



## Soundness Self Assessment Checklist

2017

### Breckland Local Plan

This soundness self assessment checklist was produced by the Planning Advisory Service (PAS). Breckland District Council has used this checklist to demonstrate that the Local Plan and supporting documents meet the tests of soundness as set out in the relevant legislation.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
<p><b>Positively Prepared:</b> the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</p>		
<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed.</li> <li>• Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them.</li> <li>• The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another.</li> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery.</li> <li>• Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> </ul>	<p>The introductory section (Section 1) of the Local Plan sets out the Strategic Vision and Objectives. The supporting text explains how the Strategic Vision is linked to Breckland Council's 2015 Corporate Plan which was informed by aspirations expressed by the local community, businesses and organisations through stakeholder consultation. The 18 Strategic Objectives seek to implement the vision and inform the direction of the Core Policies in the plan.</p> <p>The document is divided into logical sections under the wider headings of: general policies, housing, transport, environment, economy and employment, communities, infrastructure and delivery. This ordering helps to link the policies to the vision and objectives, and ensures that all objectives are adequately addressed. The supporting text provides justification for the direction of each of the plan policies. The policies on infrastructure and delivery are supported by the Breckland Infrastructure Delivery Plan, November 2017 (LP/V/1) which forms the key evidence for infrastructure planning and phasing of the two Strategic Urban Extensions (SUE's).</p> <p>The proposed vision, objectives and spatial strategy were initially set out in the Issues and Options Consultation document published in November 2014 (LP/S/6). Specific questions sought to attain people's views on the proposals at the earliest stage of</p>

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		<p>document production to help feed into, and to develop, the vision, objectives and spatial strategy in subsequent versions of the document. Options for different growth scenarios and development patterns were presented at Issues and Options stage. The Sustainability Appraisal that accompanied each consultation document also demonstrates that alternative options were considered and appraised (LP/S/3, LP/S/5, LP/S/7, LP/S/10, LP/S/11, LP/S/13). The presented options of different growth scenarios were informed by evidence; initially different models based on demographic led, economic led and supply-side led growth which was refined with reference to the Central Norfolk Strategic Housing Market Assessment (SHMA) 2015 and the subsequent update to the SHMA in 2017 (LP/H/1). The appendix for the submitted Consultation Statement sets out a summary of responses received at each stage. The full responses were used to inform the development of the Local Plan. The Duty to Cooperate Statement (LP/S/18) demonstrates cooperation with the DtC bodies showing how each key strategic cross boundary issue was addressed in cooperation with the relevant organisations.</p> <p>The policies are internally consistent. Many of the plan policies contain references to other complementary policies within the plan to help the reader understand internal linkages, particularly where this relates to the assessment of a planning application.</p> <p>The submitted Breckland Local Development Scheme, June 2017 (LP/S/20) sets out the timescale for the Local Plan and the intention to produce a supplementary planning document on design to aid implementation of</p>

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<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <p>—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<ul style="list-style-type: none"> <li>• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see ‘Section 3 Effective’, below).</li> <li>• An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</li> <li>• Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)</li> </ul>	<p>the Local Plan.</p> <p>A local approach to achieving sustainable development is set out in the first overarching policy of the Local Plan. Policy GEN 1 – Sustainable Development in Breckland, reflects a more local interpretation of sustainable development which seeks recognition of Breckland’s rural nature and aspirations of the local community whilst also reflecting the presumption in favour of sustainable development as set out in national policy.</p> <p>The objectively assessed need for Breckland has derived from key evidence based documents including the Central Norfolk Strategic Housing Market Assessment (SHMA) (LP/H/1), the Employment Growth Study (LP/ER/1), the Breckland Gypsy and Traveller Accommodation Needs Assessment (LP/H/2) and the Breckland Retail and Town Centre Study (LP/ER/2).</p> <p>The Local Service Centre Topic Paper (LP/H/3) and Site Selection Topic Paper (LP/H/4) accompanying the submitted plan provide an overview of how development has been distributed to the most sustainable locations. These topic papers link to, and are further supported by the four iterations of the Sustainability Appraisal (LP/S/3, LP/S/5, LP/S/7, LP/S/10, LP/S/11, LP/S/13) which demonstrate how options for growth were considered at each stage. The preferred overall strategy and plan area distribution of development has also been influenced by the responses to public consultations. This is documented in the Consultation Statement (LP/S/14), which reports the responses received to proposed options for growth.</p>

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<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> <li>• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see <a href="http://www.planningportal.gov.uk">model policy at www.planningportal.gov.uk</a>)</li> </ul>	<p>As described in the proceeding section, policy GEN 1 – Sustainable Development in Breckland reflects the principles of the presumption in favour of sustainable development as set out in the NPPF.</p> <p>The policy on settlement boundaries (GEN 05) linking with Core Policies for housing (HOU 01 – 14) in addition to Core Policies for employment (EC 01 – 08), renewable energy (ENV 10), community facilities (COM 04) and infrastructure (INF 01 – 02) help to provide a positive planning framework for new development in the District.</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"> <li>• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs.</li> <li>• Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.</li> </ul>	<p>The Objectively Assessed Need (OAN) for the District has been informed by a number of evidence base documents. The update to the Central Norfolk SHMA (2017) (LP/H/1) sets out the housing need for the Central Norfolk housing market area, and breaks this information down for each local authority. The SHMA informs the housing need including affordable housing for the district. The Gypsy and Traveller Needs Accommodation Assessment (GTNAA, 2016) (LP/H/2) defines the current and future need for accommodation in the District. The Employment Growth Study (LP/ER/1) sets out different scenarios for employment growth based on past take up rates and projections, which has informed the requirement for 64 hectares of employment land in the District. The Local Service Centre Topic Paper (LP/H/3) sets out the level of services and facilities for each of Breckland’s settlements informing the strategy and approach to development for these villages in the Local Plan. The Site Selection Topic Paper (LP/H/4) provides an audit trail for how sites were assessed and selected for</p>

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		allocation, which is further supported by the Breckland Sequential Test (LP/E/7) and Historic Characterisation Study (LP/E/4). As previously described; the Duty to Cooperate Statement (LP/S/18) and Consultation Statement (LP/S/14) provide an audit trail of how the policy directions were informed by consultation with the public, stakeholders and defined DtC bodies.
<b>NPPF Principles: Delivering sustainable development</b>		
<b>1. Building a strong, competitive economy (paras 18-22)</b>		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	<ul style="list-style-type: none"> <li>Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.</li> </ul>	<p>Paragraph 3 of Breckland’s Strategic Vision and objectives 7 – 11 of the Strategic Objectives set out the key aspirations for economic development in the District and how this is set to be achieved.</p> <p>Chapter 6 of the Local Plan on Economy and Employment sets out the constraints and opportunities for employment development in the District. The chapter and policies draw on the Employment Growth Study and Land Review (2013) (LP/ER/1) as evidence for the policy direction.</p> <p>Proposals in the New Anglia Local Enterprise Partnership (LEP) Strategic Economic Plan are reflected in the policies for employment and the economy in the Local Plan in terms of job, business and housing creation. Specific reference is made to the 4000 home SUE in Attleborough, the 5000 home mixed use SUE in Thetford and the link to proposals for promotion of the A11 corridor which links the settlements to the wider region, connecting to London in both plans.</p>

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<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<ul style="list-style-type: none"> <li>• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</li> <li>• An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)</li> </ul>	<p>In delivering improvements to the economy, the policies seek to protect environmental assets (ENV 01-03), promote a sustainable transport network (TR 01), deliver housing (HOU policies) and employment (EC policies) including the infrastructure required to support new development (INF 02).</p> <p>Policy INF 02 Developer Contributions sets out how the Council will seek contributions to secure necessary infrastructure to enable development. The supporting Infrastructure Delivery Plan (LP/V/1) sets out the identified infrastructure constraints and the cost, timescale and delivery mechanisms to address identified barriers to investment, including for employment sites.</p> <p>Positively worded criteria based policies in the plan relating to the economy and employment include EC 03 – General Employment Areas, EC04 Employment Development outside General Employment Areas, EC 06 Farm Diversification and EC 07 – Tourism Related Development.</p> <p>The deliverability of the allocated employment sites was considered through the Employment Growth Study and Land Review (2013) (LP/ER/1). The plan allocated a significant level of employment land over the minimum identified need set out in the Employment Growth Study to plan positively for employment growth. The key locations for Employment: Snetterton, Attleborough and Thetford have been supported by significant partnership working between the Council and landowners, investors, private landowners and infrastructure providers which is documented in the</p>

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		Infrastructure Delivery Plan.
<b>2. Ensuring the vitality of town centres (paras 23-37)</b>		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	<ul style="list-style-type: none"> <li>The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</li> </ul>	<p>Policy EC 05 Town Centre and Retail Strategy sets out the hierarchy of centres and directs floorspace requirements in line with the Retail Study Addendum (2017) (LP/ER/3) projections over the plan period. The policy defines the Town Centre and Primary Shopping Area for the five market towns which are shown on the Policies Maps.</p> <p>Policy EC 05 outlines the focus for retail and leisure proposals in town centres, where an impact assessment will be required for proposals (based on a locally appropriate floorspace threshold), and the support for retail in rural settlements defined as Local Service Centres. The policy is positively worded to encourage the vitality of Breckland’s hierarchy of town centres.</p>
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	<ul style="list-style-type: none"> <li>An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses.</li> <li>Primary and secondary shopping frontages identified and allocated.</li> </ul>	An assessment of the future need for additional retail floorspace in the town centres was carried out as part of the 2014 Retail Study (LP/ER/2) which was subject to an update in 2017 (LP/ER/3). The update reassessed the quantitative scope for new retail and food and beverage floorspace in Breckland. The Study concluded that there was generally limited capacity for further convenience retail floorspace and that in terms of comparison goods, the District’s towns lose out due to competition from higher order centres outside the District. Policy EC 05 sets out the convenience, comparison and gross food and beverage floorspace requirements for the District’s five towns building on

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		<p>the evidence set out in the Retail Study update.</p> <p>Policy EC 05 defines the Primary and Secondary frontages for the District which are presented on the Policies Maps.</p>
<p><b>3. Supporting a prosperous rural economy (para 28)</b></p>		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<ul style="list-style-type: none"> <li>Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities.</li> </ul>	<p>Much of the District is rural in its character, therefore it is appropriate for the Council to have supportive policies relating to the rural economy. Policy EC 04 - Employment Development Outside General Employment Areas, sets a criteria based policy to enable new/expanded employment development in circumstances where allocated sites or general employment areas are unsuitable for the proposal. The Local Plan also contains a policy on farm diversification (policy EC 06) and for tourism related development (EC 07). Policies EC 05 and COM 04 support local retail, services and community facilities in the more rural settlements.</p>
<p><b>4. Promoting sustainable transport (paras 29-41)</b></p>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable</p>	<ul style="list-style-type: none"> <li>Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31.</li> <li>Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices</li> </ul>	<p>The Infrastructure Delivery Plan (IDP) (LP/V/1) and Duty to Cooperate Statement (LP/S/18) both contain chapters on Transport, setting out how the Council has worked with Norfolk County Council, as Highways Authority to identify infrastructure constraints and opportunities at a strategic level and considered individual proposed allocations at a more detailed level. In terms of evidence gathering and cooperative working, specific focus has been given to proposals for</p>

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<p>transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to</p>	<p>where appropriate, particularly the criteria in paragraph 35.</p> <ul style="list-style-type: none"> <li>• A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.</li> <li>• Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.</li> <li>• If local (car parking) standards have been prepared, are they justified and necessary? (39)</li> <li>• Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</li> </ul>	<p>Attleborough, Thetford and Dereham due to the scale of development proposed for allocation in these towns and the existing capacity issues. The IDP sets the detailed evidence, constraints, cost and funding secured to deliver strategic transport improvements to enable planned development to be delivered in the plan period. Policies for allocations in the identified towns set requirements to contribute to wider highway improvements.</p> <p>Policy TR 01 Sustainable Transport Network sets out how new development should seek to minimise the need to travel, promote sustainable modes of transport and improve accessibility. TR 02 Transport Requirements sets more specific criteria to ensure new development delivers the objectives set out in TR 01 and promotes maximum flexibility in the choice of travel modes for all potential users.</p> <p>The overall settlement hierarchy has been developed with accessibility and the provision of public transport as one of the five key criteria to define the order of settlements. This strategy ensures that greater levels of development are distributed to settlements which are more easily accessible. A mix of uses are promoted in the two Strategic Urban Extensions and other employment allocations have been directed to the towns and Snetterton as an employment hub on the A11 as these are the most accessible locations, in the District's most populated areas.</p> <p>Due to Breckland's rural location, it is considered essential to ensure an appropriate level of parking is provided for new developments, which are based on</p>

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<p>undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>the standards currently implemented through a policy in the Core Strategy. Policy HOU 06 – Principle of New Housing sets a ‘starting point’ for the consideration of level of parking for new developments, but the policy provides flexibility to reflect local conditions.</p> <p>The Local Plan Policies Maps (LP/S/2), as well as the Key Diagram within the Local Plan, show strategic routes in the District connecting Breckland’s key centres for housing and employment. The Local Plan does not identify sites and routes for protection, as new strategic transport infrastructure is predominantly being delivered within the areas identified as Strategic Urban Extensions and within the built up areas of Dereham.</p>
<p><b>5. Supporting high quality communications infrastructure (paras 42-46)</b></p>		
<p>Support the expansion of the electronic communications networks, including telecommunications’ masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> <li>Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.</li> </ul>	<p>Policy INF 01 Telecommunications supports proposals for the provision and improvement of telecommunications infrastructure subject to limited exceptions relating to design and siting. The Council has undertaken partnership working as part of the wider program ‘Better Broadband for Norfolk’ and therefore the policy seeks new development to include on-site SuperFast and UltraFast broadband infrastructure to enable connectivity to wider networks.</p>
<p><b>6. Delivering a wide choice of high quality housing (paras 47-55)</b></p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years’</p>	<ul style="list-style-type: none"> <li>Identification of: <ul style="list-style-type: none"> <li>a) five years or more supply of specific</li> </ul> </li> </ul>	<p>The Strategic Housing Land Availability Assessment 2014(SHLAA) (LP/H/5) and SHLAA Addendum 2015</p>

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<p>worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<p>deliverable sites; plus the buffer as appropriate</p> <ul style="list-style-type: none"> <li>• Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)</li> <li>• A SHLAA</li> </ul>	<p>(LP/H/6) records suitable, available and deliverable sites for housing and employment in the District. The housing trajectory set out in appendix 1 of the Local Plan demonstrates that the local plan identifies sufficient deliverable sites to provide a five year housing supply. This includes the 20% buffer, accepting that there has been a persistent under delivery of housing since the start of the plan period.</p> <p>Policy HOU 01 sets the development requirements and HOU 02 sets the level and location of growth. The majority of growth is directed to the higher order settlements; of which the majority of the supply consists of sites allocated in the plan. For those Local Service Centres where suitable sites for allocation have not been identified, and for the more rural settlements with boundaries, the source of housing will come from windfall development to meet the housing target, assessed in accordance with criteria based policies HOU 03 and HOU 04. This source of supply is limited to 6% of the target for additional dwellings and is justified on the basis that Breckland is an exceptionally rural district where the supply of housing for villages with limited services may take the form of small permissions of sites for 5 dwellings. It is neither a justified or effective strategy to undertake detailed site assessment to allocate smaller sites where this can be more efficiently addressed by a criterion based policy. A further criterion based policy also enables limited development in the smallest villages and hamlets in the District HOU 05 but this does not form part of the target supply.</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<ul style="list-style-type: none"> <li>• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</li> </ul>	<p>The Plan provides for a range of sites of different scales which ensures delivery of sites over the entire plan</p>

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		<p>period, helping to maintain a rolling supply. Larger sites will be phased according to infrastructure requirements and the capacity of the developer and therefore are projected to be delivered over longer timescales than the initial five years of the plan, as set out in the Infrastructure Delivery Plan (LP/V/1).</p> <p>The large strategic development sites consisting of Thetford Strategic Urban Extension (SUE) for 5000 dwellings and the Attleborough SUE for 4000 dwellings are projected to be delivered over the entire plan period and beyond. A number of the larger scale development sites in the plan located in the Market Towns will require a lead in time for the planning application and preparatory work and are projected to partially be delivered in the 6-10 year period. The criterion based policies HOU 03, HOU 04, HOU 05 will enable smaller sites for housing to come forward throughout the plan period to meet the identified need which is specific to each village.</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"> <li>• A housing trajectory</li> <li>• Monitoring of completions and permissions (47)</li> <li>• Updated and managed SHLAA. (47)</li> </ul>	<p>The housing trajectory is set out in the Local Plan in Appendix 1 (referenced in Policy HOU 01 – Development Requirements).</p> <p>The Council monitors completions and commitments annually which is documented in the Council’s Five Year Housing Land Supply Statement (most recently published in July 2017). The SHLAA (LP/H/5) sets out the theoretical source of supply and timescales for delivery. The Authorities Monitoring Report (LP/S/23) produced annually in September draws together the data monitored by the Council and external sources which aids implementation of policies in the Local Plan.</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
Set out the authority's approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> <li>Policy on the density of development.</li> </ul>	Policy HOU 06 – Principles of Development sets the local approach to housing density which is supplemented by Policy COM 01 – Design.
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	<ul style="list-style-type: none"> <li>Policy on planning for a mix of housing (including self-build, and housing for older people</li> <li>SHMA</li> <li>Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50)</li> <li>Evidence for housing provision based on up to date, objectively assessed needs. (50)</li> <li>Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)</li> </ul>	<p>The Central Norfolk SHMA (LP/H/1) sets the objectively assessed needs for the authorities which comprise the Central Norfolk Housing Market Area and is the basis for determining the level and mix of housing required within the plan period.</p> <p>Policy HOU 02 sets the level and location of growth for the District. Policy HOU 06 – Principles of Housing ensures proposals refer to the mix of housing identified for the District in the SHMA.</p> <p>Policy HOU 07 sets the local target for affordable housing in new development. The target has been informed by a range of evidence including the SHMA, past completions and the Breckland Local Plan CIL and Viability Assessment (LP/V/2).</p> <p>Policy HOU 08 sets the provision for accommodation for Travellers and Travelling Showpeople. Policy HOU 09 seeks to encourage the provision of specialist housing to meet the varied needs of the ageing population. Policy HOU 10 sets the proportion of housing which is required to conform to technical design standards to ensure a range of housing types are delivered to suit the different needs of potential occupiers.</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	<ul style="list-style-type: none"> <li>Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local</li> </ul>	The plan provides recognition of the rural character of the District, setting a number of policies to aid consideration of specific circumstances for housing

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
<p>where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<p>needs.</p> <ul style="list-style-type: none"> <li>• Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)</li> <li>• Examples of special circumstances to allow new isolated homes listed at para 55.</li> </ul>	<p>provision in the countryside.</p> <p>Policy HOU 11 sets out criteria for considering proposals for residential replacement, extension and alteration to protect the stock of modest scale homes in rural locations. Policy HOU 12 outlines criterion to enable the sustainable re-use of appropriately located and constructed buildings in the countryside, principally for economic purposes, but where not viable, for residential.</p> <p>Policy HOU 13 specifies how proposals for dwellings for agricultural workers will be assessed to support rural businesses, where relevant criteria are met. Policy HOU 14 – Affordable Housing Exceptions enables development of 100% affordable housing schemes for local people outside defined settlement boundaries, subject to a number of criteria.</p>
<p><b>7. Requiring good design (paras 56-68)</b></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"> <li>• Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues</li> </ul>	<p>The Local Plan contains a strategic overarching policy on design; policy GEN 2 - Promoting High Quality Design which sets out the Councils expectations for high quality design in new development. The plan additionally includes a more detailed policy on design; COM 01 – Design, which sets out the detailed design parameters to ensure that Breckland’s towns and villages retain the characteristics that provide their character, as set out in the strategic vision.</p>
<p><b>8. Promoting healthy communities (paras 69-77)</b></p>		

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies on inclusive communities.</li> <li>• Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</li> </ul>	<p>The policies on community: COM 01 – Design, COM 02 – Healthy Lifestyles and COM 03 - Protection of Amenity collectively ensure that development promotes healthy mixed communities. COM 01 includes clauses requiring development to be of high quality design, reduce opportunities for crime and anti social behaviour and to ensure accessibility for walking and cycling. Policy COM 02 seeks developments to mitigate potential negative effects on the health of the population. COM 03 helps to protect existing resident’s amenity, thereby helping to promote community cohesion between new occupiers and existing residents and to ensure development will provide for adequate levels of amenity for future residents.</p> <p>The largest planned development: Attleborough SUE (policy GEN 03) is required to be supported by a masterplan to provide for a mixed community, with additional infrastructure upgrades to the existing town centre and transport network to help integrate the development. The masterplan will also provide new facilities in the SUE boundary to serve both existing and new residents, helping to promote integration and community cohesion.</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies addressing community facilities and local service.</li> <li>• Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop</li> </ul>	<p>Policy COM 04 – Community Facilities protects against the loss of community facilities from Breckland’s settlements. The policy supports the creation, enhancement and expansion of new community facilities. The criteria based policies HOU 03 and HOU 04 enables limited additional development in rural villages over the plan period which additionally helps to sustain existing services and facilities.</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
	<p>and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</p>	
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<ul style="list-style-type: none"> <li>• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)</li> <li>• A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74)</li> <li>• Protection and enhancement of rights of way and access. (75)</li> </ul>	<p>The Open Space Assessment (2015) (LP/E/8) identifies the quantitative and qualitative deficits/surpluses of open space, sports and recreational facilities in the local area. In addition, the Council commissioned an Indoor and Built Sports and Recreational Facilities Study in 2017 (LP/V/7). This evidence informed policy ENV 04 – Open Space, Sport and Recreation which is supported by the identification of specific open space which is defined on the Policies Maps (LP/S/2). The policy protects against the loss of designated open space and additionally sets requirements for new open space in new residential developments. In exceptional circumstances provision will take the form of financial contributions, but for the most part is expected to deliver open space on site to serve new residents.</p> <p>Policy ENV 01 – Green Infrastructure seeks to safeguard and enhance the green infrastructure network in the district, helping to improve both non accessible green space for wildlife habitat and publicly accessible space for recreational opportunities building on existing public rights of way.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> <li>• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a</li> </ul>	<p>The 2015 Open Space Assessment (LP/E/8) reviewed sites submitted by Parish Councils which fed into the Local Plan. Only three Local Green Spaces met the definition outlined in the NPPF and these have been mapped on the Policies Maps. These Local Green Spaces are protected along with the existing designated open spaces under policy ENV 04 Open Space, Sport</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
	local green space should be consistent with policy for Green Belts. (78)	and Recreation.
<b>9. Protecting Green Belt land (paras 79-92)</b>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<ul style="list-style-type: none"> <li>• Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> <li>○ Enhance the beneficial use of the Green Belt. (81)</li> <li>○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)</li> <li>○ Specify that inappropriate development should not be approved except in very special circumstances. (87)</li> <li>○ Specify the exceptions to inappropriate development (89-90)</li> <li>○ Identify where very special circumstances might apply to renewable energy development. (91)</li> </ul> </li> </ul>	Breckland does not contain any land designated as Green Belt.
<b>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</b>		
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)	<ul style="list-style-type: none"> <li>• Planning of new development in locations and ways which reduce greenhouse gas emissions.</li> <li>• Support for energy efficiency improvements to existing building.</li> <li>• Local requirements for a building’s sustainability which are consistent with the Government’s</li> </ul>	The Site Selection Topic Paper (LP/H/4) demonstrates how the choice of sites for allocation was informed by the evidence including the sequential test, to avoid areas at risk of flooding, and through the process of sustainability appraisal to ensure sites chosen were the most sustainable options overall, taking into account

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
	zero carbon buildings policy . (95))	<p>the 19 locally devised sustainability objectives.</p> <p>Reference is made for the need to incorporate sustainable design and construction in new development in policy COM 01 – Design. The policy on technical design standards for new homes also sets a requirement for water efficiency standards in response to the findings of the Water Cycle Study (LP/E/5) which highlight that the district is one of the driest areas in the country.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> <li>• A strategy and policies to promote and maximise energy from renewable and low carbon sources,</li> <li>• Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</li> <li>• Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)</li> </ul>	<p>Policy ENV 10 - Renewable Energy Development sets out the Council’s approach to the assessment of renewable energy proposals in the district. The plan recognises the suitability of the district for solar energy. The policy encourages proposals for renewable energy, where it is demonstrated that there are no significant adverse effects or where there are such effects, the impacts are demonstrably outweighed by the benefits and the adverse impacts can be mitigated.</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<ul style="list-style-type: none"> <li>• Account taken of the impacts of climate change. (99)</li> <li>• Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</li> <li>• Policies to manage risk, from a range of impacts, through suitable adaptation measures</li> </ul>	<p>The Strategic Flood Risk Assessment (SFRA) (LP/E/6) was originally produced in 2007 which was subject to an update in 2017. The findings of the SFRA and comments on specific sites by the Local Lead Flood Authority were taken into account in the Breckland Sequential Test (LP/E/7). This document explains how sites were assessed to in line with the sequential approach to allocating development in lower flood risk areas.</p> <p>Policy ENV 09 – Flood Risk and Surface Water Drainage sets out how development should minimise the risk of</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
		flooding and requires developers to demonstrate that flood risk has been addressed and, where relevant, mitigated for through a planning application.
Take account of marine planning (105)	<ul style="list-style-type: none"> <li>• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation</li> <li>• Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development</li> <li>• Integrate as appropriate marine policy objectives into emerging policy</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	Breckland District does not contain any areas of coastline.
Manage risk from coastal change (106)	<ul style="list-style-type: none"> <li>• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas.</li> <li>• Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.</li> </ul>	Breckland District does not contain any areas of coastline.
<b>11. Conserving and enhancing the natural environment (paras 109-125)</b>		
Protect valued landscapes (109)	<ul style="list-style-type: none"> <li>• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.</li> <li>• Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of</li> </ul>	The Breckland Landscape Character Assessment (LCA) (LP/E/1) and Settlement Fringe Landscape Assessment (2007) (LP/E/2) is cited in the supporting text for each settlement, and has been used to inform the selection of allocations in the plan. The sensitivity of the landscape to change informed the scoring for one of the objectives in the Sustainability Appraisal (LP/S/3), with

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
	National Parks, the Broads and AONBs.	<p>sites in areas at higher risk of change scoring negatively against this criterion.</p> <p>Policy ENV 05 Protection and Enhancement of the Landscape provides high protection to distinctive landscapes in the district including The Brecks and river valleys and chalk rivers. The policy also requires the design of new development to be sympathetic to the landscape as informed by the LCA.</p>
Prevent unacceptable risks from pollution and land instability (109)	<ul style="list-style-type: none"> <li>Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.</li> </ul>	Policy COM 01, COM 02, and COM 03 seek to minimise pollution from new development, mitigate adverse impacts on health and seek to protect residential amenity.
<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"> <li>Identification and mapping of local ecological networks and geological conservation interests.</li> <li>Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species</li> </ul>	<p>Policy ENV 01 seeks to protect and enhance green infrastructure networks. The Duty to Cooperate Statement (LP/S/18) section on the Natural Environment (page 15) explains how Breckland District Council is cooperating with Norfolk authorities to develop a cross boundary Norfolk wide green infrastructure map. The proposed policy on ENV 01 pre-empted the completion of this map which is anticipated in 2017 but would provide a hook to refer to specific identified green corridors on a map adopted by the Norfolk Strategic Member Forum overseeing the production of the Norfolk Strategic Framework (see DtC Statement for detail).</p> <p>The Policies Map (LP/S/2) shows a number of international, national and local environmental designations including Regionally Important Geological Sites. Policy ENV 02 Sites of International, European, National &amp; Local Nature Conservation Importance</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
		<p>requires developments to demonstrate no adverse effect on designated sites setting out where an EIA and HRA would be necessary.</p> <p>Policy ENV 03 The Brecks Protected Habitats &amp; Species sets more detailed requirements for development proposals within a set distance from the European designated site. The policy refers to buffers which provide additional protection for habitats for Woodlark, Nightjar and Stone Curlews. These buffers have been adopted by neighbouring local authorities. The Habitats Regulation Assessment (HRA) (LP/S/4) provides more detail on the buffer areas and recommended policy approach. The DtC Statement explains the joined approach to management of development in the vicinity of The Brecks and the ongoing work to develop shared management, monitoring and mitigation strategies.</p>
<p><b>12. Conserving and enhancing the historic environment (paras 126-141)</b></p>		
<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"> <li>• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</li> <li>• A map/register of historic assets</li> <li>• A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</li> </ul>	<p>The Historic Characterisation Study (2017) (LP/E/4) provides an assessment of the impact of the proposed site allocations on the historic environment in relation to both designated heritage assets and potential non-designated assets. This Study informed the removal of some preferred allocations which were determined to have an adverse impact on heritage assets which could not be mitigated against. The Study further set policy requirements where sites could have an impact on the historic environment, to provide mitigation measures to enable development.</p> <p>Designated heritage assets including conservation</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
		<p>areas, listed buildings and scheduled monuments are shown on the Policies Maps (LP/S/2).</p> <p>Policy ENV 07 Designated Heritage Assets and policy ENV 08 Non-Designated Heritage Assets seek to ensure that historic assets are protected from adverse harm through proposals for development. The policy sets requirements for consideration of sites with potential archaeological interest.</p>
<p><b>13. Facilitating the sustainable use of minerals (paras 142-149)</b></p>		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to 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>Norfolk County Council are primarily responsible for minerals and waste planning in the county. Specific reference is made to policies in the adopted Minerals and Waste Core Strategy in relevant site allocations policies where such sites overlie a minerals resource.</p>
<p><b>Justified:</b> <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> <li>• Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area.</li> <li>• The most appropriate strategy when considered against reasonable alternatives.</li> </ul>		
<p><i>Participation</i></p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and</p>	<p>The Regulation 22 Consultation Statement (LP/S/14)</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
<p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>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>sets out the stages of consultation on the Local Plan, who was consulted and provides summaries of the representations made at each stage. The summary of representations enabled the identification of main issues which were presented to members after each stage of consultation to influence the direction of policies in the plan. Consultations were carried out in accordance with the adopted Statement of Community Involvement (LP/S/16).</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"> <li>• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by.</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>• Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already</li> </ul>	<p>The Breckland Local Plan has been informed by a range of comprehensive, detailed, up to date evidence produced both in house and also by consultants where more specialised knowledge and interpretation of data is required. The document library for the examination lists all the evidence used to develop the plan, the date of preparation and subsequent updates and who they were produced by.</p> <p>The supporting text for the policies in the plan cite the evidence used to justify each policy. The Topic Papers (LP/H/3, LP/H/4) explain in greater detail how evidence was used to inform the policy direction. Each version of the DPD provides supporting text to demonstrate how the proposed policy direction has been informed by available evidence. This is additionally supported by the different stages of the Sustainability Appraisal (LP/S/3, LP/S/5, LP/S/7, LP/S/10, LP/S/11, LP/S/13).</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
<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>	<p>clear in the reasoned justification in the DPD).</p> <ul style="list-style-type: none"> <li>• Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</li> <li>• An audit trail of how the evidence base, consultation and SA have influenced the plan.</li> <li>• Sections of the SA Report showing the assessment of options and alternatives.</li> <li>• Reports on how decisions on the inclusion of policy were made.</li> <li>• Sections of the consultation document demonstrating how options were developed and appraised.</li> <li>• Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.</li> </ul>	<p>The four iterations of the Sustainability Appraisal (LP/S/3, LP/S/5, LP/S/7, LP/S/10, LP/S/11, LP/S/13) document the assessment of the options to determine the most sustainable policy direction. Commentary for each of the policy options justifies the approach taken and the assessment of reasonable alternatives.</p> <p>The Issues and Options document (LP/S/6) set out reasonable options for the development strategy including options for the quantum of growth and distribution of development strategy. These options were refined in the separate Preferred Directions (LP/S/8, LP/S/9) and Preferred Sites and Settlement Boundaries (LP/S/12) consultations. Each of these consultations posed questions on the policy options or proposed direction which helped elicit responses from the public and stakeholders to help inform policies and feed into the final proposed submission document. The Consultation Statement (LP/S/14) presents an audit trail for comments received at each stage, a summary of main issues and how these were used to develop the document.</p> <p>Additionally the Site Selection Topic Paper (LP/H/4) collates the variety of evidence used to inform the choice of development allocations. The paper sets out the process of consideration of reasonable alternative site options, demonstrating how selection was informed by the SA and other evidence, particularly where options were scored comparably in the SA. Other evidence including the Sequential Test (LP/E/7), Historic Characterisation Study (LP/E/4), and information on deliverability helped to refine options to determine the</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
		most sustainable options for allocation.
<p><b>Effective:</b> <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> <li>• Be deliverable</li> <li>• Demonstrate sound infrastructure delivery planning</li> <li>• Have no regulatory or national planning barriers to its delivery</li> <li>• Have delivery partners who are signed up to it</li> <li>• Be coherent with the strategies of neighbouring authorities</li> <li>• Demonstrate how the Duty to Co-operate has been fulfilled</li> <li>• Be flexible</li> <li>• Be able to be monitored</li> </ul>		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> <li>• Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</li> <li>• Are the policies internally consistent?</li> <li>• Are there realistic timescales related to the objectives?</li> <li>• Does the DPD explain how its key policy objectives will be achieved?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans).</li> <li>• Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> <li>• Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such</li> </ul>	<p>The structure of the document follows a clear relationship between the Vision, the Strategic Objectives and the policies that will enable the Council's aspirations to be met. This ordering helps to link the policies to the vision and objectives, and ensures that all objectives are adequately addressed. The supporting text provides justification for the direction of each of the plan policies.</p> <p>Policies for strategic, larger scale allocations in particular Attleborough SUE (GEN O3), Thetford SUE saved policies, allocations for the Market Towns and employment sites contain clauses to ensure that key potential constraints to delivery are addressed in planning applications and that necessary infrastructure is delivered. This is supported by chapter 8 - Infrastructure and Delivery and particular policy INF 02</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
	as through a matrix).	<p>which sets out requirements for developer contributions to deliver infrastructure necessary to support development. This is underpinned by the Infrastructure Delivery Plan (LP/V/1) which sets out in detail the infrastructure constraints, costs, funding sources and phasing to enable the delivery of sites allocated in the plan.</p> <p>The housing trajectory (appendix 1) referenced in policy HOU 01 and HOU 02 sets out the projections for delivery of sites allocated in the plan. The deliverability of each site was checked prior to the submission of the plan. Each preferred and reasonable alternative site for residential allocations identified in the Preferred Sites and Settlement Boundaries consultation (LP/S/12) were individually contacted and requested to complete a Site Information Form which sought to determine when the site would be available, any outstanding issues regarding ownership or site constraints, including viability issues. This information was used to determine the deliverability of the site based on up to date information, as a number of sites were submitted at the start of the Local Plan process in 2013/14.</p> <p>The Local Development Scheme (LP/S/17) sets out the timescale for the Local Plan and commits to the production of a Design Supplementary Planning Document to aid implementation of the plan policies.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> <li>• Have the infrastructure implications of the policies clearly been identified?</li> <li>• Are the delivery mechanisms and timescales for implementation of the policies clearly</li> </ul>	<ul style="list-style-type: none"> <li>• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.</li> <li>• A schedule setting out responsibilities for delivery, mechanisms and timescales, and</li> </ul>	<p>The Infrastructure Delivery Plan (IDP) (LP/V/1) identifies the infrastructure requirements to deliver growth proposed in the Breckland District Local Plan over the plan period (to 2036). The IDP outlines what infrastructure is required, where and when in the plan</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
<p>identified?</p> <ul style="list-style-type: none"> <li>• Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?</li> </ul>	<p>related to a CIL schedule where appropriate.</p> <ul style="list-style-type: none"> <li>• Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues.</li> <li>• Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</li> </ul>	<p>period. One of the principal outcomes of the study is to identify the cost of delivering infrastructure to support the plan and the mechanism for delivery. The IDP addressed each infrastructure requirement as an individual topic e.g. transport, education, health. This provides a more comprehensive overview of the constraints and opportunities for each type of infrastructure, drawn down to requirements for specific sites. This information is summarised in an end table which lists the overall costs and timescale for delivery. More detailed phasing projections are provided for the Strategic Urban Extensions of Attleborough and Thetford to account for the level and complexity of infrastructure required to deliver the quantum of housing allocated for these extensions. Information from the IDP has been used to inform policies in the plan, and is specifically referenced through policy INF 02.</p> <p>Comments from infrastructure providers received at each stage of consultation on the document have informed the evidence on infrastructure needs and requirements. Further correspondence with infrastructure providers has taken place to refine options and feed into the IDP. A record of cooperation on strategic issues is set out in the Duty to Cooperate Statement (LP/S/18).</p> <p>The plan has also been subject to viability testing. The Local Plan and CIL Viability Assessment (LP/V/2) provided consideration to the financial implications of proposed policies on developers, and informed the setting of the affordable housing policy (HOU 07). Breckland District Council have not made a formal</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
		<p>commitment to introduce CIL at this point and the IDP demonstrates that infrastructure is able to be funded through existing S106 and S278 agreements. However, consideration of the potential role of CIL will inform development of a Schedule, should the Council decide to progress CIL in the future.</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"> <li>• Sections of the DPD that reflect the plans or strategies of the local authority and other bodies</li> <li>• Policies which seek to pull together different policy objectives</li> <li>• Expressions of support/representations from bodies responsible for other strategies affecting the area</li> </ul>	<p>The Local Plan has been developed with reference to plans, strategies and aspirations for the wider area. The quantum of planned growth derived from the Strategic Housing Market Assessment (LP/H/1) which focused on the central Norfolk housing market area which spans over a number of local authority boundaries. Similarly the level of employment growth target has been formulated from considering the wider functional economic area and commuting patterns in the Breckland Employment Growth Study, 2013 (LP/ER/1).</p> <p>All the local authorities in Norfolk have established a Norfolk Strategic Planning Member Forum made up of 2 elected members from each of the Norfolk Local Authorities which have worked cooperatively since forming in 2015. The Forum oversees the preparation of a Norfolk Strategic Framework (NSF) which considers and seeks agreement in relation to the strategically important cross boundary issues affecting the delivery of growth in Norfolk.</p> <p>Additionally the document has been guided by the wider strategy for Norfolk and Suffolk produced by the New Anglia LEP. The strategy for growth reflects the wider partnership work to promote the A11 Tech</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
		<p>Corridor in strategic allocations for Attleborough, Thetford and Snetterton.</p> <p>The Duty to Cooperate (LP/S/18) is a key part of the evidence base which shows how the Council has worked cooperatively to develop the plan through consideration of strategic issues and opportunities.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> <li>• Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</li> <li>• Does the DPD include the remedial actions that will be taken if the policies need adjustment?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.</li> <li>• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> <li>a. the effectiveness of policies and what evidence is being collected to undertake this</li> <li>b. changes affecting the baseline information and any information on trends on which the DPD is based</li> </ul> </li> <li>• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> <li>• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</li> <li>• Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if</li> </ul>	<p>The SA objectives will be monitored by headline monitoring indicators which will be updated annually in the Authorities Monitoring Report (AMR) (see SA document, chapter 8 – Proposals for Monitoring). The AMR (LP/S/23) provides an annual review of a range of data linked to the policies in the Local Plan in addition to Neighbourhood Planning and is thus the mechanism for which to determine the effectiveness of the implementation of the policies in the Local Plan. The AMR is the key evidence base which indicates whether a review of any Local Plan policy is required in the case that it is either not delivering a key objective of the Local Plan or the Sustainability Appraisal effectively. It therefore operates as the monitoring framework for the Local Plan.</p> <p>Flexibility has been built into the plan through the policy wording. Many of the policies are worded to allow flexibility to enable development to go ahead where it is otherwise sustainable but does not meet all the policy criteria. Examples of this are where there are clauses which indicate flexibility in meeting the criteria if evidence is provided to demonstrate that development would not be otherwise viable such as Policy HOU 07 – Affordable Housing.</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
	adjustment is required.	Further flexibility is provided in key policies related to housing as set out in HOU02 Level and Location of Growth, and the policies linked to this (HOU 03 -05). Each allocation is expected to provide 'at least' the number of houses sought for each site, enabling a higher level of development where this is in accordance with other plan policies. Furthermore the nature of policies HOU 03, HOU 04 and HOU 05 allows further development on sites immediately adjacent to village settlement boundaries, in some cases where a suitable site could not be identified in the Local Plan and in locations where under the current and previous planning policies for Breckland, development would be more restricted. There is flexibility in the specific locations where sites could come forward. These policies will ensure housing is delivered to meet the identified need.
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> <li>• Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?</li> <li>• Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>• A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why.</li> <li>• The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a</li> </ul>	<p>The Duty to Cooperate Statement (LP/S/18) sets out how the Council has, and continues to work with neighbouring authorities and other prescribed bodies in the formulation of the Local Plan and to address strategic cross boundary issues.</p> <p>Breckland Council is a member of the Norfolk Strategic Member Forum which comprises 2 elected members from each of the Norfolk Local Authorities. The Member Forum oversees the production of the Norfolk Strategic Framework (NSF) which considers and seeks agreement in relation to the strategic cross boundary issues affecting the delivery of growth in Norfolk. Breckland will continue as a member of the Norfolk Strategic Member Forum and the NSF after the Local Plan examination, and will therefore cooperate in planning</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
	<p>memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.</p>	<p>for growth in the wider county and bordering areas.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> <li>• Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)?</li> <li>• Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</li> <li>• Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out indicators, targets and milestones</li> <li>• Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>• Reference to any other reports or technical documents which contain information on the delivery of policies</li> <li>• Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal</li> </ul>	<p>As stated in relation to determining flexibility in the plan; the SA objectives will be monitored by headline monitoring indicators which will be updated annually in the Authorities Monitoring Report (see SA document, chapter 8 – Proposals for Monitoring). The AMR (LP/S/23) provides an annual review of a range of data linked to the policies in the Local Plan in addition to Neighbourhood Planning and is thus the mechanism for which to determine the effectiveness of the implementation of the policies in the Local Plan. The AMR is the key evidence base which indicates whether a review of any Local Plan policy is required in the case that it is either not delivering a key objective of the Local Plan or the Sustainability Appraisal effectively. It therefore operates as the monitoring framework for the Local Plan.</p> <p>In relation to housing, appendix 1 of the Local Plan sets out a housing trajectory which sets out anticipated delivery rates for housing allocations. Housing targets are set in HOU02 Level and Location of Growth, which are taken forward in the linked policies HOU 03 – 05. Housing delivery rates are monitored annually and recorded in the 5 year land supply statement and the AMR. Targets for employment development are contained in Policy EC 01 Economic Development and proposals for retail in EC 05 Town Centre and Retail Strategy. The AMR monitors more than just the delivery of development also containing sections on natural</p>

Soundness Test and Key Requirements	Possible evidence	Evidence Provided
		resources, the environment and accessibility.
<p><b><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></b></p>		
<p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> <li>• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification?</li> <li>• Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons.</li> <li>• Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy.</li> <li>• Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement.</li> <li>• Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement</li> <li>• Reports or copies of correspondence as to how representations have been considered and dealt with.</li> </ul>	<p>The plan does not present a departure from National Policy and has been produced in consistency with the NPPF.</p> <p>Policy ENV 07 Designated Heritage Assets does not build substantially on chapter 12 of the NPPF 'Conserving and enhancing the historic environment'. However, it is a necessary addition to the Local Plan as it complements and links to policy ENV 08 Non-Designated Heritage Assets, reinforcing the importance of both types of heritage assets, whilst asserting the more significant level of protection for designated assets as reflected in national policy.</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
<b>Policy A: Using evidence to plan positively and manage development (para 6)</b>		
Early and effective community engagement with both settled and traveller communities.	<ul style="list-style-type: none"> <li>• Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.</li> </ul>	The Gypsy and Traveller Accommodation Needs Assessment (GTANA) (LP/H/2) engaged with travelling communities to establish levels and types of need. Interviews were carried out with those living on authorised and unauthorised yards and encampments. The assessment made up to 3 attempts to contact individual households. In addition to this efforts were made to contact Gypsy and Travellers living within bricks and mortar.
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	<ul style="list-style-type: none"> <li>• Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan.</li> <li>• Collaborative working with neighbouring local planning authorities.</li> <li>• A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.</li> </ul>	<p>Norfolk County Council help fund the Norfolk and Suffolk Gypsy Roma and Traveller Service which provides support for Gypsy and Travellers including engagement with District Councils. The Gypsy Roma Traveller Achievement Service are also a general consultee on all Local Plan documents,</p> <p>Breckland Council carry out a caravan count bi-annually which provides data on the number and location of caravans within the District. This allows for engagement with the community. Engagement also occurred through the GTANA. The consultants liaised with the Showman's Guild of Great Britain in order to establish need for travelling</p>

Policy Expectations	Possible Evidence	Evidence Provided
		showmen.
<b>Policy B: Planning for traveller sites (paras 7-11)</b>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> <li>• Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15.</li> <li>• An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified.</li> <li>• Policy which takes into account criteria a-h of para 11</li> </ul>	<p>The Gypsy and Traveller Accommodation Needs Assessment (GTANA) (LP/H/2) sets pitch targets for both gypsy and travellers and also travelling show people. The level of need is shown within this assessment within five year periods. The assessment considers the level of need over the remainder of the plan period to 2036.</p> <p>Policy HOU08 within the Local Plan seeks to meet the needs for both travellers and travelling showpeople. The policy provides a criteria based approach which accords with criteria a to h of the PPTS. Planning applications will need to demonstrate that sites are in a sustainable location including through access to services and facilities. Furthermore the policy requires that applications will need to achieve neighbourliness including through its interaction with immediate neighbours and the wider settled community.</p>
<b>Policy C: Sites in rural areas and the countryside (para 12)</b>		

Policy Expectations	Possible Evidence	Evidence Provided
<p>When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.</p>		<p>Breckland is a predominantly rural District and the majority of existing authorised and tolerated sites are located within rural settings.</p> <p>Policy HOU08 of the Local Plan requires planning applications for new pitches to be sensitive to the local character. Sites which dominate the nearest settled communities would therefore be viewed as not meeting the criteria of Policy HOU08 and being sensitive to the local community. Furthermore the criteria approach includes the requirement to achieve neighbourliness including through their interactions with the wider settled community.</p>
<p><b>Policy D: Rural exception sites (para 13)</b></p>		
<p>If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.</p>	<ul style="list-style-type: none"> <li>• If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.</li> </ul>	<p>Policy HOU 08 sets a criteria based policy to assess proposals for the provision of plots and pitches on new sites. The policy does not specify the location/s for new sites and therefore is essentially a rural exception policy. The last clause of the policy safeguards the use of the site for Gypsy and Traveller and Travelling Showpeople outlining that alternative development or changes of use are not permitted.</p>

Policy Expectations	Possible Evidence	Evidence Provided
<b>Policy E: Traveller sites in Green Belt (paras 14-15)</b>		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<ul style="list-style-type: none"> <li>Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.</li> </ul>	<p>Breckland does not contain any land within a Green Belt and therefore this section has not been completed.</p>
<b>Policy F: Mixed planning use traveller sites (paras 16-18)</b>		
<p>Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.</p>	<ul style="list-style-type: none"> <li>Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another.</li> <li>N.B. Mixed use should not be permitted on rural exception sites</li> </ul>	<p>Policy HOU 08 does not preclude proposals for mixed use sites but such proposals should be in conformity with other policies in the Local Plan.</p>
<b>Policy G: Major development projects (para 19)</b>		
<p>Local planning authorities should work with the planning applicant and the affected traveller</p>	<ul style="list-style-type: none"> <li>Where a major development proposal requires the permanent or temporary relocation of a traveller</li> </ul>	<p>The Local Plan does not propose any development which would lead to the</p>

Policy Expectations	Possible Evidence	Evidence Provided
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.	site, the identification of a site or sites suitable for re-location of the community.	permanent or temporary relocation of the community.

## Soundness Self-Assessment Checklist

### Integration of marine and terrestrial planning

This part of the checklist has not been completed as it does not apply to Breckland.