

## Soundness tool

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	Regulation 24 Consultation Statement
<b>Research/ fact finding</b>		
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"> <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> 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	Appendix C of the Core Strategy and Development Control Policies Proposed Submission Document details the evidence that supports the Core Strategy and Development Control Policies DPD. Most of the evidence has been produced since 2006.

Key question	Possible evidence	Evidence provided
	<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? 6. Are the assumptions reasonable and justified?</p>	<p>i. Sections of the development plan documents setting out the assumptions ii. Sections of the sustainability appraisal report setting out the assumptions iii. A very brief statement for each assumption as to how the evidence led to the assumption iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions</p>	<p>Assumptions have been made in forecasting completions on small sites with planning permission. It has been assumed that the average completion rate observed over previous years will continue until all sites with planning permission are complete. A 3% lapse rate has been applied to the small site permissions. This lapse rate has been calculated from the District average since 2001. As these assumptions are based on the best evidence available we regard them as reasonable and justifiable.</p>
<b>Alternatives</b>		
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives? 8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at? 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>i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options ii. Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised iv. Sections of the preferred strategy report explaining: • how alternatives were developed and evaluated, and • why alternatives were rejected in favour of the preferred strategy v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed vi. Reports prepared during the plan preparation process (including after the preferred strategy</p>	<p>The Sustainability Appraisal Report and the Core Strategy and Development Control Policies DPD show how alternatives were considered and discounted. Chapter 5 and Appendix B&amp;C of the Sustainability Appraisal Report 2007 clearly show the comparison of policy options. Regulation 24 Consultation Statement shows how consultation responses were taken into account in the formulation and adoption of policy options.</p>

Key question	Possible evidence	Evidence provided
	<p>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>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 has influenced the choice of strategy and the content of policies</p>	<p>The three volumes of the Sustainability Appraisal Report</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>Spatial Strategy, Policies CP1, CP2, CP3, CP4, CP6, CP7, CP8, CP9, CP10, CP11, DC4, DC5, DC6, DC7, DC11, DC12, DC14, DC15, DC19, DC16, DC21, DC20, DC22, DC24</p> <p>Representations from the East of England Regional Assembly and Regulation 29 Statement of Conformity.</p>

<b>Key question</b>	<b>Possible evidence</b>	<b>Evidence provided</b>
	iv. Representations from the Government Office v. Reports or copies of correspondence as to how the representations have been considered and dealt with	Comments from GO-East

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"> <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> <li>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</li> <li>iii. A core strategy vision which is framed to set out the outcomes which are sought for the future</li> <li>iv. Sections of the development plan document which identify the main issues addressed</li> <li>v. Sections of the development plan document which indicate the priority outcomes</li> </ul>	<p>The Sustainability Appraisal Report, the Breckland Sustainable Community Strategy. Development Choices Consultation (old Regulation 25).</p> <p>Chapter 2 of the Core Strategy and Development Control Policies Development Plan Document</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"> <li>i. Sections of the regional special strategy which identify cross-boundary issues.</li> <li>ii. Sections of the development plan document setting out cross-boundary issues and the response to them</li> <li>iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations</li> <li>iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance</li> </ul>	<p>Cross boundary infrastructure constraints have been assessed in Water Cycle Study and Infrastructure Study.</p> <p>The Parish of Weeting shares a border with the town of Brandon in Forest Heath District. Forest Heath District have never notified the Council that cross boundary issues need to be explored in this area as part of the growth of Brandon.</p> <p>Breckland is part of a sub-regional housing market with the Districts of North Norfolk and Kings Lynn and West Norfolk. A Strategic Housing Market Assessment was prepared for the three Districts.</p>
<p>16. Does the development plan document contain clear</p>	<ul style="list-style-type: none"> <li>i. A spatial portrait which identifies the key issues facing the area</li> </ul>	<p>Chapter 2 of the Core Strategy and Development Control Policies DPD includes Spatial Objectives</p>

objectives?	<ul style="list-style-type: none"> <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>	
<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>	<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>	Chapter 2 of the Core Strategy and Development Control Policies DPD includes Spatial Objectives
<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>	<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>	The Monitoring and Implementation Framework of the Core Strategy and Development Control Policies DPD
21. Are there realistic timescales related to the objectives?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives</li> <li>ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery</li> </ul>	Spatial Strategy, CP1, CP2, CP3, CP4, Monitoring and Implementation Framework of the Core Strategy and Development Control Policies DPD.
22. Are the policies internally consistent?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the</li> </ul>	Policies arranged into higher strategic themes. Statement in introduction to Core Strategy and Development Control Policies DPD that policies

	<p>objectives are consistent</p> <p>ii. A very brief statement explaining how the council considers its objectives are consistent</p>	<p>should be read in conjunction with one another.</p>
<p>23. Does the development plan document contain material which:</p> <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>Local Development Scheme (October 2008)</p> <p>Correspondence and representations from GO-East.</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<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 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>The Monitoring and Implementation Framework of the Core Strategy and Development Control Policies DPD.</p> <p>Representations from infrastructure providers.</p> <p>Technical evidence listed in Appendix C of the Core Strategy and Development Control Policies DPD.</p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<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>37. derive from, and elaborate on, the objectives and policies of the plan</p>	<p>Development Control Policies fit into the same higher strategic themes as the Core Policies. The supporting text of the development control policies refer back to related Core Policies.</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<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>Policy CP4 and CP5 of the Core strategy and Development Control Policies DPD. Technical evidence found in the Breckland Infrastructure Study, the Thetford Growth Framework and Infrastructure Study and the Water Cycle study.</p> <p>Representations from infrastructure providers.</p>
<p>27. Are the delivery mechanisms and timescales for</p>	<p>i. Sections of the development plan document setting out delivery mechanisms and timescale</p>	<p>Monitoring and Implementation Framework of the Core Strategy and Development Control Policies.</p>

<p>implementation of the policies clearly identified?</p>	<ul style="list-style-type: none"> <li>ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered</li> <li>iii. Research or studies that address matters of delivery and the realistic timescales</li> <li>iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms</li> <li>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</li> <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>Technical evidence found in the Breckland Infrastructure Study, the Thetford Growth Framework and Infrastructure Study and the Water Cycle study.</p> <p>Representations from infrastructure providers.</p>
<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 timescales 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>Monitoring and Implementation Framework of the Core Strategy and Development Control Policies.</p> <p>Technical evidence found in the Breckland Infrastructure Study, the Thetford Growth Framework and Infrastructure Study and the Water Cycle study.</p> <p>Representations from infrastructure providers.</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>Monitoring and Implementation Framework of the Core Strategy and Development Control Policies.</p> <p>Technical evidence found in the Breckland Infrastructure Study, the Thetford Growth Framework and Infrastructure Study and the Water Cycle study.</p> <p>Regulation 24 Consultation Statement</p>
<p>31. Does the development plan</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that</li> </ul>	<p>Sustainability Appraisal Report, Core Policies in</p>



<p>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>reflect the plans or strategies of other bodies</p> <ol style="list-style-type: none"> <li>ii. Expressions of support from bodies responsible for other strategies affecting the area</li> <li>iii. Representations in respect of services provided by other agencies</li> <li>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</li> </ol>	<p>the Core Strategy and Development Control Policies DPD.</p>
<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>	<ol style="list-style-type: none"> <li>i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them</li> <li>ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</li> </ol>	<p>Extending plan period to 2026 to ensure long term housing supply.</p> <p>Annual Monitoring Report</p> <p>Monitoring and Implementation framework includes contingencies.</p>
<p><b>Flexible</b></p>		
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<ol style="list-style-type: none"> <li>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</li> <li>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> </li> <li>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</li> <li>iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could</li> </ol>	<p>Monitoring and Implementation Framework</p> <p>Annual Monitoring Report 2008</p>

	cope with changing circumstances	
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"> <li>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</li> <li>ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> </ul>	<p>Monitoring and Implementation Framework</p> <p>Spatial Strategy, CP1, CP2, CP3 and CP4</p> <p>Technical evidence found in the Breckland Infrastructure Study, the Thetford Growth Framework and Infrastructure Study and the Water Cycle study</p>
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	<ul style="list-style-type: none"> <li>i. A section of the development plan document which expressly addresses flexibility</li> <li>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</li> </ul>	Monitoring and Implementation Framework
<b>Monitoring</b>		
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?	<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 which report on indicators, targets, milestones and trajectories</li> <li>iii. Reference to any other reports or technical documents which contain information on the delivery of policies</li> </ul>	<p>Monitoring and implementation Framework, Sustainability Appraisal Report .</p> <p>Housing trajectory included in Policy CP1, will be updated in Annual Monitoring Reports</p>
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>	Monitoring and implementation Framework, Sustainability Appraisal Report .

<p>39. Are suitable targets and indicators present (by when, how and by whom)?</p>	<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>	<p>Monitoring and implementation Framework, Sustainability Appraisal Report .</p>
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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"> <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> <li>iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement</li> <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>Representations and correspondence from GO-East</p>
<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>Representations from Government Office at Regulation 28 state that Policy DC10, DC18 and DC23 do not add materially to national policy.</p>