Central Bedfordshire Council Local Plan (2015-2035)

Soundness Self-Assessment Checklist (April 2018)

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

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

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

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

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

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Vision and Objectives 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? Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives? Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? Have reasonable alternatives to the quantum of development and overall spatial strategy been considered? Are the policies internally consistent? Are there realistic timescales related to the objectives? Does the DPD explain how its key policy objectives will be achieved?	• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. • Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. • The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.	The Council is satisfied that the Local Plan identifies the issues that the Local Plan will address. It is also satisfied that the Local Plan contains a clear vision with a direct relationship between the identified issues, the vision and the objectives. Chapter 2 of the Local Plan paints the spatial portrait of Central Bedfordshire by identifying the key themes and corresponding challenges and opportunities. This draws together Central Bedfordshire's key characteristics, the broad spatial patterns and strategic issues which must be addressed through the policies elsewhere within the plan. They also lead to the overarching vision, identified in Chapter 4, which is explicit in setting out how the Council wishes Central Bedfordshire to develop over the lifetime of the plan. To provide a stepping stone between the Vision and the Local Plan a set of Strategic Objectives have been developed. Thirteen strategic objectives have been identified. These cover growth and infrastructure, local character, jobs and businesses, homes, transport and environment. These link back to the identified key themes in Chapter 2. This chapter includes a table which shows the relationship between the key themes and the strategic objectives. In addition, this table links with Local Plan Policies identifying how the vision and strategic objectives will be delivered. The Local Plan's policies follow logically from the objectives and spatial strategy, and they follow the structure of the 6 key themes. The Council considers that there are no policy gaps and each objective can be linked to a relevant policy in the plan.

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		Reasonable alternatives have been considered as part of the Sustainability Appraisal (SA) process. SA is an iterative part of the plan making process. SA was carried out simultaneously alongside the preparation of the Plan and informed the consideration of alternatives and options, as well as making decisions on the final policy direction.
		The Local Plan has gone through various internal Council consultation and approvals. All policies have been agreed corporately and the Council considers that there are no internal inconsistencies.
		The timescales set out in the Local Plan are considered realistic. The Plan covers a 20-year period up to 2035. Evidence has been produced to support the various objectives and policies of the Local Plan.
		Section 7 of the Plan sets out the implementation and delivery of the Plan. The majority of new development, both the strategic sites and small and medium sites, identified in the Plan's site allocations, particularly investments in new housing and jobs, will be delivered by the private sector.
		The Council has also updated and published an updated Infrastructure Delivery Plan (IDP) (2018), which incorporates an Infrastructure Delivery Schedule, and together it sets out the range of plans, programmes and strategies, including those of partner organisations and agencies.
		The IDP was prepared in collaboration and partnership working with

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		the infrastructure and service providers. It sets out responsibilities for the delivery of each scheme/infrastructure, funding arrangements where known and likely timescales of delivery. In addition, infrastructure providers, key agencies and other key stakeholders have been consulted throughout the preparation of the Local Plan and IDP, and the Consultation Statements set out how their comments have been considered. Ongoing monitoring of the Local Plan, for example through the Authority's Monitoring Report, and regular reviews of the IDP, will highlight if changes to the timescales are required. The Local Plan is supported by a Monitoring Framework. The Council's Local Development Scheme (March 2018) sets out the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.
The presumption in favour of sustainable development (NPPF paras 6-17) 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. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —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	• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below). • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)	The Council has produced a robust and detailed evidence base that supports the Local Plan and its spatial strategy. The evidence base has informed the establishment of development needs of the plan area and has been used to develop the spatial strategy in terms of quantum and distribution of development in Central Bedfordshire. All evidence underpinning the Local Plan is listed on the Council's website. The list of supporting and background documents submitted to the Planning Inspectorate is also available online. All the relevant studies are included on the Council's website. The intention of the strategic objectives and of the associated policies is to meet these needs identified within these reports and articulated by Policy SP1: Growth Strategy.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
—specific policies in this Framework indicate development should be restricted.		The Local Plan is underpinned by a Strategic Housing Market Assessment (2016) for the Central Bedfordshire and Luton HMA. Further evidence has also been carried out in relation to other types of developments and uses, such as in relation to employment, retail, green belt and transport. The Housing Implementation Strategy identifies a surplus in housing land supply which will take account of any non-delivery or delayed delivery as a result of changing circumstances. In addition, the Local Plan is supported by a Sustainability Appraisal. The Initial SA Report (June 2017) (incorporating the requirements of SEA), which was carried out to support the Regulation 18 consultation, considered the options and alternatives in terms of areas of growth, approach to the distribution of growth and different growth scenarios to accommodate the housing need. The findings of the Initial SA process concluded that the draft Local Plan, both its policies and its site allocations, are well designed to deliver sustainable development. The Initial SA Report and consultation responses received were then used to inform the Regulation 19 Draft Local Plan. The final SA Report (January 2018) of the Draft Local Plan (January 2018) sets out how the SA process has influenced the choice of the strategy and contact of policies in terms of what difference the SA process has made. The findings of the SA process concluded that the draft Local Plan,

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		both its policies and its site allocations, are well designed to deliver sustainable development. In addition, it identified that the Local Plan objectives are supportive of the delivery of the Sustainability Appraisal objectives, and the policies in the draft Local Plan aim to provide for the necessary growth of the Central Bedfordshire and surrounding area within its environmental, social and economic capacity and constraints. The Local Plan is flexible enough to adapt to rapid change as the overall strategy does not rely on the delivery of one particular element in one particular way. To add to the ability to respond to development pressures and infrastructure projects, a partial review of the Local Plan is proposed to start within six months of adoption of the Local Plan. This is to consider the potential opportunities of the of Cambridge-Milton Keynes-Oxford Arc. The Local Plan identifies Identified Areas for Future Growth and the Partial Plan Review will further assess them to look at the potential of strategic sites on the East West Rail/Expressway and the A1/East Coast Main Line Corridor routes in line with emerging decisions on this strategic infrastructure.
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.	• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk)	Policy SP2: National Planning Policy Framework – Presumption in Favour of Sustainable Development. This policy reflects the principles of the presumption in favour of sustainable development.

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Objectively assessed needs The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.	The challenges and opportunities facing Central Bedfordshire are set out in Chapter 2 of the Local Plan. Chapter 3 lists the Council's six key priorities for the area. The plain aims to achieve all these priorities. The Consultation Statement, the Consultation Statement Regulation 22(1) (c) Statement (April 2018), provides information on how the community has been engaged to identify local needs and opportunities. The Strategic Allocations set out in Chapter 7 detail the policy requirements for sustainable mixed-use communities. Central Bedfordshire & Luton Strategic Housing Market Assessment (SHMA) (Dec 2017) Housing Implementation Strategy (HIS) Functional Economic Market Assessment & Employment Land Review Duty to Co-operate Statement The Consultation Statement Regulation 22(1) (c) Statement (April 2018)
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively	• Articulation of a clear economic vision and strategy for the plan area linked to	The overarching Vision for Central Bedfordshire is explicit in seeking the provision of a range of job opportunities across the area and to

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encourages sustainable economic growth (21),	the Economic Strategy, LEP Strategy and marine policy documents where appropriate.	takes full advantage of its strategic position as the central hub of the Cambridge-Milton Keynes-Oxford Arc and its existing strategic north-south routes to deliver new high-tech employment. There are three strategic objectives which seek to provide a minimum of 24,000 new jobs, recognise the contribution of land for employment uses to meet the needs of different sectors of the economy and link deprived areas with employment benefits arising from the development of major sites and existing key locations. Locations for new strategic employment allocations are set out in policy SP1: Growth Strategy. Chapter 12: Employment and Economy of the Local Plan contains policies (Policies EMP1, EMP2, EMP3, EMP4 and EMP5) that seek to grant planning permission for appropriate B1, B2 and B8 uses and provide flexibility in changes of use for other non-B employment generating uses.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para	The Council recognises that there is potential for Central Bedfordshire's economy to expand due to its strategic position as the central hub of the Cambridge-Milton Keynes-Oxford Arc and its existing strategic north-south routes to deliver new high-tech employment supported by sustainable new homes. Additionally, the Local Plan recognises the high quality landscape, heritage and distinctiveness of the area. The Council's economic and employment policies, as set out in Chapter 12, are not prescriptive, other than ordinarily requiring the protection of employment uses. They allow flexibility and support changes of uses within the B class uses.

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	(22)	Chapter 12 of the Local Plan is underpinned by an updated Functional Economic Market Assessment and Employment Land Review (July 2017). This evidence document defines the functional economic market area (FEMA) geography and forecasts the demand and supply of employment land over the plan period. In addition, a Residential Development Viability Report (July 2017), Local Plan Viability Report Update (January 2018) and Local Plan Viability Assessment Addendum Report (April 2018) support the Local Plan and considers the cumulative assessment of all of the emerging plan policies, proposals and requirements. These studies considered the allocated sites, in particular the strategic allocations, to be deliverable.
2. Ensuring the vitality of town centres (paras 23-37)		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	• 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.	In accordance with the NPPF, the Local Plan includes policies concerned with maintaining the diversity of uses within the principal and secondary town centres, minor service centres and the large villages, and with supporting their vitality and their viability. This is a key aspect of the Local Plan's spatial strategy and strategic objectives (SO1). Chapter 13: Retail and Town Centres of the Local Plan seeks to support and encourage the retail and service provision in the villages and larger centres of Central Bedfordshire. Policies R1, R2 and R3 collectively are expected to deliver the vision and objectives to support Central Bedfordshire's centres and villages and to ensure they are competitive and meet the needs of the growth planned for. Chapter 13 (Table 13.1) sets out the retail hierarchy for Central Bedfordshire in accordance with the settlement hierarchy. Table

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		13.2 sets out the quantitative need for comparison and convenience floorspace across Central Bedfordshire. Additionally, this table sets out the need for food and drink uses in Central Bedfordshire. Chapter 13 of the Local Plan is underpinned by an updated Retail Study (July 2017). This evidence document assesses the retail and leisure needs across Central Bedfordshire considering market trends and the impact on larger centres in adjoining authority areas. This suggested that there was no need to allocate new retail sites in the area as it considered that there was an ability to accommodate this need within the existing centres.
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)	• An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages identified and allocated.	The Retail Study (July 2017) suggested that there was no need to allocate new retail sites in the area as it considered that there was an ability to accommodate this need within the existing centres. The Policies Map for Submission will identify the town centre boundaries for Dunstable, Leighton Buzzard, Houghton Regis, Flitwick, Ampthill, Sandy and Biggleswade.
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	• 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.	Due to the nature of Central Bedfordshire, there are several policies which seek to support sustainable economic growth in the rural areas. The Vision of the Local Plan recognises the heritage and distinctiveness of the existing market towns and villages and was all the high-quality landscape. Strategic Objectives (SO6 and SO7) relate to the economic growth of rural areas. Policy EMP4: Rural and Visitor Economy – recognises the contribution of the rural area and tourism to the wider economy and seeks to support proposals for appropriate employment generating

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		uses.
		EMP5: Significant facilities in the Countryside and Green Belt – acknowledges the presence of significant employment facilities in the countryside and Green Belt and seeks to support these facilities.
		Policy R2: Retail for minor service centres, villages and the rural economy – seeks to support retail premises outside of settlement boundaries recognising the need for these rural services.
		Policies in Chapter 19: Development in the Countryside recognise that the countryside and landscape is an important local issue and that the re-use and adaptation of rural buildings has an important role to play in the sustainability of rural areas (Policies DC1, DC2 and DC3).
4. Promoting sustainable transport (paras 29-41)		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29) Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where	• Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. • Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. • A spatial strategy and policy which seeks to reduce the need to travel	In accordance with the NPPF, the Council has worked closely with adjoining authorities, transport providers and government agencies to support sustainable growth. This has been through Duty to Cooperate meetings with adjoining local planning authorities, adjoining county councils and Highways England. Infrastructure providers have also been consulted on the IDP. To underpin this Local Plan and transport initiatives and strategic sites proposed within it, the Council has undertaken Transport Modelling. This identifies some public transport schemes to mitigate the impacts of growth. The strategic vision of the Local Plan recognises Central Bedfordshire's position on the Cambridge-Milton Keynes-Oxford Arc

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
reasonable to do so, facilitates the use of sustainable modes of transport. (30)	through balancing housing and employment provision.	and strategic north-south routes to deliver new jobs and homes as well as serving the new businesses and population by excellent transport infrastructure and multi-service hubs.
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)	• Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.	The strategic objectives (SO9 and SO10) seek to reduce the reliance on the use of the car by improving facilities at bus and train stations, delivering transport interchanges and promoting safe and sustainable forms of transport, such as improved walking and cycling routes. SO10 seeks to improve the network of east/west and north/south public transport and encourage the shift from road to rail freight to reduce demand on the highway network. Where appropriate, these objectives have been reflected within our planning policies.
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)	• If local (car parking) standards have been prepared, are they justified and necessary? (39)	
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)	• Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.	The Spatial Strategy and Policy SP1: Growth Strategy allocates strategic allocations for housing, employment and mixed-use development in line with the provision of new infrastructure and to meet the identified housing need close to key transport corridors in central Bedfordshire (East-West, A1/East Coast Mainline and M1/Thameslink).
Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)		
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)		The policies in Chapter 14: Transport aim to ensure that these strategic objectives are implemented, and new development capitalises on Central Bedfordshire's proximity to these key transport corridors.
For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale		Policy T1: Mitigation of Transport Impacts on the Network – requires new development to demonstrate how it will seek to reduce the need to travel and secure a modal shift towards sustainable forms of transport.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38) The setting of car parking standards including provision for town centres. (39-40) Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)		Policy T2: Highway Safety and Design – ensures that ned developments must not have a detrimental effect on highway safety and patterns of movement. Policy T4: Public Transport Interchanges – recognises the importance of public transport connectivity in forming an essential element to new development to further support the viability of public transport services. The strategic policies for the site allocations in Chapter 7 provide site-specific requirements for each of the strategic allocations ensuring that they deliver the vision and objectives of the Local Plan. In addition to transport related infrastructure requirements, including pedestrian and cycle routes, there are also requirements for the provision of employment land, health and social care hubs, community facilities, educational facilities and leisure facilities. This is to ensure that the new strategic allocations result in a sustainable development reducing the need to travel by car for accessing services. These requirements for new developments are reinforced by the Core Policies in the Local Plan. Policy T3: Parking requires developers of new development to have regard to the car parking standards set out in Central Bedfordshire's Design Guide and Parking Strategy. In addition to car parking, this policy also has a requirement for cycle parking. The provision of lorry parking facilities is also required in new industrial and commercial development. The Local Plan has 'Identified Locations for Future Development'

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		which will be subject to the Partial Plan Review. Central Bedfordshire is expected to play a core role in relation to the Cambridge-Milton Keynes-Oxford Arc. However, the timing, service and route selection for the new strategic road and rail infrastructure needs further development and definition. Related issues such as potential for capacity upgrades of the A1 have still to be resolved. As such a Partial Plan Review of the Local Plan is proposed to start within six months of adoption of this Plan and complete as soon as decisions on routeing and financial commitments to strategic infrastructure are in place.
5. Supporting high quality communications infrastructure (paras 42-46)		
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)	• Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.	In accordance with the NPPF, the Local Plan includes policies concerned with high quality communications infrastructure. The Local Plan Vision sets out that new businesses and population will be served by excellent community, transport and communications infrastructure and multi-service hubs have been delivered to support strong communities. Strategic Objectives SO1 relates to the associated infrastructure requirements to ensure sustainable growth. Section 17:5 Communications Infrastructure of Chapter 17, Policy HQ5: Broadband and Telecommunications Infrastructure requires new developments to provide superfast next generation broadband infrastructure to improve access to places where people live, work and travel in Central Bedfordshire.
6. Delivering a wide choice of high quality housing (paras 47-55)		
Identify and maintain a rolling supply of specific deliverable sites sufficient to	• Identification of: a) five years or more supply of specific	The Housing Implementation Study sets out that CBC can demonstrate a five-year supply of housing with the appropriate 5%

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provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) • A SHLAA	buffer. An update to the Housing Trajectory and the five-year supply position will be provided to incorporate results of the Councils 2017/18 quarter 4 monitoring. The housing supply includes windfall sites and the evidence to justify this is included within the Windfall Topic paper. Strategic Housing Land Availability Assessment (Jan 2018) identifies sufficient available land to meet the Plan requirement.
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15	The Housing Implementation Strategy includes a housing trajectory setting out the supply of housing across the whole plan period.
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)	• A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47)	The Housing Implementation Strategy (Jan 2018) includes the Council's Housing Trajectory.
Set out the authority's approach to housing density to reflect local circumstances (47).	• Policy on the density of development.	The Central Bedfordshire Design Guide provides examples of where different densities might be appropriate, but it is the Plan's approach that all schemes will be considered on a case by case basis. Policy HQ1 requires that 'careful consideration is given to the density of new housing proposals to ensure that they make the most efficient use of the land available, whilst reflecting the existing character of the surrounding area and making provision for appropriate landscaping and boundary treatments.'
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	• Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA	The Central Bedfordshire and Luton Strategic Housing Market Assessment (January 2018) identifies the needs for different tenures and types of housing (including self-build and housing for older people). The Housing Implementation Strategy addresses how this

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159)	• Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50) • Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)	need will be delivered. Policies in the Local plan for the provision of a mix of housing are: • H1: Housing Mix • H3: Housing for Older People • H4: Affordable Housing • H5: Rural Exception Sites • H6: Starter Homes • H7: Self and Custom build Housing • H8: Assessing Planning Applications for Gypsy and Traveller Sites • H9: Assessing Planning Applications for Travelling Showpeople Sites.
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality	• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary) (para 53)	Policy SP7: Development within Settlement Envelopes. This policy sets out the circumstances for development within and outside the Settlement Envelopes and addresses what is appropriate for large and small villages. Policy H5: Rural Exception Sites allows for up to 20% market dwellings for the sole purpose of making the scheme financially viable.

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of rural communities.	• Examples of special circumstances to allow new isolated homes listed at para 55.	Policy DC1: Re-use of Buildings in the Countryside Policy DC2: Replacement Dwellings in the Countryside Policy DC3: Rural Workers Dwellings
7. Requiring good design (paras 56-68)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	• 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	Chapter 17 of the Local Plan contains policies relating to the provision of high quality places. Policy HQ1: High Quality Development seeks to promote and increase high quality development and addresses the principles set out in paragraph 58 of the NPPF, the Council's vision. Policy HQ9: Larger Sites requires applications for developments in excess of 300 dwellings to be accompanied by a development brief and in certain circumstances, a design code.
8. Promoting healthy communities (paras 69-77)		
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).	• Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and	Policy HQ1: High Quality Development requires that inclusive design is considered from the outset, proposals are well connected to surrounding areas and meet the needs of all street users, layouts are designed to maximise surveillance and increase pedestrian activity to reduce opportunities for crime Policy HQ10: Small Open Spaces recognises the importance of retaining small open spaces with development. Policy HQ7: Public Art set out the circumstances under which public

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	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)	art should be provided HQ3: Provision for Social and Community Infrastructure supports the expansion and enhancement and the provision of new social and community infrastructure. The policy sets out that the Council will ensure an integrated approach to the location of housing, economic uses and community facilities. Policy EE13: Outdoor Sport, Leisure and Open Space. Policy for the provision and protection of open spaces and outdoor sporting facilities. Site Specific Policies set out in Chapter 7 for strategic allocations promote mixed use development and set out the principles under which that development should be provided:- SA1: North Luton SA2: Marston Vale New Villages SA3: East of Arlesey SA4: East of Biggleswade
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	• Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued	Policy HQ3: Provision of Social and Community Infrastructure. Supports the expansion and enhancement and the provision of new social and community infrastructure. Those, application that fail to provide adequate social and community infrastructure without reasoned justification or fail to make appropriate contributions will be refused. Policy R1: Ensuring Town Centre Vitality. This policy supports and encourages retail and service provision in the town centre

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.	boundaries. Policy R2: retail for Minor Service Centres, Villages and the Rural Economy. This policy supports proposals for retail uses within minor service centres and villages and sets out strong parameters for applications which would result in the loss of shops and public houses
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).	• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75)	The Council's Leisure Strategy has included the mapping of all recreation and open space sites and a parish schedule for each settlement which lists existing leisure sites and identifies local facility needs. The document defines local standards for the provision of open space, playing pitches, courts and greens and indoor sports facilities. Policy EE13 Outdoor Sport, Leisure and Open Space protects existing open space and requires the provision of new open space on new residential development. Policy HQ4: Indoor Sport and Leisure facilities protects existing indoor sport and leisure facilities and requires their provision on new residential development in accordance with the Leisure Strategy standards and requirements. EE12: Public Rights of Way. This policy requires that development protects, enhances and promotes the public rights of way network.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	• 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	Paragraph 15.15.2 of the Local Plan states that the Council supports the principle of designating Local Green Spaces through Neighbourhood Plans.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)	
9. Protecting Green Belt land (paras 79-92)		

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)
 	
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)
 	
When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)
 	
Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)
	• Where Green Belt policies are included, these should reflect the need to:
	
	   o Enhance the beneficial use of the Green Belt. (81)
	
	   o Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)
	
	   o Specify that inappropriate development should not be approved except in very special circumstances. (87)
	
	   o Specify the exceptions to inappropriate development (89-90)
	
	   o Identify where very special circumstances might apply to renewable energy development. (91)
		The Local Plan identifies the value of the green belt in Central Bedfordshire as the vision recognises the high quality landscape and environment in Central Bedfordshire. Strategic Objectives SO3 and SO4 seek to conserve and enhance the area's heritage and setting, seeking to maintain and enhance the contribution of the built, landscaped and buried heritage. SO4 seeks to ensure that development is sensitive and responsive to the local environment reinforcing the identity of the area's townscape, landscape and public places.
		
		Chapter 8: Green Belt, Coalescence and Settlements discusses the exceptional circumstances for the release of the Green Belt and development in the Green Belt. As such Policy SP4: Development in the Green Belt seeks to identify the Green Belt on the policy map and setting out the exceptional circumstances for development in the Green Belt whilst seeking to prevent inappropriate development in the Green Belt, in line with the guidance in the NPPF and NPPG.
		
		Policy SP4 is underpinned by technical evidence. A Central Bedfordshire and Luton Green Belt Study (Stages 1 to 3) was undertaken was to test the performance of the Central Bedfordshire and Luton Borough Green Belt against the five purposes of Green Belt as identified within the NPPF, and to identify any areas which may be performing less well in Green Belt terms. The study also assessed the status of Central Bedfordshire's Green Belt villages to determine whether these settlements should remain inset or

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		washed over by the designation.
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
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)	• Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy. (95))	The site assessment process which was part of the SHLAA included the assessment of sites in relation to their proximity to the existing settlement and public transport. Policy SP7: Development within Settlement Envelopes promotes and supports development within existing settlements thus reducing the need to travel by car. Chapter 16 of the Local Plan relates to climate change and sustainability. Policies relevant to mitigation and adaption to climate change are: • CC1: Climate Change and Sustainability • CC2: Sustainable Energy Development • CC3: Flood Risk Management • CC5: Sustainable Drainage • CC6: Water Supply and Sewerage Infrastructure • CC8: Pollution and Land Instability • HQ11: Modern Methods of Construction The Central Bedfordshire Local Climate Change Risk Assessment

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		(LCCRA) and the Central Bedfordshire Environmental Framework helped to inform the above policies.
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)	• A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)	Renewables Capacity Study (March 2014) Policy CC2: Sustainable Energy Development positively supports applications which relate to sustainable energy developments.
Minimise vulnerability to climate change and manage the risk of flooding (99)	• Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures	SHLAA site assessment process took account of whether sites were located within Flood Zones 2 & 3. Site more than 50% within the Flood Zone were discounted. Strategic Flood Risk Assessment Water Cycle Strategy Policy CC1: Climate Change and Sustainability requires development proposals to demonstrate how they will support the mitigation of and adaptation to climate change. Policy CC3: Flood Risk Management

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Take account of marine planning (105)	• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation • Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development • Integrate as appropriate marine policy objectives into emerging policy • Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS	N/A
Manage risk from coastal change (106)	• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.	N/A
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green	The Local Plan Vision recognised the valued landscape and natural environment of Central Bedfordshire and therefore Strategic Objectives SO11 and SO12 all seek to improve the quality and

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	infrastructure. • Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.	accessibility of open space, encourage wildlife corridors and enhancing biodiversity. Chapter 15: Environmental Enhancement relates to Central Bedfordshire's natural environment, including green infrastructure, biodiversity, nature conservation, woodlands, landscape, Chilterns AONB, Greensand Ridge NIA, The Forest of Marston Vale, public rights of way, waterway network and outdoor recreation. Policy EE1: Green Infrastructure – requires development to provide for and enhance green infrastructure assets and to integrate high quality, multifunctional green infrastructure into new developments. Policy EE2: Enhancing Biodiversity – seeks to ensure that there is a net gain in biodiversity through enhancement and creation of ecological networks. Policy EE7: The Chilterns Area of Outstanding Natural Beauty – reaffirms national guidance and seeks to refuse planning permission for major development unless exceptional circumstances prevail. Chapter 19: Development in the Countryside relates to the preservation of the countryside and landscape in Central Bedfordshire. Policy DC5: Agricultural Land – seeks to prevent the significant loss of Grade 1, 2 and 3a agricultural land.
Prevent unacceptable risks from pollution and land instability (109)	• 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.	The overall strategy and vision of the Local Plan is to ensure that development is located in the most appropriate and sustainable location. Chapter 15: Environmental Enhancement relates to Central

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Bedfordshire's natural environment, including green infrastructure, biodiversity, nature conservation, woodlands, landscape, Chilterns AONB, Greensand Ridge NIA, The Forest of Marston Vale, public rights of way, waterway network and outdoor recreation.
		In particular, Policy EE2: Enhancing Biodiversity; Policy EE3: Nature Conservation; Policy EE4: Trees, woodlands and hedgerows; Policy EE5: Landscape Character and Value.
		Chapter 16: Climate change and Sustainability seeks to ensure that new development takes in to account planning for climate change and reduce the impact on flood risk.
		Policy CC1: Climate Change and Sustainability – requires new development to demonstrate how they support thee mitigation of and adaptation to the impacts of climate change.
		Policy CC2: Sustainable energy development – supports energy developments.
		Policy CC3: Flood Risk Management and Policy CC5: Sustainable Drainage – seeks to ensure that developments consider flood risk management and incorporates naturalistic solutions for flood mitigation.
		Policy CC8: Pollution and Land Stability – requires new development to demonstrate compliance with the current national guidance as well as the Council's adopted standards in terms of pollution and land instability.
		Chapter 17: High Quality Places seeks to ensure that new developments are designed to respect the landscape and settlement character and enhance the unique characteristics of the area.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Policy HQ1: High Quality Development – ensures that all developments are of the highest possible quality.
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	• Identification and mapping of local ecological networks and geological conservation interests. • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species	The Local Plan Vision recognised the valued landscape and natural environment of Central Bedfordshire and therefore Strategic Objectives SO11 and SO12 all seek to improve the quality and accessibility of open space, encourage wildlife corridors and enhancing biodiversity. Chapter 15: Environmental Enhancement relates to Central Bedfordshire's natural environment, including green infrastructure, biodiversity, nature conservation, woodlands, landscape, Chilterns AONB, Greensand Ridge NIA, The Forest of Marston Vale, public rights of way, waterway network and outdoor recreation. Policy EE2: Enhancing Biodiversity – seeks to ensure that there is a net gain in biodiversity through enhancement and creation of ecological networks. Policy EE3: Nature Conservation – seeks to ensure that important habitats and sites of geological and geomorphological interest will be protected, maintained and enhanced.
12. **Conserving and enhancing the historic environment (paras 126-141)**		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets • A policy or policies which promote new development that will make a positive	Chapter 18: Historic Environment sets out the Councils approach to development and the historic environment. Policy HQ1: High Quality Development requires that all development proposals relate well to the existing local surroundings and reinforce local distinctiveness.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	contribution to character and distinctiveness. (126)	The strategic site specific policies in Chapter 7 identify any heritage issues that must be addressed.
		Historic Parks and Gardens, Scheduled Monuments and Conservation Areas are shown on the Proposals Map
		Listed buildings are mapped on the Council's public access mapping system
		Archaeological sites are mapped for internal use.
13. Facilitating the sustainable use of minerals (paras 142-149)		
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) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	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.	The issue of mineral and waste is covered by The Minerals and Waste Local Plan: Strategic Sites and Policies (MWLP: SSP) January 2014.

Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

To be 'justified' a DPD needs to be:

• 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

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives.		
Participation Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI	A Consultation Statement Regulation 22(1) (c) Statement (April 2018) has been prepared to document the consultation undertaken throughout the Local Plan preparation. The consultation was undertaken in accordance with Central Bedfordshire's adopted Statement of Community Involvement (2012).
Research / fact finding 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? What assumptions were made in preparing the DPD? Were they reasonable and justified?	• 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. AND • 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. OR • 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. OR	The Inspectorate has been provided with all the extensive evidence base which has supported the production of the Local Plan. This evidence is referenced throughout the Local Plan to provide clarity and explanation on how the strategy, policies and proposals are supported. The list of supporting evidence can be found on the Council's website. The Local Plan assumptions are based on accommodating the forecast levels of housing and employment growth in Central Bedfordshire over the period 2015-2035, providing the infrastructure and supporting services appropriate to that level of growth and seeking to direct and locate it sustainably and responsibly. The principal assumption made with regards the spatial distribution of development is that it is most sustainable and effective to meet development needs through the provision of a range of sites in locations which balance the growth in the north and south of Central Bedfordshire. The source of these assumptions are set out in the SA.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	• For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).	The initial SA Report (June 2017) (incorporating the requirements of SEA) which was carried out to support the Regulation 18 consultation, considered the options and alternatives in terms of areas of growth, approach to the distribution of growth and different growth scenarios to accommodate the housing need. The findings of the SA process concluded that the draft Local Plan, both its policies and its site allocations, are well designed to deliver sustainable development. Additionally, it identified that the Local Plan objectives are supportive of the delivery of the Sustainability Appraisal objectives, and the policies in the draft Local Plan aim to provide for the necessary growth of the Central Bedfordshire and surrounding area within its environmental, social and economic capacity and constraints. The final SA Report (January 2018) of the Draft Local Plan (January 2018) sets out how the SA process has influenced the choice of the strategy and contact of policies in terms of what difference the SA process has made.
Alternatives 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	• 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.	Reasonable alternatives were prepared and considered within the Sustainability Appraisal (SA). The Local Plan has been subject to SA throughout the plan-making stages and all necessary requirements have been complied with. The relevant SA documents are: • Draft Sustainability Appraisal Scoping Report (June 2016) – this sets out the key issues and relevant evidence base against which the Plan has been assessed. Following the consultation and consideration of responses received on the SA Scoping Report, a

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
decisions were taken? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?	• An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.	final SA Scoping Report (October 2016) was published. • Initial SA Report (July 2017) – this was carried out to support the Regulation 18 consultation and considered the options and alternatives in terms of areas of growth, approach to the distribution of growth and different growth scenarios to accommodate the housing need. The findings of the SA process concluded that the draft Local Plan, both its policies and its site allocations, are well designed to deliver sustainable development. Additionally, it identified that the Local Plan objectives are supportive of the delivery of the Sustainability Appraisal objectives, and the policies in the draft Local Plan aim to provide for the necessary growth of the Central Bedfordshire and surrounding area within its environmental, social and economic capacity and constraints. • SA Report (January 2018) – this includes how the SA process has influenced the choice of the strategy and contact of policies in terms of what difference the SA process has made. The alternatives of the Local Plan were derived from an assessment and review of the supporting evidence underpinning the Local Plan. The starting point for the alternatives related to the OAN for Central Bedfordshire and meeting the unmet housing need from Luton. Technical evidence studies also informed the alternatives and are available on the Council's website.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Effective: *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.* To be 'effective' a DPD needs to: • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored		
Deliverable and Coherent • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved?	• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.	Chapter 2 identifies the challenges and opportunities facing Central Bedfordshire and the vision and strategic objectives are set out in Chapter 7. This section of the plan also identifies those policies which fulfil each strategic objective. There are no gaps in the policies. Chapter 5 'The Spatial Strategy' identifies 6 key spatial objectives. The approach to how these objectives will be achieved is detailed in 5.4 'Spatial Strategy Approach' The targets and timescales relating to the provision of new homes and jobs are set out in policy SP1: Growth Strategy. These targets and timescales are realistic and have been informed by evidence including the SHMA, SHLAA, HIS, SA, FEMA and ELR. The Local Plan has gone through various internal Council consultation and approvals. All policies have been agreed corporately and the Council considers that there are no internal inconsistencies.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	• Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).	The timescales set out in the Local Plan are considered realistic. The Plan covers a 20-year period up to 2035. Evidence has been produced to support the various objectives and policies of the Local Plan.

Section 7 of the Plan sets out the implementation and delivery of the Plan. The majority of new development, both the strategic sites and small and medium sites, identified in the Plan's site allocations, particularly investments in new housing and jobs, will be delivered by the private sector.

The Council has also updated and published an updated Infrastructure Delivery Plan (IDP) (2018), which incorporates an Infrastructure Delivery Schedule, and together it sets out the range of plans, programmes and strategies, including those of partner organisations and agencies.

The IDP was prepared in collaboration and partnership working with the infrastructure and service providers. It sets out responsibilities for the delivery of each scheme/infrastructure, funding arrangements where known and likely timescales of delivery. |
| *Infrastructure Delivery*

• Have the infrastructure implications of the policies clearly been identified?
• Are the delivery mechanisms and timescales for implementation of the policies clearly identified?
• Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale | • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.

• A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.

• Confirmation from infrastructure providers that they support the | The Council has also updated and published an updated Infrastructure Delivery Plan (IDP) (2018), which incorporates an Infrastructure Delivery Schedule, and together it sets out the range of plans, programmes and strategies, including those of partner organisations and agencies.

The IDP was prepared in collaboration and partnership working with the infrastructure and service providers. It sets out responsibilities for the delivery of each scheme/infrastructure, funding |

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
of the policies?	solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.	arrangements where known and likely timescales of delivery. Infrastructure needs for site allocations are identified through site allocation policies. The Council has produced viability assessments which demonstrate plan wide viability, when incorporating the infrastructure requirements within the IDP, policy requirements (including affordable housing) and strategic infrastructure costs in line with the Harman Report. The reports confirm that all sites are viable including strategic sites, with all sites featuring healthy residual values.
Co-ordinated Planning 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?	• Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area	The Local Plan pulls together the objectives of a wide range of strategies such as those relating to education, health, air quality, transport and health etc. into a cohesive spatial strategy. The Local Plan goes far beyond traditional land use planning by setting out a clear vision as to what Central Bedfordshire will be like in 2035, which is supported by strategic objectives that outline what will need to be achieved to deliver the Local Plan's strategic vision. The Local Plan's policies follow logically from the vision, objectives and spatial strategy and they demonstrate how the policies will deliver collectively the different policy objections. The Council has carried out extensive consultation, including with Duty to Co-operate bodies as well as partner agencies and key stakeholders. Representations from bodies responsible for other strategies have been received and considered in the preparation of the Plan.
Flexibility • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?	• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.	The Council considers that the Local Plan is regarded as sufficiently flexible to respond to unexpected changes in circumstances. Central Bedfordshire is expected to play a core role in relation to the

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
• Does the DPD include the remedial actions that will be taken if the policies need adjustment?	• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: a. the effectiveness of policies and what evidence is being collected to undertake this b. changes affecting the baseline information and any information on trends on which the DPD is based • Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances • Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision • Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.	Cambridge-Milton Keynes-Oxford Arc. However, the timing, service and route selection for the new strategic road and rail infrastructure needs further development and definition. Related issues such as potential for capacity upgrades of the A1 have still to be resolved. These decisions will have a major impact on the scale of development and growth potential at strategic sites. As such a Partial Plan Review of the Local Plan is proposed to start within six months of adoption of this Plan and complete as soon as decisions on routeing and financial commitments to strategic infrastructure are in place. The Housing Implementation Strategy identifies a surplus in housing land supply which will take account of any non-delivery or delayed delivery as a result of changing circumstances. Ongoing monitoring of the Local Plan, for example through the Authority's Monitoring Report, and regular reviews of the Infrastructure Delivery Plan, will highlight if changes to the timescales are required. The infrastructure requirements have been tested through plan wide viability assessments. The Council has worked proactively with infrastructure providers to agree proposed solutions. The [Viability Study] undertook to assess whether development across Central Bedfordshire was deliverable
Co-operation • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?	• 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	A Duty to Co-operate Statement has been prepared to demonstrate that the Duties to Co-operate have been undertaken appropriately.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
• 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?	correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. • The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.	
Monitoring • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the	• Sections of the DPD setting out indicators, targets and milestones • Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the	The targets and timescales relating to the provision of new homes and jobs are set out in policy SP1: Growth Strategy. These targets and timescales are realistic and have been informed by evidence including the SHMA, SHLAA, HIS, SA, FEMA and ELR. A Housing Trajectory is provided in the Housing Implementation Strategy A Monitoring Framework is provided in Appendix 3 of the Local Plan. This identifies how the policies and their targets will be monitored. This will be reported annually in the Authority Monitoring Report. The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
plan, through the annual monitoring report?	DPD against the sustainability appraisal	monitored to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance on SA/SEA advises that existing monitoring arrangements should be used where possible to avoid duplication. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Central Bedfordshire Council Monitoring Report (produced annually) is considered sufficient to ensure appropriate monitoring takes place. The SA Scoping Report Framework set out how indicators align with issues and objectives for sustainable development for the Central Bedfordshire area.
Consistent with national policy: *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.* 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.		
• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?	• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy	The Local Plan does not contain policies that are inconsistent with national planning policy. The Local Plan does not unnecessarily repeat national planning policy.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	Statement	
	• Reports or copies of correspondence as to how representations have been considered and dealt with.	