected and evidence being gathered to set the framework for the sustainability	The Act section19(5)	NPPF paras 165 and 167 Strategic		The production of a Sustainability Appraisal for the SIR provides evidence that the SA and Plan making processes have been iterative, with SAs available to

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
appraisal?		Environmental Assessment Guide, chapter 5		<p>accompany and inform the consultation for each stage of the SIR.</p> <p>The SA Scoping Report was subject to consultation in accordance with the SEA Regulations and was titled:</p> <ul style="list-style-type: none"> • Sustainability Appraisal Scoping Report – 2015 (Johns Associates in partnership with Levett-Therivel) <p>The following SA Reports were undertaken and published for consultation regarding the Forest Heath SIR:</p> <ul style="list-style-type: none"> • Initial Sustainability Appraisal of the Single Issue Review of Core Strategy Policy CS7 Issues and Options stage, (Reg. 18) Forest Heath District Council Local Plan - July 2012 • Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review Interim SA Report – August 2015 • Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review Interim SA Report –

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				<p>April 2016</p> <ul style="list-style-type: none"> Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review SA Report – January 2017 <p>In addition to the above iterations of the SIR SA, the following was also consulted upon:</p> <ul style="list-style-type: none"> Sustainability Appraisal (SA) of 1) the Core Strategy Single Issue Review; and 2) the Site Allocations Local Plan Non-technical Summary of two SA Reports - January 2017
<p>8. Have you consulted the statutory environment consultation bodies for five weeks on the scope and level of detail of the environmental information to be included in the sustainability appraisal report?</p>	<p>Regulations 9 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633.</p>	<p>NPPF paras 165 and 167 SEA Guide chapter 3</p>	<p>The Strategic Environmental Assessment consultation bodies are also amongst the 'specific consultation bodies' which are defined in Regulation 2).</p>	<p>A 'Sustainability Appraisal Scoping Report' prepared for Forest Heath District Council, undertaken by consultants Johns Associates in partnership with Levett-Therivel, was consulted on for 5 weeks with the Statutory Consultees from 5th March to 10th April 2015. The final version of the Scoping Report, dated June 2015, includes a Section (7) entitled 'Consultation of this Document' which outlines actions suggested by Consultees and responses / subsequent actions taken in finalising the Scoping Report.</p>

1.2 Stage two: Plan preparation - frontloading phase

Information assembled during this phase contributes to:

- showing that the procedures have been complied with
- demonstrating cooperation with statutory cooperation bodies
- developing alternatives and options and appraising them through sustainability appraisal and against evidence.

The council should record actions taken during this phase as they will be needed to show that the plan meets the legal requirements. They will also show that a realistic and reasonable approach has been taken to plan preparation.

Stage two: Plan preparation

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
<p>1. Have you notified:</p> <ul style="list-style-type: none"> • the specific consultation bodies? • the general consultation bodies that have an interest in the subject of the DPD and invited them to make representations about its contents? 	<p>Regulation 18(1) and (2)(a) (b)</p>	<p>NPPF paras 159 – 173</p>	<p>Specific and general consultation bodies are defined in Regulation 2.</p>	<p>The Statement of Consultation Regulation 22 (March 2017) summarises those representations relevant to the Proposed Submission SIR (2017) consultation.</p> <p>The Statement of Consultation Regulation 19 (January 2017) summarises those representations and subsequent responses relevant to the Issues and Options SIR (2015) and the Preferred Options SIR (2016) consultations.</p> <p>The Duty to Cooperate Report – March 2017 summarises how the duty has been fulfilled with a range of consultees including district and county councils where relevant and Statutory Consultees.</p> <p>Additionally, the numerous stages of public consultation represented an opportunity for engagement with such prescribed bodies under the duty to cooperate.</p> <p>The Council’s responses to the representations received on the Preferred Options (Regulation 18 Stage) and Proposed Submission (Regulation 19) are available on the Council’s website / JDi online consultation system for reference (these can be found at:</p>

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				<p>http://westsuffolk.jdi-consult.net/localplan/index.php).</p> <p>Responses to comments outline and highlight where consultation comments have shaped corresponding iterations of the SIR.</p>
<p>2. Are you inviting representations from people resident or carrying out business in your area about the content of the DPD?</p>	<p>Regulation 18(1) and (2)(c)</p>	<p>NPPF paras 159 – 173</p>		<p>The Forest Heath District Council & St Edmundsbury Borough Council Statement of Community Involvement (SCI) Adopted - February 2014 identifies that the Council will try to engage with all statutory consultees, Parish and Town Councils and neighbouring Parish/Town Councils where appropriate, Suffolk County Council and neighbouring District / County Councils where appropriate, local bodies and organisations, and individuals and organisations who have expressed an interest in or a willingness to be involved in the plan-making process (such as interested members of the public, landowners and developers).</p> <p>The Council's responses to the representations received on the Preferred Options (Regulation 18 Stage) and Proposed Submission (Regulation 19) are available on the Council's website / JDi online consultation system for reference (these can be found at: http://westsuffolk.jdi-consult.net).</p>

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				<p>consult.net/localplan/index.php).</p> <p>Responses to comments outline and highlight where consultation comments have shaped corresponding iterations of the SIR.</p>
3. Are you engaging with stakeholders responsible for delivery of the strategy?	Regulation 18	NPPF para 155	NPPF paras 160-171 4.29 give examples of relevant bodies which should be consulted.	<p>The Duty to Cooperate Report – March 2017 summarises contact made with the LEP and the LNP. It also summarises how the duty has been fulfilled with a range of consultees including neighbouring district and county councils where relevant.</p> <p>A list of the statutory consultees engaged is included within the Statement of Consultation Regulation 22 (March 2017), and the previous Statement of Consultation Regulation 19 (January 2017) in Annex A including those bodies as contained within the NPPF paragraphs 160-171 where relevant to the administrative area and scope of the SIR.</p>
4. Are you taking into account representations made?	Regulation 18(3)	NPPF para 155	Evidence from participation is part of the justification. Show how you have taken representations into account.	<p>The Statement of Consultation Regulation 22 (March 2017) summarises those representations and subsequent responses relevant to the Proposed Submission SIR (2017) consultation.</p> <p>The Statement of Consultation Regulation 19 (January 2017) summarises those representations</p>

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				<p>and subsequent responses relevant to the Issues and Options SIR (2015) and the Preferred Options SIR (2016) consultations.</p> <p>The Council's responses to the representations received on the Preferred Options (Regulation 18 Stage) and Proposed Submission (Regulation 19 stage) consultations are available on the Council's website / JDi online consultation system for reference (http://westsuffolk.jdi-consult.net/localplan/index.php).</p> <p>Responses to comments outline and highlight where consultation comments have shaped corresponding iterations of the SIR.</p>
5. Does the consultation contribute to the development and sustainability appraisal of alternatives?	<p>The Act section 19(5)</p> <p>Regulations 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>	<p>NPPF paras 165 – 168</p> <p>SEA Guide, chapter 3</p>		<p>The production of a Sustainability Appraisal for the SIR demonstrates that the SA and Plan making processes have been iterative, with SAs having been produced and made available for consultation to accompany and inform the consultation of the SIR at each required stage.</p> <p>The SA Scoping Report was subject to consultation in accordance with the SEA Regulations and was titled:</p> <ul style="list-style-type: none"> • Sustainability Appraisal Scoping Report – 2015 (Johns Associates in partnership with

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				<p>Levett-Therivel)</p> <p>The following SA Reports were undertaken and published for consultation regarding the Forest Heath SIR:</p> <ul style="list-style-type: none"> • Initial Sustainability Appraisal of the Single Issue Review of Core Strategy Policy CS7 Issues and Options stage, (Reg. 18) Forest Heath District Council Local Plan - July 2012 • Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review Interim SA Report – August 2015 • Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review Interim SA Report – April 2016 • Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review SA Report – January 2017 <p>In addition to the above iterations of the SIR SAs, the following was also consulted upon:</p> <ul style="list-style-type: none"> • Sustainability Appraisal (SA) of 1) the Core Strategy Single Issue Review; and 2) the Site Allocations Local Plan Non-technical Summary of two SA Reports - January 2017 <p>The appraisal of reasonable</p>

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				alternatives has been undertaken throughout the SA and Plan-making processes with findings presented and consulted upon in each of the above SA Reports. The Proposed Submission (Regulation 19) SA Report for the SIR, refine what constitutes a 'reasonable alternative' at each stage. The SIR SA Report – January 2017 contains the definitive identification and appraisal of all 'reasonable alternative' approaches at the time of Proposed Submission consultation and include their appraisal alongside all preferred approaches for comparison purposes.
<p>6. Is the participation:</p> <ul style="list-style-type: none"> • following the principles set out in your SCI? • integrating involvement with the sustainable community strategy? • proportionate to the scale of issues involved in the DPD? 	The Act section19(3)	NPPF para 155		<p>Consultation procedures have been in full accordance with the relevant SCI at the time of each consultation.</p> <p>The Statement of Consultation Regulation 19 (2016) summarises the Further Issues and Options and Preferred Options consultations. The Statement of Consultation Regulation 22 (2017) summarises the Proposed Submission consultation held regarding the SIR prior to the submission of the documents.</p>
<p>7. Are you keeping a record of:</p> <ul style="list-style-type: none"> • the individuals or bodies invited to make representations? 	The Act section20(3) Regulation 17	NPPF paras 158 - 171	You will need to submit a statement of representations under Regulation 22 (1) (c): see Submission stage	Records of comments made during the Preferred Approach and Proposed Submission consultation stage of the SIR are held in the JDi Consultation System, which is available online at

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
<ul style="list-style-type: none"> • how this was done? • the main issues raised? 			<p>below.</p> <p>Regulation 35 deals with the availability of documents and the time of their removal.</p>	<p>the Council's website.</p> <p>Representations received at the Proposed Submission stage have been reproduced in full as part of the evidence base submitted to the Inspector.</p> <p>The main issues associated with each consultation stage have been captured in the Statement of Consultation Regulation 19 (January 2017) and the Statement of Consultation Regulation 22 (March 2017).</p>
<p>8. Are you inviting representations on issues that would have significant impacts on both your areas from another local planning authority? Or county issues from an affected county council that is not a planning authority? Or significant cross-boundary issues and strategic priorities of a body prescribed under Section 33A(1)(c)?</p>	<p>The Act section 33A(1)(a) (b) and (c), section 33A(3)(d) & (e) section 33A(4) section 33A(9)</p> <p>The Act section 20 (5)(c)</p>	<p>NPPF paras 178 to 181</p>	<p>Section 33A(3)(d) and (e) requires cooperation on significant cross-boundary issues before and during plan preparation.</p> <p>Section 33A(2) requires you to engage constructively, actively and on an ongoing basis.</p>	<p>The Duty to Cooperate Report – March 2017 summarises how the duty has been fulfilled with a range of consultees including neighbouring district and county councils.</p> <p>Additionally, the numerous stages of public consultation represented an opportunity for engagement with other authorities within the Housing Market Area (HMA).</p> <p>The Council's responses to the representations received on the Preferred Options (Regulation 18 Stage) and Proposed Submission (Regulation 19 stage) consultations are available on the Council's website / JDi online consultation system for reference (http://westsuffolk.jdi-</p>

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				consult.net/localplan/index.php). Responses to comments outline and highlight where consultation comments have shaped corresponding iterations of the SIR.
9. Are you inviting representations on cross-boundary issues and strategic priorities from a local enterprise partnership (LEP) or a local nature partnership (LNP)?	The Act section 33A(1)(c) and Section 33A(9). The Act section 20(5) (c). Regulation 4	NPPF paras 178 to 181	Section 33A(3)(d) and (e) requires cooperation on significant cross-boundary issues before and during plan preparation. Section 33A(2) requires you to engage constructively, actively and on an ongoing basis.	The Duty to Cooperate Report – March 2017 summarises contact made with the LEP and LNPs as outlined. It also summarises how the duty has been fulfilled with a range of consultees including neighbouring district and county councils where relevant. Additionally, the numerous stages of public consultation represented an opportunity for engagement with such prescribed bodies, which were dutifully notified of such consultation periods in accordance with the SCI. This included engagement with other authorities within the Housing Market Area (HMA).
10. Are you developing a framework for monitoring the effects of the DPD?	The Act section 35 Regulation 34 Regulation 17 of The Environmental Assessment of Plans and Programmes	NPPF paras 165 - 1687 SEA Guide, Chapter 5	It is a matter for each council to decide what to include in their monitoring reports while ensuring they are prepared in accordance with relevant UK and EU legislation” Chief Planning Officer letter 30 March 2011 withdrawing ODPM	Updates on the effectiveness of the SIR will be recorded annually in the council’s Authority Monitoring Report (AMR) including updates through the Five Year Housing Land Supply. Indicators will be used to monitor the policy. Chapter 15 of the SIR SA indicates 23 indicators from the Council’s AMR that will specifically monitor the

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
	Regulations 2004 No1363		guidance.	performance of the SIR. Co-operation between the council and public and private agencies and organisations will continue in the monitoring and implementation of the SIR.

1.3 Stage three: Plan preparation - formulation phase

This stage has many legal matters, for process and content, to address. The council should be beginning to formulate the preferred strategy for the local plan or supplementary planning document with which the council chooses to address Regulation 18 requirements, using the information gathered and previous collaborative work with stakeholders.

Para 182 of the NPPF makes it clear that explicit consideration of alternatives is a key part of the plan making process.

You should evaluate the reasonable alternatives identified in 'stage two: frontloading phase – plan preparation' phase against the:

- completed body of information from evidence gathering
- results of sustainability appraisal
- findings from community participation
- findings from engagement with statutory cooperation bodies.

This may be written up as a preferred strategy report. The results of participation on the preferred strategy and an accompanying sustainability report will enable the council to gauge the community's response and receive additional evidence about the options. The council can then decide whether, and how, the preferred strategy and policies should be changed for publishing the finished DPD.

Alternatives developed from the evidence and engagement during the frontloading stage need to be appraised to decide on the preferred strategy. Participation will also need to be carried out on it.

These matters need to be considered, and dealt with, in good time, and not left until publication. Supporting documents will assist in providing evidence that decisions on alternatives and strategy are soundly based. These documents will, in due course, become part of the proposed submission documents in stage four.

The council should tell all parties that this is the main participation opportunity on the emerging plan.. The publication stage is a formal opportunity for anyone to comment on an aspect of the DPD's soundness, and to propose a change to the plan accordingly. The more effectively this message is put across, the lower the chance of late changes being brought forward following publication.

Stage three: Plan preparation – writing the plan

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
<p>1. Are you preparing reasonable alternatives for evaluation during the preparation of the DPD?</p>	<p>Regulation 12 (2) of The Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633</p>	<p>NPPF paras 152 - 182 SEA Guide, Chapter 5</p>	<p>The sustainability appraisal report and supporting documents relevant to the preparation of the DPD are part of the proposed submission documents (see Regulation 17).</p>	<p>The Further Issues & Options SIR (2015) (second Regulation 18 stage) document covered numerous alternatives which were refined in subsequent consultations. In addition, the SIR Sustainability Appraisal (January 2017) outlines those alternatives considered reasonable at the Proposed Submission stage of the Plan making process, with commentary to further outline the consideration of reasonable alternatives, and what constituted a reasonable alternative, at each consultation stage of the SIR.</p>
<p>2. Have you assessed alternatives against:</p> <ul style="list-style-type: none"> • consistency with national policy? • general conformity with the regional spatial strategy where still in force? 	<p>The Act section 19 (2), section 24</p>	<p>NPPF para 151</p>	<p>For London boroughs and local authorities where regional strategies are still in force general conformity is tested formally later but you need to consider it during preparation of the DPD.</p>	<p>The Further Issues & Options SIR (2015) (second Regulation 18 stage) document covered various alternatives which were refined in subsequent consultations. The SIR document and consultation exists specifically to address an area of the adopted Core Strategy that was not in conformity to National Policy, specifically the requirements within the NPPF that the District's housing needs be objectively assessed. In addition, the SIR Sustainability Appraisal outlines those alternatives considered reasonable and in conformity with National Policy only at the Proposed Submission stage of</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
				the Plan making process, with commentary to further outline the consideration of reasonable alternatives, and what constituted a reasonable alternative, at each consultation stage of the SIR.
<p>3. Are you having regard to (where relevant):</p> <ul style="list-style-type: none"> • adjoining regional spatial strategies? • the spatial development strategy for London? • Planning Policy for Wales? • the National Planning Framework for Scotland? 	<p>The Act sections 19 (2) and 24 (1) and (4)</p> <p>Regulation 10 and 21</p>		Where the regional strategy has been revoked you should record that fact.	The East of England Plan / RSS has been revoked in line with the adoption of the NPPF. The geographic location of Forest Heath is so that the requirements of this legal soundness criterion are not relevant.
<p>4. Are you co-operating with other local planning authorities including counties, to address significant cross boundary issues?</p> <p>Have you discussed doing joint local development documents?</p>	<p>The Act section 33A(2)(a)</p> <p>Section 33A(6)(a)(b)</p> <p>Section 20(5) (c)</p>	NPPF paras 181 and 185		<p>Correspondence was offered to and where relevant undertaken with adjoining Local Planning Authorities; a summary of relevant groups, forums and other means of joint working with neighbouring authorities and prescribed bodies can be found in the Duty to Cooperate Report – March 2017.</p> <p>West Suffolk Council represents an amalgamation of Forest Heath and St. Edmundsbury District Councils, with local planning functions undertaken by a single team. This</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
				<p>led to a number of evidence base documents being jointly undertaken / commissioned for both administrative areas, covering the scope of, and being relevant to, a range of planning documents.</p> <p>These were:</p> <ul style="list-style-type: none"> • The Joint Western Suffolk employment land study 2008-2015 • Visitor Survey Results from Breckland SPA (2016) • Stone Curlew Buffers in the Brecks (2016) • Joint Infrastructure and Environmental Capacity Appraisal (2009) • Joint Strategic Flood Risk Assessment and Water Cycle Study (2009) • Western Suffolk Local Strategic Partnership, Community Strategy 2006-2016 • Cambridgeshire (excluding Fenland), King's Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Needs Assessment (GTAA) update 2016 • Strategic Housing Market Assessment (SHMA) 2013 • Update on Objectively

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
				<p>Assessed Need (OAN) in the Cambridge Sub-Region Housing Market Area (February 2017)</p> <ul style="list-style-type: none"> • A note for clarification by Cambridgeshire County Council Research Group to support Forest heath District Council in objectively assessing and evidencing development needs for housing (January 2017) • Joint West Suffolk Strategic Housing Land Availability Assessment (2016) • West Suffolk Housing Strategy (October 2014) • Forest Heath and St. Edmundsbury Retail Impact Threshold Advice 2014 <p>A Local Plan Review will be undertaken in early 2018. This will be a joint plan covering the administrative areas of Forest Heath and St. Edmundsbury District Councils.</p>
<p>5. Are you cooperating with a person prescribed for the purposes of Regulation 33A(1)(c) to address significant cross boundary issues including preparing joint approaches?</p>	<p>The Act section 33A(2)(a), section 33A(6)(a)</p> <p>The Act section 20 (5) (c)</p>	<p>NPPF paras 181 and 182</p>	<p>The bodies prescribed by The Act section 33A(1)(c) are set out at Regulation 4 (1).</p>	<p>Correspondence was offered to and undertaken with all adjoining Local Planning Authorities; a summary of these meetings can be found in the Duty to Cooperate Report – March 2017. West Suffolk Council represents an amalgamation of Forest Heath and St. Edmundsbury</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
	Regulation 4			<p>District Councils, with local planning functions undertaken by a single team.</p> <p>A Local Plan Review will be undertaken in early 2018. This will be a joint plan covering the administrative areas of Forest Heath and St. Edmundsbury District Councils.</p>
6. Are you cooperating with having regard to the activities of the LEP and LNP?	The Act section 33A(2)(b) and section 33A(9). Regulation 4 (2)	NPPF para 181 and 182		The Duty to Cooperate Report – March 2017 summarises contact made with the LEP as outlined.
<p>7. Are you having regard to:</p> <ul style="list-style-type: none"> • your sustainable community strategy or of other authorities whose area comprises part of the area of the council? • any other local development documents adopted by the council? 	The Act section 19(2)			<p>Adherence to relevant corporate strategies was ensured throughout the plan-making process and as part of the formal sign-off process through Cabinet and Full Council. This included the Suffolk Sustainable Community Strategy 2008-2018.</p> <p>The SIR document has had regard to the adopted Core Strategy (2010) and Joint Development Management Policies Document (2015) and the plan-making process has run concurrently with the emerging Site Allocations Local Plan (SALP). These documents combine to form the suite of local planning documents for the administrative area. This is shown diagrammatically in Section 1.9 of</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
				<p>the SIR.</p> <p>The Duty to Cooperate Report – March 2017 summarises how the duty has been fulfilled with a range of consultees including neighbouring district and county councils where relevant. The duty to co-operate process has involved adherence to the development plans and other relevant corporate documents of other relevant local planning authorities where relevant within the wider county council administrative area.</p>
<p>8. Do you have regard to other matters and relevant strategies relating to:</p> <ul style="list-style-type: none"> • resources • the local/regional economy • the local transport plan and transport facilities and services • waste strategies • hazardous substances 	<p>The Act section19(2)</p> <p>Regulation 10</p>		<p>As well as the matters and strategies listed in the Act and Regulations there are likely to be other matters identified in planning policy statements, regional and local strategies that you will need to have regard to in preparing the DPD.</p>	<p>The Adopted Core Strategy (2010), to which the SIR (of Core Strategy Policy CS7) directly relates, regards all necessary national policy requirements at the time of adoption, and outlines these in Section 1. The SIR responds more directly to the requirements of the NPPF and a need to meet the District’s objectively assessed housing needs as outlined in Section 2 of the SIR.</p> <p>The Duty to Cooperate Report – March 2017 summarises how the duty has been fulfilled with a range of consultees including neighbouring district and county councils where relevant. The duty to co-operate process has involved adherence to the development plans and other relevant corporate documents of</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
				<p>other relevant local planning authorities within the wider county council administrative area.</p> <p>Regarding transport issues, a group has been established that includes representatives of Forest Heath District Council, East Cambridgeshire District Council, Suffolk County Council, Cambridgeshire County Council, Highways England and the Greater Cambridge Greater Peterborough LEP.</p>
<p>9. Are you having regard to the need to include policies on mitigating and adapting to climate change?</p>	<p>The Act section19(1A)</p>	<p>NPPF paras 93 -108</p>		<p>The SIR document has had regard to the adopted Core Strategy (2010) and Joint Development Management Policies Document (2015) and the plan-making process has run concurrently with the emerging Site Allocations Local Plan (SALP). These documents combine to form the suite of local planning documents for the administrative area.</p> <p>The SIR is a single issue review of Core Strategy policy CS7 in order to meet the objectively assessed housing need espoused in the NPPF. Policy regarding mitigating and adapting to climate change is contained within the Core Strategy (2010) Policy CS4: Reduce Emissions, Mitigate and Adapt to future Climate Change, and the Joint Development Management Policies (2015) Policy DM7: Sustainable</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
				Design and Construction and Policy DM8: Low and Zero Carbon Energy Generation.
10. Have you undertaken the sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?	The Act section 19(5) Regulation 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF para 182 SEA Guide, Chapter 5	Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633 sets out the consultation procedures.	<p>The SIR Sustainability Appraisal outlines those alternatives considered reasonable at the Proposed Submission (2017) stage of the SIR plan making processes, with commentary to further outline the consideration of reasonable alternatives, and what constituted a reasonable alternative, at each consultation stage of the SIR.</p> <p>The production of the Sustainability Appraisal has been an iterative process at each stage of the SIR. Iterations of the SA exist for the:</p> <ul style="list-style-type: none"> • Forest Heath District Council core strategy policy CS7 single issue review issues and options – September 2012 • Single Issue Review (SIR) of Core Strategy Policy CS7 – October 2015 • Single Issue Review (SIR) or Core Strategy Policy CS7 Preferred Option – July 2016 • Proposed Submission Single Issue Review of Core Strategy Policy CS7 (SIR) – January 2017
11. Are you setting out	Regulation 8(2)	NPPF para 182	This will include Information from the	The justifications for the preferred strategy are outlined in the SIR at

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
<p>reasons for any preferences between alternatives?</p>			<p>sustainability appraisal.</p>	<p>relevant consultation stages.</p> <p>Reasonable alternative approaches are also included in the SA of the SIR at the Proposed Submission (2017) stage, including the reasons for the rejection of alternative options (and the rationale behind the consideration of some alternative options as not 'reasonable' throughout the SA and plan-making processes) and the selection of the SIR's preferred content.</p>
<p>12. Have you taken into account any representations made on the content of the DPD and the sustainability appraisal? Are you keeping a record?</p>	<p>Regulations 17, 18(3) and 22 (1) (c) (iv)</p> <p>Regulation 13(4) of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>	<p>NPPF paras 150, 155, 157 and 159-171</p>	<p>Records on the sustainability appraisal should also include recording any assessment made under the Habitats Directive.</p>	<p>The schedule of all representations received at the Proposed Submission engagement stage of the SIR outlines the representations received during the proposed submission consultation. This includes representations made regarding the Sustainability Appraisal of the SIR at this stage.</p> <p>Representations made at previous consultation stages of the SIR, including the Sustainability Appraisals made available for consultation alongside these iterations of the SIR, have been logged and responded to by the Council and can be found on the SIR JDi consultation pages on the Council's website (http://westsuffolk.jdi-consult.net/localplan/index.php).</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
<p>13. Where sites are to be identified or areas for the application of policy in the DPD, are you preparing sufficient illustrative material to:</p> <ul style="list-style-type: none"> • enable you to amend the currently adopted policies map? • inform the community about the location of proposals? 	<p>Regulations 5 (1)(b) and 9</p>	<p>NPPF para 157</p>	<p>Regulation 2 defines the terms 'submission' and 'adopted' proposals map.</p> <p>A map showing changes to the adopted policies map is part of the proposed submission documents defined in Regulation 17.</p>	<p>A separate policies map document has also been published and made available at the Proposed Submission consultation stages of the SIR.</p>
<p>14. Are the participation arrangements compliant with the SCI?</p>	<p>The Act, section 19(3) Regulation 18</p>	<p>NPPF paras 150 and 155</p>		<p>Arrangements relating to the Proposed Submission SIR (2017) consultation were carried out in accordance with the SCI (Forest Heath District Council & St Edmundsbury Borough Council Statement of community Involvement (SCI) Adopted – February 2014).</p>

1.4 Stage four: Publication

Under Regulation 20, the period for formal representations takes place **before** the DPD is submitted for examination in accordance with a timetable set out in the statement of the representations procedure which is made available at the council's office and published on its website.

When moving towards publication stage, the council should consider the results of participation on the preferred strategy and sustainability appraisal report and decide whether to make any change to the preferred strategy. In the event that changes are required, the council will need to choose either to:

- do so and progress directly to publication; OR
- produce and consult on a revised preferred strategy.

The latter may be appropriate where the changes to the DPD bring in changed policy or proposals not previously covered in community participation and the sustainability appraisal. It avoids having to treat publication as if it were a consultation, which it is not. It also provides insurance in relation to compliance with the Strategic Environmental Assessment Regulations. Legally, during any participation on a revised preferred strategy, you should:

- comply with the requirements of the SCI
- update the sustainability appraisal report.

The council should then produce the DPD in the form in which it will be published. This includes removing material dealing with the evaluation of alternatives and the finalisation of the text. The council should be happy to adopt the DPD in this form, and satisfied that it is sound and fit for examination.

The six weeks publication period is the opportunity for those dissatisfied (or satisfied) with the DPD to make formal representations to the inspector about its soundness. Only people proposing a change to the plan can expect to be heard at examination.

The possibility of change under certain circumstances (which should be exceptional) is allowed for in the new procedures, and is described in 'stage five: submission'.

Stage four: Publication

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
1. Have you prepared the sustainability appraisal report?	The Act section 19(5) Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF paras 165 - 168 SEA Guide Chapter 5		The SA supporting the Proposed Submission SIR (2017) was made available for consultation alongside the Proposed Submission SIR in January 2017. The SA report was prepared by independent consultants.
2. Have you made clear where and within what period representations must be made?	Regulation 17, 19, 20 and 35		The period must not be less than 6 weeks from when you publish under Regulations 19 and 35 (see below).	The Proposed Submission SIR (2017) consultation was carried out for a total of 8 weeks between January and March 2017 in accordance with the SCI (Forest Heath District Council & St Edmundsbury Borough Council Statement of community Involvement (SCI) Adopted – February 2014) and Local Development Scheme. Updates to timetable arrangements have been highlighted in numerous relevant and prominent positions on the Council's website and electronic notifications sent to all those individuals and organisations on the Council's consultation database.
3. Have you made copies of the following available for inspection: <ul style="list-style-type: none">• the	Regulation 19(a)		Regulation 17 gives definitions.	The Proposed Submission document for the SIR has been made available for inspection. Representations were made available in accordance with the SCI (Forest Heath District Council & St Edmundsbury Borough Council Statement of Community Involvement (SCI) Adopted – February 2014).

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
<p>proposed submission documents?</p> <ul style="list-style-type: none"> the statement of the representations procedure? 				
<p>4. Have you published on your website:</p> <ul style="list-style-type: none"> the proposed submission documents? the statement of the representations procedure? statement and details of where and when documents can be inspected? 	Regulations 19 and 35		Regulations 2 and 17 give definitions.	The SIR, as well as the SA for the document, the IDP and all associated evidence base documents have been uploaded to the Council's website at the dedicated pages to the relevant Submission Plan (http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-local-plan-examination-2017.cfm).
<p>5. Have you sent to each of the specific consultation</p>	Regulation 19(b)		Regulations 2 and 17 give	<p>Comment was invited by all bodies required by the regulations.</p> <p>Core documents and the statement of representations procedure are available for viewing at various locations throughout the District. These</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
<p>bodies invited to make representations under Regulation 18(1):</p> <ul style="list-style-type: none"> • A copy of each of the proposed submission documents • The statement of the representations procedure? 			<p>definitions.</p>	<p>locations are:</p> <ul style="list-style-type: none"> • Forest heath District Council Offices, College Heath Road, Mildenhall, Suffolk, IP28 7EY • Newmarket Customer Information, 63 The Guineas, Newmarket, Suffolk, CB8 8HT • Brandon Library, The Brandon Centre, Bury Road, Brandon, IP27 0BQ <p>In addition, core and supporting documents are available online at: http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-local-plan-examination-2017.cfm.</p>
<p>6. Have you sent to each of the general consultation bodies invited to make representations under Regulation 18(1):</p> <ul style="list-style-type: none"> • the statement of the representations procedure? 	<p>Regulation 19(b)</p>		<p>Regulations 2 and 17 give definitions.</p>	<p>Comment was invited by all bodies required by the regulations.</p> <p>The notification letters and emails that were sent to all relevant bodies and individuals outline where documents can be viewed (online and location specific), how to respond, and include the statement of representations procedure.</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Provided
<ul style="list-style-type: none"> where and when the documents can be inspected? 				
<p>7. Have you requested the opinion of the Mayor of London (if a London Borough or Mayoral DC) on the general conformity of the DPD spatial development strategy?</p>	<p>The Act section 24 Regulation 21</p>		<p>The request must be made on the day you publish the documents under Regulation 19(a) and a response must be made within six weeks from the request (Regulation 21).</p>	<p>N/A. The Local Planning Authority is not a London Borough or an adjoining authority.</p>

1.5 Stage five: Submission

At the submission stage, the council should receive and collate any representations made at publication stage. You don't have to report these representations to councillors but there may be requirements deriving from other legislation, Standing Orders or council procedures that must be considered. Or you might just think it is a good idea to report on it anyway.

If they are reported it should be on the facts of the representations made, not the results of a consultation process by the council. They should not be treated as a consultation or an opportunity to make changes or answer representations. NB: under the 2012 Regulations there is no longer any requirement to give notice by local advertisement.

You should ensure you are in legal compliance with the SCI, the Habitats Directive and the Strategic Environmental Assessment Directive in any additional work. Any formal publication of additional or changed matters would need to allow at least a six-week period for representations to be made.

There are different approaches that could be taken to changes. You should be satisfied that you remain fully compliant with the legal requirements if any changes are made (and any consequential effects on the DPD as a whole).

Apart from notification of the examination, this tool does not deal with the legal requirements that need to be followed after submission.

Stage five: Submission

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
<p>1. Has the DPD been prepared in accordance with the LDS? Does the DPD's listing and description in the LDS match the document? Have the timescales set out in the LDS been met?</p>	<p>The Act section 19(1)</p>		<p>The Act section 15(2) sets out the matters specified in the LDS.</p> <p>As at January 2013, no further matters are prescribed in the Regulations.</p>	<p>The Proposed Submission SIR (2017) consultation was carried out in accordance with the Local Development Scheme (LDS).</p> <p>Updates to timetable arrangements have been highlighted in numerous relevant and prominent positions on the Council's website and electronic notifications were sent to all those individuals and organisations on the Council's consultation database.</p>
<p>2. Has the DPD had regard to any sustainable community strategy for its area (like a county and district)?</p>	<p>The Act section 19(2)</p>	<p>NPPF para 182</p>		<p>The SIR has been formulated in accordance with and in regard to the 'Transforming Suffolk – Suffolk's Community Strategy 2008-2028'. The SIR responds directly to the main themes of this strategy, notably to achieve a prosperous and vibrant economy, learning and skills for the future, protecting and enhancing the natural and historic environment and ensuring healthy and inclusive communities.</p> <p>The Sustainability Appraisal contains a review of plans and programmes, including additional relevant strategies associated with sustainability.</p>

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
3. Is the DPD in compliance with the SCI (where one exists)? Has the council carried out consultation as described in the SCI?	The Act section 19(3) Regulation 22(1)(c)		Before the SCI is formally amended to take into account the changes in the regulations, you may need to set out how the community engagement that you carried out met the regulations (as amended).	Throughout the SIR plan making process all consultations have been in line with the relevant adopted SCI at that time. For the Proposed Submission SIR (2017), refer to the Forest Heath District Council Statement of Community Involvement (2017).
4. Have you identified and addressed any issues which are likely to have a significant impact on at least two planning areas. In doing so, have you co-operated with other local planning authorities, county councils where they are not a planning authority, LEAs, LNPs and the prescribed bodies in identifying and addressing any strategic cross-boundary issues If you have not agreed on the approach is there a justification?	The Act section 33A(1) and section 20(5)	NPPF paras 181 and 182	Under NPPF para 182, the plan should be based on effective joint working on cross-boundary strategic priorities to be found 'Effective'.	Correspondence was offered to and undertaken with all relevant adjoining local planning authorities; a summary of these meetings can be found in the Duty to Cooperate Report – March 2017. West Suffolk Council represents an amalgamation of Forest Heath and St. Edmundsbury District Councils, with local planning functions undertaken by a single team. Communication with all relevant planning authorities and prescribed bodies has been ongoing up to the point of the submission of the SIR with this being documented in the Duty to Cooperate Report – March 2017. With reference to issues likely to have a significant impact on planning areas, changes to the SIR have been made in conjunction with these

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				meetings where necessary. The submission version SIR has been finalised taking into account the Proposed Submission (2017) consultation representations. Changes to the SIR are detailed within the JDi consultation portal on the Council's website where representations have been made by various authorities and statutory bodies.
5. Has the DPD been subject to sustainability appraisal? Has the council provided a final report of the findings of the appraisal?	The Act section 19(5) Regulation 22(1)(a)	NPPF para 165 SEA Practical Guide, chapter 5		A SA has been produced for the SIR at all statutory consultation stages. The final SA has been produced for the submission of the SIR (2017).
6. Is the DPD to be submitted consistent with national policy?	The Act section 19(2) and Schedule 8	NPPF para 151		The PAS Soundness Self-Assessment Checklist has been completed. Advice and critical friend analysis of progress has been ongoing throughout the SIR plan-making process with an independent planning solicitor. In addition, the Council have had Planning Advisory Service (PAS) support throughout the plan-making process.
7. Does the DPD contain any policies or proposals that are not in general	The Act section 24(1)(a) and	NPPF para 218 footnote 41	In London the requirement is for general conformity with the	N/A - the RSS has been revoked and the authority is not a London

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
<p>conformity with the regional strategy where it still exists? If yes, is there local justification?</p> <p>If the LPA is a London borough or a mayoral development corporation has it requested an opinion from the Mayor of London on the general conformity of the plan with the spatial development strategy?</p>	<p>24(4) Regulation 21</p>		<p>spatial development strategy (The London Plan).</p>	<p>Borough.</p>
<p>8. Has the council published the prescribed documents, and made them available at their principal offices and their website?</p> <p>Has the council notified the relevant statutory and non-statutory bodies, and all persons invited to make representations on the plan?</p> <p>Does the DPD contain a</p>	<p>The Act section 20(2), 20(3) and 20(5)(b) Regulations 8 and 19</p>	<p>NPPF para 182</p>	<p>Requirements relating to publication of the prescribed documents are listed later in this table.</p>	<p>The SIR documents, including the supporting evidence are available online, and paper copies of core documents are available for viewing at the Council offices and other locations consistent with the SCI. Specific and general consultees will be also be notified. This is in accordance with the SCI.</p> <p>The SIR contains a list of 'Replacement of 2010 Core Strategy policies/paragraphs' in Appendix B.</p>

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
list of superseded saved policies?				
<p>9. Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted policies map?</p> <p>If yes, have you prepared a submission policies map?</p>	Regulations 5(1) (b), 9 (1), 17 & 22(1)			The SIR does not include any policies applying to sites or areas by reference to an Ordnance Survey map, nor does the SIR amend an adopted policies map.
10. Is the DPD consistent with any other adopted DPDs for the area? If the DPD is intended to supersede any adopted development plan policies, does it state that fact and identify the superseded policies?	Regulation 8(3) and (4) Regulation 8(5)		Development Plan is defined in Section 38 of the Act.	<p>The SIR is consistent with the Core Strategy (2010) and the Joint Development Management Policies plan (2015).</p> <p>The SIR contains a list of Replacement of 2010 Core Strategy policies/paragraphs in Appendix B.</p>

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
<p>11. Have you prepared a statement setting out:</p> <ul style="list-style-type: none"> • Which bodies and persons were invited to make representations under Regulation 18? • How they were invited? • A summary of the main issues raised? • How the representations have been taken into account? 	<p>The Act section 20 (3) Regulation 22(1)(c)</p>		<p>This will bring forward material from the Consultation statement (see Stage 2 above).</p>	<p>Reference should be made to the Statement of Consultation Regulation 19 (January 2017) and the Statement of Consultation Regulation 22 (March 2017).</p>
<p>12. Have you prepared a statement giving:</p> <ul style="list-style-type: none"> • the number of representations made under Regulation 22? • a summary of the main issues raised? <p>OR</p> <ul style="list-style-type: none"> • that no representations were made? 	<p>The Act section 20(3) Regulation 22(1)(c)</p>			<p>Reference should be made to the Statement of Consultation Regulation 22 (March 2017).</p>
<p>13. Have you collected together all the representations made under Regulation 28?</p>	<p>The Act section 20(3) Regulation</p>			<p>Reference should be made to the schedule of all representations received at the Proposed Submission (2017) consultation stage of the SIR</p>

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
	22(1)(e)			between January to March 2017.
14. Have you assembled the relevant supporting documents?	The Act section 20(3) Regulation 22(1)(g)			<p>The following documents have been assembled as per advice from PINS:</p> <ul style="list-style-type: none"> • The Submission SIR • The Submission policies map • The Regulation 22 Consultation Statement • The final Sustainability Appraisal (SA) • The final Habitats Regulation Assessment (HRA) • The Strategic Housing Market Assessment (SHMA) • The Strategic Housing Land Availability Assessment (SHLAA) • The Employment Land Review (ELR) <p>All the above documents plus all supporting documents, topic papers and studies forming the evidence base will be submitted in electronic format.</p> <p>Additionally, the following will be sent:</p> <ul style="list-style-type: none"> • The Proposed Submission consultation representations (in policy order) • The Proposed Submission

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
				consultations representations (in respondents order).
15. Has your council approved the DPD for submission?			Check the LPA's constitution/standing orders for the authorisation process appropriate for the type of DPD.	Cabinet and full Council of the District Council supported the decision to publish and submit the SIR at meetings in March 2017.
16. Have you sent the Secretary of State (the Planning Inspectorate) both a paper copy and an email of the following: <ul style="list-style-type: none"> • the DPD? • the submission policies map (unless there are no site allocation policies)? • the documents prescribed in Regulation 22(1)? 	The Act section 20(1) and 20(3) Regulations 22(1) and 22(2)		Regulation 35 deals with the availability of documents and the time of their removal. Electronic copies of some of the representations and supporting documents may not be practicable. Regulation 35 deals with the availability of documents and the time of their removal.	A hard copy and an electronic copy of the Submission SIR (2017) and all relevant supporting documents have been made available to the Planning Inspector.
17. Have you made the following available at the same places where the proposed submission documents were to be seen: <ul style="list-style-type: none"> • The DPD? • The documents 	Regulation 22(3)		You should do this as soon as reasonably practicable after submission.	The SIR core and supporting documents are available to view online at the Council's website. The SIR's associated core documents have been supplied to those locations that received copies during the Proposed Submission SIR (2017) consultation in January - March 2017

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
prescribed in Regulation 22(1)?				and are available to view.
<p>18. On your website, have you published the:</p> <ul style="list-style-type: none"> • DPD? • submission policies map? • sustainability appraisal report? • Regulation 22(1)(c) statement? • supporting documents (where practicable) ? • representations made under Regulation 20 (where practicable) ? • statement as to where and when the DPD and the documents are available? 	Regulation 22(3) and 35(1)(b)		You should do this as soon as reasonably practicable after submission.	These documents are hosted on the Council's website and have been clearly and effectively signposted during consultation periods.
<p>19. For each general consultation body invited to make representations under Regulation 18(1), have you sent:</p> <ul style="list-style-type: none"> • notification that the documents prescribed in Regulation 	Regulation 22(3)(b)		You should do this as soon as reasonably practicable after submitting to the Secretary of State.	Letters have been sent to all consultees outlining the submission date and full details of the examination process including location.

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
<p>22(3)(a)(i)-(iii) are available for inspection</p> <ul style="list-style-type: none"> • where and when they can be inspected? 				
<p>20. Have you given notice to persons who have requested to be notified that submission has taken place?</p>	<p>Regulation 22(3)(c)</p>		<p>You should do this as soon as reasonably practicable after submitting to the Secretary of State.</p>	<p>Those individuals and organisations who requested to be notified through representations made during the Proposed Submission SIR (2017) consultation, and those on the Council's consultation database have been notified of submission and the examination process including location.</p>
<p>21. If an examination is being held, at least six weeks before its opening has the Programme Officer:</p> <ul style="list-style-type: none"> • published the time and place of the examination and the name of the person appointed to carry out the examination on your website? • notified those who have made representations on the published DPD which have not been withdrawn of these 	<p>The Act section 20 Regulations 24 and 35</p>			<p>A Programme Officer has been appointed and will undertake these tasks six weeks prior to the commencement of the Examination in Public.</p>

Activity	Legal requirement	Guidance reference	Additional notes	Evidence Provided
details?				

2. Soundness Self-Assessment Checklist

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.

2.1 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?

2.2 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:

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.

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

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

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

- Evidence of participation of the local community and others having a stake in the area; and

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

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.

2.3 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). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

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

In addition, the Legal Compliance checklist (a separate document, see www.pas.gov.uk) should be completed to ensure that this aspect is covered.

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

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Vision and Objectives</i> 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? 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</p>	<ul style="list-style-type: none"> • Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. • Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. • The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. 	<p>Chapters 1 and 2 of the SIR, entitled 'Background to the Single Issue Review process' and 'Background to assessing the overall housing requirement for the district' respectively, outline the scope of the SIR and the issue that the SIR is seeking to address.</p> <p>A wider Vision and Objectives are contained in the adopted Core Strategy (2010). The scope of the SIR represents those parts of the Core Strategy which were revoked following a successful High Court challenge and an update on the overall housing provision. With the scope of the SIR covering a single issue, regarding the quantum and distribution of housing development within the district to 2031, it is clear how the policy will meet the Core Strategy's wider objectives in a consistent manner and within realistic timescales. This is further evidenced by supporting documents regarding viability and infrastructure delivery.</p> <p>Alternatives to the SIR's quantum and distribution have been explored within the Sustainability Appraisal (SA), with a review as to what constitutes a 'reasonable' alternative undertaken at each consultation stage. The spatial strategy of the Core Strategy (2010) remains appropriate for the district to 2031 and is not within the scope of the SIR.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
its key policy objectives will be achieved?		
<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"> -any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or -specific policies in this Framework indicate development should be restricted. 	<ul style="list-style-type: none"> • An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below). • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area) 	<p>The SIR evidence base establishes the development needs of the area through a 'Forest Heath Objectively Assessed Housing Need' study in January and August 2016. The SIR recognises the need for flexibility in Chapter 5 'Monitoring and Review', which states at para. 5.2 that 'should monitoring through the Authority Monitoring Report and Five Year land supply indicate that the district is not delivering the required amount of housing, a more proactive approach to site identification and delivery will be necessary in the latter part of the plan period.' Para. 5.3 adds that 'it should also be noted that the Council has made a commitment to commence a West Suffolk Local Plan Review (working with St Edmundsbury Borough Council) in early 2018.'</p> <p>The spatial strategy of the adopted Core Strategy (2010) remains appropriate for the district to 2031 and is not within the scope of the SIR. Chapters 1 and 2 of the SIR outline how and why the quantum of development was arrived at. The SA of the SIR also outlines a detailed audit trail of how and why the quantum of development of the SIR was arrived at in Part 1, entitled 'What has plan-making / SA involved up to this point?'</p>
Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so	<ul style="list-style-type: none"> • A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk) 	Policy CS7 of the SIR sets out the overall housing provision and distribution within the district. Sustainable development will be ensured through the

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>		<p>policy content of the adopted Core Strategy (2010), the adopted Joint Development Management Policies document (2015) and through an emerging Site Allocations Local Plan (SALP), the plan-making process of which has run concurrently alongside the SIR.</p>
<p><i>Objectively assessed needs</i> The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> • Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate. 	<p>Chapter 2 of the SIR outlines the background to assessing the overall housing requirement for the district. The SIR housing target has been identified in response to:</p> <ul style="list-style-type: none"> • the need to update the OAN for Forest Heath to ensure a robust evidence base; • the need for a consistent approach within the Cambridge housing market area; • the spring 2015 release of new Department for Communities and Local Government (CLG) household projections and East of England Forecasting Model (EEFM) forecasts; and • changes in national planning policy and guidance. <p>Work towards identifying OAN for the district has also involved the undertaking / commissioning and publication of a number of housing related evidence base documents. These are:</p> <ul style="list-style-type: none"> • Strategic Housing Land Availability Assessment 2016 (April 2016)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Omissions sites (April 2016 and January 2017) • Market Signals and Objectively Assessed Housing Need (February 2016) • Strategic Housing Market Assessment for the Cambridge sub region 2013 • Objectively Assessed Housing Need (January 2016) and update (August 2016) • Update on Objectively Assessed Need (OAN) in the Cambridge Sub-Region Housing Market Area (February 2017) • A note for clarification by Cambridgeshire County Council Research Group to support Forest Heath District Council in objectively assessing and evidencing development needs for housing (January 2017) <p>Communication with neighbouring and other LPAs within the HMA has been ongoing up to the point of submission and this has been documented in the Duty to Cooperate Report – March 2017.</p>
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	<ul style="list-style-type: none"> • 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. 	The SIR focuses on the single issue of objectively assessed housing need within the district. The adopted Core Strategy (2010) policy CS6 focuses on strategic economic matters. In addition, Chapter 6 'Economy and Jobs' of the SALP identifies existing employment areas and allocates additional employment sites in the district through a sustainable plan-led approach.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> • A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22) 	Economic criteria-based policies are not contained within the SIR, but are included within the adopted Core Strategy (2010) and adopted Joint Development Management Policies document (2015) which form part of the district’s suite of planning documents.
2. Ensuring the vitality of town centres (paras 23-37)		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	<ul style="list-style-type: none"> • 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. 	Town centre and retail based policies are not contained within the SIR, but are included within an emerging Site Allocations Local Plan (SALP), the adopted Core Strategy (2010), and the adopted Joint Development Management Policies document (2015) which form part of the district’s suite of planning documents.
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development	<ul style="list-style-type: none"> • An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages identified and allocated. 	Site allocations are not contained within the SIR, but are included within an emerging Site Allocations Local Plan (SALP), the plan-making process of which has run concurrently alongside the SIR.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
needed in town centres (23)		
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	<ul style="list-style-type: none"> • 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. 	Rural economy based policies are not contained within the SIR, but are included within the adopted Core Strategy (2010) and adopted Joint Development Management Policies document (2015) which form part of the district's suite of planning documents.
4. Promoting sustainable transport (paras 29-41)		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from	<ul style="list-style-type: none"> • Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. • Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. • A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. 	Sustainable transport based policies are not contained within the SIR, but are included within the adopted Core Strategy (2010) and adopted Joint Development Management Policies document (2015) which form part of the district's suite of planning documents. In Section 3 of the SIR, entitled 'Background to assessing the distribution of housing', outlines in para. 3.6 the following plan evidence base documents relevant to transport in the district that have influenced the final iteration of the SIR: <ul style="list-style-type: none"> • Draft Infrastructure Delivery Plan (IDP) (January 2017) • Forest Heath Transport Technical Note Update (May 2016) • Forest Heath District Council Site Allocations Cumulative Traffic Impact Study (August 2016)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>urban to rural areas. (29) Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30) Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31) Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32) Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of</p>	<ul style="list-style-type: none"> • If local (car parking) standards have been prepared, are they justified and necessary? (39) • Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan. 	<ul style="list-style-type: none"> • Forest Heath Site Allocations Cumulative Traffic Impact Study – Addendum (October 2016) • A11 Growth Corridor – Feasibility Study: Delivering the Economic Growth Potential of the A11 Corridor – Executive Summary

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>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.</p> <p>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.</p>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>(39-40) Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		
<p>5. Supporting high quality communications infrastructure (paras 42-46)</p>		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing</p>	<ul style="list-style-type: none"> • Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44. 	<p>Telecommunications policy is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015), which forms part of the district's suite of planning documents.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
development. (44)		
6. Delivering a wide choice of high quality housing (paras 47-55)		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> • Identification of: <ul style="list-style-type: none"> a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) • A SHLAA 	<p>The Council in its production of the SIR produced a report, 'Forest Heath Five Year Housing Land Supply (December 2016)'. This report sets out the availability of housing land supply for the period 2017-2022. It takes a baseline of 31st March 2016 and estimates completions from existing commitments for 2016-17, establishing a 'year forward' 5 year supply for the period 2017-2022. Sites with planning permission are considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years. The assessment of land supply will be updated annually, although if any significant land supply changes occur at any time, further updates may be prepared and made available on the website. All sites with planning permission have been included within the first five years supply. Thereafter the housing trajectory takes a reasonable windfall allowance of 25 units per annum. This windfall allowance reflects a realistic assumption of sites likely to come forward, allowing for some to lapse. However, it should be noted that while there is a steady supply of windfalls, none are included within the 5 year supply. A technical report explains the Council's position regarding windfall.</p> <p>The report includes evidence to support a 5% buffer as being appropriate. The inspectors report into the Meddlar Stud appeal (Appeal Ref: APP/H3510/W/15/3070064) stated that he was not</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>persuaded that 'there has been a persistent under delivery of housing and so a 20% buffer is not justified'. The Secretary of State's decision on Hatchfield Farm (Ref: APP/H3510/V/14/2222871) accepted that the council had demonstrated there was a 5 year supply, and the council's methodology had applied a 5% buffer, indicating this was considered appropriate.</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"> • Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 	<p>The Council in its production of the SIR and emerging SALP have undertaken a Strategic Housing Land Availability Assessment (SHLAA) (2016, updated annually). The housing trajectory (appended to the 5 year supply report 2016) identifies a supply of deliverable sites for years 1-5, and developable sites for years 6-10 and 11-15.</p>
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)</p>	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	<p>Appendix C of the SIR contains the Housing Trajectory over the plan period to 2031. Section 5 of the SIR outlines the Council's approach to monitoring and review. This includes that the implementation of the housing strategy will be achieved through a variety of mechanisms, including an emerging Site Allocations Local Plan (SALP) and masterplans and concept statements, which will identify parameters for some of the more complex development sites.</p> <p>The Council, in its production of the SIR have produced a report, 'Forest Heath Five Year Housing Land Supply' (December 2016). This report includes a housing trajectory which illustrates the council can maintain a 5 year supply throughout the plan period. The assessment of land supply will be updated annually,</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>although if any significant land supply changes occur at any time, further updates may be prepared and made available on the website.</p> <p>The Council Authority Monitoring Reports (AMRs) record progress on housing delivery and other indicators for each monitoring year.</p>
<p>Set out the authority's approach to housing density to reflect local circumstances (47).</p>	<ul style="list-style-type: none"> • Policy on the density of development. 	<p>Housing density policy is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015), which forms part of the district's suite of planning documents.</p>
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)</p>	<ul style="list-style-type: none"> • Policy on planning for a mix of housing (including self-build), and housing for older people • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50) • Policy on affordable housing and consideration for the need for 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) 	<p>Housing mix / affordability policy is not contained within the SIR, but is included within the adopted Core Strategy (2010) and the adopted Joint Development Management Policies document (2015), both of which form part of the district's suite of planning documents.</p> <p>The SHMA 2013 provides evidence on the mix and type of housing provision and the needs of different groups.</p> <p>The SHMA January 2016 provides updated evidence on the affordable housing need for the district.</p> <p>The Parish Profiles (Cambridgeshire Atlas) provides population, housing stock, housing market indicators, affordability data and economic indicators at a parish level for the Cambridgeshire sub region including Forest Heath.</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs,</p>	<ul style="list-style-type: none"> • Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. 	<p>Rural housing and affordability policy is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015),</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>particularly for affordable housing, including through rural exception sites where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new isolated homes listed at para 55. 	<p>which forms part of the district's suite of planning documents.</p>
<p>7. Requiring good design (paras 56-68)</p>		
<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"> • 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 	<p>Specific housing quality / design based policy is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015), which forms part of the district's suite of planning documents.</p>
<p>8. Promoting healthy communities (paras 69-77)</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"> • Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community 	<p>Specific housing quality / design based policy is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015), which forms part of the district's suite of planning documents.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>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>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"> • Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure. 	<p>Specific community facility based policy is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015), which forms part of the district’s suite of planning documents.</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"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75) 	<p>Specific open space, sports and recreational facility based policy is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015), and an adopted Open Space, Sport and Recreation SPD (2011) which both form part of the district’s suite of planning documents.</p>
<p>Enable local communities, through local and neighbourhood plans, to</p>	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or 	<p>Specific local green space based policy is not contained within the SIR, but is included within the adopted Joint</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<p>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)</p>	<p>Development Management Policies document (2015), which forms part of the district’s suite of planning documents.</p>
<p>9. Protecting Green Belt land (paras 79-92)</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 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</p>	<ul style="list-style-type: none"> • Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> ○ Enhance the beneficial use of the Green Belt. (81) ○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) ○ Specify that inappropriate development should not be approved except in very special circumstances. (87) ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	<p>N/A - There is no land within or adjoining Forest Heath that is designated as Green Belt.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>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>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>		
<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"> • Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy. (95)) 	<p>Specific policy related to the mitigation and adaptation to climate change is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015), which forms part of the district's suite of planning documents.</p> <p>A variety of evidence base documents have helped inform the SIR distribution, including the 2011 SFRA, the SHLAA, the water cycle strategy and the sustainability appraisal, to ensure mitigation and adaptation to climate changes issues were considered.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies</p>	<ul style="list-style-type: none"> • A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for 	<p>Specific policy related to the use and supply of renewable and low carbon energy is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015),</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<p>renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</p> <ul style="list-style-type: none"> • 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) 	<p>which forms part of the district's suite of planning documents.</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<ul style="list-style-type: none"> • Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures 	<p>Specific policy related to the mitigation and adaptation to climate change is not contained within the SIR, but is included within the adopted Core Strategy (2010) and Joint Development Management Policies document (2015), which form part of the district's suite of planning documents.</p> <p>A variety of evidence base documents have helped inform the SIR distribution, including the 2011 SFRA, the SHLAA and the sustainability appraisal, to ensure that development is allocated away from flood risk areas.</p>
<p>Take account of marine planning (105)</p>	<ul style="list-style-type: none"> • Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation • Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development • Integrate as appropriate marine policy 	<p>N/A – Forest Heath district does not contain any land within, or have any direct influence on coastal areas.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	objectives into emerging policy <ul style="list-style-type: none"> Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	
Manage risk from coastal change (106)	<ul style="list-style-type: none"> Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	N/A – Forest Heath district does not contain any land within, or have any direct influence on coastal areas.
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	<ul style="list-style-type: none"> A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs. 	<p>Specific policy related to protecting valued landscapes is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015), which forms part of the district’s suite of planning documents.</p> <p>A variety of evidence base documents have helped inform the SIR distribution, including the SHLAA, a landscape and heritage study, Accessible Natural Green Space study and Sustainability Appraisal to ensure that biodiversity and green infrastructure is managed and enhanced.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Prevent unacceptable risks from pollution and land instability (109)	<ul style="list-style-type: none"> • Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity. 	Specific policy related to preventing unacceptable effects of pollution on health, the natural environment or general amenity is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015), which forms part of the district's suite of planning documents.
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> • Identification and mapping of local ecological networks and geological conservation interests. • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species 	<p>Specific policy related to minimising impacts on biodiversity is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015), which forms part of the district's suite of planning documents.</p> <p>A variety of evidence base documents have helped inform the SIR distribution, including the SHLAA, a landscape and heritage study, Accessible Natural Green Space study, deliverability of housing numbers in relation to Natura 2000 Constraint Buffers and Sustainability Appraisal, to ensure that ecological networks and priority species are preserved.</p>
12. Conserving and enhancing the historic environment (paras 126-141)		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	<ul style="list-style-type: none"> • A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets • A policy or policies which promote new 	Specific policy related to the conservation and enjoyment of the historic environment is not contained within the SIR, but is included within the adopted Joint Development Management Policies document (2015), which forms part of the district's suite of planning

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	development that will make a positive contribution to character and distinctiveness. (126)	documents.
13. Facilitating the sustainable use of minerals (paras 142-149)		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>N/A – Forest Heath District Council is not a Minerals Planning Authority.</p>
<p>Justified: <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"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<i>Participation</i>	The consultation statement. This should set out	The Statement of Consultation Regulation 19

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>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>summarises the Further Issues and Options and Preferred Options consultations, and The Statement of Consultation Regulation 22 (2017) summarises the Proposed Submission consultation held prior to submission of the SIR with corresponding responses made by the Council.</p> <p>The Duty to Cooperate Report - March 2017 summarises how the duty has been fulfilled with a range of consultees including district and county councils and Statutory Consultees.</p> <p>Additionally, the numerous stages of public consultation represented an opportunity for engagement with such prescribed bodies under the duty to cooperate.</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? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> • The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. <p>AND</p> <ul style="list-style-type: none"> • 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. <p>OR</p> <ul style="list-style-type: none"> • 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 	<p>Extensive evidence was commissioned / undertaken to provide the evidence for the context of the SIR documents. This includes, but is not limited to (consultants used where necessary in parenthesis):</p> <ul style="list-style-type: none"> • Sustainability Appraisal Scoping Report – 2015 (Johns Associates in partnership with Levett-Therivel) • Initial Sustainability Appraisal of the Single Issue Review of Core Strategy Policy CS7 Issues and Options stage, (Reg. 18) Forest Heath District Council Local Plan - July 2012 • Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review Interim SA Report – August 2015 (AECOM) • Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review Interim SA

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>formulation phases; and any other information on community views and preferences.</p> <p>OR</p> <ul style="list-style-type: none"> 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). 	<p>Report – April 2016 (AECOM)</p> <ul style="list-style-type: none"> Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review SA Report – January 2017 (AECOM) Sustainability Appraisal (SA) of 1) the Core Strategy Single Issue Review; and 2) the Site Allocations Local Plan Non-technical Summary of two SA Reports - January 2017 (AECOM) Habitats Regulations Assessment of the SIR – 2017 (LUC) Forest Heath Single Issue Review of CS7 and Site Allocations Local Plan – Air Quality Assessment regarding Breckland Special Area of Conservation (SAC) and Breckland Special Protection Area (SPA) - February 2017 (AECOM) Forest Heath District Council Local Plan Monitoring Report for 2013/14 and 2014/15 – 2016 (FHDC) Forest Heath draft Infrastructure Delivery Plan (supporting the SIR of Core Strategy Policy CS7 and Site Allocations Local Plan) – 2017 (FHDC) Forest Heath Five Year Housing Land Supply – 2016 (FHDC) Cambridgeshire (excluding Fenland), Kings Lynn & West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Needs Assessment (GTANA) – 2016 (Opinion Research Services) SHLAA – 2016 (FHDC) Market Signals and OAHN report – 2016 (Peter Brett Associates)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • OAHN and update report – 2016 (Cambridgeshire County Council Research Group) • Update on Objectively Assessed Need (OAN) in the Cambridgeshire Sub-Region Housing Market Area – February 2017 (Cambridgeshire and Peterborough Strategic Planning Unit) • A note for clarification by Cambridgeshire County Council Research Group to support Forest Heath District Council in objectively assessing and evidencing development needs for housing – January 2017 (Cambridgeshire County Council Research Group) • Landscape and Heritage Study – 2017 (FHDC) • Accessible Natural greenspace Study – 2017 (FHDC) • Review of Core Strategy CS2 Nesting Attempts Buffer – 2016 (Footprint Ecology) • Wildlife Audits (for Brandon, Mildenhall, Newmarket, Lakenheath, Red Lodge, Beck Row, Exning, Kentford and West Row) – 2015 (Suffolk Wildlife Trust) • FH Water Cycle Study – 2016, and Hatchfield Farm Impact Addendum – 2016 (Arcadis) • Deliverability of SIR Housing Numbers in relation to the Natura 2000 Constraint Buffers – 2016 (FHDC) • FH Economic Viability Assessment – 2016 (Three Dragons and Troy Planning & Design) • Forest Heath Employment Land Review – 2016 (Nathanial Lichfield & Partners)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • West Suffolk Retail & Leisure Study 2016: Forest Heath – 2016 (Carter Jonas) • Forest Heath Transport Technical Note Update – 2016 (AECOM) • A11 Growth Corridor – Feasibility Study: Delivering the Economic Growth / Potential of the A11 Corridor – Executive Summary (Bruton Knowles) • Economic Impact of the Horse Racing Industry in Newmarket – 2014 (SQW) • Local, national and international impacts of the Horseracing Industry in Newmarket - 2015 (Deloitte) <p>The following studies, reports and technical papers were commissioned / undertaken as part of the evidence for the Core Strategy (2010) and Joint Development Management Policies document (2015) but are relevant and have been used in the production of the SIR documents (consultants used where necessary in parenthesis):</p> <ul style="list-style-type: none"> • Forest Heath Strategic Flood Risk Assessment – 2011 (Hyder) • Forest Heath Retail and Town Centre Study – 2011 (Strategic Perspectives) • Suffolk Landscape Character Assessment – 2011 (Suffolk County Council) <p>The above mentioned studies, reports and technical papers are available on the Council’s website at the following locations:</p> <p>http://www.westsuffolk.gov.uk/planning/Planning_Poli</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		cies/local_plans/forest-heath-local-plan-background-evidence.cfm and http://www.westsuffolk.gov.uk/planning/Planning_Policies/backgroundpolicyevidence.cfm
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> • Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies. 	<p>Alternatives have been explored and appraised throughout the plan-making process in the following Sustainability Appraisal reports:</p> <ul style="list-style-type: none"> • Initial Sustainability Appraisal of the Single Issue Review of Core Strategy Policy CS7 Issues and Options stage, (Reg. 18) Forest Heath District Council Local Plan - July 2012 • Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review Interim SA Report – August 2015 (AECOM) • Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review Interim SA Report – April 2016 (AECOM) • Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review SA Report – January 2017 (AECOM) • Sustainability Appraisal (SA) of 1) the Core Strategy Single Issue Review; and 2) the Site Allocations Local Plan Non-technical Summary of two SA Reports - January 2017 (AECOM) <p>Chapters 1 and 2 of the SIR set out how the quantum of development within the document has been determined. The accompanying final SA of the SIR (2017) in 'Chapter 6: Developing the Reasonable</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Alternatives' outlines the history of the plan-making and SA process in regard to alternatives that were considered reasonable at the following stages of the SIR's development:</p> <ul style="list-style-type: none"> • Issues and options (2012) • Further issues and options (2015) • Preferred options (April 2016) • Refining understanding of reasonable alternatives (late 2016) <p>This chapter also sets out the reason for rejection of each alternative explored throughout the process, and in light of the selection of the most appropriate approach. The appraisal of the preferred approach, and the reasonable alternatives at the time of the Proposed Submission SIR (2017), are contained within the SA at Chapter 7. The SA also outlines throughout the report where recommendations made within previous iterations of the SA have been taken into account within the SIR.</p>
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan’s vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<ul style="list-style-type: none"> • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	<p>The SIR document is accompanied by the ‘Forest Heath draft Infrastructure Delivery Plan (supporting the SIR of Core Strategy Policy CS7 and Site Allocations Local Plan) – 2017 (FHDC).’</p> <p>The SIR forms part of the Council’s suite of planning documents alongside the adopted Core Strategy (2010), the Joint Development Management Policies document (2015) and the emerging Site Allocations Local Plan (SALP) (2017).</p> <p>The Statement of Consultation Regulation 22 (2017) outlines those responses received on the context of the SIR by relevant agencies.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale 	<ul style="list-style-type: none"> • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL 	<p>The SIR document is accompanied by the ‘Forest Heath draft Infrastructure Delivery Plan (supporting the SIR of Core Strategy Policy CS7 and Site Allocations Local Plan) – 2017 (FHDC).’</p> <p>The SIR form part of the Council’s suite of planning documents alongside the adopted Core Strategy (2010), the Joint Development Management Policies document (2015) and the emerging Site Allocations Local Plan (SALP) (2017).</p> <p>The Statement of Consultation Regulation 22 (2017) outlines those responses received on the context of the</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
of the policies?	schedule.	SIR by relevant agencies.
<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"> • Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area 	<p>The SIR form part of the Council’s suite of planning documents alongside the adopted Core Strategy (2010), the Joint Development Management Policies document (2015) and the emerging Site Allocations Local Plan (SALP) (2017).</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<ul style="list-style-type: none"> • Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed. • Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> a. the effectiveness of policies and what evidence is being collected to undertake this b. changes affecting the baseline information and any information on trends on which the DPD is based • Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	<p>The SIR document is accompanied by the ‘Forest Heath draft Infrastructure Delivery Plan (supporting the SIR of Core Strategy Policy CS7 and Site Allocations Local Plan) – 2017 (FHDC).’</p> <p>Section 5 of the SIR outlines the monitoring and review processes of the document post-adoption. Appendix C of the SIR outlines the District’s Housing Trajectory to 2031.</p> <p>Section 9 of the SIR outlines the monitoring process of the document post-adoption. Appendix 2 of the SALP outlines the District’s detailed Housing Trajectory to 2031.</p> <p>The SA of the SIR outlines monitoring indicators relevant to the document in Chapter 15 of the SA.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. 	
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? Is it clear who is intended to implement each part of 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? 	<ul style="list-style-type: none"> A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy 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. 	<p>The Duty to Cooperate Report – March 2017 summarises how the duty has been fulfilled with a range of consultees including district and county councils and Statutory Consultees.</p> <p>Additionally, the numerous stages of public consultation represented an opportunity for engagement with such prescribed bodies under the duty to cooperate.</p> <p>West Suffolk Council represents an amalgamation of Forest Heath and St. Edmundsbury District Councils, with local planning functions undertaken by a single team.</p> <p>A Local Plan Review will be undertaken in early 2018. This will be a joint plan covering the administrative areas of Forest Heath and St. Edmundsbury District Councils.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<ul style="list-style-type: none"> • Sections of the DPD setting out indicators, targets and milestones • Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal 	<p>The SIR document is accompanied by the 'Forest Heath draft Infrastructure Delivery Plan (supporting the SIR of Core Strategy Policy CS7 and Site Allocations Local Plan) – 2017 (FHDC).'</p> <p>Section 5 of the SIR outlines the monitoring and review processes of the document post-adoption. Appendix C of the SIR outlines the District's Housing Trajectory to 2031.</p> <p>Section 9 of the SIR outlines the monitoring process of the document post-adoption.</p> <p>The SA of the SIR outlines monitoring indicators relevant to the documents in Chapter 15 of the SA.</p>
<p><i>Consistent with national policy:</i> <i>the plan should enable the delivery of sustainable development in accordance with the policies 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"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is 	<ul style="list-style-type: none"> • Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, 	<p>The SIR reflects a single policy review of Core Strategy Policy CS7 in order to align the adopted Core Strategy (2010) with national policy; specifically the requirements for housing needs to be objectively</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>there local justification?</p> <ul style="list-style-type: none"> Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<p>where appropriate, other information which provides the rationale for departing from national policy.</p> <ul style="list-style-type: none"> Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement Reports or copies of correspondence as to how representations have been considered and dealt with. 	<p>assessed as espoused in the NPPF.</p>

Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

Policy Expectations	Possible Evidence	Evidence Provided
<p>Policy A: Using evidence to plan positively and manage development (para 6)</p>		
<p>Early and effective community engagement with both settled and traveller communities.</p>	<ul style="list-style-type: none"> • Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups. 	<p>A review of the Gypsy and Traveller Accommodation Need Assessment (GTANA) forming part of the SIR evidence base was completed by independent consultants (ORS) in October 2016. This review indicated that there are no identified accommodation needs for settled or traveller communities falling within the new definition in the SIR plan period. This study included engagement with relevant communities.</p> <p>Policy for the provision of such accommodation needs does not fall within the scope of the SIR, and exists within the LPA's adopted Core Strategy (2010) and Joint Development Management Policies document (2015). The Core Strategy policy CS8 was based on an earlier assessment of gypsy and traveller provision, as set out in the Regional Spatial Strategy. Policy CS8 sets a criteria based approach to assess sites and proposals against.</p>
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an</p>	<ul style="list-style-type: none"> • Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the 	<p>A review of the Gypsy and Traveller Accommodation Need Assessment (GTANA) forming part of the SIR evidence base was completed by independent consultants (ORS) in October 2016. This review indicated that there are no identified accommodation needs for settled or traveller communities falling within the new definition in the SIR plan period. This study included engagement with relevant</p>

Policy Expectations	Possible Evidence	Evidence Provided
<p>up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<p>preparation of your local plan and make planning decisions.</p>	<p>communities.</p> <p>Policy for the provision of such accommodation needs does not fall within the scope of the SIR, and exists within the LPA's adopted Core Strategy (2010) and Joint Development Management Policies document (2015). The Core Strategy policy CS8 was based on an earlier assessment of gypsy and traveller provision, as set out in the Regional Spatial Strategy. Policy CS8 sets a criteria based approach to assess sites and proposals against.</p>
<p>Policy B: Planning for traveller sites (paras 7-11)</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</p>	<ul style="list-style-type: none"> • Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 11 	<p>A review of the Gypsy and Traveller Accommodation Need Assessment (GTANA) forming part of the SIR evidence base was completed by independent consultants (ORS) in October 2016. This review indicated that there are no identified accommodation needs for settled or traveller communities falling within the new definition in the SIR plan period. This study included engagement with relevant communities.</p> <p>Policy for the provision of such accommodation needs does not fall within the scope of the SIR, and exists within the LPA's adopted Core Strategy (2010) and Joint Development Management Policies document (2015). The Core Strategy policy CS8 was based on an earlier assessment of gypsy and traveller provision, as set out in the Regional Spatial Strategy. Policy CS8 sets a criteria based approach to assess</p>

Policy Expectations	Possible Evidence	Evidence Provided
and environmentally.		sites and proposals against.
Policy C: Sites in rural areas and the countryside (para 12)		
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		<p>A review of the Gypsy and Traveller Accommodation Need Assessment (GTANA) forming part of the SIR evidence base was completed by independent consultants (ORS) in October 2016. This review indicated that there are no identified accommodation needs for settled or traveller communities falling within the new definition in the SIR plan period. This study included engagement with relevant communities.</p> <p>Policy for the provision of such accommodation needs does not fall within the scope of the SIR, and exists within the LPA's adopted Core Strategy (2010) and Joint Development Management Policies document (2015). The Core Strategy policy CS8 was based on an earlier assessment of gypsy and traveller provision, as set out in the Regional Spatial Strategy. Policy CS8 sets a criteria based approach to assess sites and proposals against.</p>
Policy D: Rural exception sites (para 13)		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas,	<ul style="list-style-type: none"> • If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity. 	A review of the Gypsy and Traveller Accommodation Need Assessment (GTANA) forming part of the SIR evidence base was completed by independent consultants (ORS) in October 2016. This review

Policy Expectations	Possible Evidence	Evidence Provided
<p>where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.</p>		<p>indicated that there are no identified accommodation needs for settled or traveller communities falling within the new definition in the SIR plan period. This study included engagement with relevant communities.</p> <p>Policy for the provision of such accommodation needs does not fall within the scope of the SIR, and exists within the LPA's adopted Core Strategy (2010) and Joint Development Management Policies document (2015). The Core Strategy policy CS8 was based on an earlier assessment of gypsy and traveller provision, as set out in the Regional Spatial Strategy. Policy CS8 sets a criteria based approach to assess sites and proposals against.</p>
<p>Policy E: Traveller sites in Green Belt (paras 14-15)</p>		
<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</p>	<ul style="list-style-type: none"> Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process. 	<p>There is no land within the LPA administrative area that is designated as Green Belt.</p>

Policy Expectations	Possible Evidence	Evidence Provided
be done only through the plan-making process.		
Policy F: Mixed planning use traveller sites (paras 16-18)		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	<ul style="list-style-type: none"> • Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. • N.B. Mixed use should not be permitted on rural exception sites 	<p>A review of the Gypsy and Traveller Accommodation Need Assessment (GTANA) forming part of the SIR evidence base was completed by independent consultants (ORS) in October 2016. This review indicated that there are no identified accommodation needs for settled or traveller communities falling within the new definition in the SIR plan period. This study included engagement with relevant communities.</p> <p>Policy for the provision of such accommodation needs does not fall within the scope of the SIR, and exists within the LPA's adopted Core Strategy (2010) and Joint Development Management Policies document (2015). The Core Strategy policy CS8 was based on an earlier assessment of gypsy and traveller provision, as set out in the Regional Spatial Strategy. Policy CS8 sets a criteria based approach to assess sites and proposals against, which includes consideration for employment related activities.</p>
Policy G: Major development projects (para 19)		
Local planning	<ul style="list-style-type: none"> • Where a major development proposal 	A review of the Gypsy and Traveller Accommodation

Policy Expectations	Possible Evidence	Evidence Provided
<p>authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.</p>	<p>requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.</p>	<p>Need Assessment (GTANA) forming part of the SIR evidence base was completed by independent consultants (ORS) in October 2016. This review indicated that there are no identified accommodation needs for settled or traveller communities falling within the new definition in the SIR plan period. This study included engagement with relevant communities.</p> <p>Policy for the provision of such accommodation needs does not fall within the scope of the SIR, and exists within the LPA's adopted Core Strategy (2010) and Joint Development Management Policies document (2015). The Core Strategy policy CS8 was based on an earlier assessment of gypsy and traveller provision, as set out in the Regional Spatial Strategy. Policy CS8 sets a criteria based approach to assess sites and proposals against.</p>