

MID SUFFOLK CORE STRATEGY FOCUSSED

DEVELOPMENT PLAN DOCUMENT

SELF ASSESSMENT of SOUNDNESS

SUBMISSION DOCUMENT MARCH 2012

Soundness tool

Key question	Possible evidence	Evidence provided
Justified		
Participation		
1. Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement	Yes – Please see Statement of Consultation
Research/ fact finding		
2. Is the content of the development plan document justified by the evidence? 3. What is the source of the evidence? 4. How up to date and convincing is it?	i. Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals ii. Sections of the pre-submission proposals documents iii. Sections of the preferred strategy report iv. Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document v. Sections of the consultation statement OR A very brief statement of how the main findings of consultation support the policies, with reference to: <ul style="list-style-type: none"> ○ reports to the council on the issues raised during participation, covering both the front-loading and formulation phases ○ any other information on community views and preferences vi. The studies, reports and technical papers that provide the evidence for the policies set out in the development plan document. The date of preparation and who they were produced by should be signposted OR For each policy (or group of policies dealing with the	Yes Core Strategy Focused Review deals with key changes to the Core Strategy to update the documents proposals for housing distribution through the district and the delivery of new employment opportunities in Stowmarket. Environmental Assessment for Stowmarket setting constraints and environmental capacity Highways Agency position on A14 usage (from Planning for Stowmarket open day) Stowmarket Retail Study and Civic Trust Report 2002. Stowmarket Masterplan 2008 Employment Land Review 2008 Felixstowe Port Logistics Study 2008 Strategic Housing Market Assessment 2008 Urban Housing Capacity Study 2006 Strategic Housing Land Availability 2008 Please see Statement of Consultation on the web site.

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	<p>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 development plan document)</p>	
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>i. Sections of the development plan documents setting out the assumptions</p> <p>ii. Sections of the sustainability appraisal report setting out the assumptions</p> <p>iii. A very brief statement for each assumption as to how the evidence led to the assumption</p> <p>iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions</p>	<ul style="list-style-type: none"> • That Stowmarket was identified in the adopted Core Strategy as the main town for development in the District. • That SSSI, flood plain and landscape constraints should preclude development in certain areas around the town. • That previous commitments to the Housing element of the Mid Suffolk Local Plan have now been largely completed. • That the town lacks an industrial heritage that offers large volumes of brown field land for redevelopment. (Accepted previously by Core Strategy Inspector.) • Highways agency power of direction over unacceptable development in proximity to A14 means that the town must internalise its traffic and therefore ... • That there must be a green travel and public transport plan to accompany the Area Action Plan delivered through a viable Infrastructure Programme and therefore ... • The first five years of the plan period should prioritise transport plans and ongoing running costs. • Updated employment evidence material to the Council's further allocation at Mill Lane. Information to hand – awaiting formal publication.
Alternatives		
<p>7. Can it be shown that the council's chosen approach is</p>	<p>i. Sections of the consultation statement showing how the community was involved in considering issues,</p>	<p>With the assumptions set out above and the physical constraints the alternatives were</p>

Key question	Possible evidence	Evidence provided
<p>the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>alternatives and options</p> <p>ii. Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered</p> <p>iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised</p> <p>iv. Sections of the preferred strategy report explaining:</p> <ul style="list-style-type: none"> • how alternatives were developed and evaluated, and • why alternatives were rejected in favour of the preferred strategy <p>v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed</p> <p>vi. Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document</p> <p>vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions</p> <p>viii. Sections of the representations statement</p> <p>OR</p> <p>A brief statement of the influence upon decisions of: the issues raised during stakeholder and community engagement, and how they have been addressed</p> <p>ix. Any other documentation showing how alternatives were developed and evaluated</p> <p>x. A very brief statement and any other supporting documentation of the way decisions have been taken</p>	<p>reduced and were set out frankly in our Stowmarket Area Action Plan and the Master planning work with the public and during our road show events in Dec 2008/ Jan 2009</p> <p>Subsequently, the findings were incorporated into committee reports and these are available on the Council Web site e.g. – Executive minutes</p> <p>Topic Papers for Employment and Housing have previously been submitted. These adopted the concepts arrived at following consultation and reflected the Council’s understanding of external guidance and studies which were then current.</p> <p>The CSFR deals with issues that would, if unaddressed, result in a lack of conformity between LDF documents, due to the supremacy of one document over another. These issues are fully addressed with their evidence base in the SAAP submissions.</p>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the</p>	<p>i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy</p> <p>ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced</p>	<p>The Sustainability Appraisal was undertaken at the start of the Core Strategy process using a shared approach set out by the inter authority Suffolk Sustainability Appraisal Group and again by independent consultants. The protection of</p>

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<p>content of the development plan document from the start?</p>	<p>the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings</p> <p>iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies</p>	<p>certain habitats and Special Landscape Areas has influenced the allocation and non-allocation of land.</p> <p>The reappraisal report that considers the proposed focussed changes to the Core Strategy finds that there are some environmental negatives arising from the use of agricultural land but these are non-significant and capable of mitigation. The reappraisal shows clear economic and social benefits arising from the focussed changes. The mitigation and offsetting of environmental negatives will be achieved upon delivery of proposals suggested in the Stowmarket Area Action Plan</p>
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons</p> <p>ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy</p> <p>iii. Representations received from the regional development agency/regional planning body</p> <p>iv. Representations from the Government Office</p> <p>v. Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>Q11 - Yes</p> <p>Q12 - Yes</p>

Effective		
Deliverable		
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy iii. A core strategy vision which is framed to set out the outcomes which are sought for the future iv. Sections of the development plan document which identify the main issues addressed v. Sections of the development plan document which indicate the priority outcomes 	<p>The DPD facilitates the development of the District's main market town with updated housing and employment allocations presented in the tables of the document.</p> <p>The Council's approach to the delivery of sustainable development (in the light of the emerging NPPF) has also been explained; requiring some adjustment to the original Core Strategy's text.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<ul style="list-style-type: none"> i. Sections of the regional special strategy which identify cross-boundary issues. ii. Sections of the development plan document setting out cross-boundary issues and the response to them iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance 	<p>One outstanding cross boundary objection has been maintained to the proposed Mill Lane Business Park, from an adjoining authority. It is claimed that the release of land in the environs of Stowmarket will harm the viability and deliverability of the Suffolk Business Park near Bury St Edmunds. Statements of common ground have been requested to hone the arguments prior to the hearing and some agreement may be possible based on the phasing and the quantum of particular use classes being proposed.</p>
<p>16. Does the development plan document contain clear objectives?</p>	<ul style="list-style-type: none"> i. A spatial portrait which identifies the key issues facing the area ii. A core strategy vision which is framed to set out the outcomes which are sought for the future iii. The strategic objectives of the development plan document, and the commentary in the development 	<p>Yes</p> <p>Yes</p> <p>Yes</p>

	plan document of how they derive from the spatial portrait and vision	
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<p>i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it</p> <p>ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place</p>	<p>Yes – the strategic physical and environmental objectives are described.</p> <p>The document has been completed since September 2011 and key partners notified. No new objections have been raised.</p>
<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<p>i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them</p> <p>ii. Relevant sections of the sustainable community strategy which identify its objectives</p> <p>iii. Confirmation from the local strategic partnership and partner organisations that they believe the policies will achieve the agreed objectives</p> <p>iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed</p> <p>v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.</p>	<p>Yes - The need for enabling changes to the Core Strategy has been accepted.</p> <p>The limited policy changes will prevent a conformity issue arising between the Core Strategy and the submitted Area Action Plan for Stowmarket.</p>
<p>21. Are there realistic timescales related to the objectives?</p>	<p>i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives</p> <p>ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery</p>	<p>Yes</p>
<p>22. Are the policies internally consistent?</p>	<p>i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent</p> <p>ii. A very brief statement explaining how the council considers its objectives are consistent</p>	<p>Yes</p>
<p>23. Does the development plan document contain material</p>	<p>i. Information in the local development scheme, or provided separately, about the scope and content</p>	<p>No</p>

<p>which:</p> <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? 	<p>(actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure</p> <ul style="list-style-type: none"> ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document that identify the key objectives and how they will be delivered upon ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document 	<p>Yes – each section proposing change to the original core strategy is explained in preamble.</p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document that show how the development management policies: <ul style="list-style-type: none"> • will help to deliver the strategy 37. derive from, and elaborate on, the objectives and policies of the plan 	<p>The Council has not yet been able to complete development management policies, however, the Council has moved forward with its saved Local Plan and an adopted Core Strategy</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<ul style="list-style-type: none"> i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward ii. Representations in respect of infrastructure iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with 	<p>Yes</p>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out delivery mechanisms and timescale ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered iii. Research or studies that address matters of delivery and the realistic timescales iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery 	<p>Yes – housing delivery and employment opportunities are phased to ensure delivery of transport systems and other infrastructure.</p>

	<p>mechanisms</p> <ul style="list-style-type: none"> v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder vi. Correspondence from stakeholders on delivery mechanisms and timescale vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	
<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<ul style="list-style-type: none"> i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery ii. Representations in respect of infrastructure iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with 	<p>Yes and Yes</p>
<p>29. Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out responsibilities for delivery ii. Correspondence showing how other stakeholders intend to support the delivery of the policies iii. Reports by the council or the relevant stakeholder iv. Representations from stakeholders on implementation v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	<p>Yes</p> <p>Yes - Suffolk County Council is willing and able to be involved in the process while other agencies either accept that there is capacity locally or suggest improvements which confirm with the statutory tests for S106</p>
<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places</p>	<ul style="list-style-type: none"> i. Sections of the development plan document that reflect the plans or strategies of other bodies ii. Expressions of support from bodies responsible for other strategies affecting the area iii. Representations in respect of services provided by other agencies iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the 	<p>Mid Suffolk has attempted to help the spatial planning of other agencies.</p> <p>Yes</p>

and how they function?	substance of the representation	
33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?	<ul style="list-style-type: none"> i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy 	Yes – the Council is aware that unless key elements of the development programme set out in the Stowmarket Area Action Plan the Highways Agency may require a finding of unsound.
Flexible		
34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	<ul style="list-style-type: none"> i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> • the effectiveness of policies and what evidence is being collected to undertake this • changes affecting the baseline information and any information on trends on which the development plan document is based iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	Yes.
35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?	<ul style="list-style-type: none"> i. Sections within the development plan document 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 ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	The document is specifically addressing a possible uplift in housing numbers for the town of Stowmarket.

<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<ul style="list-style-type: none"> i. A section of the development plan document which expressly addresses flexibility ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing 	<p>Delivery of the new homes will be monitored as part of the annual monitoring process and measured against the delivery of the expected employment opportunities.</p>
<p>Monitoring</p>		
<p>37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories iii. Reference to any other reports or technical documents which contain information on the delivery of policies 	<p>Yes</p>
<p>38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators 	<p>Yes</p>
<p>39. Are suitable targets and indicators present (by when, how and by whom)?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories 	<p>It is felt there are suitable targets and indicators present with the Stowmarket Area Action Plan that can be monitored.</p>

National policy		
<p>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement iv. Representations from the Government Office on the preferred strategy or the submitted development plan document v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with 	No
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	No