



Site Specific Proposals Draft Plan  
**Tests of Soundness**

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## Site Specific Proposals Draft Plan: Tests of Soundness

# 1 Introduction

Title of Development Plan Document	Site Specific Proposals		
<b>Local Authority preparing the DPD:</b>	North Norfolk District Council		
<b>Submission Date:</b>	March 2010		
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Please note: relevant guidance on approaches and good practice is available from the Planning Advisory Service website: [www.pas.gov.uk/ldf](http://www.pas.gov.uk/ldf).

- 1.1** This statement has been prepared by North Norfolk District Council as an objective self-assessment of the soundness of the Site Specific Proposals (incorporating Proposals Map Amendments) Development Plan Document (SSP) scheduled for submission in March 2010.
- 1.2** The Public Examination of the SSP is due to be held in June / July 2010.
- 1.3** The primary purpose of the Public Examination is to consider two matters:
- Whether the Policy document has been prepared in accordance with the legislative requirements as set out in the Act<sup>(1)</sup> and the Regulations<sup>(2)</sup> relating to the preparation of DPDs
  - Whether the Policy is “sound”
- 1.4** The Planning Advisory Service (PAS) has produced a ‘Soundness Toolkit’ that can be used to show an authority what it needs to have done in order to reach the stage of publication and submission of a DPD with everything in order. The Planning Inspectorate (PINS) strongly urges Local Planning Authorities to conduct a self assessment and experience has shown that those using the toolkit are more likely to produce a sound DPD.
- 1.5** This Statement which relates to the SSP has been drawn up based on the PAS Soundness Toolkit. The Toolkit is in two parts, the first of which provides guidance to local authorities to assist the preparation of plan documents, and the second provides the basis for the self-assessment.
- 1.6** Section 2 of this Statement addresses compliance with the formal procedural requirements. It is organised by the stages of production of the Policy document. Legal Compliance of the plan making process considers each stage of the plan making process and is structured under 5 headings:

1 Planning and Compulsory Purchase Act 2004

2 Town and Country Planning (Local Development) (England) Regulations 2004 as amended 2008



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1. Inception – planning the production of the DPD
2. Preparation – frontloading phase - establishment of a robust evidence base and early engagement with local community / key delivery stakeholders about the content of the development plan document.
3. Preparation – formulation phase – development of a policy approach following the consideration of alternative options, results of sustainability appraisal and findings from community participation.
4. Publication – to enable representations to be made.
5. Submission – to the Secretary of State.

**1.7** The regulations and PPS12 provide for flexibility. This means that these are not strictly defined stages, and that common sense should be applied when using the tool. While legal compliance is a requirement, the preparation of the DPD should be proportional to the issues.

**1.8** Section 3 of this Statement expresses the view of the Council that the Policy document is 'sound', in terms of the statutory provisions and guidance. In a nutshell, this means, as the PINS guide indicates, 'well-founded'. Soundness is explained in PPS12, specifically paragraph 4.52 states that to be 'sound' a core strategy should be 'justified, effective & consistent with national policy'. Paragraph 5.2 of PPS12 also provides that to be sound DPDs other than core strategies should also be justified, effective & consistent with national policy. Section 3 therefore addresses each of the soundness tests in turn, to demonstrate the Council's view of the soundness of the document.

**1.9** The presumption established in the legislation is that the plan document is sound unless, as a result of considering the representations made and evidence considered at the Public Examination, it is proved not to be. This Statement is intended to provide a context for the Examination, by bringing together all the relevant components on which soundness should be judged, and effectively providing a comprehensive index to the Council's evidence.

## 2 Legal Compliance

### Stage 1: Inception (2005)

Activity	Legal Requirement	Evidence Provided
1. Is the DPD identified in the adopted local development scheme & have you recorded the timetable for its production?	The Act s15(2); s19(1)	Yes. See LDS April 2005.
2. Have you considered how community engagement will be programmed into the preparation of the development plan document?	1. The Act s19(3) 2. Regulation 25	Yes. See Statement of Community Involvement Chapter 3 & Chapter 4 section 4.3.
3. Have you considered the appropriate bodies you should consult?	Regulation 25	Yes. See Statement of Community Involvement Chapter 4 section 4.3.
4. Is baseline information being collected and evidence being gathered to keep the matters which affect the development of the area under review?	The Act s13	Yes. See Sustainability Appraisal Scoping Report 2005 and the Annual Monitoring Report 2005.
5. Is baseline information being collected and evidence being gathered to set the framework for the sustainability appraisal?	The Act s19(5)	Yes. See Sustainability Appraisal Scoping Report 2005 and the Annual Monitoring Report 2005. The Sustainability Appraisal was also being carried out at this stage with the information being maintained within a dedicated database.
6. Have you consulted the statutory environment consultation bodies for five weeks on the scope and level of detail of the environmental information to be included in the sustainability appraisal report?	Regulations 9 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	Yes. See section 3.3 of the SSP Preferred Options SA 2006.

### Stage 2: Plan Preparation - Frontloading Phase (2005-06)

Activity	Statutory Requirement	Evidence Provided (Reg 25)
1. Have you notified the specific consultation bodies that have an interest in the subject of the development plan document and invited them to make representations about its contents?	Regulation 25(1) and (2)(a)	Yes. See SSP Final Consultation Statement, Chapter 2 & Appendices 2, 3, 4 & 5.
2. Have you notified the general consultation bodies that you consider have an interest in the subject of the development plan document and invited them to make representations about its contents?	Regulation 25(1) and (2)(b)	Yes. See SSP Final Consultation Statement, Chapter 2 & Appendices 2, 3 4 & 5.



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Activity	Statutory Requirement	Evidence Provided (Reg 25)
3. Are you inviting representations from people resident or carrying out business in your area about the content of the development plan document?	Regulation 25(3)	Yes. For correspondence see copy of letter dated 11 August 2005 in Appendix 4 of SSP Final Consultation Statement.  Organisations and businesses invited to workshops which were held in June/July 2005. See SSP Final Consultation Statement, Chapter 2.
4. Are you engaging with stakeholders responsible for delivery of the strategy?	Regulation 25	Yes. Regular meetings & communications, including focus groups were carried out with utility companies, government agencies, various county council departments and developers throughout the process. See SSP Final Consultation Statement, Chapter 2.
5. Are you taking into account representations made?	Regulation 25(5)	Yes. See SSP Final Consultation Statement, Chapter 2.
6. Does the consultation contribute to the development and sustainability appraisal of alternatives?	1. The Act section 19(5) 2. Regulations 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633.	Yes. The consultation identified a number of sites for consideration. Consultation on the SA and responses to the consultation informed the SA methodology. See SSP Final Consultation Statement, Chapter 2, the SSP Preferred Options SA report Sept 2006 & the SSP Coastal Service Villages Preferred Options SA report June 2008.
7. Is the participation: <ul style="list-style-type: none"> <li>following the principles set out in your statement of community involvement</li> <li>integrating involvement with the sustainable community strategy</li> <li>proportionate to the scale of issues involved in the development plan document?</li> </ul>	1. The Act s.19(3) 2. Regulation 25	<ul style="list-style-type: none"> <li>Yes. See SSP Final Consultation Statement: Appendix 1 Statement of Community Involvement Compliance Statement.</li> <li>Yes. See SSP Final Consultation Statement sections 2 &amp; 3.</li> <li>Yes. The level of participation is considered appropriate &amp; is in accordance with the SCI.</li> </ul>
8. Are you keeping a record of: <ul style="list-style-type: none"> <li>the individuals or bodies invited to make representations</li> <li>How this was done</li> <li>The main issues raised?</li> </ul>	Regulation 24	Yes. A consultee database was set up & maintained which contains contact details of over 1000 local & national voluntary & interest groups, interested individuals, specific consultees and many other groups (see SSP Final Consultation Statement sections 1.18 - 1.19 for further detail).  Yes. The main issues raised were recorded. See Chapter 2 of SSP Final Consultation Statement & Appendices C & D of the Core Strategy Consultation Statement.
9. Are you developing a framework for monitoring the effects of the development plan document?	1. The Act section 35 2. Regulation 48	Yes. The application of sustainability appraisal ensures that economic, social and environmental issues have been thoroughly considered in the preparation of the

Activity	Statutory Requirement	Evidence Provided (Reg 25)
	Reg 17 of The Environmental Assessment of Plans and Programmes Regulations 2004 No1363	preferred options. Chapter 2 of the SSP preferred options document contains information on how the proposals will be implemented & monitored. The Annual Monitoring Report will be the main record of monitoring information.
<b>10. Have you arranged to send copies of documents used in consultation to the Government Office and Planning Inspectorate?</b>	<b>Not statutory, but will assist in identifying issues leading towards a sound development plan document</b>	Yes. The Core Strategy and SSP Consultation Statements contain the relevant information. Further details can be provided on request.

### Stage 3: Plan Preparation - Formulation Phase (2006-09)

Activity	Statutory Requirement	Evidence Provided (Reg 26)
1. Are you preparing reasonable alternatives for evaluation during the preparation of the development plan document?	Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633	Yes. See Sustainability Appraisals & Preferred Options Reports.  SSP Preferred Options SA Sept 2006.  Coastal Service Villages Preferred Options SA June 2008.  SSP Preferred Options Sept 2006.  Coastal Service Villages Preferred Options June 2008
2. Have you assessed alternatives against: <ul style="list-style-type: none"> <li>consistency with national policy</li> <li>general conformity with the regional spatial strategy?</li> </ul>	The Act section19(2), section 24	Yes. The level, type and distribution of development to be provided for has been determined by the Core Strategy which was adopted in September 2008.  The Sustainability Appraisal Scoping Report lists national and regional policies (see Appendix 2). Topic Papers summarised the national and regional context and this informed the identification of issues and options.  See also SSP chapter 2: policy context.
3. Are you having regard to: <ul style="list-style-type: none"> <li>adjoining regional spatial strategies, the spatial development strategy for London, or Welsh Spatial Plan (as appropriate)</li> <li>the National Planning Framework for Scotland?</li> </ul>	1. The Act section19(2)  2. Regulation 15(1)(g)	N/A
4. Are you having regard to: <ul style="list-style-type: none"> <li>the sustainable community strategy of the authority or other authorities whose area</li> </ul>	The Act section19(2)	Yes. Section 2.3 of the SSP Final Consultation Statement & paragraphs 2.1.5 - 2.1.11 of the SSP shows how the Community Strategy Priorities have been addressed in the Core Strategy & SSP.



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Activity	Statutory Requirement	Evidence Provided (Reg 26)
<ul style="list-style-type: none"> <li>comprises part of the area of the council</li> <li>any other local development documents adopted by the council?</li> </ul>		
<p>5. Do you have regard to other matters and strategies relating to:</p> <ul style="list-style-type: none"> <li>Resources</li> <li>the regional development agencies' regional economic strategy</li> <li>the local transport plan and transport facilities and services</li> <li>waste strategies</li> <li>hazardous substances and accidents?</li> </ul>	<p>1. The Act section 19(2)</p> <p>2. Regulation 15</p>	<p>Yes.</p> <p>The SA Scoping Report 2005 (Appendix 2) reviewed relevant plans and programs and their implications for Local Development Documents.</p> <p>Correspondence with Government agencies, utilities and County Council, internally with Environmental Health / HSE re-hazardous substances (Bacton, North Walsham &amp; Hoveton) informed proposals.</p>
<p><b>6. Are you having regard to the need to include policies on mitigating and adapting to climate change?</b></p>	<p><b>This is expected to be an amendment to section 19(2) of the Act.</b></p>	<p>Yes. All developments over 10 dwellings are required by Core Strategy policy to be built to high environmental standards. Allocations are generally in locations well related to town centre facilities &amp; services, thus reducing the need to travel by car. Works to improve pedestrian &amp; cycle access is required on many of the individual site policies.</p>
<p>7. Have you undertaken the necessary sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?</p>	<p>1. The Act section 19(5)</p> <p>2. Regulation 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>	<p>Yes. Sustainability Appraisal has been carried out throughout the preparation of the plan and the various editions were subject to consultation in conjunction with the various stages of consultation on the SSP.</p> <p>SSP Preferred Options SA Sept 2006.</p> <p>Coastal Service Villages Preferred Options SA June 2008.</p>
<p>8. Are you setting out clear reasons for any preferences between alternatives?</p>	<p>Regulation 13(1)</p>	<p>Yes. SSP Preferred Options SA Sept 2006 Chapter 3: Appraisal Methodology &amp; Coastal Service Villages Preferred Options SA June 2008 Chapter 4. A three stage assessment was used to inform site selection. Stage two scored a series of measurable criteria weighted in favour of those sites that are well integrated &amp; have low environmental impact in line with the identified sustainability objectives.</p>
<p>9. Have you taken into account any representations made on the content of the development plan document and the sustainability appraisal?</p> <p>10. Are you keeping a record?</p>	<p>1. Regulations 24, 25(5) and 30(1)(d)(iv)</p> <p>2. Regulation 13(4) of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>	<p>Yes. See Local Development Framework Working Party reports &amp; minutes during the period Sept 2008 to April 2009 for summaries of issues raised and reasons for recommendations. View at: <a href="http://www.northnorfolk.org/ldf">www.northnorfolk.org/ldf</a></p> <p>All representations are available to view online at the consultation portal: <a href="http://consult.north-norfolk.gov.uk/portal/planning/ssp/ssppocd">http://consult.north-norfolk.gov.uk/portal/planning/ssp/ssppocd</a></p>

Activity	Statutory Requirement	Evidence Provided (Reg 26)
<p>11. Where sites are to be identified or areas for the application of policy in the development plan document, are you preparing sufficient illustrative material to:</p> <ul style="list-style-type: none"> <li>enable you to amend the currently adopted proposals map</li> <li>inform the community about the location of proposals?</li> </ul>	Regulations 9 and 14	Yes. The SSP preferred options consultation document contains maps for each settlement and individual site maps. The documents were also available to view in HTML format with links to an interactive mapping system based on the Council's Geographical Information System. Exhibitions which were held (see section 3 of the SSP Final Consultation Statement for further detail) also provided access to variously scaled aerial photographs and ordnance survey maps illustrating the potential allocations and other areas subject to consideration.
12. Are the participation arrangements compliant with the statement of community involvement?	<p>1. The Act, section 19(3)</p> <p>2. Regulation 25</p>	Yes. See Statement of Community Involvement Compliance Statement (Appendix 1 - SSP Final Consultation Statement).
<b>13. Have you remained in close contact with the Government Office and discussed any emerging issues that might affect the soundness of the development plan document?</b>	<b>Plan Making Manual - New Regulation 25</b>	Yes. Meetings held with Go East to discuss their comments on the Preferred Options Report.

### Stage 4: Publication (2009)

Activity	Statutory Requirement	Evidence Provided
1. Have you prepared the sustainability appraisal report?	<p>1. The Act section 19(5)</p> <p>2. Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>	<p>Yes. See Sustainability Appraisals:-</p> <p>SSP Draft Plan SA Parts 1 &amp; 2 June 2009.</p> <p>SSP Final SA Parts 1 &amp; 2 March 2010.</p>
2. Have you made clear where and within what period representations must be made?	Regulation 28(2) and (3)	<p>Yes. See Statement of Representations Procedure &amp; section 1.4 of the SSP.</p> <p>SSP Final Consultation Statement June 2009 - includes copies of statutory adverts and sets out how the consultations were promoted.</p>
<p>3. Have you made copies of the following available for inspection:</p> <ul style="list-style-type: none"> <li>the proposed submission documents?</li> <li>the statement of the representations procedure?</li> </ul>	Regulation 27(a)	Yes. See Statement of Representations Procedure (SSP Final Consultation Statement Appendix 14) & Chapter 4 of the SSP Final Consultation Statement for a record of where and when these were made available.



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<p>4. Have you published on your website the following:</p> <ul style="list-style-type: none"> <li>the proposed submission documents?</li> <li>the statement of the representations procedure?</li> <li>statement and details of where and when documents can be inspected?</li> </ul>	Regulation 27(b)	Yes. See: <a href="http://www.northnorfolk.org/ldf/1272_2569.asp">www.northnorfolk.org/ldf/1272_2569.asp</a>
<p>5. Have you sent to each of the specific consultation bodies invited to make representations under Regulation 25(1):</p> <ul style="list-style-type: none"> <li>A copy of each of the proposed submission documents</li> <li>The statement of the representations procedure?</li> </ul>	Regulation 27(c)	Yes. See section 4 of the SSP Final Consultation Statement & Appendix 4.
<p>6. Have you sent to each of the general consultation bodies invited to make representations under Regulation 25(1):</p> <ul style="list-style-type: none"> <li>the statement of the representations procedure?</li> <li>where and when the documents can be inspected?</li> </ul>	Regulation 27(d)	Yes. See section 4 of the SSP Final Consultation Statement & Appendix 13.
<p>7. Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> <li>the statement of the representations procedure</li> <li>where and when the documents can be inspected?</li> </ul>	Regulation 27(e)	<p>Yes. Statutory advertisements were placed in the following newspapers from the week beginning 8 June 2009:</p> <ul style="list-style-type: none"> <li>Eastern Daily Press - daily local paper</li> <li>North Norfolk News - weekly local paper</li> <li>Dereham &amp; Fakenham Times - weekly local paper.</li> </ul> <p>Copies can be viewed online at: <a href="http://www.northnorfolk.org/ldf/1272_2569.asp">www.northnorfolk.org/ldf/1272_2569.asp</a></p>
<p>8. Have you requested the opinion of the regional planning body (or the Mayor in London) on the general conformity of the development plan document with the regional spatial strategy (or spatial development strategy)?</p>	<p>1. The Act section 24</p> <p>2. Regulation 29</p>	Yes. Letter sent to East of England Regional Assembly on 11 June 2009 requesting confirmation of general conformity with the East of England Plan.

## Stage 5: Submission (2010)

Question	Statutory Requirement	Evidence Provided
<p>1. Are you ready to submit the DPD?</p> <ul style="list-style-type: none"> <li>Are there any major issues revealed by the representations on publication?</li> <li>Are all the relevant documents in place?</li> </ul>	<p>1. The Act section 20(2)(b)</p> <p>2. The Act section 20(1)</p> <p>3. Regulation 30(1)</p>	Yes. A small number of key issues were identified at publication stage. These have been sought to be addressed through the Schedule of Key Changes (published for public

Question	Statutory Requirement	Evidence Provided
		consultation in Jan 2010) & further dialogue with relevant agencies. In addition the Council is requesting the Inspector considers a number of minor clarifications & amendments published in the Schedule of Minor Modifications.
<p>2. Has the development plan document been prepared in accordance with the local development scheme?</p> <p>3. Does the development plan document's listing and description in the local development scheme match the document?</p> <p>4. Have the timescales set out in the local development scheme been met?</p>	The Act, section 19(1)	<p>Yes. The plan is in accordance with the adopted LDS - Fifth Revision Sept 2009.</p> <p>Yes. See the LDS Fifth Revision Sept 2009 - Appendix A.</p> <p>Submission is within 1 month of the expected date. Adoption and publication should remain consistent with the LDS (January 2011).</p>
5. Has the development plan document had regard to any sustainable community strategy for its area (like a county and district)?	The Act section 19(2)	Yes. Section 2 & table 3 of the SSP Final Consultation Statement & paragraphs 2.1.5 - 2.1.11 of the SSP shows how the Community Strategy Priorities have been addressed in the Core Strategy & SSP.
<p>6. Is the development plan document in compliance with the statement of community involvement (where one exists)?</p> <p>7. Has the council carried out consultation as described in the statement of community involvement?</p>	<p>1. The Act s19(3)</p> <p>2. Regulation 32(1)(c)</p>	<p>Yes. See Statement of Community Involvement Compliance Statement (Appendix 1 - SSP Final Consultation Statement)</p> <p>Yes. See SSP Final Consultation Statement &amp; SCI.</p>
<p>8. Has the development plan document been subject to sustainability appraisal?</p> <p>9. Has the council provided a final report of the findings of the appraisal?</p>	<p>1. The Act section19(5)</p> <p>2. Regulation 32(1)(a)</p>	<p>Yes. Sustainability Appraisal has been carried out from the start of the plan making process. See:</p> <p>Sustainability Appraisal Scoping Report 2005.</p> <p>SSP Preferred Options SA Sept 2006.</p> <p>Coastal Service Villages Preferred Options SA June 2008.</p> <p>SSP Draft Plan SA Parts 1 &amp; 2 June 2009.</p>



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Question	Statutory Requirement	Evidence Provided
		SSP Final SA Parts 1 & 2 March 2010.
10. Is the development plan document to be submitted consistent with national policy?	The Act section 20(2) and Schedule 8	Yes. For details on policy context see SSP Draft Plan 2009, Chapter 2.
11. Does the development plan document contain any policies or proposals that are not in general conformity with the regional spatial strategy?  12. If yes, is there local justification?  13. Has the council got confirmation from the regional planning body about the general conformity of the plan with the regional spatial strategy.	1. The Act section 24(1)(a); 24(2) and 24(4)  2. Regulation 29	No. The SSP does not contain any policies or proposals that are not in general conformity with the RSS.  Yes. See letter from EERA dated 10 July 09 which states that 'whilst the content of the consultation document is in general conformity with policies of the East of England Plan, the absence of provision for permanent sites for Gypsies & Travellers is a significant concern.' The Gypsy & Traveller RSS pitch requirement revision post dated the publication of the SSP & the Council (see LDF Working Party report & minutes 9 Nov 09) is currently in the process of investigating options for delivery of Gypsy & Traveller site provision outside of the LDF.
14. Does the development plan document comply with the 2004 regulations (as amended)?  15. Specifically, has the council published the prescribed documents, and made them available at their principal offices and their website?  16. Has the council placed local advertisements?  17. Has the council notified the development plan document bodies?  18. Does the development plan document contain a list of superseded saved policies?	1. The Act section 20(2), 20(3) and 20(5)(b)  2. Regulations 13(1), 13(2), 13(5) and 30(1)	Yes. See previous sections of this report.  Yes. The documents are available at the Cromer & Fakenham offices and online at <a href="http://www.northnorfolk.org/ldf">www.northnorfolk.org/ldf</a>  Yes. Statutory advertisements were placed in the following newspapers:  The Eastern Daily Press - daily local paper.  North Norfolk News - weekly local paper.  Dereham & Fakenham Times - weekly local paper.  Yes. The DPD bodies have been notified.  N/A

Question	Statutory Requirement	Evidence Provided
<p>19. Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted proposals map?</p> <p>20. If yes, have you prepared a submission proposals map?</p>	<p>Regulations 13(4) 14 and 30(1)(b)</p>	<p>Yes. The SSP illustrates the allocations on an OS map base.</p> <p>Changes to the Proposals Map are shown throughout the SSP. The Proposals Map will be updated to reflect the changes upon adoption.</p>
<p>21. If the development plan document is not a core strategy, is it in conformity with the core strategy?</p>	<p>Regulation 13(6)</p>	<p>Yes. See section 2.1.2 of the SSP. The allocations in the selected settlements comply with the Core Strategy.</p>
<p>22. Have you prepared a statement setting out:</p> <ul style="list-style-type: none"> <li>• Which bodies and persons were invited to make representations under Regulation 25</li> <li>• How they were invited</li> <li>• A summary of the main issues raised</li> <li>• How the representations have been taken into account?</li> </ul>	<p>The Act section20(3) Regulation 30(1)(d)</p>	<p>Yes. See SSP Final Consultation Statement.</p>
<p>23. Have you prepared a statement giving:</p> <ul style="list-style-type: none"> <li>• the number of representations made under Regulation 28(2)</li> <li>• a summary of the main issues raised</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• that no representations were made?</li> </ul>	<p>The Act section20(3) Regulation 30(1)(e)</p>	<p>Yes. See Summary of Main Issues report.</p>
<p>24. Have you assembled the relevant supporting documents?</p>	<p>1. The Act section20(3) 2. Regulation 30(1)(g)</p>	<p>Yes. See Examination Library.</p>
<p>25. Has your council approved the development plan document for submission?</p>	<p>The Act section20</p>	<p>Yes. See Cabinet report 8 Feb 2010.</p>
<p>26. Have you sent the Secretary of State (the Planning Inspectorate) an electronic copy of the:</p> <ul style="list-style-type: none"> <li>• development plan document?</li> <li>• submission proposals map (unless there are no site allocation policies)?</li> <li>• documents prescribed in Regulation 30(1)?</li> </ul>	<p>1. The Act s20(1) and 20(3) 2. Regulations 30(1) and 30(2)(b)</p>	<p>Yes. A copy of the email can be provided on request. (Changes to the Proposals Map are shown throughout the SSP. The Proposals Map will be updated to reflect the changes upon adoption.)</p>
<p>27. On your website, have you published the:</p> <ul style="list-style-type: none"> <li>• development plan document</li> <li>• submission proposals map</li> <li>• sustainability appraisal report</li> <li>• Regulation 30(1)(d) statement</li> <li>• Regulation 30(1)(e) statement</li> <li>• supporting documents (where practicable)</li> </ul>	<p>Regulation 30(3)(b)</p>	<p>Yes. See <a href="http://www.northnorfolk.org/ldf">www.northnorfolk.org/ldf</a></p> <p>(Changes to the Proposals Map are shown throughout the SSP. The Proposals Map will be updated to reflect the changes upon adoption.)</p>



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Question	Statutory Requirement	Evidence Provided
<ul style="list-style-type: none"> <li>representations made under Regulation 28 (where practicable)</li> <li>statement as to where and when the development plan document and the documents are available?</li> </ul>		
<p>28. For each specific consultation body invited to make representations under Regulation 25(1), have you sent the:</p> <ul style="list-style-type: none"> <li>development plan document</li> <li>submission proposals map</li> <li>sustainability appraisal report</li> <li>adopted statement of community involvement</li> <li>Regulation 30(1)(d) statement</li> <li>Regulation 30(1)(e) statement</li> <li>supporting documents you consider relevant to each body</li> <li>statement as to where and when the development plan document and the documents are available?</li> </ul>	Regulation 30(3)(c)	<p>Yes. Copies of letters available on request.</p> <p>(Changes to the Proposals Map are shown throughout the SSP. The Proposals Map will be updated to reflect the changes upon adoption.)</p>
<p>29. For each general consultation body invited to make representations under Regulation 25(1), have you sent:</p> <ol style="list-style-type: none"> <li>notification that the documents prescribed in Regulation 30(1) are available for inspection</li> <li>where and when they can be inspected?</li> </ol>	Regulation 30(3)(d)	Yes. Copies of letters available on request.
<p>30. Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> <li>the title of the development plan document?</li> <li>the subject and area covered by the development plan document?</li> <li>notification that the documents prescribed in Regulation 30(1) are available for inspection</li> <li>where and when they can be inspected?</li> </ul>	Regulation 30(3)(e)	Yes. Copies of advert available on request.
<p>31. Have you given notice to persons who have requested to be notified that submission has taken place?</p>	Regulation 30(3)(f)	Yes. Copies of letters available on request.
<p>32. If an examination is being held, at least six weeks before its opening has the Programme Officer:</p> <ul style="list-style-type: none"> <li>published the time and place of the examination and the name of the person appointed to carry out the examination on your website</li> <li>notified those who have made representations on the published development plan document which have not been withdrawn of these details</li> <li>advertised these details?</li> </ul>	<ol style="list-style-type: none"> <li>The Act section 20</li> <li>Regulation 34</li> </ol>	TBC

**2.1** The PINS guide identifies seven key questions that inspectors will use in relation to legal compliance. These have been incorporated into the tool and are identified by shading in the left-hand 'Question' column.

## 3 Soundness

### Test 1 - Justified

Key Question	Possible Evidence	Evidence Provided
<b>JUSTIFIED</b>		
<b>Participation</b>		
1. Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement.	<p>The Council has gone beyond the minimum requirement of the Regulations in an attempt to ensure that interested parties have had an opportunity to get involved. Details of the engagement process are documented in the SSP Final Consultation Statement.</p> <p>At all stages, all representations have been considered by officers and Members prior to decisions being made and public speaking allowed at relevant committee meetings.</p>
<b>Research / fact finding</b>		
2. Is the content of the development plan document justified by the evidence?	<ul style="list-style-type: none"> <li>Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals</li> </ul>	<p>The content of the Plan has been informed by a comprehensive evidence base and several stages of stakeholder &amp; public consultation.</p>
3. What is the source of the evidence?	<ul style="list-style-type: none"> <li>Sections of the pre-submission proposals documents</li> </ul>	<p>Section 3 of the SSP summarises the site selection process and explains how the proposals put forward in the document have satisfied a number of tests including compliance with policy, based on robust evidence (see paragraphs 3.1.5 and 3.1.6), considered the most appropriate when considered against a range of alternatives, have been through the SA and AA process, have been subject to stakeholder participation and are available and deliverable.</p>
4. How up to date and convincing is it?	<ul style="list-style-type: none"> <li>Sections of the preferred strategy report</li> <li>Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document</li> <li>Sections of the consultation statement <b>OR</b> a very brief statement of how the main findings of consultation support the policies, with reference to:                             <ul style="list-style-type: none"> <li>reports to the council on the issues raised during participation, covering both the front-loading and formulation phases</li> <li>any other information on community views and preferences</li> </ul> </li> <li>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</li> </ul>	<p>The evidence base includes the studies referred to in section 1.25 of the SSP Final Consultation Statement and results of early stakeholder consultation (see sections 1 and 2 of the Consultation Statement).</p> <p>The evidence base also includes the SA Scoping Report and results of the sustainability appraisal process which has gathered information on a number of points such as access, integration, landscape, etc and incorporated information received from statutory bodies about particular sites. The individual appraisal results sheets contained in the SA show the findings of the appraisal, and include a conclusion as to the findings for each site. Assessment of these results throughout the process informed the selection of sites.</p> <p>Further work was carried out, or commissioned,</p>



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Key Question	Possible Evidence	Evidence Provided
	were produced by should be signposted <b>OR</b> 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 development plan document)	<p>by the Council where further information was required. For example, biodiversity surveys were carried out in 2009 where sites were considered to have a possible impact on biodiversity and further discussions have been held with bodies such as Highways to investigate particular issues on sites (on going).</p> <p>Additional information has also been provided by developers or agents for particular sites, and this has been referred to in the SSP where it has been received.</p> <p>The answers to questions 7-9 (below) show how the main findings of consultation support the policies / allocations.</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>	<p>As development has not yet occurred, some assumptions have had to be made about the impact of the allocations. The expected impact of the allocations has been appraised through the Sustainability Appraisal (section 4.5 of the SA explains this &amp; the individual site appraisal sheets show the results).</p> <p>The assumption has been made that windfall development will continue, in addition to the allocations being made (see SSP section 2.1.3).</p> <p>The assumptions have been based on factual information (i.e. SA Stage 1 &amp; Stage 2 - measurable criteria) &amp; informed by responses from specific consultees (SA Stage 3). The individual site appraisal sheets show the responses &amp; conclusions.</p>
<b>Alternatives</b>		
<p>7. Can it be shown that the council's chosen approach is 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</p>	<p>i. Sections of the consultation statement showing how the community was involved in considering issues, 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>	<p>A number of alternative sites have been considered, and the selection of sites has been informed by a comprehensive evidence base and several stages of stakeholder &amp; public consultation.</p> <p>Section 3 of the SSP summarises the site selection process and explains how the proposals put forward in the document have satisfied a number of tests including compliance with policy, are based on robust evidence, are considered the most appropriate when considered against a range of alternatives (see paragraphs 3.1.7 and 3.1.8), have been through the SA and AA process, have been subject to stakeholder participation and are available and deliverable. The SA report, the consultation</p>

Key Question	Possible Evidence	Evidence Provided
<p>decisions between competing alternatives is it clear how and why these decisions were made?</p>	<ul style="list-style-type: none"> <li>• how alternatives were developed and evaluated, and</li> <li>• why alternatives were rejected in favour of the preferred strategy</li> </ul> <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 <b>OR</b> 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>statement and LDF Working Party papers provide a clear audit trail as to why particular decisions have been made.</p> <p>The Sustainability Appraisal report shows all the alternative sites that were considered, and the individual appraisal results sheets show the findings of the appraisal, and include a conclusion as to the findings.</p> <p>Sections 2, 3 and 4 of the SSP Final Consultation Statement describe how the community was involved in considering issues, alternatives and options, and how the outcomes were addressed. Section 2.3 - 2.6 explains how comments from early stages were addressed and informed the preferred options document. Section 3 summarises the responses received to the preferred options report and paragraph 3.27 explains that this summary of responses, and the Council's reasons for recommendations on particular sites, were included in the papers for the LDF Working Party meetings (Sept 2008 to April 2009) when decisions were made on which sites to include in the Draft Plan. The minutes to these meetings are available online at: <a href="http://www.northnorfolk.org/council/4708.asp">www.northnorfolk.org/council/4708.asp</a></p>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</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 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</p>	<p>The Council has undertaken sustainability appraisal at all stages of the production of the SSP (and Core Strategy). Section 3.2 of the SSP describes how SA has been used throughout the process to ensure that sustainability principles are embedded in the Plan.</p> <p>Chapter 2 of Part 1 of the Sustainability Appraisal provides a summary of the methodology employed for the appraisal of site allocations. Sections 4.20 and 4.21 of the SA report describe how the appraisal has influenced site selection, and highlighted particular mitigation measures required.</p> <p>SA results for individual sites have been available to inform key stages of decision</p>



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Key Question	Possible Evidence	Evidence Provided
	has influenced the choice of strategy and the content of policies	making (see LDF Working Party reports) and to inform representations made on the Plan (see part 2 of the SA report).
11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it? 12. Does the strategy take forward the regional context reflecting the local issues and objectives?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons</li> <li>ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional spatial strategy</li> <li>iii. Representations received from the regional development agency/regional planning body</li> <li>iv. Representations from the Government Office</li> <li>v. Reports or copies of correspondence as to how the representations have been considered and dealt with</li> </ul>	<p>Section 2.1 of the SSP describes the national and regional policy context and how local issues have been identified and addressed.</p> <p>The East of England Plan (EEP) requires North Norfolk to plan to provide for at least 8,000 dwellings between 2001 &amp; 2021. The Core Strategy has determined that land should be allocated for between 2,700 &amp; 3,400 dwellings in order to meet the requirement for 8,000 dwellings and for sites to be available in the years following the period covered by this plan. The Core Strategy sets out the overall distribution of development in the District (policy SS1 and SS3), which is in accordance with principles contained in the EEP. The SSP proposes to allocate sufficient land to accommodate in the region of 3,300 dwellings in the selected settlements, taking account of local issues and objectives in those settlements.</p> <p>See letter from EERA dated 10 July 09 which states that 'whilst the content of the consultation document is in general conformity with policies of the East of England Plan, the absence of provision for permanent sites for Gypsies &amp; Travellers is a significant concern.' The Gypsy &amp; Traveller RSS pitch requirement revision post dated the publication of the SSP &amp; the Council (see LDF Working Party report &amp; minutes 9 Nov 09) is currently in the process of investigating options for delivery of Gypsy &amp; Traveller site provision outside of the LDF.</p> <p>The representation from EERA can be viewed via the online consultation system (ID number: 171354 / Representation Reference: SSPDP1397) at: <a href="http://consult.north-norfolk.gov.uk/portal">http://consult.north-norfolk.gov.uk/portal</a></p>

### Test 2 - Effective

Key Question	Possible Evidence	Evidence Provided
<b>EFFECTIVE</b>		
<b>Deliverable</b>		
13. Has the council clearly identified what the issues are that the development plan	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there</li> </ul>	The table on page 10 of the SA Scoping Report and table 3.1 of the SSP SA report set out the key issues facing North Norfolk. These informed the

Key Question	Possible Evidence	Evidence Provided
<p>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>	<p>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</p> <p>iii. A core strategy vision which is framed to set out the outcomes which are sought for the future</p> <p>iv. Sections of the development plan document which identify the main issues addressed</p> <p>v. Sections of the development plan document which indicate the priority outcomes</p>	<p>development of sustainability appraisal objectives against which Core Strategy policies and site allocations were appraised.</p> <p>Section 1 of the Core Strategy sets out how the evidence gathering and early consultation gave a thorough understanding of the issues facing the District, which enabled a spatial portrait, vision and objectives to be prepared. Core Strategy policies were then developed to achieve the objectives.</p> <p>Section 1.2.2 of the SSP summarises how it seeks to deliver development in accordance with the aims of the Core Strategy.</p> <p>Sections 2.1.5 to 2.1.11 of the SSP set out the Community Strategy main outcomes, and how the Plan seeks to deliver these through the allocation of land.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<p>i. Sections of the regional spatial strategy which identify cross-boundary issues.</p> <p>ii. Sections of the development plan document setting out cross-boundary issues and the response to them</p> <p>iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations</p> <p>iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance</p>	<p>Paragraph 2.1.12 of the SSP explains how the Council works closely with neighbouring authorities.</p> <p>Some cross boundary issues have been raised in relation to:</p> <ul style="list-style-type: none"> <li>• increased visitor pressure on the North Norfolk coast SAC's &amp; SPA's from the increase in dwelling numbers. Further discussion with RSPB, Natural England and Kings Lynn &amp; West Norfolk Borough Council has been held to investigate this issue and agree a common way forward.</li> <li>• capacity of STWs serving multiple settlements, i.e. Hoveton and Wroxham. The combined effect of new development is being considered in the further investigation on this issue.</li> <li>• Capacity of schools to accommodate additional pupil numbers arising from new development in various settlements. Norfolk County Council has considered the in-combination effect in their response (See paragraph 14.0.28 of the SSP).</li> <li>• The appropriate assessment considers neighbouring authorities</li> </ul>



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Key Question	Possible Evidence	Evidence Provided
		<p>LDFs in the in-combination assessment of issues.</p> <p>North Norfolk is not identified as a sub-region or growth point in the East of England Plan.</p>
16. Does the development plan document contain clear objectives?	<ul style="list-style-type: none"> <li>i. A spatial portrait which identifies the key issues facing the area</li> <li>ii. A core strategy vision which is framed to set out the outcomes which are sought for the future</li> <li>iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision</li> </ul>	The objective of the SSP is to ensure that sites are identified and made available to meet the development needs of the District in accordance with the aims and objectives of the adopted Core Strategy. This is detailed in chapters 1 & 2 of the SSP.
17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?	<ul style="list-style-type: none"> <li>i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it</li> <li>ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place</li> </ul>	The Core Strategy objectives were developed through careful consideration of local issues and evidence (see section 1.2 of the Core Strategy). Details of the spatial portrait, vision and strategic objectives appear in the Core Strategy sections 1.3, 2.1 and 2.2 respectively.
18. Is there a direct relationship between the identified issues and the objectives?		
19. Is it clear how the policies will meet the objectives?	<ul style="list-style-type: none"> <li>i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them</li> <li>ii. Relevant sections of the sustainable community strategy which identify its objectives</li> <li>iii. Confirmation from the local strategic partnership and partner organisations that they believe the policies will achieve the agreed objectives</li> <li>iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed</li> <li>v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.</li> </ul>	<p>Paragraph 3.1.3 of the SSP states that only sites which accord with the underlying principles of the Core Strategy are proposed for allocation and that these sites comply with the housing requirement and spatial objectives for each settlement as determined by the Core Strategy.</p> <p>The Authority is satisfied that each of the proposed allocations represent suitable use of a site and that the site is or will be available and that the proposed development is deliverable within the period covered by the plan (see section 3.4 of the SSP). A number of specific issues facing the sites have been raised through consultation and consideration of the available evidence, and these have been addressed in the policy related to that site.</p> <p>The Council is not aware of any gaps in the document.</p>
20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?		
21. Are there realistic time-scales related to the objectives?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which address delivery and</li> </ul>	The adopted Core Strategy covers the period to 2021. Issues raised by infrastructure providers influenced the

Key Question	Possible Evidence	Evidence Provided
	<p>the time-scales for key developments and initiatives</p> <p>ii. Confirmation from the local strategic partnership and partner organisations that the time-scales are realistic in terms of their contribution to delivery</p>	<p>housing numbers and the distribution across the District. Section 3.4 of the SSP sets out how deliverability has been addressed.</p> <p>The accompanying text to the individual allocation policies covers deliverability in more detail and where necessary specific reference is contained within the policy. In general there are few constraints that would affect delivery of the allocations in the plan period, although the issue of limited capacity at various sewage treatment works is continuing to be investigated.</p> <p>Key partners have been consulted throughout the development of the DPD which helped to shape the policy and developer requirements that apply to each site allocation.</p>
22. Are the policies internally consistent?	<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>The SSP policies are internally consistent as only those sites which the Council considers will best meet the needs of the District and will deliver Core Strategy aims have been included.</p> <p>The Core Strategy aims were appraised against SA objectives (see Core Strategy SA sections 2.20 - 2.23, Chapter 4 &amp; Appendix F).</p>
23. Does the development plan document contain material which: <ul style="list-style-type: none"> <li>is already in another plan</li> <li>should be logically be in a different plan</li> <li>should not be in a plan at all?</li> </ul>	<p>i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure</p> <p>ii. Representations from the Government Office</p> <p>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>Section 1.1 of the SSP explains how the document relates to the Core Strategy. It reflects the vision, and defines it in detail, by allocating specific areas of land for different types of new development. Therefore the SSP builds upon the Core Strategy rather than repeating it.</p> <p>See also Appendices A (Local development document profiles) &amp; B (Schedule of DPD's) of the Local Development Scheme (5th Revision).</p> <p>The government office has not raised any concerns on this matter.</p>
24. Does the development plan document explain how its key policy objectives will be achieved?	<p>i. Sections of the development plan document that identify the key objectives and how they will be delivered upon</p> <p>ii. Confirmation from the relevant agencies that they support the</p>	<p>See section 3.4 (Deliverability) &amp; chapter 14 (monitoring &amp; implementation).</p> <p>The table in section 14.0.42 of the SSP sets out the targets, performance indicators and responsible agencies for</p>



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Key Question	Possible Evidence	Evidence Provided
	<p>objectives and the identified means of delivery</p> <p>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>	<p>each site. These reflect the targets and indicators in the Core Strategy (see table 4 in section 4.5). These were prepared in consultation with other relevant agencies and include common targets, i.e. LAA targets.</p>
25. If there are development management policies, are they supportive of the strategy and objectives?	<p>i. Sections of the development plan document that show how the development management policies:</p> <ul style="list-style-type: none"> <li>• will help to deliver the strategy</li> </ul> <p>ii. derive from, and elaborate on, the objectives and policies of the plan</p>	<p>Specific policies are applied to each site allocation. These are intended to deliver the Core Strategy and SSP objectives by ensuring that development takes account of particular issues facing a site and does not have an adverse impact on the surrounding area. All sites will also need to comply with the adopted Core Strategy which contains development control policies.</p>
26. Have the infrastructure implications of the strategy/policies clearly been identified?	<p>i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward</p> <p>ii. Representations in respect of infrastructure</p> <p>iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with</p>	<p>Chapter 14 of the SSP summarises the infrastructure needs in relation to the District and the 'Constraints' section in the supporting text to each site allocation sets out key infrastructure requirements relating to that site. The individual site policies include criteria requiring that particular issues are addressed.</p> <p>This is all supported by the correspondence and dialogue that has been held with statutory bodies during preparation of the plan - see section 2 and paragraphs 3.29 to 3.30 of the Final Consultation Statement and representations from relevant bodies at various consultation stages.</p>
27. Are the delivery mechanisms and time-scales for implementation of the policies clearly identified?	<p>i. Sections of the development plan document setting out delivery mechanisms and timescale</p> <p>ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered</p> <p>iii. Research or studies that address matters of delivery and the realistic time-scales</p> <p>iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms</p> <p>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</p>	<p>See responses to questions above.</p> <p>See section 3.4 (Deliverability) &amp; chapter 14 (monitoring &amp; implementation) of the SSP.</p> <p>Common targets with the NNDC Corporate Plan and the LAA have been used to aid agreement and implementation of policies.</p>

Key Question	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>vi. Correspondence from stakeholders on delivery mechanisms and timescale</li> <li>vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</li> </ul>	
<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"> <li>i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and time-scales for their delivery</li> <li>ii. Representations in respect of infrastructure</li> <li>iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with</li> </ul>	<p>Chapter 14 of the SSP summarises the infrastructure needs in relation to the District &amp; how &amp; when delivery of the required infrastructure can take place. The table in section 14.0.42 sets out the responsible agency for delivery of the key requirements for each site.</p> <p>The 'Constraints' &amp; 'Deliverability' sections in the supporting text to each site allocation provide further information. The individual site policies include criteria requiring that particular issues are addressed. Where delivery of an allocation needs to be delayed due to infrastructure constraints this is clearly set out within the individual site policy.</p> <p>This is all supported by the correspondence and dialogue that has been held with statutory bodies during preparation of the plan - see section 2 and paragraphs 3.29 to 3.30 of the consultation statement and representations from relevant bodies at various consultation stages.</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"> <li>i. Sections of the development plan document setting out responsibilities for delivery</li> <li>ii. Correspondence showing how other stakeholders intend to support the delivery of the policies</li> <li>iii. Reports by the council or the relevant stakeholder</li> <li>iv. Representations from stakeholders on implementation</li> <li>v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</li> </ul>	<p>The table in section 14.0.42 sets out the responsible agency for delivery of the key requirements for each site. The accompanying text to the individual allocation policies provides information relating to delivery requirements &amp; Chapter 14 of the SSP demonstrates the intentions of other stakeholders in regard to implementation / delivery of the policies. Information from stakeholders is also shown in the summary of main issues (consultation responses) in the Final Consultation Statement.</p> <p>Commitment to delivery of the Plans proposals is demonstrated through the correspondence &amp; dialogue with the various organisations &amp; bodies during preparation of the plan - see section 2 and paragraphs 3.29 to 3.30 of the consultation statement and representations from relevant bodies at</p>



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Key Question	Possible Evidence	Evidence Provided
		various consultation stages. The Final Sustainability Appraisal (part 2) also contains responses from County Highways & Landscape, Norfolk Archaeology the Environment Agency, Natural England & others.
<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 and how they function?</p>	<p>i. Sections of the development plan document that reflect the plans or strategies of other bodies</p> <p>ii. Expressions of support from bodies responsible for other strategies affecting the area</p> <p>iii. Representations in respect of services provided by other agencies</p> <p>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 substance of the representation</p>	<p>Section 2 of the SSP explains how it relates to other policy documents, such as the East of England Plan and the Sustainable Community Strategy. See especially sections 2.1.5 - 2.1.13 of the SSP for further detail on how other organisations have been involved in order to co-ordinate activities &amp; agree common objectives.</p> <p>A wide number of organisations were involved in the early identification of different issues facing the settlements, and this informed the vision and policy for each place in the Core Strategy. The SSP seeks to implement this vision through individual allocations of land.</p>
33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?	<p>i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them</p> <p>ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</p>	Paragraphs 1.5.5 and 3.4.2 explain that in many instances the deliverability of a proposal will be dependent upon the actions of others.

Flexible		
34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	<p>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</p> <p>ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor <ul style="list-style-type: none"> <li>the effectiveness of policies and what evidence is being collected to undertake this</li> <li>changes affecting the baseline information and any information on trends on which the development plan document is based</li> </ul> </p> <p>iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the</p>	<p>The individual policies provide dwelling numbers that are either approximate figures or are presented as a range (minimum to maximum). This allows for some flexibility in the form of development that comes forward on the site. Also, while key constraints are set out, the individual site policies try not to be overly prescriptive.</p> <p>Paragraph 1.5.6 of the Draft Plan describes the framework that may trigger a review of the Plan. The Annual Monitoring Report is the main record of monitoring information. The progress of the policies in the SSP will be regularly</p>

	<p>progress of the policies and changes in the baseline</p> <p>iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</p>	<p>reviewed in order for the Council (and / or its partners) to respond if necessary to secure or encourage implementation or to revise the policies if appropriate (see monitoring table in SSP section 14.0.42).</p> <p>Common targets with the NNDC Corporate Plan and the LAA have been used to aid gathering of information for monitoring of policies.</p>
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional spatial strategy (RSS)?</p>	<p>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</p> <p>ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</p>	<p>The individual policies provide dwelling numbers that are either approximate figures or are presented as a range (minimum to maximum). This allows for some flexibility in the amount of development that comes forward on the site, which could accommodate minor changes to the housing requirement. The Council will regularly assess the performance of the policies, and delivery of allocations, against the monitoring framework. This will enable a response to any particular issues that are identified or to any major changes to the RSS that would necessitate a review of the Plan.</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<p>i. A section of the development plan document which expressly addresses flexibility</p> <p>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>	<p>Paragraphs 1.5.6 and 14.0.33 to 14.0.36 describe how policies will be monitored and how a review may be triggered. Where targets are not met over a sustained period this will trigger a review of the SSP or indicate that a supplementary planning document may need to be prepared to give extra guidance on the implementation of a particular policy.</p>

Monitoring		
<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>	<p>i. Sections of the development plan document setting out indicators, targets and milestones</p> <p>ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</p> <p>iii. Reference to any other reports or technical documents which contain</p>	<p>It is expected that all the proposals will be implemented by the end of the plan period (2021). Where infrastructure constraints may affect delivery these have been incorporated into the individual policies.</p> <p>The table in section 14.0.42 of the SSP sets out the targets (key requirements) and performance indicators for the allocations.</p> <p>Paragraphs 14.0.33 to 14.0.36 describe the monitoring regime.</p>



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		information on the delivery of policies	See also Annual Monitoring Report (AMR) Chapter 4, sections 4.4 - 4.9 for the housing trajectory.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>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</li> <li>iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators</li> </ul>		The targets and performance indicators in the table in section 14.0.42 correlate to the Core Strategy indicators and are monitored in the Annual Monitoring Report.
39. Are suitable targets and indicators present (by when, how and by whom)?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories</li> </ul>		See sections referred to above.

### Test 3 - National Policy

Key Question	Possible Evidence	Evidence Provided
<b>NATIONAL POLICY</b>		
40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy</li> <li>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</li> </ul>	No. Paragraph 2.1.1 describes how the document conforms with national policy and the Sustainable Community Strategy.
41. If yes, is there a local justification?	<ul style="list-style-type: none"> <li>iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement</li> </ul>	

Key Question	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>iv. Representations from the Government Office on the preferred strategy or the submitted development plan document</li> <li>v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with</li> </ul>	
<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"> <li>i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons</li> <li>ii. Representations from the Government Office</li> <li>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</li> </ul>	<p>The Plan contains policies allocating land for development purposes that meet the needs of the District in accordance with the aims of the Core Strategy. It is therefore building upon national guidance and is in general conformity with the EEP. (See letter from EERA dated 10 July 09 - view online (ID number: 171354 / Representation Reference: SSPDP1397) at: <a href="http://consult.north-norfolk.gov.uk/portal">http://consult.north-norfolk.gov.uk/portal</a>)</p>



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