

The County Durham Plan Soundness Self-Assessment Checklist

June 2019

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 informed by agreements with other authorities?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it an 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 update

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 35): “Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound.” Plans are ‘sound’ if they are:

1. **Positively Prepared: providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.** 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: an appropriate strategy, taking into account the reasonable alternatives, and 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 an 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 the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

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 Authority Monitoring Report.

4. Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in the NPPF.

The NPPF is considered to be the government's explanation of what sustainable development means for planning policy therefore compliance with the NPPF is key unless a locally justified departure is clearly evidenced.

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

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

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

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Vision and Objectives</i></p> <p>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?</p> <p>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?</p> <p>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?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> 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. 	<p>Chapter 2 'What the County Durham Plan is seeking to achieve' sets out the high level issues and challenges that the local plan is seeking to address and picks up on those set out in the Sustainable Community Strategy (SCS).</p> <p>The vision and objectives for County Durham to 2035 are set out in Chapter 3 'Vision and Objectives'. They have been refined through the consultation process to be more targeted and concise and focus on addressing the issues and challenges identified.</p> <p>The Plan's objectives are the guiding principles for delivering the vision and there is a direct relationship between the identified issues, the vision and the policies in the Plan. For Example:</p> <p>Economy</p> <p>Objective 1 - Economic Ambition 'Improve the economic performance of the whole of County Durham by creating more and better jobs, increasing the employment rate and reducing unemployment, thereby increasing GVA (a measure of economic performance), household income, demand for local goods and services and improving the resilience of the county's economy.'</p> <p>This in turn relates directly to the policies in the Plan including; Policy 1 (Quantity of New Development) sets out how much new employment land is needed to 2035 to attract and retain businesses. A trajectory for expected take-up of this land is also included; Policy 2 (Employment Land) identifies the most appropriate locations for the new employment land to ensure is suitable and attractive to investors and</p>

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		<p>which existing employment premises should be protected; and Policy 3 (Ayckley Heads) identifies a strategic employment site to provide a high quality employment location in a sustainable location in order to attract more and better jobs.</p> <p>Sustainable Communities</p> <p>Objective 2 – Sustainable Communities ‘Locate new development in areas which offer the best opportunity for sustainable development patterns, including means of travel other than the private car, thus ensuring that new homes and jobs are supported by a high quality environment, services and infrastructure, and in turn new development supports the vitality, viability and economic performance of our towns and villages’.</p> <p>This in turn relates directly to the policies in the Plan including; the chosen spatial distribution for housing and employment and the specific allocations set out in Policy 2 (Employment Land) and Policy 4 (Housing Allocations) were chosen by using an approach which sought to maximise access to services and facilities and access to means of transport other than the private car, including use of the Settlement Study. This is also one of the exceptional circumstances that the council considers justifies the Plan’s Green Belt releases.</p> <p>It also relates to Policy 22 (Delivering Sustainable Transport) seeks to ensure that new development should be maximise opportunities for walking, cycling and public transport and Policy 30 (Sustainable Design) requires suitable access to all users whilst prioritising the needs of pedestrians, cyclists and public transport users including connections to</p>

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		<p>existing networks.</p> <p>Natural Environment</p> <p>Objective 9 – Natural Environment ‘Protect, enhance, maintain and manage the county’s locally, nationally and internationally important natural environment, including through securing net gains, protecting connectivity and recognising the wider benefits from natural capital.</p> <p>This in turn relates directly to the policies in the Plan including; Policy 38 (North Pennines AONB); Policy 39 (Landscape); Policy 40 (Trees, Woodlands and Hedges); Policy 41 (Biodiversity and Geodiversity); Policy 42 (internationally Designated Sites; and Policy 43 (Protected Species and Nationally and Locally Protected Sites) together address the objective.</p> <p>Reasonable Alternatives</p> <p>Reasonable alternatives to the quantum of development and overall spatial strategy and distribution (including alternatives to the use of Green Belt) have been aired, tested, and resolved during production of the Plan at key stages. The ‘Spatial Strategy Justification’ (2019) explains this clearly. The options are also tracked through the Sustainability Appraisal documents, in particular Section 4.123 of the ‘Sustainability Appraisal of the County Durham Plan Pre-Submission Draft’ (2019). All evidence was made available to view in tandem with the respective consultations.</p> <p>Internally Consistent</p> <p>The policies in the Plan will contribute to achieving the Vision and Objectives in a comprehensive manner and are therefore internally consistent. For each stage of</p>

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		<p>the Local Plan, the sustainability appraisal has considered the cumulative impacts of the policies and objectives including how they relate to each other.</p> <p>Delivery Timescales</p> <p>The timescales related to the objectives of the plan span nineteen years. This is a realistic overall time period to be able to assess impact. The Monitoring Framework details the information that will be monitored through the council's Annual Monitoring Report. This establishes the measures that the council will use to undertake the required five year review of policies, and trigger earlier review if necessary. With specific regard to housing the SHLAA is updated annually and is based on information from land owners and developers. The position regarding employment land take up and availability is also monitored annually. The housing trajectory can be found on page 30 of the Plan.</p> <p>The 'Delivering Sustainable Development Section' and the 'How Much Development and Where' sections. Set out how the vision will be delivered.</p> <p>The 'Supporting High Quality Infrastructure' chapter also deals with delivery and explains how infrastructure should be delivered in the county. This is informed by and in turn informs the Infrastructure Delivery Plan (IDP) which sets out the implementation and delivery mechanisms and key agencies and partners involved. Necessary transport infrastructure to support the Plan is included in Policies 23 (Durham City Sustainable Transport) and 24 (Allocating and Safeguarding Transport Routes and Facilities). The IDP is a live document that will continue to be updated as new information emerges.</p>

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		<p>Support of Agencies</p> <p>In preparing the Plan and the IDP the council, as part of the duty to cooperate, has and continues to liaise with the relevant agencies (notably Natural England, the Environment Agency, Historic England, Highways England and Northumbrian Water) to ensure support and acceptance of the identified means of delivery</p> <p>Content of DPDs</p> <p>As set out in the Local Development Scheme, the County Durham Plan in conjunction with the Minerals and Waste DPD will provide coherent and comprehensive policy coverage.</p>
	<ul style="list-style-type: none"> • 	
<p><i>The presumption in favour of sustainable development (NPPF para 11)</i></p> <p>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.</p> <p>Local Plans should positively seek opportunities to meet development needs, with sufficient flexibility to adapt to rapid change.</p> <p>Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless</p> <p>- the application of policies within the NPPF that protect assets of particular importance</p>	<ul style="list-style-type: none"> • An evidence base which establishes the development needs of the plan area (see Justified below, that the needs of the wider area have been taken into account 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) 	<p>Quantum</p> <p>The Plan assesses the development needs of the county to 2035 for all key areas, including housing, employment land, retail, minerals and waste.</p> <p>The 'County Durham Strategic Housing Market Assessment (SHMA)' (2019) has found that County Durham is a self-contained housing market area and an appropriate geography for the purposes of assessing local housing need (LHN).</p> <p>Housing needs in County Durham have been developed in line with the government's standard methodology as set out in Planning Practice Guidance (PPG). This approach results in a LHN of 1,287 homes per annum. PPG notes that the standard method for assessing local housing need provides the minimum</p>

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<p>provide a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</p> <p>- 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.</p>		<p>starting point for determining the number of homes needed in an area but that authorities should also consider previous delivery levels. Over the past five years (2013/14 - 2017/18) the council has delivered on average 1,308 homes. This record of delivery can be considered as being indicative of a greater housing need above the minimum starting point. For this reason, housing need in County Durham is based on the minimum assessment for LHN adjusted for recent past delivery and is therefore 1308 dwellings per year (24,852 houses from 2016-2035). Flexibility is built by including a 10% discount on the commitments to reflect those that will not come forward during the Plan period.</p> <p>The 'Strategic Housing Market Assessment' (2019) sets out the detailed needs of different groups in the county in respect of housing such as older persons, those seeking custom and self-build housing and needs for affordable housing.</p> <p>The 'Travellers Sites Needs Assessment' (2019) concludes that for the Plan period to 2035, there is no need for any new pitches for those meeting the planning definition of Gypsies and Travellers. When considering the wider definition there is an identified need for six additional pitches.</p> <p>Based on past take up rates and following a review of the existing supply of employment land and potential new employment sites, the 'Employment Land Review (ELR)' (2018) recommends that County Durham's portfolio of employment land should be circa 260 hectares. To give flexibility and to acknowledge that many of the employment land allocations are within</p>

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		<p>existing employment areas and therefore unsuitable for other uses, the Plan identifies a supply of land of 302 hectares. The final figure also takes into account relevant qualitative factors including the views of businesses, agents and developers which give an understanding of the commercial market, emerging sectors and market signals.</p> <p>The 'Retail and Town Centre Study' (2018) did not identify a need to specifically allocate sites for new retail, leisure or cultural development within our town centres. The Plan does however support new retail and town proposals that will improve choice and bring regeneration benefits.</p> <p>The scale of future provision for minerals has been determined by the council's annual 'Local Aggregate Assessment (LAA)' (2018) which was prepared in cooperation with councils in Northumberland and Tyne and Wear. The requirements for each type of mineral are set out in the supporting text for Policy 50 (Primary Aggregates Provision).</p> <p>An assessment of future waste capacity needs has been undertaken over the Plan period in the 'Waste Management Capacity Study and Addendum' (2018). Subject to other considerations, the Plan will seek to permit development in line with future needs. Needs have been identified in line with waste stream.</p> <p>Distribution</p> <p>The Distribution of Employment Land section (paragraph 4.30) identifies that in order to attract new</p>

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		<p>businesses and allow the retention and expansion of existing businesses it is essential that these are located in areas of the county that offer good opportunities to attract investment. The allocations included in Policy 2 (Employment Land) reflect this approach and are focused on the most attractive market areas such as the A1 and A19 corridors and Durham City whilst recognising that other locations also play a role in supporting more local businesses. Policy 3 (Aykley Heads) also reflects this approach.</p> <p>The Issues and Options presented four different spatial options for the distribution of housing; Main Town Focus; Sustainable Communities; Sustainable Communities with Central Durham Villages; and Wider Dispersal (see Table 5 on page 46 of the Plan). In order to maximise sustainable patterns of development, support economic growth, ensure the effective use of land and to maximise the likelihood of delivery the Sustainable Communities is the chosen spatial strategy for the Plan. More detail is available in the 'Spatial Strategy Justification document' (2019). This approach includes the deletion of some Green Belt land. The exception circumstances to justify this are; ensuring sustainable patterns of development; maximising journeys undertaken by sustainable means; providing the right type of homes in the right places; helping address economic under-performance; and maximising the delivery of affordable housing and other infrastructure. Further details are provided in the 'Exceptional Circumstances document' (2019). Adjoining authorities were asked if they could accommodate the development proposed in the Green Belt and all indicated this was not possible.</p>

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		<p>The Sustainability Appraisal has assessed alternative options for the distribution of development and site allocations at stage of the preparation of the Plan and been used alongside the evidence base and consultation responses to support the options chosen.</p> <p>The Local Plan allocates sufficient land to meet needs identified. The audit trail for site selection is found in the following documents:</p> <ul style="list-style-type: none"> • Section 7.0 of the 'Employment Land Review' (2018) and the 'Office Development in Durham City – Sequential Search' (2018). • The 'Strategic Housing Land Availability Assessment' (2019), the 'Rationale for Housing Allocations' (2019), the 'Site Allocations Viability Appraisals Report' (2019), the 'County Durham Market Review' (2018) and the 'Exceptional Circumstances' (2019). • 'Potential New Minerals and Waste Sites in County Durham' (2018).
<p>Policies in Local Plans should follow the approach of 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.</p>	<ul style="list-style-type: none"> • A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk) 	<p>The Sustainable Development Statement makes it clear how the presumption in favour of sustainable development will be applied locally and reflects the model policy. A number of policies including Policy 6 (Development on Unallocated Sites in the Built Up Area) and Policy 30 (Sustainable Design) also set out the principles that will be applied to the assessment of development proposals to deliver sustainable development and sustain the vitality of local</p>

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		<p>communities.</p> <p>The approach has been made to ensure that policies are positively worded and encourage sustainable development subject to certain criteria rather than discouraging development unless criteria are met.</p>
<p><i>Objectively assessed needs</i></p> <p>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.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 11 of the NPPF (see above).</p> <p>Objectively assessed need is informed by agreements with other authorities</p> <p>Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy, in particular, where additional infrastructure is necessary (26)</p>	<ul style="list-style-type: none"> • Background evidence papers demonstrating requirements based on employment projections and community needs. Standard Methodology for Local Housing Need used as a minimum start point for assessing housing requirement. • 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 particularly in respect of meeting development needs. 	<p>The Plan is supported by a robust and proportionate body of evidence which has been available for public scrutiny. The council has ensured this evidence remains up to date. This evidence has established the development needs of County Durham within the national context.</p> <p>The 'County Durham Housing Need and Residual for Allocation Evidence Paper' (2018) explains how our local housing need was established. This is based on the standard methodology set out in NPPF and PPG.</p> <p>Examples of other background papers demonstrating the use of evidence in respect of needs include the 'Employment Land Review' (2018); 'Joint Local Aggregates Assessment for County Durham, Northumberland and Tyne and Wear' (2019); 'Traveller Needs Assessment' (2019); and the Retail and Town Centre Study (2018).</p> <p>The promotion of effective use of land and mixed use development is included in Objective 8 – Effective Use of Land and policies 30 (Sustainable Design) and Policy 9 (Retail Hierarchy and Town Centre Development).</p> <p>The Duty to Cooperate Statement and related Statements of Common Ground explain how the council has worked and continues to work effectively with neighbouring authorities. This includes specific correspondence with neighbouring authorities who</p>

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		have confirmed that they are unable to accommodate any of our local housing need.
NPPF Principles: Delivering sustainable development		
Delivering a sufficient supply of homes para 59		
<p>A sufficient amount and variety of land can come forward where it is needed and the standard method for assessing the number of homes required has been used as a minimum unless exception circumstances justify an alternative approach. (59 - 60)</p> <p>Any needs that cannot be met within neighbouring authorities has been taken into account in establishing the amount of housing to be planned for. (60)</p>	<ul style="list-style-type: none"> Evidence for housing provision based on up to date, objectively assessed needs. 	<p>As noted above the start point for the assessment of housing need was the government's Standard Methodology. The council are proposing an uplift to reflect previous past delivery, maintain recent momentum within the County Durham economy and contribute to meeting affordable housing needs.</p> <p>Policy 1 (Quantity of New Development) sets out the scale of provision in the local housing need of 24,852 for the full Plan period. There are a significant level of existing commitments in the county and houses that have already been delivered. Table 2, page 29 of the Plan shows the residual figure for allocations once all sources of supply have been taken into account. This also includes an allowance for lapsed permissions based on evidence set out in the 'County Durham Housing Need and Residual for Allocation Evidence Paper' (2018).</p> <p>The range of sites identified to meet the local housing need are set out in Policy 4 (Housing Allocations). This sits within the Plan's spatial distribution of housing and which reflects sustainable patterns of development. The detail of the choices made in the distribution of housing development are set out in the 'Spatial Strategy Justification' (2019).</p>

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<p>The size type and tenure of housing needed for different groups has been assessed and is reflected in policies (including for those wishing to rent homes) (61)</p>	<ul style="list-style-type: none"> • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. • Evidence and policy on planning for a mix of housing includes but is not limited to those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their homes (61) 	<p>The 'Strategic Housing Market Assessment (SHMA)' (2019) set out the needs of different groups in the county in respect of housing such as those of older persons, those seeking custom and self-build housing and needs for affordable housing. The 'Traveller Needs Assessment' (2019) identifies the needs for travellers and travelling showpeople.</p> <p>Policy 19 (Type and Mix of Housing) deals with housing types and mix and indicates that development proposals will be expected to address imbalances in the stock. The policy also covers custom and self-build housing.</p> <p>The approach to affordable housing and housing for older and vulnerable people is set out in Policy 15 (Addressing Housing Need). Policy 17 (Sites for Travellers) sets out how proposals for accommodation for Gypsies and Travellers and Travelling Showpeople will be considered.</p>
<p>Where need for affordable housing is identified the following matters have been addressed:</p> <ul style="list-style-type: none"> • Other than in designated rural areas affordable housing is not sought for non-major development (63) • 10% of the affordable homes are affordable home ownership products subject to exemptions at paragraph 64 	<ul style="list-style-type: none"> • Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (62) 	<p>The latest SHMA (2019) identifies net affordable housing need as the equivalent of 836 dwellings over the Plan period to 2035, equivalent to 64% of the county's overall annual requirement of 1308 dpa.</p> <p>Policy 15 (Addressing Housing Need) takes into account the viability of sites across the county and their ability to deliver affordable housing. As a result it applies a requirement of between 10% and 25% depending upon the location of the site. Tenure split is applied to these requirements in line with available evidence from the SHMA which identifies that it should be 70% affordable rented housing 30%</p>

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		<p>intermediate housing.</p> <p>Alternative off site provision and financial contributions in lieu will be considered in certain circumstances and where clearly justified.</p> <p>Within the designated rural area (shown on Map 3 in the Supporting a Prosperous Rural Economy chapter) the 5 unit threshold will apply to affordable housing requirements.</p>
Neighbourhood Plan areas have an identified housing requirement figure (65)	<ul style="list-style-type: none"> Evidence of Policy for Neighbourhood Plan areas 	The housing requirements for neighbourhood plan areas are included in Policy 1 (Quantity of Development) and are based on the spatial strategy, future sustainability of communities and the scale of commitments in each area.
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% , 10% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 10% buffer is used where an annual position statement is used, 20% buffer applies where there has been significant under delivery of housing over the previous three years (73)	<ul style="list-style-type: none"> Identification of: <ul style="list-style-type: none"> a) five years or more supply of specific deliverable sites; plus the buffer as appropriate (73) Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (70) A SHLAA Annual position statement 	The council updates its monitoring of housing permissions granted and completions every quarter and this informs the Strategic Housing Land Availability Assessment (SHLAA), housing trajectory and the 5 year housing land supply position. The most recent publication of the SHLAA is the 'County Durham SHLAA' (2019). The 'County Durham Housing Need and Residual for Allocation Evidence Paper' (2019) sets out the housing trajectory up to 2035 and reports that there was 5.96 years supply of housing at 30th September 2018 measured against the local housing need in the Plan which is based on the government standardised methodology adjusted to take account of past performance (1308dpa).
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (67).	<ul style="list-style-type: none"> Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 	As above.

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<p>Measures to bring small and medium sites forward are taken and windfall sites supported including 10% of housing requirement is supplied on sites no larger than 1 ha, subject to caveat in paragraph 68</p>	<ul style="list-style-type: none"> • Evidence of portfolio of sites and size of allocations • Evidence of measures to bring forward small and medium sites including Brownfield registers, LDO's and area wide design assessments and work with developers to subdivide large sites (68) 	<p>Small sites have historically made a contribution to past housing delivery (an average of 117 houses per annum for the past five years). However, it is expected that with the Plan in place the number of windfalls will reduce, therefore it is considered that an allowance of 80 per annum on small sites would be appropriate. There is no windfall allowance for sites over 0.4 hectares.</p> <p>Although only two of the proposed allocations (30 houses) in the Plan are less than 1 hectare, 15% of the commitments are on small sites, which taking into account the 10% discount for non-delivery equals 2245 houses. Adding the 30 on allocations the 2245 on commitments expected to come forward and the 1120 small site windfall allowance gives a total of 3395 houses or 14% of the total housing requirement of 24,852 and over the 10% threshold required. In addition, 29 of the total number of 51 sites on the council's Brownfield Register are under 1 hectare.</p>
<p>Entry level exception site measures are in place unless need is already being met (71)</p>	<ul style="list-style-type: none"> • Evidence for and approach to entry level exception sites. 	<p>Policy 11 (Rural Housing and Employment Exception Sites) and Policy 10 (Development in the Countryside) also apply to entry level exception sites for first time buyers or renters.</p>
<p>Illustrate the expected rate of housing delivery through a trajectory; (73)</p>	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (73) • Updated and managed SHLAA. (73) 	<p>The housing trajectory included in the Plan at page 30 illustrates the expected delivery of new homes throughout the Plan period.</p> <p>Housing completions and permissions are monitored throughout the year and these are reported through a variety of reports both nationally and locally including</p>

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<p>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 (77).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities. (78)</p>	<ul style="list-style-type: none"> • Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. (77) • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(70) • Examples of special circumstances to allow new isolated homes listed at para 79 	<p>in the Annual Monitoring Report.</p> <p>A large part of County Durham is considered to be rural and therefore the housing policies in the Plan are relevant to rural housing.</p> <p>The approach to rural exception sites is set out in Policy 11 (Rural Housing and Employment Exception Sites) for sites that are within adjacent or well related to existing settlements and this includes self-build, custom build and community led housing if they meet the criteria within the policy. Provision for a proportion of enabling market housing is made subject to certain conditions. The policy approach is based upon local evidence of need and provision.</p> <p>Development in rural areas located within the built up area of existing settlements is included in Policy 6 (Development on Unallocated Sites in the Built up Area) and outside of settlements in Policy 10 (Development in the Countryside). Policy 12 (Permanent Rural Workers Dwellings) sets out the circumstances when the council will support new rural workers dwellings.</p>
<p>Where larger scale development is being proposed this has considered infrastructure, access to services and employment, expectations regarding the quality of development, delivery rates and the necessity for new Green Belt designation (72)</p>	<ul style="list-style-type: none"> • Evidence supporting the delivery of large scale development • Infrastructure delivery plan • site trajectory 	<p>The 'Infrastructure Delivery Plan' (2019) lists the infrastructure required to support the Plan including the larger scale developments within it. Policy 5 (Durham City's Sustainable Urban Extensions) identifies a requirement for improved links to existing services and within the site. The policy is clear that both urban extensions will be required to deliver attractive, well designed places incorporating sustainable development principles.</p>

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		The build out for all sites in the Plan has been included in the overall housing trajectory for the Plan.
<ul style="list-style-type: none"> • Building a strong, competitive economy (paras 80-84) 		
<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth having regard to Local Industrial Strategies and other local policies for economic development and regeneration.</p> <p>Set criteria or identify strategic sites for local and inward investment to meet needs over the plan period (81),</p>	<ul style="list-style-type: none"> • 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. • Portfolio of sites and policies to encourage investment 	<p>The strategy of the Local Plan sits within the context of the national industrial strategy, North East Strategic Economic Plan and the economic ambitions set out in the Sustainable Community Strategy.</p> <p>The Plan sets the overarching vision for the County including ‘By 2035 County Durham will have a thriving economy, reducing levels of deprivation, social exclusion and joblessness with the associated health and quality of life improvements. It will also be bridging the gap between its economic performance and that of other parts of the North East and the rest of England. It will be a top location for business and tourism..’ (page 17).</p> <p>The first objective in the Plan is ‘Objective 1 Economic Ambition - Improve the economic performance of the whole of County Durham by creating more and better jobs, increasing the employment rate and reducing unemployment, thereby increasing GVA (a measure of economic performance), household income, demand for local goods and services and improving the resilience of the county's economy.’</p> <p>Policy 1 (Quantity of Development) sets out the need for employment land across the Plan period which is based on past take-up rather than forecasting as recommended by the Employment Land Review to ensure that a suitable portfolio of sites is available to</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>support economic growth. The Distribution of Employment Land section (paragraph 4.30) identifies that in order to attract new businesses and allow the retention and expansion of existing businesses it is essential that these are located in areas of the county that offer good opportunities to attract investment. The allocations included in Policy 2 (Employment Land) reflect this approach and are focused on the most attractive market areas such as the A1 and A19 corridors and Durham City whilst recognising that other locations also play a role in supporting more local businesses. Policy 3 (Aykley Heads) also reflects this approach.</p>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (81)</p> <p>Be flexible in approach and address specific requirements of different sectors including making provision for clusters or networks of knowledge and data driven, creative or high technology industries; and for storage and distribution operations at a variety of scales in suitably accessible locations. (82)</p> <p>Enable sustainable growth and expansion of all types of business in rural areas, development and diversification of agricultural and other land based rural industries, sustainable rural tourism and leisure and retention of accessible local services and community facilities, recognise that local business and community needs in rural areas may need to be located outside settlements (83-84)</p>	<ul style="list-style-type: none"> • A criteria-based policy or allocations 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, • Background evidence and Flexible rural policy for business • 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. 	<p>Policy 1 (Employment Land) identifies allocations and existing employment sites to be protected. It does this through a criteria based policy that protects employment allocations whilst providing clear criteria regarding flexibility of use.</p> <p>As examples within the portfolio of allocated sites within the Plan are a strategic employment site at Aykley Heads in Durham City and a significant expansion of NetPark in Sedgefield, both of which are ideally suited to high tech, knowledge based industries. Similarly Integra 61 and Forrest Park, both situated on the A1(M) are ideally suited for storage and distribution. In fact construction has now started on a 187,000m2 unit on the Integra 61 site.</p> <p>The county economy includes small businesses located across the county including some of our remote areas. The Plan addresses rural economic including some employment allocations and an exception policy which as well as housing allows</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development.		employment related development. In addition, the policies for tourism and visitor development, Policy 7 (Visitor Attractions) and Policy 8 (Visitor Accommodation) seek to support rural economic growth.
<ul style="list-style-type: none"> Ensuring the vitality of town centres (paras 85 - 90) 		
Policies should be positive supporting the role of town centres at the heart of local communities, and take a positive approach to the management, adaptation and growth of centres, allowing a suitable mix of development, (85)	<ul style="list-style-type: none"> The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres. 	<p>Policy 9 (Retail Hierarchy and Town Centre Development) highlights the importance of the Sub-regional centres, Large and Small Town Centres and District and Local Centres and identifies them in a hierarchy. The policy supports the vitality of centres and seeks to provide for a wide range of uses and enable them to adapt to changing patterns of retail expenditure. For example town centres and primary shopping boundaries are identified on the Policies Map to guide the location of Main Town Centre uses but also has sufficient flexibility to allow opportunities for development and renewal that support the vitality of town centres including the role of residential development. In addition Policy 6 (Development on Unallocated Sites in the Built up Area) seeks to protect community facilities and services, and local village shops.</p> <p>The retail elements of the Plan are grounded in a range of evidence and in particular the 'Retail and Town Centre Study' (2018).</p>
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services	<ul style="list-style-type: none"> An assessment of the need to expand (the) town centre(s), considering the needs of town centre 	The 'Retail and Town Centre Study' (2018) did not identify a need to specifically allocate sites for new

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
and residential development needed in town centres (85)	<p>uses.</p> <ul style="list-style-type: none"> Extent of town centres and primary shopping areas identified. 	<p>retail, leisure or cultural development within our town centres. The Plan does however support new retail and town proposals that will improve choice and bring regeneration benefits.</p> <p>The 'Employment Land Review' (2018) assessed the need for office development in the county and is one of the justifications for the allocation of Aykley Heads in Durham City where there was an identified demand for offices.</p> <p>Policy 9 (Retail Hierarchy and Town Centre Development) includes the flexibility to allow opportunities for development and renewal that support the vitality of town centres including residential development.</p>
<ul style="list-style-type: none"> Supporting a prosperous rural economy 		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	<ul style="list-style-type: none"> 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. 	<p>The Plan includes a specific objective, Objective 6 – Rural Economy, which seeks to support and improve the rural economy. It also includes a whole chapter entitled 'Supporting a Prosperous Rural Economy'.</p> <p>Development in rural areas located within the built up area of existing settlements is included in Policy 6 (Development on Unallocated Sites in the Built up Area) and outside of settlements in Policy 10 (Development in the Countryside). Policy 12 (Permanent Rural Workers Dwellings) sets out the circumstances when the council will support new rural workers dwellings.</p> <p>The approach to rural exception sites is set out in</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Policy 11 (Rural Housing and Employment Exception Sites) which allows both housing and employment uses, which would not usually be supported, to support the rural economy through new development.
<ul style="list-style-type: none"> Promoting healthy and safe communities (paras 91-101) 		
<p>Policies should aim to design places which: promote social interaction, including through mixed-use development; are safe and accessible environments; and support and enable healthy lifestyles (91).</p>	<ul style="list-style-type: none"> 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 support healthy lifestyles for example through provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. (91) 	<p>The health and quality of life of the county's people and communities features in the Plan's Vision and Objective 14: Quality of Life - Safeguard, enhance and provide a wide range of educational, social, sporting, health, recreational and cultural facilities, including green infrastructure and natural capital, and seek to prevent and address pollution issues to contribute to the quality of life, satisfaction and health and wellbeing of people who live, work within and visit County Durham, including addressing the needs of those with physical and mental disabilities'.</p> <p>A Health Impact Assessment of the Plan has also been undertaken with public health colleagues. This provided a number of recommendations including ensuring that community facilities are conveniently located and open space within new development is accessible and of high quality, which have been incorporated into the Plan.</p> <p>The key outcomes relate to the protection of accessible services, green infrastructure and open space and recreational provision, healthcare and education. A range of policies support the Quality of Life objective and seek to achieve the outcomes. These include:</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Policy 22 (Delivering Sustainable Transport) which requires new development to encourage walking and cycling with their associated health benefits.</p> <p>Policy 26 (Developer Contributions) requires contributions from new development including to support health provision where necessary.</p> <p>Policy 27 (Green Infrastructure) which requires areas of open space, including recreational open space, in order to provide healthier communities.</p> <p>Policy 30 (Sustainable Design) requires new development to consider the health impacts of development including the needs of those with dementia and other sensory or mobility impairments. It also includes space standards of new housing which can also impact on people's health.</p> <p>Policy 31 (Hot Food Takeaways) seeks to limit the proliferation of hot food takeaways particular in close proximity to schools to encourage healthy eating.</p> <p>Policy 32 (Amenity and Pollution) allows development where there will be no unacceptable impact on health.</p> <p>Policy 33 (Despoiled, Degraded, Derelict, Contaminated and Unstable Land) states that development will only be permitted if the site is suitable for the proposed use and does not result in adverse impacts on human health.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (92).</p> <p>Consider the benefits of estate regeneration (93)</p> <p>Ensure schools are able to be altered or expanded (94)</p> <p>Promote public safety and take into account wider security and defence requirements. (95)</p>	<ul style="list-style-type: none"> • 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, and that schools are able to expand. • Consideration given to estate regeneration where applicable (93) • Public safety and defence requirements are addressed (95) 	<p>Infrastructure policies seek to ensure that any new development is accompanied by the necessary physical, community, social and green infrastructure through Policy 26 (Developer Contributions).</p> <p>Policy 6 (Development on Unallocated Sites in the Built up Area) seeks to protect community facilities and services, and local village shops and would be used to assess any planning application for new community facilities and other services.</p> <p>The distribution of development, including for housing, and relevant housing policies reflect the need to direct development to appropriate sustainable locations where there is access to existing local services and facilities including health, leisure education and transport facilities.</p> <p>Policy 32 (Amenity and Pollution) seeks to protect exiting community facilities and other uses from development that would place unreasonable restrictions in their use.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses and opportunities for provision of open space, sports and recreational facilities; and determine what provision is needed. (96).</p>	<ul style="list-style-type: none"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (93) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (97) • Protection and enhancement of rights of way and access. (98) • Appropriate designation of Local Green Space 	<p>Policy 27 (Green Infrastructure) requires development to maintain, protect and improve the county's green infrastructure network. The policy cross references the 'Open Space Needs Assessment' (2018) which sets the standards for open space provision and identifies protected open space. In addition neighbourhood plans identify areas of local green space across the county.</p> <p>Policy 27 (Green Infrastructure) also provides for the</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	(100)	<p>protection and enhancement of public rights of way.</p> <p>A series of Playing Pitch Action Plans are also in place which identify shortages and surpluses of playing pitches. These are currently being updated.</p> <p>The policies in the Conserving and Enhancing the Natural and Historic Environment also seek protection for natural assets.</p>
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (99-101).	<ul style="list-style-type: none"> 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 100. Policy for managing development within a local green space should be consistent with policy for Green Belts. (101) 	The Plan relies on the NPPF for this aspect of policy. A number of neighbourhood plans identify local green space in the county.
<ul style="list-style-type: none"> Promoting sustainable transport (paras 102-111) 		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Actively manage patterns of growth and offer choice to:</p> <ul style="list-style-type: none"> address the impacts of development on transport networks realise opportunities from transport infrastructure and changing technology and usage identify and pursue opportunities to promote walking cycling and public 	<ul style="list-style-type: none"> 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 	<p>Transport policy is coordinated at a regional level by the North East Combined Authority Joint Transport Committee and the work of the Regional Transport team on the emerging North East Transport Plan.</p> <p>The key transport requirements of the Plan have been derived from consultation with key partners including Highways England.</p> <p>The Plan’s Vision aims for development to be located so as to achieve sustainable patterns of development. It also expects all communities and businesses to benefit from an accessible, integrated and sustainable</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>transport</p> <ul style="list-style-type: none"> • identify and account for environmental impacts of traffic and transport infrastructure, including mitigation and net environmental gain • recognise that patterns of movement and transport considerations are integral to design and making high quality places. (102) <p>Focus significant development in locations which are or can be made sustainable whilst recognising that opportunities to maximise sustainable transport solutions will vary between urban to rural areas. (103)</p> <p>Do policies:</p> <ul style="list-style-type: none"> • Support an appropriate mix of uses, and within larger scale sites, to minimise the number and length of journeys • Align strategies and investments for supporting sustainable transport with development patterns having been prepared with local highways authority and other transport infrastructure providers and operators • Identify and protect sites and routes which may be critical to widen transport choice • Provide for high quality walking and cycling networks and supporting facilities • Provide for any large scale transport facilities that need to be located and the 	<p>housing and employment provision.</p> <ul style="list-style-type: none"> • 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. 	<p>transport system, resulting in increased public transport use and safe, well used and attractive cycling and walking routes.</p> <p>Objective 2: Sustainable Communities seeks to locate new development in areas which offer the best opportunity for sustainable development patterns, including means of travel other than the private car. Similarly, Objective 18: Sustainable Transport seeks to ensure that new development can be easily and safely accessed by all modes of transport and, wherever possible, contribute to reducing the need to travel, thereby reducing the impact of traffic and congestion on air quality, the wider environment, businesses and the economy, communities and health.</p> <p>The Plan's spatial strategy directs development to the most sustainable locations in terms of accessibility to services, facilities and employment and provides the best opportunities to maximise and encourage the use of more sustainable transport modes such as walking and cycling.</p> <p>Policy 6 (Development on Unallocated Sites in the Built Up Area) requires new development to have good access by sustainable modes of transport to relevant service and facilities. Similarly Policy 7 (Visitor Attractions) requires new attractions to be in sustainable and accessible locations.</p> <p>Policy 10 (Development in the Countryside states that development should not be solely reliant on or intensify accessibility by unsustainable modes of transport. Policy 17 (Sites for Travellers) permits new traveller sites if they are within short and safe walking</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>infrastructure and wider development required to support them</p> <ul style="list-style-type: none"> Recognise the importance of maintaining a network of general aviation airfields, their need to adapt over time and economic value (104) <p>The setting of local car parking standards for residential and non-residential development including provision for charging plug in and other ultra-low emission vehicles (105):</p> <ul style="list-style-type: none"> Maximum standards are clearly and compellingly justified Town centre parking is convenient safe and secure alongside measures to promote accessibility for pedestrians and cyclists (106) <p>Adequate overnight lorry parking facilities are provided including for new or expanded distribution centres (107)</p> <p>Allocation site have been assessed to:</p> <ul style="list-style-type: none"> promote sustainable transport modes, ensure safe access can be achieved for all users, any significant impacts on the transport network can be cost effectively mitigated to an acceptable degree (108) 		<p>distance of services and facilities or a public transport route.</p> <p>Policy 22 (Delivering Sustainable Transport) requires development to deliver sustainable transport by:</p> <ul style="list-style-type: none"> Delivering, accommodating and facilitating investment in safe sustainable modes of transport; Providing appropriate, well designed, permeable and direct routes for walking, cycling and bus access; and Ensuring that any vehicular traffic generated by new development can be safely accommodated on the local and strategic highway network. <p>It also states that all development should have regard to the policies set out in the County Durham's Strategic Cycling and Walking Delivery Plan and, where possible, contribute to the development of a safe strategic cycling and walking network and comply with the council's Parking and Accessibility Standards. The Parking and Accessibility Standards enforce maximum parking standards for employment sites, require infrastructure to support electric vehicles to be provided and cycle standards to encourage more sustainable travel behaviour</p> <p>Policy 23 (Durham City Sustainable Transport) seeks to reduce the dominance of car traffic, relieve existing highway network problems, facilitate growth, address air quality and improve the historic environment through a number of transport interventions:</p> <ul style="list-style-type: none"> Encouraging demand management including through travel plans;

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Improvements to walking, cycling and public transport infrastructure; • A new crossing of the River Wear through the provision of a Northern Relief Road; and • A Western Relief Road. <p>A significant level of evidence underpins this policy including the 'Durham City Sustainable Transport Plan' (2019), the 'Durham Local Plan Traffic Impact Report' (2019)' the 'Durham Transport Model Appraisal Report' (2019), the 'A167 Corridor Assessment' (2018) and a number of impact assessments.</p> <p>Policy 24 (Allocating and Safeguarding Transport Routes and Facilities) allocates a link road at Sherburn Retail park and a railway station at Horden. It also safeguards Leamside railway line, Bowburn Industrial Estate Access Road. There is also a corridor of interest for a relief road at Barnard Castle. Policy 25 (Provision of Transport Infrastructure) is for use when other transport infrastructure is proposed.</p> <p>Policy 30 (Sustainable Design) requires suitable access to all users whilst prioritising the needs of pedestrians, cyclists and public transport users including connections to existing networks.</p> <p>Policy 62 (Location of New Waste Facilities) seeks to direct waste facilities to locations as close to arisings as practical in order to minimise the effects of transporting waste.</p> <p>The impact of site allocations on the highway network have been assessed both in terms of whether an access is physically possible and whether they are</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>accessible by sustainable transport modes including public transport. The evidence is contained within the 'Strategic Housing Land Availability Assessment' (2018) and Section 7.0 of the 'Employment Land Review' (2018).</p> <p>The impacts of the Plan on the transport network can be cost effectively mitigated to an acceptable degree. In most cases the direct impact of the development will be met as part of the costs of developing a site. In some cases a contribution will be made to mitigate the impact of a development but in so doing will also be contributing to addressing an existing network problem such as the Western Relief Road.</p>
<ul style="list-style-type: none"> Supporting high quality communications (paras 112-116) 		
<p>Support the expansion of the electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.</p> <p>Policies should set out how high quality digital infrastructure is expected to be delivered and upgraded over time and should prioritise full fibre connections to existing and new developments. (112)</p> <p>The number of communications masts should be kept to a minimum, encouraging the use of existing masts, buildings and structures. Where new sites are required sympathetic design and camouflage is appropriate.</p> <p>Local planning authorities should not impose a</p>	<ul style="list-style-type: none"> Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 144. 	<p>The Plan recognises the importance of high quality communications and the contribution they can make to supporting the economy. Policy 28 (Utilities, Telecommunications and Other Broadcast Infrastructure) provides the positive framework for determining planning applications for telecommunications and other broadcast infrastructure. It also requires developers to ensure that new residential and commercial development is served by high speed broadband.</p> <p>The council is working in partnership with the government to help improve broadband speeds for residents and businesses through several initiatives. The importance of Next Generation Access capable of delivering high speeds is recognised, and the council is committed to extending fibre coverage to as many</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (114)		businesses, homes and communities in County Durham as possible with the funding available.
Making effective use of land (paras 117-123)		
The strategy for meeting objectively assessed needs makes as much use as possible of previously developed or 'brownfield' land (117)	<ul style="list-style-type: none"> • Evidence and approach to encouraging multiple benefits from land, including mixed use, and the achievement of net environmental gain and habitat creation. (118) • Evidence and approach to remediate despoiled, degraded, derelict, contaminated or unstable land (118) • Evidence and approach to development of underutilised land and buildings including use of vacant space on upper floors • Evidence and approach to upward extension for new homes • Evidence of facilitating land assembly, and bringing forward brownfield sites including the use of Brownfield Registers (119) 	<p>Objective 8 Effective Use of Land states that wherever possible land and buildings that have been previously developed should be re-used. Objective 9 Natural Environment seeks to secure environmental net gains and recognise the wider benefits from natural capital.</p> <p>The approach to selecting housing allocations set out in paragraph 4.84 of the Plan demonstrates that brownfield land was allocated where it was suitable and viable. Only if there was not enough suitable and viable brownfield land available have greenfield sites been allocated.</p> <p>Policy 6 (Development on Unallocated Sites in the Built Up Area) and Policy 10 (Development in the Countryside) both require new development to maximise the effective use of previously developed (brownfield) land.</p> <p>Policy 27 (Green Infrastructure) expects new green space to make a contribution to net gains in biodiversity. Policy 42 (Biodiversity and Geodiversity) also requires new development to provide net gains for biodiversity including establishment ecological</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>networks.</p> <p>The approach to remediation of despoiled, degraded, derelict, contaminated and unstable land is outlined in Policy 33 (Despoiled, Degraded, Derelict, Contaminated and Unstable Land).</p> <p>Policy 9 (Retail Hierarchy and Town Centre Development) includes a criterion supporting residential uses in town centres. This will include using vacant upper floors.</p> <p>The council's brownfield register has been in place since 2017. The latest iteration is from 2019 and is available on the council's website.</p>
Land allocations and land availability is regularly reviewed (120)	<ul style="list-style-type: none"> • Evidence of supporting alternative uses on sites and reallocation for more deliverable use (120) • Evidence of supporting alternative uses on currently developed unallocated sites. (121) 	<p>As part of the production of the plan a review of employment land was undertaken and as a result a selection of sites that were allocated in existing development plans were deallocated on the basis that they were no longer considered suitable for that use. This is identified in the 'Employment Land Review' (2018).</p> <p>The council undertake an update of its Strategic Housing Land Availability Assessment, generally on an annual basis.</p> <p>Flexibility with respect to uses is built into the policy framework for example in Policy 2 (Employment Land) and Policy 9 (Retail Hierarchy and Town Centre Development).</p>
Development that supports the efficient use of	<ul style="list-style-type: none"> • Evidence and approach to efficiency of land use 	Policy 30 (Sustainable Design) sets out requirements

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>land is supported subject to the conditions in paragraph 122.</p> <p>Where there is existing or anticipated shortage of land for meeting identified housing needs building at low densities is avoided and optimal use of sites is made subject to requirements in paragraph 123</p>	<p>(122)</p> <ul style="list-style-type: none"> Use of minimum density standards in appropriate locations (123) 	<p>for new housing to be at least 30 dwellings per hectare in and around town centres and locations with good access to facilities to ensure efficient use of land in sustainable locations.</p> <p>The Exceptional Circumstances document (2019) that supports the Plan makes it clear that densities have been maximised and low densities avoided on suitable, viable sites.</p>
<ul style="list-style-type: none"> Achieving well designed places (paras 124-132) 		
<p>Clarity about design expectations and how these will be tested (124)</p> <p>A clear design vision and expectations should be set out, and design policies developed with local communities. (125)</p> <p>Use should be made of visual tools such as design guides and codes with the level of detail and degree of prescription tailored to the circumstances of each place. (126)</p>	<ul style="list-style-type: none"> Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 127 and approaches in paras 124- 126 linked to the vision for the area and specific local issues 	<p>The Plan recognises well designed places as an integral aspect of sustainable development and places great emphasis on high quality design through the vision and Objective 11: Well Designed Places - Ensure the creation of high quality buildings and places that reflect local distinctiveness, promote sustainability, support the transition to a low carbon future and achieve safe and secure communities.</p> <p>The Plan expects design to contribute positively to place making and in response to robust analysis of the character of the site and surrounding area, in addition to the functional requirements of the intended use.</p> <p>Policy 30 (Sustainable Design) clearly sets out design expectations and the ambition to increase the quality of development. Many neighbourhood plans also including specific design policies.</p> <p>Further detail on the requirements and delivery of high quality sustainable design is provided in two Supplementary Planning Documents: 'Building for Life</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> Protecting Green Belt land (paras 133-147) 		SPD' and 'Residential Amenity Standards SPD'.
<p>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. Before concluding exceptional circumstances exist to justify changes to Green Belt boundaries the authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development (137)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development and set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (138)</p> <p>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. (141)</p>	<ul style="list-style-type: none"> Where Green Belt boundaries have been changed the evidence should indicate: <ul style="list-style-type: none"> that all other reasonable options have been examined fully (137) that the need to promote sustainable patterns of development has been accounted for Evidence of compensatory measures (138) Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> Enhance the beneficial use of the Green Belt. (141) Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (139- 140) Specify that inappropriate development should not be approved except in very special circumstances. (143) Specify the exceptions to inappropriate development (145) Identify where very special circumstances might apply to renewable energy development that is inappropriate. (147) 	<p>The preparation of the Plan has entailed a review of Green Belt boundaries in County Durham. A 'Green Belt Assessment' (2018) and 'Addendum to Green Belt Assessment' (2019). The purpose of this work was to independently and objectively assess the extent to which areas of Green Belt within Durham meet the five purposes of the Green Belt as defined within the NPPF.</p> <p>The approach to Green Belt Assessments was agreed other North East local authorities in September 2016 where methodologies were shared.</p> <p>In addition the 'Exceptional Circumstances document' (2019) includes the justification for changing the Green Belt boundary to accommodate strategic housing sites at Sniperley Park and Sherburn Road in Durham City. It also sets out in detail how all other reasonable options have been in examined fully. In summary the exceptional circumstances are:</p> <ul style="list-style-type: none"> Ensuring sustainable patterns; Maximising the number of journeys undertaken by sustainable means; Providing the right type of housing to meet the needs and aspirations of existing and future residents; Helping address economic under-performance across the county by supporting the economic potential of Durham City; and

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> Maximising the delivery of affordable housing and other infrastructure by locating development in the highest viability areas. <p>The exceptional circumstances document also considers a small deletion as part of the Aykley Heads strategic employment site. It also includes reference to minor changes to the boundary at the former Police Skid Pan at Aykley Heads, Lumley Boys School, Great Lumley and Fern Hill, Durham City and reference to the two relief roads around Durham City which will be located in the Green Belt.</p> <p>Policy 20 (Green Belt) sets out the principles of protection for Green Belt land and explains the principles applied to assessing proposals for development in the Green Belt and the criteria for limited infilling.</p> <p>Policy 5 (Durham City's Sustainable Urban Extensions) clearly sets out the requirement for compensatory benefit associated with Sniperley Park and Sherburn Road. The detail of this will be provide through future masterplans.</p>
<ul style="list-style-type: none"> Meeting the challenge of climate change, flooding and coastal change (paras 148-169) 		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change, water supply biodiversity and landscapes and the risk of overheating from rising temperatures considerations. Minimise vulnerability to climate change (149)</p>	<ul style="list-style-type: none"> Planning of new development in ways that avoid increased vulnerability to impacts arising from climate change and in locations, and ways which reduce greenhouse gas emissions such as orientation and design Support for measures to ensure future resilience of communities and infrastructure to climate 	<p>Reducing our contribution to climate change is a key part of the Plan's Vision and Objective 17: Low Carbon - Reduce the causes of climate change and support the transition to a low carbon economy by encouraging and enabling the use of low and zero carbon technologies, supporting the development of appropriate renewable energy sources and sustainable and active transport and Objective 16:</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>change impacts (149)</p> <ul style="list-style-type: none"> • Support for energy efficiency improvements to existing building. • Local requirements for a building's sustainability which are consistent with the Government's policy for national technical standards (149) 	<p>Adaptation to Climate Change - Adapt to the impacts of climate change and extreme weather conditions by promoting appropriate sustainable urban drainage systems (SUDs) in new developments, promoting sustainable land management and conservation including protecting habitats such as woodland and peatland, ensuring that new development is located away from areas of flood risk, with an integrated approach to water management across all areas and encouraging appropriate building and infrastructure design and through the restoration of minerals and waste sites.</p> <p>The spatial strategy of the Plan seeks to reduce green house gas emissions by the location of the majority of new development close to existing whilst the principles of sustainable development are set out in the Sustainable Development Statement. A range of policies also seek to deliver on the Vision and Objectives:</p> <p>Policy 6 (Development on Unallocated Sites in the Built up Area) require new development to minimise vulnerability to the impacts of climate change including flooding.</p> <p>Policy 23 (Delivering Sustainable Transport) seeks to minimise the need to travel and improve opportunities for walking, cycling and public transport. The policy also links to the council's Strategic Cycling and Walking Delivery Plan and the Parking and Accessibility guidelines which include standards for accommodating low emission vehicles.</p> <p>Policy 30 (Sustainable Design) requires a range of</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>measures that assist in both the reduction of emissions and adaptation to the impacts of climate change.</p> <p>Policy 27 (Green Infrastructure) provides for green infrastructure – a key mitigation and adaptation measure with links to flood risk management as well as biodiversity. It also encourages green walls to support temperature control in urban environments.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, whilst ensuring that adverse impacts are addressed satisfactorily and identification of key energy sources. (151)</p>	<ul style="list-style-type: none"> • 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 49) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (151) 	<p>The Plan includes an objective related to resources. Objective 19: Natural Resources - Protect and enhance air, water and soil quality and encourage the efficient and sustainable use of the county's resources, particularly energy, water, soils, best and most versatile agricultural land, timber, minerals and waste including through the development of a diverse and thriving local food system. Similarly Objective 17 encourages the use of low and zero carbon technologies.</p> <p>Policies 34 (Renewable and Low Carbon Energy) encourages low carbon energy development. Policy 35 (Wind Turbine Development) sets out how the council will consider planning applications for wind turbines and relates this to specific areas identified on the policies map potentially suitable for different sizes of turbine and underpinned by the 'Wind Turbine Evidence Paper' (2019).</p> <p>Policy 30 (Sustainable Design) encourages district energy schemes and also requires that where connection to the gas network is not viable development should utilise renewable and low carbon</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		technologies as the main heating source.
Minimise and manage the risk of flooding (155)	<ul style="list-style-type: none"> Account taken of the impacts of climate change. (149-150) Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (156- 157) Policies to manage risk, from a range of impacts, through suitable adaptation measures including requiring Sustainable Drainage systems in all major development (155-165) 	<p>The evidence supporting the allocations of sites includes level 1 and 2 'Strategic Flood Risk Assessment' (2018) together with a 'Water Cycle Study' (2018). As a result none of the housing allocations in the Plan are located in functional flood plain.</p> <p>Through detailed discussions with Northumbria Water there are no identified issues with water supply. There are some issues with sewage treatment capacity and these are reflected in the Infrastructure Delivery Plan.</p> <p>Policy 36 (Water Management) seeks to avoid new development being located in areas likely to be flooded both now and in the future and also requires water management, including sustainable drainage, to be included in any development.</p>
Take account of the UK Marine Policy Statement and marine plans (166)	<ul style="list-style-type: none"> 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 	<p>The extensive coastline of the County means that Marine Planning is relevant to Northumberland. The Marine Plan for our section of coast is currently in preparation. The council has liaised with the Marine Management Organisation and recently commented on their emerging policies (published January 2019). The Duty to Cooperate Statement details the engagement activities undertaken with the MMO as one of the Prescribed Bodies to the Duty.</p> <p>Cooperation will continue to ensure that marine and terrestrial planning are integrated in Durham, taking account of the requirements of the UK Marine Policy Statement.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		The 'Shoreline Management Plan 2' (2009) is a large scale assessment of risks associated with coastal erosion and sea flooding between River Tyne and Flamborough Head and provides a policy framework which has informed Policy 38 (Durham Heritage Coast and Wider Coastal Zone).
Manage risk from coastal change (167)	<ul style="list-style-type: none"> • 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.(167-169) • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.(167) 	The 'Shoreline Management Plan 2' (2009) found that the entirety of the Durham Coast was at no significant risk of coastal change.
<ul style="list-style-type: none"> • Conserving and enhancing the natural environment (paras 170-183) 		
Protect valued landscapes, sites of biodiversity or geological value and soils (170)	<ul style="list-style-type: none"> • A strategy and policy or policies to: <ul style="list-style-type: none"> ○ Protect and enhance valued landscapes and sites of geological value and soils ○ create, protect, enhance and manage networks of biodiversity and green infrastructure. ○ Maintain the character of the undeveloped coast (170) • 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. (172) • Policies for the Heritage Coast consistent with its special character (173) 	<p>The Plan recognises the importance of a high quality natural environment in the Vision and also includes a specific objective, Objective 9: Natural Environment - Protect, enhance, maintain and manage the county's locally, nationally and internationally important natural environment, including through securing net gains, protecting connectivity and recognising the wider benefits from natural capital.</p> <p>Policy 42 (Biodiversity and Geodiversity) does not permit development that would result in significant harm to biodiversity and geodiversity that cannot be mitigated. New development will also be required to minimise impacts and provide an overall net gain for biodiversity. Protections are also included in Policy 43 (Internationally Designated Sites) and Policy 44</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>(Protected Species and Nationally and Locally Protected Sites).</p> <p>Policy 40 (Landscape) ensures that the most important landscapes will be protected. It does this including through identifying areas of higher landscape value shown on Map H of the policies map and underpinned by the evidence in the 'County Durham Local Landscape Designations Review' (2019).</p> <p>Policy 38 (Durham Heritage Coast and Wider Coastal Zone) seeks to protect and enhance the Heritage Coast including the wider coastal zone in accordance with its special character.</p> <p>Detailed policy relating to the specific characteristics of the North Pennines AONB is set out in Policy 39 (North Pennines Area of Outstanding Natural Beauty).</p> <p>Policy 14 (Best and Most Versatile Land and Soil Resources) prevents the loss of agricultural land and soils unless the benefits of the development outweigh the loss.</p>
Prevent unacceptable risks from pollution and land instability (170 & 178 -183)	<ul style="list-style-type: none"> Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, living conditions and the natural environment or general amenity. 	<p>Objective 14 in the Plan seeks to prevent and address pollution and Objective 8 seeks to make effective use of land taking account of the need for remediation of unstable and contaminated land.</p> <p>Policy 32 (Amenity and Pollution) allows development which have no unacceptable impact on health and amenity in terms of visual intrusion, loss of light, air quality, odours, noise or vibration or light pollution. It also addresses the matter of compatibility of</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		neighbouring uses in development. The approach to remediation of despoiled, degraded, derelict, contaminated and unstable land is outlined in Policy 33 (Despoiled, Degraded, Derelict, Contaminated and Unstable Land).
<p>Planning policies should minimise impacts on biodiversity and geodiversity (170)</p> <p>Plans should distinguish between the hierarchy of designated sites (171)</p> <p>Planning policies should plan for enhancement of natural capital biodiversity at a catchment or landscape-scale across local authority boundaries (171)</p>	<ul style="list-style-type: none"> • A strategic approach is taken to maintaining and enhancing a network of green infrastructure • Identification and mapping of local ecological networks and geological conservation interests (174). • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species (174) 	<p>Policy 42 (Biodiversity and Geodiversity) does not permit development that would result in significant harm to biodiversity and geodiversity that cannot be mitigated. New development will also be required to minimise impacts and provide an overall net gain for biodiversity. The conservation and enhancement of biodiversity and geodiversity is also encouraged. Protections are also included in Policy 43 (Internationally Designated Sites) and Policy 44 (Protected Species and Nationally and Locally Protected Sites).</p> <p>A range of ecological and geological designations are identified on the Plan's policies map including AONB, SSSIs, internationally designated sites and national and local geological and wildlife sites.</p> <p>The Local Plan is also supported by a 'Strategic Green Infrastructure Framework' (2019) which identifies GI assets and networks on a spatial basis.</p>
<ul style="list-style-type: none"> • Conserving and enhancing the historic environment (paras 184-202) 		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (185)</p>	<ul style="list-style-type: none"> • 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 	<p>The Vision of the Plan includes a reference to achieving a high quality historic environment. Objective 10 of the Plan also seeks to 'Protect and enhance the significance of County Durham's locally,</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) 	<p>nationally and internationally important built and historic environment, including its wide range of buildings, sites, archaeology, parks and gardens and other heritage assets’.</p> <p>The Plan sets out a positive strategy for the historic environment on page 205 which relates to the policies in the Plan and also a number of actions related to the historic environment that the council has committed to undertaking including improving the quality and accessibility of the county’s Historic Environment Record and supporting the improved condition of Heritage at Risk. The policies map also identifies many of the county’s heritage assets.</p> <p>Policy 45 (Historic Environment) expects development to sustain the significance of designated and non-designated assets and contribute positively to the built and historic environment. It also seeks to reduce the number of heritage assets identified at risk.</p> <p>Policy 46 (Durham Castle and Cathedral World Heritage Site) requires that development proposals should sustain and enhance its significance and seek opportunities and protect and enhance the Outstanding Universal Value of this World Heritage Site.</p> <p>Policy 47 (Stockton and Darlington Railway) seeks to protect the route and encourages opportunities to reinstate it as a legible route or enhance any physical remains.</p> <p>The strategy for the historic environment in the plan is</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		informed by a range of evidence including the 'Review of Historic Parks, Gardens and Designated Landscapes of Local Interest' (2019) and 'County Durham Landscape Value Assessment' (2019).
<ul style="list-style-type: none"> • Facilitating the sustainable use of minerals (paras 203-211) 		
<p>It is essential that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation (203)</p> <p>Minerals planning authorities should:</p> <ul style="list-style-type: none"> • plan for a steady and adequate supply of aggregates and industrial materials (208) 	<p>Account taken of the matters raised in relation to paragraph 204 and 205, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>In order to plan for a steady and adequate supply of aggregate the council has worked continuously through the North East Aggregates Working Party to produce the 'Joint Local Aggregate Assessment (LAA)' (2018). The LAA sets out the long term sub-regional aggregate mineral requirement by local authority. In addition the Joint LAA also provides recommendations relating to the safeguarding of mineral resources and mineral related infrastructure.</p> <p>The council has also commented upon a number of other Local Aggregate Assessments where there are strategically important flows of aggregate minerals.</p> <p>In terms of industrial minerals, the principal mineral of national importance found with County Durham is high grade dolomite (industrial dolomitic limestone) which has until recently been extracted at Thrislington Quarry. Duty to cooperate discussions have been held with Derbyshire County Council in relation to how the supply of this mineral commodity is being met currently by Whitwell Quarry (in Derbyshire) and could be met in the future.</p> <p>The County Durham Plan contains a suite of strategic and key policies in relation to minerals development. Including Policy 48 (Sustainable Minerals and Waste</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Resource Management) which seeks to promote, encourage and foster the sustainable resource economy in County Durham. Other policies include Policy 49 (Safeguarding Minerals Sites, Minerals Related Infrastructure and Waste Management Sites) which seeks to safeguard mineral sites, minerals related infrastructure (and also waste management sites); Policy 50 (Primary Aggregates Provision) which sets the scale of primary aggregate provision over the plan period; Policy 51 (Locational Approach to the Future Supply of Primary Aggregates) which sets out the locational approach to the future supply of primary aggregates; Policy 52 (Meeting Future Aggregate Requirements) which sets out the development management framework for meeting future aggregate requirements; Policy 53 (Brick Making Raw Materials) which addresses brick making raw materials; Policy 54 (Surface Mined Coal and Fireclay) which addresses surface mined coal and fireclay extraction; Policy 55 (Natural Building and Roofing Stone) which addresses natural building and roofing stone; Policy 56 (Reopening of Relic Building Stone Quarries for Heritage Projects) which addresses relic building stone sites for heritage projects; Policy 57 (Safeguarding Mineral Resources) which seeks to safeguard mineral resources and also considers prior extraction; and Policy 58 (The Conservation and Use of High Grade Dolomite) which addresses the conservation and use of High Grade Dolomite (also known as industrial dolomitic limestone). Finally, the County Durham Plan also includes two key policies which seek to allocate land for future carboniferous limestone extraction, Policy 59 (Preferred Areas for Future Carboniferous Limestone Extraction) and brick making raw materials, Policy 60 (Strategic Area of</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Search to the South of Todhills Brickworks).</p> <p>Development management policies, specific policies for a number of minerals not addressed by this Plan and non-strategic allocations will be included in the forthcoming Minerals and Waste Policies and Allocations Document which will be prepared in accordance with the timescales set out in the County Durham Local Development Scheme.</p>
<p>Justified: <i>The plan should be an appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> • 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. 		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>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</p>	<p>The council is fully committed to meaningful and ongoing engagement in the strategic planning and local plan production processes. This is to ensure that the needs and aspirations of the community and stakeholders are fully taken into account in the preparation of the Local Plan to help shape the future development of Northumberland, in line with its Statement of Community Involvement and national regulations and guidance.</p> <p>The 'Regulation 22 Statement of Consultation' sets out how the council has involved the community and relevant bodies, including hard to reach groups, through a variety of methods to maximise opportunities to shape the Plan. It also tells the story of how the Plan has evolved as a result of people's views and opinions and why it has not always been possible to change the plan along the lines sought by</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>the various bodies of opinion – for example due to conflicting evidence, national policy or changing circumstances.</p> <p>The council has made use of the county's fourteen Area Action Partnerships and town and parish councils as a means to access communities and understand their concerns. It has also built up a considerable database of groups and individuals who sought to engage in the process and have been contacted at each stage of plan making.</p> <p>The 'Duty to Cooperate Statement' and 'Statement of Common Ground' cover in detail, the ongoing cooperation on key strategic planning matters of a cross boundary nature with neighbouring authorities, prescribed bodies and key agencies.</p>
<p><i>Research / fact finding</i></p> <p>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?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> • 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. <p>AND</p> <ul style="list-style-type: none"> • 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. <p>OR</p> <ul style="list-style-type: none"> • 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 	<p>The council has developed and maintained a comprehensive suite of evidence that supports the Plan. Updates have been made as appropriate to ensure that the key evidence is robust and current. The council has ensured that this information has been available as part of the formal consultations on the Plan and the full body of evidence used to inform the plan has been available through the council's web pages as it has been completed.</p> <p>The council has sought to ensure that the evidence developed is robust and consistent with best practice and the requirements of the NPPF and Planning Practice Guidance.</p> <p>There are references throughout the Plan as to how</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>information on community views and preferences.</p> <p>OR</p> <ul style="list-style-type: none"> 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). 	<p>evidence has informed specific policies. The studies form an extensive body of evidence produced by the council and in some cases by specialist consultancies depending upon expertise and subject matter.</p> <p>In addition, a number of background papers explain how the evidence has been used to reach conclusions in the policy approach of the plan, and the choice of site allocations. For example the 'Spatial Strategy Justification' (2019), the Exceptional Circumstances' (2019); the Rationale for Housing Allocations' (2019) and the 'Wind Turbine Evidence Paper' (2019).</p> <p>Sustainability Appraisal and Habitats Regulation Assessment have been integral to informing the preparation of the Plan. This has meant that the principles of sustainability appraisal have been embedded into the writing of policies and site selection from the earliest opportunity.</p>
<p><i>Alternatives</i></p> <p>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?</p> <p>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?</p>	<ul style="list-style-type: none"> Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. 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. 	<p>The Sustainability Appraisal process clearly informed policy formulation throughout the plan and this can be seen from Scoping in March 2016, to the final report in January 2019. Throughout Plan production the alternatives considered have been made clear through the Sustainability Appraisal and the background papers.</p> <p>The Plan policies have also been tested through Habitats Regulations Assessment at appropriate stages which is explained in the 'Habitats Regulations Assessment' (2019).</p> <p>Equalities Impact Assessments, Rural Proofing and a</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> 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. 	<p>Health Impact Assessment also informed the Plan.</p> <p>The 'Regulation 22 Statement of Consultation' explains how consultation has informed the plan, in particular how the main issues raised during the Regulation 18 consultation were, or were not, taken forward in the Regulation 19 Plan.</p>
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> Be deliverable Demonstrate sound infrastructure delivery planning Have no regulatory or national planning barriers to its delivery Have delivery partners who are signed up to it Be coherent with the strategies of neighbouring authorities Demonstrate how the Duty to Co-operate has been fulfilled Be flexible Be able to be monitored 		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 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). 	<p>The Plan has a clear top down relationship between the Vision, the Plan Objectives and the policies that will enable the council's aspirations to be met. The vision, objectives and policies seek to address the key issues identified.</p> <p>The policies are internally consistent and presented as a complete set. This is demonstrated by the policy coverage of the Plan in addition to specific wording of</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>objectives will be achieved?</p> <ul style="list-style-type: none"> Is the Plan viable? 	<ul style="list-style-type: none"> 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). 	<p>policies and cross references where required.</p> <p>The timescales related to the objectives of the plan and its overall delivery run to 2035. Within the monitoring sections of policies, other specific timescales are included where relevant.</p> <p>The 'Local Plan Viability Study' (2019) assesses the viability of allocations and helped to inform whether sites were included or not in the Plan.</p> <p>The relevant agencies have been consulted at each stage of plan preparation and have supported specific objectives at different stages and there are no outstanding objections to any of the objectives from the relevant agencies from the Pre-Submission stage.</p> <p>Appendix 1 in the 'Monitoring Framework' (2019) maps all policies of the Plan against the objectives.</p> <p>The 'Local Development Scheme' (2019) explains that the County Durham Plan includes all local plan policies other than development management policies and non-strategic minerals and waste allocations which will be included in a separate DPD.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 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 	<p>The 'Infrastructure Delivery Plan' (2019) has been prepared in consultation with key partners and agencies, to ensure that it is reflective of their plans, strategies and programmes. It identifies the likely infrastructure requirements of development over the Plan period to 2035, and where feasible the implementation and delivery mechanisms and funding sources. In recognition that infrastructure investment</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>infrastructure and does the timing of the provision complement the timescale of the policies?</p>	<p>identified means and timescales for their delivery, or a plan for resolving issues.</p> <ul style="list-style-type: none"> • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule, and sufficient for decision making on planning applications. (57) 	<p>planning is fluid and continually changing in light of varying priorities this is a 'live' document that will be updated annually and in consultation with key partners and agencies.</p> <p>The Plan is also accompanied by the 'Strategic Green Infrastructure Framework' (2019) and the 'Playing Pitch Strategy' (2011).</p> <p>Policies 23 (Durham City Sustainable Transport) and 24 (Allocating and Safeguarding Transport Routes and Facilities) include a number of transport infrastructure proposals. These have been safeguarded or allocated depending on the level of certainty relating to the funding available including Western and Northern Relief Roads around Durham City. In the case of the Western Relief Road there is a relationship with the Sniperley Park Sustainable Urban Extension which necessitates a significant contribution to the total cost of the road, via a Section 106 Obligation, from the developers of the site.</p> <p>The Plan is supported by a 'Local Plan Viability Study' (2019) which has informed the selection of allocations to ensure that proposed development is viable and that developments are able to contribute infrastructure provision. In addition, this work also informed the approach to affordable and other specialist housing in Policy 15 (Addressing Housing Need).</p> <p>Policy 26 (Developer Contributions) sets out how new development will contribute to relevant infrastructure. The 'Issues and Options - Viability Assessments in County Durham' (2016), which was</p>

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		endorsed by the council's Cabinet, concluded that 'Given the current market conditions, and based on our involvement with other CIL studies (including those undertaken by third parties), we are of the opinion that it is unlikely all development types would be able to viably provide a CIL charge. In particular, we anticipate retail, office and industrial development is likely to be subject to viability pressure, unless the site is situated in a prime location. We anticipate some residential areas are likely to be able to support CIL charges, albeit for the lowest value areas the chances of a CIL charge being shown to be viable will be reduced'. On this basis a CIL has not been progressed for County Durham.
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> Sections of the DPD that reflect the plans or strategies of the local authority and other bodies Policies which seek to pull together different policy objectives Expressions of support/representations from bodies responsible for other strategies affecting the area 	<p>The Plan draws on a wide range of spatial connections, frameworks, policies and programmes including the existing and emerging initiatives delivered through, for example, the North East LEP, North East Joint Transport Committee, emerging Marine Plans and AONB Management Plans.</p> <p>In addition, evidence has been prepared in partnership with adjoining authorities and agencies such as the Local Aggregates Assessments, Strategic Flood Risk Assessments and Water Cycle Studies.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> 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? 	<ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> a. the effectiveness of policies and what 	<p>The Plan seeks to provide as much certainty as possible but also has built in flexibility to adapt to change.</p> <p>The 'Employment Land Review (ELR)' (2018) recommends that County Durham's portfolio of employment land should be circa 260 hectares. To give flexibility and to acknowledge that many of the</p>

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	<p>evidence is being collected to undertake this</p> <p>b. changes affecting the baseline information and any information on trends on which the DPD is based</p> <ul style="list-style-type: none"> • Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances • Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision • Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. 	<p>employment land allocations are within existing employment areas and therefore unsuitable for other uses, the Plan identifies a supply of land of 302 hectares. Flexibility is also in-built into meeting housing needs by including a 10% discount on the commitments to reflect those that will not come forward during the Plan period.</p> <p>In addition, the policies of the plan allow for appropriate windfall development, and there are exceptions policies in relation to affordable housing and employment.</p> <p>The monitoring framework and the preparation of the Annual Monitoring Report will enable early detection of any concerns in respect of delivery of the Plan and inform the required five yearly review. Should monitoring results trigger the need for earlier review then this will be addressed. The housing and employment trajectory will help inform monitoring.</p>
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined set out in the Duty to Cooperate Statement. • 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? 	<ul style="list-style-type: none"> • 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 	<p>The 'Duty to Cooperate Statement' (2019) and Statements of Common Ground set out in detail the strategic issues and agreements in respect of policy and delivery.</p> <p>The SCG will continue to be updated as required by National Policy and will reflect new and evolving agreements.</p> <p>In addition, the 'Infrastructure Delivery Plan' (2019) sets out the implementation and delivery mechanisms and key agencies and partners involved in delivering the Plan. Recognising the need for flexibility and</p>

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	strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.	change in infrastructure investment planning this will be updated annually to respond to changes.
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<ul style="list-style-type: none"> Sections of the DPD setting out indicators, targets and milestones Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories Reference to any other reports or technical documents which contain information on the delivery of policies Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal 	<p>The 'Monitoring Framework' (2019) and the monitoring section following each policy set out the indicators and targets for the Plan and the overall approach to monitoring and review. Monitoring will also include the infrastructure proposals included in the 'Infrastructure Delivery Plan' (2019) and the relevant elements of the Sustainability Appraisal.</p> <p>The Annual Monitoring Report will reflect the Plan's monitoring framework and report on the delivery of the Plan's policies and proposals.</p>
<p><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>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.</p>		
<ul style="list-style-type: none"> 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? 	<ul style="list-style-type: none"> 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. 	<p>It is considered that all policies in the Plan are fully consistent with National Policy.</p> <p>The Sustainable Development Statement reflects the NPPF's presumption in favour of sustainable development recommended for inclusion in local plans by the Planning Inspectorate.</p> <p>In all other respects policies are justified in that they add to or aid the implementation of national policies</p>

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	<ul style="list-style-type: none"> • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement • Reports or copies of correspondence as to how representations have been considered and dealt with. 	within the local context and are locally distinctive and as such do not repeat or reformulate national policy.