

Soundness Self-Assessment Checklist (March 2014)

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

In summary – the key requirements of plan preparation are:

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

The Tests of Soundness at Examination

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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>		

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<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> • 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>The Local Plan sets out a clear vision and set of objectives that are specific to Reading in section 2. The vision and objectives were initially consulted on as part of the Issues and Options consultation and have informed the preparation of the plan throughout. It is clear which priorities the plan seeks to address and what it seeks to achieve.</p> <p>It is generally clear how the vision and objectives have informed the policies and proposals in the local plan. There are not considered to be any policy gaps arising from the objectives.</p> <p>Reasonable alternatives to the quantum of development have been assessed. Alternatives to the level of housing development in policy H1 and employment development in policy EM1 have been considered through the sustainability appraisal process. Different approaches to the employment – housing balance were also subject to sustainability appraisal at Issues and Options stage.</p> <p>It is difficult to assess reasonable alternatives to the spatial strategy, as sites can only be used where they arise, and inevitably that means a focus on central and south Reading.</p>

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		<p>There are no reasonable alternatives to the overall spatial strategy.</p> <p>The policies are internally consistent. The Local Plan Background Paper (EV002) contains a matrix testing the compatibility of policies with one another, and identifying any issues.</p> <p>The Local Plan contains an implementation section, which sets out how the proposals in the plan can be delivered and timescales for the plan are identifies realistic delivery timescales.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —any adverse impacts of doing so would</p>	<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 Local Plan contains a policy on the presumption in favour of sustainable development at CC1.</p> <p>The plan as a whole reflects the presumption in favour of sustainable development, in that it identifies the development needs and seeks to accommodate them insofar as is possible whilst still achieving ‘sustainable’ development. The</p>

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<p>significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</p> <p>—specific policies in this Framework indicate development should be restricted.</p>		<p>evidence to demonstrate how this process has worked is set out in the Local Plan Background Paper (EV002) in summary, and in more site-specific detail in the Housing and Economic Land Availability Assessment (EV014 & EV015).</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> • A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk) 	<p>Policy CC1 reflects the presumption in favour of sustainable development as set out in the National Planning Policy Framework. It is based on the model policy, and is carried forward from the Sites and Detailed Policies Document (PP006), where it was found to be sound and consistent with national policy.</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<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>Objectively assessed development needs have been identified as follows:</p> <ul style="list-style-type: none"> • Housing: Berkshire Strategic Housing Market Assessment (2016) – EV011 • Employment: Central Berkshire Economic Development Needs Assessment (2016) – EV009 • Retail and Leisure: Western Berkshire Retail and Leisure Study (2017) – EV020 <p>The main vehicle for seeking to accommodate these needs has been the Housing and Economic Land Availability Assessment (2017) (EV014 & EV015), and this sets out the audit</p>

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		<p>trail for how the plan translates the needs into a plan requirement. This may be complemented by additional information, for instance for employment needs there is additional information set out in the Employment Area Analysis (EV010).</p> <p>The Local Plan Background Paper (EV002) contains general commentary on how development needs have been translated into plan requirements.</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 vision and objectives for the Local Plan set out a high level economic vision, and this is articulated further through other parts of the Local Plan, in particular the Employment section. This has been informed by and helps to achieve the Thames Valley Berkshire Strategic Economic Plan (OP003), and research work for the SEP has also underpinned both the SHMA and EDNA.
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. 	Policy CC9 of the Local Plan is a specific policy which requires the provision of infrastructure, which

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	<ul style="list-style-type: none"> 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) 	<p>includes, transport, education and environmental enhancements. However, the need to address barriers to investment is threaded throughout the plan. One of the main barriers to investment consistently identified through economic plans is the provision of affordable housing, and the plan therefore contains strong policies to address this from both housing development (H3) and employment development (CC9). Other examples include delivering major transport projects (TR2) and ensuring small business space (EM4).</p>
<p>2. Ensuring the vitality of town centres (paras 23-37)</p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> 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. 	<p>Policies RL1 and RL2 plan for the growth of the network and hierarchy of centres over the plan period. In the case of central Reading, this expands into the policies in the Central Reading section of the plan which deal with a range of different matters relating to the growth of the centre, including development allocations. There are also development allocations that provide for the growth of smaller centres including The Meadway (WR3o) and Whitley (SR2).</p>
<p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial,</p>	<ul style="list-style-type: none"> An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. 	<p>A range of sites have been identified to meet needs for a variety of uses in</p>

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office, tourism, cultural, community services and residential development needed in town centres (23)	<ul style="list-style-type: none"> Primary and secondary shopping frontages identified and allocated. 	town centres, particularly in central Reading. Policies CR11-CR14 identify sites to meet around 5,500-8,400 homes, around 130,000-185,000 sq m of offices and 24,000-37,000 sq m of retail and leisure. Additional allocations are made for other centres (see above).
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. 	Not applicable in Reading, which contains no rural areas.
4. Promoting sustainable transport (paras 29-41)		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do</p>	<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. If local (car parking) standards have been prepared, are they justified and necessary? (39) Identification and protection of sites and routes where 	Transport policies for Reading are set out in section 4.5 of the Local Plan. This includes a range of measures to promote and support sustainable modes of transport. It is also supplemented by policy CC6, which seeks to link the intensity of development to the accessibility of the location, and the development allocations themselves, which seek to maximise the potential of those areas which are accessible by a choice of means of travel and ensure a mix of uses in the most accessible locations which reduce the need to travel.

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<p>so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p>	<p>infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</p>	<p>The plan provides for the setting of car parking standards, although the specific standards themselves are set out and justified in a Parking Standards and Design Supplementary Planning Document (PP011).</p> <p>The plan also safeguards land required for transport infrastructure schemes, including for sustainable modes of travel.</p> <p>Transport infrastructure has been a key aspect of the duty to co-operate and has been considered jointly with neighbouring authorities.</p>

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<p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		
<p>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)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> • Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44. 	<p>Policy OU2 of the Local Plan sets out the policy on telecommunications development. This provides broad support to proposals for telecommunications development, and does not impose any blanket restrictions or unreasonable burdens on new development.</p>
<p>6. Delivering a wide choice of high quality housing (paras 47-55)</p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in 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 Housing Implementation Strategy (EV012) identifies that Reading has a five-year housing land supply, using a 5% buffer to reflect Reading’s past record of good housing delivery.</p>

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Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	<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 	A supply of developable sites has been identified for the whole plan period to deliver the housing provision figure set out in policy H1. This is set out in various locations, but best summarised in the Housing Implementation Strategy (EV012) and Housing and Economic Land Availability Assessment (EV014 & EV015).
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)	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	<p>A Housing Trajectory is included within the Local Plan which demonstrates the expected rate of delivery across the plan period.</p> <p>A Housing Implementation Strategy (EV012) has been produced which describes how a five-year housing land supply will be maintained across the plan period.</p>
Set out the authority’s approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> • Policy on the density of development. 	Policy H2 sets out Reading’s approach to the density of housing development. This is based on an understanding of local needs, in particular the Strategic Housing Market Assessment (EV011).
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	<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) 	The Berkshire (including South Bucks) Strategic Housing Market Assessment (EV011) seeks to identify the needs for housing, including for different

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supply to meet this demand. (para 159)	<p>required in particular locations, reflecting local demand. (50)</p> <ul style="list-style-type: none"> • 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>groups. Policy H2 of the Local Plan plans for a mix of housing sizes, and also makes provision for self- and custom build, whilst other policies such as H6 and H12 deal with the needs of older people and vulnerable groups and students.</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> • Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new isolated homes listed at para 55. 	<p>Not applicable in Reading, which contains no rural areas.</p>
7. Requiring good design (paras 56-68)		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<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>Policy CC7 is an overall design policy that sets out expectations for design quality across Reading, and it is supplemented by policy CR2 on design quality in the town centre. Policies on matters such as heritage and landscape also deal with issues of quality where there are particular sensitivities. Many of the policies throughout the plan are relevant to the quality of development, and as such, much of the plan meets this requirement.</p>

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8. Promoting healthy communities (paras 69-77)		
<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 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>There is no specific policy on inclusive communities. However, matters such as mixed use, safety and accessibility are threaded throughout the plan. Policy CC7 on design deals with accessibility and safety, and seeks to provide high quality public realm. Policy CR2 deals in more detail with design and public realm in the centre. Policy H5 seeks provision of accessible housing. All policies and proposals have been assessed through the Sustainability Appraisal (LP005), which includes looking at safety and community cohesion through assessment against objective 12.</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>Policy OU1 of the Local Plan deals with the provision of new and retention of existing community facilities, and encourages the co-location of facilities on site.</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 	<p>In terms of open space, the Open Spaces Strategy (EV021), as updated by the Open Space Update Note (EV022), assesses the need for and</p>

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	<p>buildings and land from development, with specific exceptions. (74)</p> <ul style="list-style-type: none"> • Protection and enhancement of rights of way and access. (75) 	<p>quantity of open space. A Playing Pitches Strategy (EV023) looks specifically at the provision of playing pitches. This has led to the standards for new provision in policy EN9 and the other open space policies EN7, EN8 and EN10.</p> <p>In terms of built sport facilities, the Western Berkshire Retail and Commercial Leisure Assessment (EV020) considers this matter, and this fed into policy RL2.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78) 	<p>Policy EN7 of the Local Plan identifies Local Green Space in Reading. This was informed by consultation with the community, particularly at Issues and Options stage. With no Neighbourhood Plan Areas in Reading, there are no other opportunities to identify such spaces, which means that they should be set out in the Local Plan. The background paper to support policy EN7 (EV033) sets out more information.</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</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) 	<p>Not applicable in Reading, which contains no Green Belt land.</p>

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<p>biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<ul style="list-style-type: none"> ○ 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>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>The Local Plan contains a variety of measures to mitigate and adapt to climate change. It is threaded throughout the plan, but some of the most significant elements are as follows:</p> <ul style="list-style-type: none"> ● Policy CC2 seeks sustainable design and construction of new buildings ● Policy CC3 requires the design of development to adapt to climate change ● Policy CC4 seeks the provision of

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>decentralised energy in larger development schemes</p> <ul style="list-style-type: none"> • Policy CC6 links intensity of development to the accessibility particularly by non-car modes • Policy H5 requires zero carbon homes for major housing and improved water efficiency standards • Policy TR1 promotes sustainable modes of transport.
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> • A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97) 	<p>Policy CC4 of the Local Plan particularly requires larger developments to consider the provision of decentralised energy, and specifically identifies central and south Reading as particular opportunities.</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>Policy CC3 of the Local Plan deals with adaptation to climate change, and addressing the vulnerability of development to changes that will result, such as increased risk of flooding, and other extreme weather events.</p> <p>Policy EN18 manages the risk of</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>flooding by directing development away from areas where there is a high risk of flooding, and ensuring that developments incorporate adequate sustainable drainage systems.</p> <p>The sequential and exception test has been applied in identifying development sites, and this is available as an evidence document (EV028).</p>
Take account of marine planning (105)	<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 objectives into emerging policy • Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	Not applicable in Reading, as plans have no implications for marine areas.
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. 	Not applicable in Reading, which has no 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 EN13 of the Local Plan identifies

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> 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. 	five Major Landscape Features of particular landscape significance, and also deals with the proximity of two Areas of Outstanding Natural Beauty.
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. 	Policy EN15 (on air quality), EN16 (on pollution) and EN17 (on noise-generating equipment) together deal with pollution issues for new development. Where individual sites would potentially result in, or be vulnerable to, pollution effects, this is highlighted within the site allocation policy itself.
<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>Policy EN12 sets out Reading’s approach to minimising effects on biodiversity and geodiversity, and where possible enhancing, Reading’s biodiversity. It is particularly based around the concept of a Green Network, which allows for movement of wildlife between the fragmented habitats within Reading, and across the Borough boundaries.</p> <p>The Local Plan also recognises areas of biodiversity importance identified at a strategic level, including Local Wildlife Sites and Biodiversity Opportunity Areas (which span Borough boundaries).</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
12. Conserving and enhancing the historic environment (paras 126-141)		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<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 development that will make a positive contribution to character and distinctiveness. (126) 	<p>The Local Plan contains a positive strategy for the historic environment, which has been significantly enhanced from the adopted development plans. This includes policies EN1 to EN6, as well as CR15, but it is incorporated throughout the whole plan rather than being a separate element.</p> <p>This positive strategy has been developed in co-operation with Historic England and with community organisations, in particular the Conservation Area Advisory Committee.</p> <p>The Historic Environment Background Paper (EV024) sets out more detail on how this positive strategy has been developed.</p>
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>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</p>	<p>Reading Borough Council is a minerals planning authority, and is preparing a joint Minerals and Waste Local Plan with Wokingham Borough Council, Bracknell Forest Borough Council and the Royal Borough of Windsor and Maidenhead. This joint plan is due to reach Preferred Options stage in 2018.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	neighbouring and more distant authorities.	The programme for production is set out in the Local Development Scheme (PP001). As such, the Local Plan does not set out minerals policies.
<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. 		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>The Local Plan has been through three periods of community engagement (Issues and Options, Draft and Pre-Submission Draft), all of which have allowed for engagement of all interested parties. The respective consultation statements (LP006, LP012, LP015) set out how these periods have been undertaken and how they comply with the Council's adopted Statement of Community Involvement (PP002).</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>	<p>There is a wide evidence base which is available alongside the submission Local Plan and Proposals Map. This provides detail on how the individual policies have been justified and what assumptions are made. The Local Plan Background Paper (EV002) deals with each policy in turn and summarises how it has been developed and what</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<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 formulation phases; and any other information on community views and preferences. <p style="text-align: center;">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). 	evidence it draws on.
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA’s chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> • 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. 	Reasonable alternatives have been derived for each policy and identified site, and appraised in the Sustainability Appraisal of the Pre-Submission Local Plan (LP005). The reasons why alternatives were rejected are summarised in the Local Plan Background Paper (EVO02), unless otherwise specified.
<p>Effective: the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</p>		

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • 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 		
<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 link between the vision, objectives, spatial strategy and the policies and proposals is considered to be clear. There are no obvious policy gaps in fulfilling the vision and objectives.</p> <p>The policies are internally consistent. The Local Plan Background Paper (EV002) includes an assessment of the plan's internal consistency.</p> <p>The Implementation section of the plan (section 10) sets out realistic timescales for when proposals will come forward, and outlines how they will be achieved.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? 	<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 	<p>The Local Plan is accompanied by a full Infrastructure Delivery Plan (EV007), which sets out the infrastructure</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<p>and timescales, and related to a CIL schedule where appropriate.</p> <ul style="list-style-type: none"> • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	<p>required to deliver the plan, how it will be delivered, when and by whom. A summary schedule is included within the plan itself at section 10. The Community Infrastructure Levy Charging Schedule (PP009) was based on previous versions, and there are plans to update it based on the most recent Local Plan.</p>
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> • 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 Local Plan reflects spatial planning, and integrates with other policies such as the Strategic Economic Plan, Local Transport Plan, Air Quality Action Plan, Cycling Strategy and high level documents such as the Reading 2050 vision.</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: <ol 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 • Sections within the DPD dealing with possible change areas and 	<p>The Local Plan is reasonably flexible to cope with changes in circumstances. The Local Plan Background Paper (EV002) contains a section examining the possible changes in circumstances and outlining the flexibility of the plan. There are limits to the degree to which plans can be flexible however, and changes in circumstances that would fundamentally change the character of the area would always be likely to necessitate a full review.</p> <p>Section 11 (Monitoring Framework) describes the expectations in terms of</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>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</p> <ul style="list-style-type: none"> 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>levels of development and other matters and outlines how the Council will keep this under review, and trigger a review of the Local Plan if necessary.</p>
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? Is it clear who is intended to implement each part of 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 Co-operate Statement (EV001) sets out how the duty to co-operate has been complied with, and includes evidence of complying with the duty such as correspondence and memoranda of understanding.</p> <p>Where the Local Plan relies upon another organisation to deliver its proposals, this is set out in the plan itself, either within the supporting text to policies and proposals, or within the summary infrastructure delivery plan. A full Infrastructure Delivery Plan (EV007) accompanies the Submission documents.</p>
<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? 	<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 	<p>The Local Plan contains a monitoring framework in section 11, which sets out how the plan will be monitored, when, by whom and where it will be reported. The significant sustainability effects have generally fed into policies in the Local Plan itself, which will be monitored through the same framework. The latest version</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • 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? 	<p>the sustainability appraisal</p>	<p>of the Annual Monitoring Report (PP010) shows the current monitoring that the Council undertakes. A Housing Trajectory is also included at Appendix 1 of the Local Plan.</p>
<p><i>Consistent with national policy: 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 there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<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, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement • Reports or copies of correspondence as to how representations have been considered and dealt with. 	<p>There are four main areas where there are potential tensions with national policy, as set out below. These are explored in more depth in other documents such as the Local Plan Background Paper (EV002) and Duty to Co-operate Statement (EV001):</p> <ul style="list-style-type: none"> • Reading cannot meet its full OAN for housing, due to a lack of suitable, available and achievable sites. Provision will need to be made elsewhere within the HMA, and is being managed under the duty to co-operate. This is in line with the process in national policy. • Reading also cannot meet its full need for permanent traveller sites. Provision will need to be made elsewhere, and is being managed under the duty to co-operate. This is in line with the process in national policy.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Policy H3 seeks to secure affordable housing on sites of 10 and under dwellings. Although a ministerial statement does not support this, this does not override local policy, and the Council considers that the need for affordable housing locally justifies this requirement. The Local Plan Background Paper (EV002) provides more details. • Policy H5 seeks provision of zero carbon homes, which exceeds the standards set out in the ministerial statement which withdrew the Code for Sustainable Homes. The Council considers that this is justified in Reading, and the Local Plan Background Paper (EV002) provides more details. <p>No policies are included that merely repeat national policy.</p>

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Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

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Policy Expectations	Possible Evidence	Evidence Provided
<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>The needs of gypsies and travellers formed a specific item in the first consultation, Issues and Options for the Local Plan (LP013). The Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment (EV016) was based upon survey work of travellers in Reading, and took account of other stakeholder involvement such as from representative bodies.</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 up-to-date understanding of likely permanent and transit accommodation needs of their areas.</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 preparation of your local plan and make planning decisions. 	<p>The Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment (EV016) was based upon survey work of travellers in Reading, and took account of other stakeholder involvement such as from representative bodies, nearby local authorities, police and health services, and assessed the permanent and transit accommodation needs</p>

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Policy Expectations	Possible Evidence	Evidence Provided
		within Reading.
Policy B: Planning for traveller sites (paras 7-11)		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> • 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>The Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment (EV016) identified needs for 10-17 permanent traveller pitches, 5 transit pitches and 2 plots for travelling showpeople. Whilst it is considered that the transit and travelling showpeople need could be accommodated within Reading, no suitable sites have been identified for meeting the permanent need (see EV019, the Gypsy and Traveller Provision Background Document). This has led to a need to seek alternative locations under the duty to co-operate. At the point of submission, no locations had been identified. The process is described in more detail in the Local Plan Background Paper (EV002).</p>

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Policy Expectations	Possible Evidence	Evidence Provided
		Policy H13 of the Local Plan sets out the criteria against which proposals for gypsy and traveller sites will be considered. These conform generally to the criteria in PPTS.
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.		Not applicable in Reading, which contains no rural areas.
Policy D: Rural exception sites (para 13)		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	<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. 	Not applicable in Reading, which contains no rural areas.
Policy E: Traveller sites in Green Belt (paras 14-15)		
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. Exceptional limited alteration to the defined	<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. 	Not applicable in Reading, which contains no Green Belt land.

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Policy Expectations	Possible Evidence	Evidence Provided
<p>Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>		
<p>Policy F: Mixed planning use traveller sites (paras 16-18)</p>		
<p>Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.</p>	<ul style="list-style-type: none"> • 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>No sites have been identified in the Local Plan for permanent traveller pitches, and therefore no mixed-use sites have been identified. Transit sites, for which a potential site has been identified, are less suited for mixed uses, as operation of a business will require a more permanent base.</p>
<p>Policy G: Major development projects (para 19)</p>		
<p>Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.</p>	<ul style="list-style-type: none"> • Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community. 	<p>There are no existing traveller sites in Reading, and therefore no proposals for relocation.</p>

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Integration of marine and terrestrial planning

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

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

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

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

Soundness Self-Assessment Checklist (March 2014)

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

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

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

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

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all¹ public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions²

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

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

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

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

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

Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
Key requirements under the Duty to Co-Operate		
Consistency between marine and terrestrial policy documents and guidance	<ul style="list-style-type: none"> • Demonstration of consistency of aim between relevant local plan policies and marine policy documents (i.e. the MPS and any relevant adopted marine plans) • Proof of collaborative working with the MMO and that the MPS has been taken into account. 	Not applicable in Reading, as plans have no implications for marine areas.
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	<ul style="list-style-type: none"> • Early and effective policy development engagement undertaken, including discussions with the MMO • Evidence of iteration of policies and plans as a result of engagement with the MMO • Evidence of engagement with the MMO in relation to monitoring, implementation and throughout the policy cycle • Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	Not applicable in Reading, as plans have no implications for marine areas.
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	<ul style="list-style-type: none"> • Evidence that the LPA has shared or provided relevant data to the MMO that can help inform Marine Plans or MPS review • Demonstration that local plan policy has been underpinned by data provided by the MMO or the MPS • Explicit cross-referencing in local plan to MPS, the MMO, their 	Not applicable in Reading, as plans have no implications for marine areas.

Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
	roles, and relevant marine plans	
Marine Policy Statement- Chapter 2: General Principles for Decision-Making³		
Sections 2.1 -2.2: The UK vision for the marine environment		
<p>The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')</p> <p>Achieving the vision through marine planning</p>	<ul style="list-style-type: none"> • Reference in DPD where appropriate to UK vision for the marine environment • Contribution to the vision through local plan policies and supporting text 	Not applicable in Reading, as plans have no implications for marine areas.
Section 2.4: Considering benefits and adverse effects in marine planning		
<p>Consider benefits and adverse effects of plan policies</p>	<ul style="list-style-type: none"> • Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal 	Not applicable in Reading, as plans have no implications for marine areas.
Section 2.5: Economic, social and environmental considerations	<ul style="list-style-type: none"> • 	
<p>Contribute to the objectives of relevant</p>	<ul style="list-style-type: none"> • Reference to relevant EU Directives in DPD and sustainability 	Not applicable in Reading, as

³ As the Marine Policy Statement was not targeted specifically at terrestrial planning authorities, some of its sections are, in practice, relevant to marine planning authorities only and/or there is already a comprehensive policy framework governing terrestrial development (e.g. energy infrastructure), Where this is considered to be the case, i.e. where it is considered likely that a terrestrial planning DPD would be found sound without referencing that section, the section in question has been omitted from this checklist.

Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
EU Directives (Marine Strategy Framework Directive and Water Framework Directive)	appraisal <ul style="list-style-type: none"> • Consideration of contribution of DPD policies to the objectives of relevant EU Directives 	plans have no implications for marine areas.
Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities		
3.1 Marine Protected Areas		
Incorporate identified areas and features of importance for nature conservation Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts	<ul style="list-style-type: none"> • Identification of relevant areas and features of importance for nature conservation within relevant marine plan area(s) • Consideration of impacts of policy and/or terrestrial development on those areas and features of importance • Measures to mitigate, monitor and manage negative impacts on those areas and features of importance 	Not applicable in Reading, as plans have no implications for marine areas.
3.4 Ports and shipping		
Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety Protect the efficiency and resilience of continuing port operations	<ul style="list-style-type: none"> • Evidence that policy with potential impact on ports and shipping minimises negative impacts on sector • Where relevant, evidence that economic, employment and transport policies are protective of ports and shipping sector 	Not applicable in Reading, as plans have no implications for marine areas.
3.8 Fisheries		
Consider potential economic, social	<ul style="list-style-type: none"> • Where relevant, evidence that other policies minimise negative 	Not applicable in Reading, as

Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
and environmental impacts of other developments on fishing activity	impacts on fishing activity and/or aquaculture	plans have no implications for marine areas.
3.9 Aquaculture		
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	<ul style="list-style-type: none"> • Where relevant, evidence that the benefits of aquaculture industry development have been considered 	Not applicable in Reading, as plans have no implications for marine areas.
3.10 Surface water management and waste water treatment and disposal		
Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment	<ul style="list-style-type: none"> • Reference to and consideration of the co-existence of waste water infrastructure with other marine activities, including the potential for waste water infrastructure to mitigate marine impacts through design or location 	Not applicable in Reading, as plans have no implications for marine areas.
3.11 Tourism and recreation		
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and local communities	<ul style="list-style-type: none"> • Where relevant, reference to marine tourism and recreation • Evidence that the potential for marine tourism and recreation has been recognised in plan-making 	Not applicable in Reading, as plans have no implications for marine areas.