Wycombe District Council Local Plan PAS Soundness Assessment – Submission

March 2018

PAS Soundness Self-Assessment Checklist (March 2014)

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

In summary – the key requirements of plan preparation are:

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

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

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

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

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

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

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

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

3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities
This means the DPD should be deliverable, requiring evidence of:
- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

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

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

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

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

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Vision and Objectives Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve? Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives? Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? Have reasonable alternatives to the quantum of development and overall spatial strategy been considered? Are the policies internally consistent? Are there realistic timescales related to the objectives? Does the DPD explain how its key policy objectives will be achieved?	• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. • Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. • The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.	The Wycombe District Local Plan (WDLP) sets out how development should take place for the plan period of 2013-2033. Section 2 identifies the key challenges for the district, recognising the large proportion of the district lying within the Chilterns AONB and Metropolitan Green Belt. Section 3 sets out the vision for Wycombe District to be 'economically strong and the place to live work and visit'. This is supported by eight strategic objectives for the District, which explains how the issues will be addressed. Section 4 provides the strategy to meet the vision, setting out the quantum of development, where development will go and why (policy CP2), along with a settlement Strategy (policy CP3), showing how the key policy objectives will be achieved. All policies are internally consistent with realistic timescales. The delivery of the policies are founded on an Infrastructure Delivery Plan (IDP). This identifies key infrastructure required for delivery and timescales for this, supported by relevant stakeholders and agencies. Section 7 sets out how the plan will be monitored to ensure key policy objectives are achieved. This will be assessed yearly in the Council's Authority Monitoring Reports (AMR). Other DPDs which are The Wycombe District Delivery and Site Allocations Plan for Town Centres and Managing Development (DSA) (2013) is also part of the Development Plan. This contains a mix of development management and site specific policies which cover sustainable transport, town centres, retail

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		environment and infrastructure. These will not be replaced by the WDLP but will sit alongside the Local Plan. Neighbourhood Plans also form part of the Development Plan, which add further detail to those policies set out in the WDLP. The [Wycombe Local Development scheme (Dec 2016-Dec 2019)](#) sets out the work programme for the next three years.
The presumption in favour of sustainable development (NPPF paras 6-17) Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or —specific policies in this Framework indicate development should be restricted.	• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below). • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)	The development needs for the District have been established through a Bucks wide Housing and Economic Development Needs Assessment (HEDNA) – December 2016 and Addendum 2017. The supply of land and distribution of development has been informed by a large number of technical assessments including a Bucks wide Green Belt Assessment Part 1 (Arups) and District Wide Part 2 assessment; an AONB Site Assessment; Housing and Economic Land Availability Assessment (HELAA) and Employment Land Review. The development strategy for the District including the most sustainable locations for growth is set out in policies CP3 'Settlement Strategy' and CP4 'Delivering Homes'. This is supported by the Settlement Hierarchy Report (September 2017). The strategy also includes proposals for a major expansion area at Princes Risborough. The justification for the preferred overall strategy is set out in the Sustainability Appraisal (September 2017). This identifies the different options considered. This was also informed by community consultation under Regulation 18, including Community Conversations 2013, Options Consultation 2014, Princes Risborough Draft Town Plan consultation February 2016 and Draft Local Plan consultation in summer 2016. Extensive

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		community consultation has taken place throughout the plan making. See Statement of Consultation (September 2017).
Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.	• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk)	Policy CP1 expresses in that the Council will take a positive approach that reflect the presumption in favour of sustainable development contained within the NPPF, acknowledging the constraints of the district as identified in footnote 14 of the NPPF. Policy CP4 'Delivering Homes' allocates proportionate levels of growth to sustainable locations. The adopted DSA policy DM1 also sets out in policy a presumption in favour of sustainable development.
Objectively assessed needs The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.	The Council has an extensive evidence base on the OAN. The HEDNA (and the updates) identifies the objectively assessed need for housing and economic development requirements for the district and the wider Housing Market Area and Functional Economic Market Area. See HMA & FEMA Report (ORS, March 2015). A series of Technical Assessments was undertaken for settlements with allocations, including the HELAA, Green Belt Review, AONB Site Assessment, Employment Land Review and Retail Study. A Memorandum of Understanding statement has jointly been prepared and agreed with the Buckinghamshire Authorities to set out levels of unmet housing from Wycombe district to be met in Aylesbury Vale. See Buckinghamshire Districts and Bucks Thames Valley Local Enterprise Partnership Memorandum of Understanding (July 2017).

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		A Bilateral Agreement has been signed between WDC and Chiltern District Council to set out agreement on sites which overlap the boundary. A series of duty to co-operate statements has been prepared with key stakeholders.
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.	Fostering economic growth is a key objective of the plan. The economic vision and strategy is set out in Section 4 'Delivering Land for Business' (strategic policy CP5). The strategy seeks to accommodate a sustainable level of employment growth whilst recognising unmet employment needs have been agreed to be accommodated in Aylesbury Vale. See Buckinghamshire Councils Memorandum of Understanding (July, 2017). The plan includes a range of policies which safeguard and promote economic growth through the allocation of new employment sites and sites for regeneration. New employment land is allocated at Wycombe Air Park (HW15); High Heavens Recycling Centre (RUR17); Princes Risborough (PR9); and Stokenchurch Business Park Expansion Area (RUR10). Figure 7 maps the economic development strategy. Further detail for employment is dealt with in DM28 'Employment areas'. The strategy is based on Technical Assessments including the HEDNA, Employment Land Review and Retail Study.

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		DSA (2013) policy DM5 on scattered business sites sets out the approach for the protection of smaller sites.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)	Policy CP7 'Delivering the infrastructure to support growth' sets out infrastructure requirements and the approach to be followed in assessing development impacts. CP7 refers to the Community Infrastructure Levy, an adopted SPD setting out how funds will be collected. Identification for priority areas for improvements and regeneration at Cressex Business Park, High Wycombe (HW17) and Globe Park in Marlow (MR7). An up-to-date Infrastructure Delivery Plan has been prepared specifically to address the infrastructure necessary for the delivery of CP5 'Delivering Land for Business'. Series of underperforming employment sites have been released for housing, these are identified in the HELAA (September 2017). DM29 Community Facilities provides a criteria based policy to ensure new development is served by adequate community facilities.
2. Ensuring the vitality of town centres (paras 23-37)		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	• The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites;	Strategic objective 7 is to 'Champion our town centres' to provide the focus of our social and economic activity. CP6 'Securing Vibrant and High Quality Town Centres' sets out the strategy for town centres.

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	allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.	A technical assessment of retail needs has been undertaken (Nathanial Litchfield and Partners 2014). Study updates have been produced in 2016 and 2017. The HELAA (September 2017) identifies the supply of retail land for the plan period. The Local Plan identifies site specific policies for retail - High Wycombe (HW19) and Princes Risborough (PR3, PR13, PR14). There is also a town centre improvement policy for Princes Risborough (PR12). The DSA allocates a number of sites in the main town centres for mixed use - HWTC1, HWTC2, HWTC3, recognising town centres can accommodate a diverse mix of uses. The DSA and Local Plan identify sites to help meet the need for new retail, including the overarching "town centres first" principle. In the DSA policy DM7 sets out Town Centre Boundaries, DM8 identifies the Primary Shopping Areas and DM9 identifies the District Centres.
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	• An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages identified and allocated.	The retail Study Update sets out the retail need. Sites to meet that need are identified in the HELAA (September 2017). The DSA allocates a number of sites in the main town centres for mixed use, recognising town centres can accommodate a diverse mix of uses. The DSA sets out primary and secondary shopping frontages for High Wycombe (HWTC5 and HWTC6), Marlow (MR1 and MR2) and Princes Risborough (PR1 and PR2). DM16 of the DSA sets out the requirements for Open Space provision DM29 provides a policy on the provision and safeguarding of community facilities.

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3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	• Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities.	Strategic objective 3 is to 'foster the economic strength of the M40/A404 location and that of the rural economy'. DM28 allocates 'Employment areas' and identifies what uses will be supported in employment areas. Policy CP5 'Delivering Land for Business' Safeguards existing employment areas, allocates new employment areas and supports rural enterprise and diversification. Policy RUR14 allocates new employment in the village of Stokenchurch.
4. Promoting sustainable transport (paras 29-41)		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29) Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including	• joint working with adjoining authorities, transport providers and government agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. • policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. • a spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.	Policy CP2 and CP3 sets out the main principles for development, prioritising development at existing settlements in accessible locations, encouraging development where there are existing sustainable modes of travel. This supported the Settlement Hierarchy report (September 2017). Major development is proposed at Princes Risborough, PR8 – 'Provision and Safeguarding of Transport Infrastructure'. This requires development within the expansion area to provide and secure new road infrastructure in the form of a complete relief road round the town, as well as a new bus service and walking and cycling links. This is supported by an extensive evidence base including, among others, - Princes Risborough Area Transport Study (January 2014), a Stage 1 Options Assessment Report (February 2016), final scenario modelling (July 2017) and Princes Risborough southern options and feasibility update

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supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30) Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31) Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32) Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34) Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35) Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37) For larger scale residential developments in particular, planning	• policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. • if local (car parking) standards have been prepared, are they justified and necessary? (39) • identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the local transport plan.	(August 2017). Section 1 and 2 of policy CP7 'Delivering the infrastructure to support growth' sets out the main transport priorities for wider and local connectivity. This includes references to strategic priorities of improving access to Wycombe from the M40, improvements to A404 corridor south of High Wycombe and improvements to north/south connectivity. See Countywide Local Plan Modelling (July 2016, March 2017 and August 2017); and High Wycombe Area Transport Study (January, 2014) and Wycombe Local Plan Sites Traffic Modelling (June 2017). Development management policy DM33 'Managing Carbon Emissions: Transport and Energy Generation', requires development to have safe, direct and convenient access to jobs, services and facilities via sustainable transport modes and sufficient car parking requirements to be provided. Individual site policies set out requirements for supporting sustainable and active travel where justified. The Council has worked co-operatively with Highways England and the Highway Authority (Bucks County Council). See Duty to Cooperate Statements. Policy DM47 protects the opportunity for widening the track of the Princes Risborough to Aylesbury line to support increased rail capacity in the future.

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policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38) The setting of car parking standards including provision for town centres. (39-40) Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)		
5. Supporting high quality communications infrastructure (paras 42-46)		
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new	• Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.	DM20, point 5, identifies that matters to do with telecoms development will be considered against paragraphs 42 to 46 of the NPPF. Broadband is recognised as a key infrastructure requirement to new homes.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
telecommunications development and existing development. (44)		
6. Delivering a wide choice of high quality housing (paras 47-55)		
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	• Identification of: a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) • A SHLAA	Policy CP4 sets out the Local Plan target for the period of 2013-2033. The plan allocates a number of strategic and non-strategic sites to provide a 5 year housing land supply. This includes a windfall allowance of 43 dwellings per annum. Evidence is identified for this in the HELAA. The Councils 5 and 10 year Housing Land Supply and Local Plan trajectory is set out in Appendix 7 of the HELAA (September 2017). The 5 year housing land supply and AMR is regularly updated.
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15	The HELAA sets out the supply of developable housing and employment (including retail) sites for years 6 – 10 and 11 – 15 of the plan period. Broad locations are identified for Great and Little Kimble and Longwick-cum-Ilmer Parishes where Neighbourhood Plans are being prepared. The evidence for the broad location quantum of development is set out in the HELAA (September 2017).
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	• A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47)	A housing trajectory has been provided, based on robust evidence for phasing and delivery rates. This is part of the HELAA (September 2017). The plan is based on up to date monitoring information including completions and permissions as of 1st April 2016. The 5 year housing land supply is regularly updated to take

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		account of new permissions and completions.
Set out the authority's approach to housing density to reflect local circumstances (47).	• Policy on the density of development.	Development Management policy DM23 identifies that development will reflect and respect the scale and intensity of use of surrounding dwellings. Policy DM40 identifies internal space standards for development, following nationally prescribed space standards. The Council has assessed housing numbers on large sites through site specific assessments reflecting the local circumstances, this has a direct influence on density. For a number of sites development briefs have either been adopted or are subject to consultation. The outcomes of this work is reflected in the site specific policies.
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	• Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50) • Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective	Development Management policy DM22 provides a specific policy on housing mix to ensure future development takes account current evidence for size, type and tenure mixes and a requirement for self-build plots. This is informed by a technical assessment in the HEDNA Addendum (ORS, September 2017). This provides up to date evidence on housing needs for specialist housing groups, including housing for older people and a C2 requirement. A specific policy on Affordable Housing is provided in DM24, requiring provision or financial contributions for affordable housing for on-site and off-site, depending on the scale of development. Evidence for affordable housing requirements is set out in the HEDNA and Viability Assessment (May 2017). It is recognised housing mix plays an integral part in successful

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	of creating mixed and balanced communities. (50)	place making.
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new isolated homes listed at para 55.	Affordable housing requirement is set out in HEDNA. DM25 'Rural Exceptions Affordable Housing', allows for a proportion of market housing to deliver affordable housing on rural exception sites. DM44 'Development in the countryside beyond the green belt' sets out criteria were there permission for development could be granted. A separate criteria based policy for Housing for Rural Workers (DM27) is also included. The need for development to maintain and enhance the vitality in rural areas is recognised, with a number of site allocations within the more sustainable villages of the rural areas, including at Stokenchurch and Lane End. See AONB Site Assessment report (September, 2017).
7. Requiring good design (paras 56-68)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	• Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues	A series of design policies are set out in Chapter 6 – Development management. Policy DM35 – placemaking and design quality, sets out principles for requiring good design. Site specific policies for design are identified for the larger sites. These sites also require a Development Brief which includes design codes and a specific vision for the area. This includes the Princes Risborough Expansion Area, former Reserve sites and two Green Belt sites which are of significant size (Tralee Farm and Hollands Farm).

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
8. Promoting healthy communities (paras 69-77)		
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).	• Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)	The Plans strategy focused on locating development in existing communities where services and facilities are already present. Policy CP7 identifies facilities will be supported that promote healthy living including for sports, open space and recreation, including open space. The Local Plan Infrastructure Delivery Schedule (September, 2017) identifies a number of community facilities required to support new development.
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	• Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.	CP7 provides a strategic policy to ensure growth is support by new infrastructure. Extensive evidence has been collected to identify what new infrastructure is required. This is supported by an Infrastructure Delivery Plan. This gives detailed requirements for individual sites and Princes Risborough expansion area. DM29 'Community Facilities' – ensure full range of community facilities is provided alongside development and the safeguarding of community facilities where viable. The Settlement Hierarchy Report (September 2017) has assessed community facilities which has informed the Settlement Tiers for the district.

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Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75)	The DSA already protects and allocates Green Space (DM12) and provides a policy on Green Networks and Infrastructure (DM11). DM16 provides open space requirement for new developments. The Local Plan is not changing sites allocated in DM12, but includes a number of new Green Space designations including the allotments at Horns Lane, Booker (HW10). New open space has been allocated in strategic sites, including Princes Risborough and the larger former reserve sites. There are also a number of site specific policies which require enhancements to PRoW to connect sites to the wider network. DM34 'Delivering Green Infrastructure in Development' requires protection and enhancement of green infrastructure features and networks both on and off site.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)	No specific policy for Local Green Spaces, however there are already a number of 'Green Space' designations made in the DSA (DM12), which require an exceptions test for development. Neighbourhood Plans can allocate Local Green Space designations in accordance with the NPPF.
9. **Protecting Green Belt land (paras 79-92)**		

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Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)
 	
Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)
 	
When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)
 	
Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)
	• where green belt policies are included, these should reflect the need to:
	
	   ○ enhance the beneficial use of the green belt. (81)
	
	   ○ accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)
	
	   ○ specify that inappropriate development should not be approved except in very special circumstances. (87)
	
	   ○ specify the exceptions to inappropriate development (89-90)
	
	   ○ identify where very special circumstances might apply to renewable energy development. (91)
		Core Policy 10 is for the protection of the Green Belt. A Green Belt Assessment has been undertaken for the whole county by ARUP (March 2016). This Part 1 assessment assesses parcels of land against NPPF Green Belt purposes and a district wide Part 2 assesses the appropriateness of any adjustments to the Green Belt boundary (see Green Belt Assessment Part 2, September 2017). Part 2 assessed the overall integrity of the Green Belt (e.g. avoiding isolated holes in the Green Belt) and ensuring permanent and robust boundaries. A judgement was made whether exceptional circumstances to amend the boundary exist. Where exceptional circumstances have been identified, housing and employment sites are brought forward for allocation (HW8, HW9, HW10, HW11, HW15, HW16, MR6, BE2, RUR1, RUR2, RUR3, RUR10 and PR11).
		
		Chapter 6 'Managing Development in the Green Belt and our Rural Areas' sets of development management policies for Green Belt. DM42 - Managing Development in the Green Belt; DM43 - The Replacement or Extension of Dwellings in the Green Belt; and DM44 - Previously Developed Land in the Green Belt.

10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)	• Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building's sustainability which are consistent with	Strategic objective 8 is to mitigate climate change. The spatial strategy directs growth to the most sustainable location which reduces the need to travel and therefore greenhouse gas emissions. The plan is supported by a series of flood risk evidence – Strategic Flood Risk Assessment Level 1 and 2; and Sequential

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	the Government's zero carbon buildings policy . (95))	Test Report. Sites are directed away from flood risk areas, where flooding (ground water or surface) is an issue, site specific policy requirements are identified. The plan includes a policy on Managing Flood Risk and Sustainable Drainage Systems (DM39). The Council undertook a Princes Risborough and Little Marlow Wastewater Treatment Works Assessment to ensure that the growth does not have a significant impact on the environmental quality of the treatment works respective receiving watercourses. Policy DM38 aims to manage risk to water resource in terms of water quality, protection of chalk aquifer and groundwater source protection zones. The plan also includes a policy on water efficiency standards (DM41) which helps with managing water supply as the District is in a water stressed area.
Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)	• A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat	Strategic objective 8 is to mitigate climate change. Policy CP12 'climate change' promotes mitigation and adaptation measures to prevent climate change. The Plan seeks to direct development to those places with better services and facilities, including public transport. This is supported by the Settlement Hierarchy Report (September, 2017). Policy PR7 requires development in the largest allocation in the plan (the expansion area at Princes Risborough) to provide on-site renewable energy and / or low-carbon decentralised energy generation.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	customers and suppliers. (97)	
Minimise vulnerability to climate change and manage the risk of flooding (99)	• Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures	Sequential testing has been carried out for the Local Plan allocations Sites (see Flood Risk Sequential Test Report, WDC September 2017), to ensure development is located away from flood risk areas. Other supporting evidence includes SFRA Level 1 (Jacobs, November 2014) and Level 2 (Jacobs, September 2017). Policy DM39– managing flood risk and sustainable drainage systems, sets out a policy to manage flood risk and implement SuDS.
Take account of marine planning (105)	• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation • Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development • Integrate as appropriate marine policy objectives into emerging policy • Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS	Not applicable.
Manage risk from coastal change (106)	• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. • Provision for development and infrastructure that needs to be re-located	Not applicable.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	from such areas, based on SMPs and Marine Plans, where appropriate.	
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. • Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.	A strategic objective of the plan is to 'Cherish the Chilterns' and it is recognised as one of the challenges for the district. Policy DM30 'The Chilterns area of outstanding natural beauty – sets out a policy to protect and enhance the AONB and setting of the AONB. Policy DM32 – Landscape character and settlement pattern – ensure development respects the distinctive landscape character for those areas which are not within the AONB. An AONB Site Assessment Report has been produced which informs where new development is allocated for villages in the AONB. For areas outside the AONB, but within the setting, there have been several other landscape studies completed, to inform the location, scale, and form of development. This included Princes Risborough (Landscape Sensitivity and Capacity Study, February 2016), Kimble (Kimble Landscape Assessment, September 2017) and Longwick (see Neighbourhood Plan evidence). Policy PR6 sets out a development principle for the expansion of Princes Risborough to protect the setting of the AONB. There has been consultation and engagement with the Chilterns AONB Board.
Prevent unacceptable risks from pollution and land instability (109)	• Policy which seeks development which is appropriate for its location having regard	Core Policy 12 'Climate Change', promotes mitigation and

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	to the effects of pollution on health, the natural environment or general amenity.	adaptation to climate change, including introducing a requirement that new development should be designed to contribute towards mitigating urban heat island effects and increases in air pollution.

The Habitats Regulation Assessment screening report considered air quality in relation to European sites (SACs) and concludes the plan will not amount to likely significant affects, confirmed by Natural England (September, 2017). |
| Planning policies should minimise impacts on biodiversity and geodiversity (117)

Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117) | • Identification and mapping of local ecological networks and geological conservation interests.

• Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species | A core policy of the plan is to promote the conservation and enhancement of the natural environment and green infrastructure (CP10). DM34 'Delivering Green Infrastructure in Development' seeks to protect and enhance Green Infrastructure of on site and off site. Policy RUR4 'Little Marlow Lakes Country Park' identifies environmental improvements, including the provision of publicly accessible open space, ecological and biodiversity enhancements for the country park. Also contributes to minimising recreation pressure on Burnham Beeches SAC.

Various sites policies include requirements for ecological enhancement and a net gain in biodiversity.

Habitats regulation Assessment Screening Report (September, 2017), confirms the plan will not have likely significant effects on European Sites to in relation to recreation pressure, air quality and Water Quality.

The plan is supported by a Tree Canopy Cover Assessment (July, 2016), which makes recommendations for Wycombe District. |

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Additional Local Wildlife Sites are also identified in the plan (see Local Wildlife Sites Technical Note, September 2017). The DSA has an existing policy for Green Infrastructure (DM11) requiring where appropriate developments to contribute towards the improvement of the Green Infrastructure Network, delivery of Corridor Opportunity Areas and improvement of Biodiversity Opportunity Areas.
12. Conserving and enhancing the historic environment (paras 126-141)		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets • A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)	Core Policy 11 sets out a strategy for the historic environment, including designated and non-designated heritage assets. This is supported by DM31 'Development Affecting the Historic Environment,' a criteria based policy for managing heritage assets, including heritage assets most at risk. Core policy 9 is for creating a sense of place. This is supported by DM35 which sets out development requirements for place making and design quality. All development are required to improve the character of the area and the way it functions.
13. Facilitating the sustainable use of minerals (paras 142-149)		
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is	Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within	Not applicable.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
important to make best use of them to secure their long-term conservation (142) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.	

Justified: *The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.* To be 'justified' a DPD needs to be: • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives.		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Participation Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI	A large number of other consultation events have taken place. What the consultation has involved is set out in detail in the Statement of Consultation (March 2018). The Local Plan has involved a number of periods of formal public engagement and consultation – Issues (June 2013), Options (February 2014), Draft Local Plan (June 2016) and Publication consultation in October/ December 2017. The Council consulted on a draft AAP for Princes Risborough in February – March 2016, which has since been incorporated into the main Local Plan and formed part of the Publication Local Plan. Each consultation is supported by a feedback summary report for representations received. See Community Conversations (2013); New local plan options consultation: feedback Report (October 2014); Draft Wycombe district local plan: consultation comments summary (Summer 2016); and draft Princes Risborough Town Plan consultation report (Spring 2016) At each consultation stage prior to publication the plan has been reassessed, taking into account consultation responses,

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		new evidence and any changes in national policy. An Equalities Impact assessment has been produced.
Research / fact finding Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?	• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. AND • Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. OR • A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. OR • For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).	The Local Plan is based on an extensive raft of evidence. A series of Topic Papers has been produced to draw together findings from different evidence documents and explain how policies have been derived. A list of evidence base can be found in the New Local Plan Publication Evidence webpage. As appropriate evidence has been updated throughout the plan preparation, including the housing and economic development needs assessment. Each policy is supported by justification text which refers to the key evidence base documents. In addition the proposed submission Sustainability Appraisal (September 2017) shows which evidence supports each policy.
Alternatives	• Reports and consultation documents	Alternative approaches have been considered at the previous

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?	produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.	stage of Plan preparation at the Options and Preferred Options stage. The strategy and supporting evidence clearly show how and why options are taken forward or discounted at each stage. An SA accompanies the Local Plan and provides a clear indication of how options perform against a sustainability framework. The SA has been an iterative process, showing how and why options have been considered at each stage - Consultation Draft Sustainability Appraisal July 2016 considers a range of alternatives The Proposed submission Sustainability Appraisal (September, 2017) tests the preferred policy options. The HEDNA, HELAA, Green Belt Assessment, AONB Site Assessment, Employment Land Review and Countywide transport modelling have largely influenced the plan alternatives.

Effective: *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.*

To be 'effective' a DPD needs to:

- Be deliverable

- Demonstrate sound infrastructure delivery planning

- Have no regulatory or national planning barriers to its delivery

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
• Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored		
Deliverable and Coherent • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved?	• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).	The Local Development Scheme Dec 2016 – Dec 2019 sets out the scope and content of each DPD showing how they combine to form a coherent policy structure. An Infrastructure Delivery Plan has been prepared and agreed with the County Council. The IDP shows how the policy objectives will be achieved. Relevant deliverability agencies have been consulted through the course of the plan preparation. The Council has worked with the Environment Agency to ensure that the plan will not have a negative impact in relation the Water Framework Directive. The Habitats Regulation Assessment screening report considered air quality in relation to European sites (SACs) and concludes the plan will not amount to likely significant affects, confirmed by Natural England (September, 2017). The spatial vision and strategic objectives address the issues facing the district. These are followed through in the 12 Core Policies for the Local Plan. A number of development management policies have been identified to support the strategy. Whole plan Viability Assessment and a separate Viability Assessment for the Princes Risborough expansion area have been published.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		A Bucks wide Housing Capacity and Delivery study has been produced to demonstrate certainty for housing delivery for the Princes Risborough Expansion Area. Appendix H 'Monitoring' shows a matrix of how the objectives and core policies link together.
Infrastructure Delivery • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?	• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.	The plan is supported by an Infrastructure Delivery Plan. This sets out what the requirements are and how they will be delivered. In particular the strategic infrastructure requirement for the Princes Risborough expansion area. An infrastructure schedule sets out who is responsible for delivery and the timescales. Confirmations from infrastructure providers support the requirements and how they will be delivered. The Local Plan has been produced working in partnership with infrastructure providers and Bucks CC. Plan wide viability assessment, particularly in relation to the delivery of affordable housing and deliverability of housing shows policies are viable and deliverable. Separate viability assessments have been produced for the Princes Risborough expansion and former Reserve Sites.
Co-ordinated Planning Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by	• Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together	The Plans vision reflects the Sustainability Communities Strategy and the Economic Development Strategy for the Council.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?	different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area	The Plan has regard to the AONB Management Plan and Natural England's Sites Improvement Plans. The plan has been development in consultation with the Bucks Thames Valley Local Economic Partnership, reflecting the Buckinghamshire Strategic Economic Plan. The Plan has been development in consultation with Bucks County Council and has regard to the policy objectives of the Local Transport Plan 4.

Flexibility
• Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?
• Does the DPD include the remedial actions that will be taken if the policies need adjustment?
	• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.
	• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:
	  a. the effectiveness of policies and what evidence is being collected to undertake this
	  b. changes affecting the baseline information and any information on trends on which the DPD is based
	• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances
	• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development
		Section 7 'Implementation and Delivery' sets out monitoring and deliverability. Appendix H sets out a monitoring framework for the plan and how the overall objectives, key indicators and targets of the Plan will be monitored.
		
		Once the Plan is adopted, this data will be reported on a regular basis in the Council's Authority Monitoring Report which will identify whether the policies are working or whether they need to be reviewed.
		
		A housing trajectory and 5 year land supply sets out how housing is expected to be delivered over the plan period (See HELAA, September 2017). Table 4 sets out the delivery profile for housing.
		
		Section 7 – Monitoring and Delivery of the Local Plan includes a local plan review process if there are changes in circumstances. It sets out how the plan will be monitored to identify indicators of success of if remedial actions need to be taken.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision • Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.	
Co-operation • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? • Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?	• A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. • The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.	The Wycombe District Council Local Plan and the Duty to co-operate Report has been produced this sets out the strategic issues, the outcomes of addressing these issues and where the Duty has been met. There are a number of signed Memorandum of Understanding statements including with the Buckinghamshire Districts setting out the level of unmet housing from Wycombe District (and Chiltern and South Bucks District Councils) to be met in Aylesbury Vale,. See appendices in Duty to Co-operate Report for other Memorandums of Understanding.
Monitoring • Does the DPD contain targets, and milestones which relate to the delivery	• Sections of the DPD setting out indicators, targets and milestones • Sections of the current annual monitoring	Section 7 of the plan sets out the approach to monitoring and delivery. This includes a comprehensive monitoring framework including targets and indicators for each of the strategic policies

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?	report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal	in the plan. Housing trajectories are included in the Councils Authority Monitoring Report and updated regularly. This includes an assessment against the housing target and will identify any need to revise or review the plan. The Sustainability Appraisal maps across the strategic policies and objectives against the objectives of the SA to ensure changes in the baseline can be picked up.
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.		
• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?	• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy	All policies within the Local Plan are consistent with national planning policy and guidance. Introduction and justification text to the plan policies make references to the NPPF where relevant. The Statement of Consultation (March 2018) and Sustainability Appraisal identify changes as a result of community involvement.

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