

LEEDS SITE ALLOCATION PLAN CONSULTATION

GUIDANCE NOTES FOR AIREBOROUGH



These guidance notes may help you find your way through the sea of documents that make up the Leeds Site Allocation Draft Plan. They are based on our own experience. The notes do not refer to all the documents available to you, just the ones we think are the most useful for making comments in responses to Leeds City Council, on the soundness and legality of the plan.

The consultation is on the 'soundness' of the Site Allocation Plan. The Planning Inspector must examine whether the Plan is 'sound', according to four tests (see back page), legally compliant and in accordance with Duty to Cooperate with neighbouring authorities. The starting point for the examination is the assumption that the Council has submitted a sound plan. **Those seeking changes should demonstrate why the plan is unsound by reference to one or more soundness criteria**

The most important documents on the individual sites are in section b). We have provided a link to all these documents, and some key points about them.

- a) IMPORTANT CONTEXT DOCUMENTS – the rules
- b) SITE SPECIFIC PLAN DOCUMENTS – this is the key area for comment on individual sites
- c) LEGAL AND BACKGROUND DOCUMENTS OF NOTE – will help with supporting evidence
- d) TESTS OF SOUNDNESS – key things to think about when making responses

NB - () Indicated planning jargon

If you need help then email us, and we will do what we can. You may also find CPRE's booklet Planning Explained, useful. <http://www.cpre.org.uk/resources/housing-and-planning/planning/item/2654-planning-explained>

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IMPORTANT CONTEXT DOCUMENTS

These are the rules of planning

1. NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The planning 'rule book' is the NPPF. It is divided into sections; for example the rules (policies) on protecting Green Belt are numbers 79 – 92, sustainable transport are 29 – 41.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60777/2116950.pdf



2. NATIONAL PLANNING POLICY GUIDANCE (NPPG)

The NPPG is a user manual for the NPPF, and was launched in Spring 2014 – right in the middle of the Inspection of the Leeds Core Strategy. Each NPPF rule has a 'how to interpret' explanation in the NPPG. So, if you want to know if "housing and economic needs override constraints on the use of land, such as Green Belt?" you go to paragraph 044 of the NPPG. There is an on-line search facility.

<http://planningguidance.planningportal.gov.uk/>

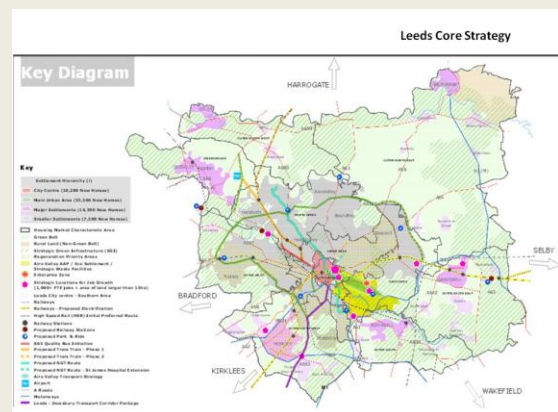
3. LEEDS LOCAL PLAN – CORE STRATEGY 2012 - 2028

The Leeds Core Strategy 2012 – 2028, also known as the Local Development Framework (LDF), was adopted by Leeds as its planning rule book in November 2014. So, these rules now govern planning in Leeds. The LDF is divided into sections – important ones are 3.3 Plan Objectives 4.1 Settlement Hierarchy 4.6 Housing Market Characteristic Areas (HMCA) targets, 4.8 Green Belt 4.9 Transport. The map of the strategy for the whole city is called the Key Diagram, page 60. Within the LDF there are key rules –called Spatial Policies (SP) – so SP7, page 44, gives the housing targets for each HMCA.

Note; it is often said that the Housing target for Aireborough has been approved at 2,300. It has not. The table at SP7 is 'indicative' of what might happen once the Site Allocation Plan (SAP) is put together. For this look at section 4.6.14, and SP7.

You will find very little that is specific to Aireborough in the LDF, apart from the indicative housing target of 2,300 houses to be built between 2012 and 2028.

<http://www.leeds.gov.uk/SiteAllocationMaps/Core%20Strategy/Adopted%20Core%20Strategy%20Nov%202014%20Final.pdf>



4. LEEDS LDF - INSPECTOR'S REPORT

When the Planning Inspector gave Leeds the green light that their Core Strategy passed the tests of 'soundness'¹, he wrote a report dated September 2014, that gave conditions Leeds had to meet, or put into their LDF.



Two key conditions given by the Inspector were that

- *"considerations such as **environmental constraints** and infrastructure will need to be addressed"* (point 22)
Note: Green Belt, is an environmental constraint in the NPPG.
- *'the Green Belt review had to be comprehensive, not selective ie not just for certain sites'*(point 29). Note: It is our view, that the council has not done a comprehensive Green Belt review, and that many Local Authorities such as Calderdale have done a much better job.

<http://www.leeds.gov.uk/docs/Leeds%20Core%20Strategy%20Final%20Report%20inc%20Appendices.pdf>

5. LEEDS DRAFT SITE ALLOCATION PLAN – INTRODUCTION AND OVERVIEW

This is the plan currently in consultation

Section 1. Gives general information on the SAP timetable, documents, who was consulted, test of soundness. You might like to read for general information.

Note: Aireborough's Neighbourhood Planning Forum has only been truly consulted during normal public consultations. (1.18)

Section 2 Gives an overview of the housing, employment, and green space figures with some policies. 2.91 has the proposals for Leeds Bradford Airport, including taking land out of Green Belt for employment.

Note: Some of the housing data **does not clearly state the current situation** eg table 3 at 2.32, does not make it clear that in Aireborough over 90% of sites still to be allocated are Green Belt. Readers are left to calculate that for themselves.

Note: The term green field in this document is misleading as **it covers land that is currently Green Belt**, as well as land that is currently green field with no Green Belt status.

¹ See last section of these guidance notes for tests of soundness

SITE SPECIFIC PLANS

You need documents 1, 3 and 4 for each site you want to comment on – then you will also need the documents that explain the scoring systems.

1. LEEDS SITE ALLOCATION PLAN (SAP) AREA PROPOSALS

This shows specific sites in each housing area (HMCA) that Leeds Planners have assessed as suitable for development - housing, retail, employment or green space. Their Green Belt and sustainability assessments (SA see 3 and 4 below) should be factual, and based on research and data reports (the Evidence Base).

The Proposals Plan, lists all the sites that have been built, are being built, and **which are proposed as development sites** eg 3029 Wills Gill Guiseley, between 2012-2028.

The number in brackets eg (3029) is the important reference. It comes from the Strategic Housing Land Availability Assessment (SHLAA). Leeds has also given each site a plan reference eg Wills Gill is HG2-2, this is less important, but worthwhile just jotting down.

The proposals have a page for each site, with potential housing numbers, a site boundary map, and on the back is a list of the actions (mitigating factors) that Leeds think have to be taken to make the site suitable for sustainable² development. Site plans are for Developers to put forward, once the site is approved.

The interactive map on the Leeds website is a nice application; you can click on the site and it will bring up the site proposals (picture) and a site proforma (3 below) – but **not the detailed sustainability appraisals** (see 4 below) or previous comments that had been put on earlier versions of the proformas.

Note; are there other brownfield sites, in the built environment, that could be better used to take the houses planned for the Green Belt sites – sites like the reuse of The Drop in Guiseley, Town Street?

<http://www.leeds.gov.uk/SiteAllocationMaps/SAP%20and%20AVL%20Documents/01%20Aireborough.pdf>

Site Reference: HG2-2 (3029)

Site Address: Wills Gill, Guiseley

Housing allocation

Site Capacity: 133 units

Site Area: 5.06 hectares

Ward: Guiseley and Rawdon

HMCA: Aireborough

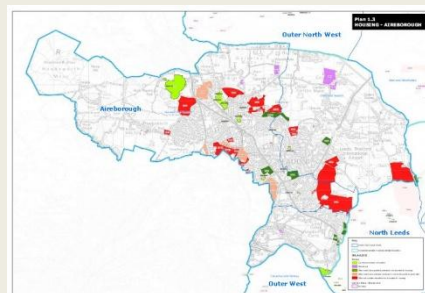
Phase: 2



² Sustainability is defined in the NPPF 7-17. It is the way for people to use resources without the resources running out – to meet the needs of the present without compromising the ability of future generations to meet their own needs. It has three concerns, a strong economy, a vibrant, healthy community, and protection of the natural and historic environment.

2. STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA) - 2014

Each year Leeds ‘puts out a call’ for suggestions for potential housing land; the result is mapped on the SHLAA. You don’t have to own land to put it on the SHLAA – some land owners do not know their land is on the map. The sites are assessed by a SHLAA Panel for accessibility, suitability and deliverability. Developers sit on the Panel. Aireborough SHLAA map below, click on documents, left hand column.



<http://www.leeds.gov.uk/council/Pages/Strategic-housing-land-availability-assessment-%28SHLAA%29-.aspx>

3. AIREBOROUGH SITE PROFORMAS

An important part of checking if sites are ‘sound’ is to look at how they have been assessed by Leeds Officers. There are two key assessment documents

- I. **The Site Proformas** – which give the Green Belt review assessment together with comments from infrastructure providers and the public, and site characteristics.
- II. **The Sustainability Assessments** – which have scored sites against a range of criteria such as transport, schools, ecology and flooding

The Aireborough Site Proformas are below. Look up the site you are interested in, using the SHLAA site number, eg Wills Gill 3029. Note: everything on the Proforma should be supported by research and data in the Evidence Base – so, it may be wrong, out of date, or the evidence may not be there. The Aireborough Neighbourhood Forum has put together an Aireborough Specific Evidence Base on our website. The assessment score is based on judgement – you can disagree and give reasons.

<https://aireboroughnf.files.wordpress.com/2015/03/aireborough-assessment-2.pdf>

Aireborough	
3029	Wills Gill, Guiseley
Site Details	
Easting 419789	Northing 442279
Site area ha 5.1	SP7 Major Settlement Extension
HMCA Aireborough	Ward Guiseley and Rawdon
Site Characteristics	
Site type Greenfield	
On-site land uses	
Agriculture	
Neighbouring land uses	
Agriculture	
Dwellings	
Other land uses - None	
Topography Sloping	Landscape Limited Tree Cover
Boundaries Partially well-defined	Road front Yes
Description	
Agricultural land to the rear of properties on Shaw Lane Gardens. Track runs through part of the site. Site is flat, with some tree cover on boundaries. A public right of way runs along the western boundary. The site is within a conservation area.	
Greenbelt Assessment	
1. Check the unrestricted sprawl of large built up areas	
Would development lead to/constitute ribbon development?	No

4. SUSTAINABILITY APPRAISALS (SA)

The SA's are a 'must have' for each site, as they are the check on whether developing the site causes any harm –socially, economically or environmentally. If it does, then 'mitigating factors' will be considered – that is to say, can anything be done to address the harm and so let the development go ahead. Different outside bodies, such as Historic England, Natural England, and the Environment Agency are required to input to the SA. The Leeds SA has 22 sustainability criteria, 2 economic, 7 social, 13 environmental. These are given on page 13 of the SA report, section 3.6. Three of interest are as follows, but there are other's you may like to quote in your response.

- SA 15 Provide a transport network which maximises access, whilst minimising detrimental impacts.
- SA 19 Maintain and enhance landscape quality.
- SA 20 Maintain and enhance the quality and distinctiveness of the built environment.

Best way to comment on this is to - print off a) for reference. Then, go to report d) and find the site you are interested in, then list the criteria numbers and the score given. Then go to the framework c) to see what the decision criteria were. **Do you think the score Leeds have given is justified?** An added extra, would then be to look at the criteria you do not agree with in f) and g). This will give you the ability to comment on the inclusion of the site.

- The scoring system for each sustainability criteria is on page 21 Table 4.
- The base line Sustainability Appraisal for Aireborough is page 90 – 99
- The site specific Sustainability Framework is page 218 – 223 (this is a useful list)
- The actual scoring for each site allocated is page 224 (Appendix 7) (picture below)
- The actual scoring for each site not allocated is page 232 (Appendix 8)
- A summary of overall findings is at page 248 (Appendix 10)
- Mitigation measure are given at page 257 (Appendix 11)

The SA is in the Background Papers here look at the report, rather than the non-technical summary

<http://www.leeds.gov.uk/council/Pages/Site-allocations-plan-publication.aspx>

Sustainability Appraisals of proposed housing allocations. Version @ 25/08/15

WMA	Ref	SMA1	SMA2	SMA3	SMA4	SMA5	SMA6	SMA7	SMA8	SMA9	SMA10	SMA11	SMA12	SMA13	SMA14	SMA15	SMA16	SMA17	SMA18a	SMA18b	SMA18c	SMA19	SMA20	SMA21	SMA22a	SMA22b	SMA22c
Aireborough	HG2-1	3026	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aireborough	HG2-2	3029	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aireborough	HG2-3	12558	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aireborough	HG2-4	4020	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aireborough	HG2-5	11804_1311 A_263A	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aireborough	HG2-6	1113	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aireborough	HG2-7	110	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aireborough	HG2-8	4019	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aireborough	HG2-9	3366	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aireborough	HG2-10	1221	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aireborough	HG2-11	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aireborough	HG2-12	4254	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
City Centre	HG2-187	3157	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
City Centre	HG2-188	446	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
City Centre	HG2-189	2006	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
City Centre	HG2-190	421	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
City Centre	HG2-191	426	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

5. GREEN BELT REVIEW METHODOLOGY

Green Belt is a special class of open green land around a built up area, where building is restricted to prevent urban sprawl, and ensure a healthy environment for man, wildlife and activities such as forestry and agriculture. The position of the Green Belt is determined by five purposes; it has to meet at least one purpose, possibly a number.

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns from merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The definition and method that Leeds used to assess these purposes for each site is below in appendix 2, and the result of that assessment is in the **Aireborough Site Proformas**, at 3 above.

<http://democracy.leeds.gov.uk/documents/s134440/BACKGROUND%20DOCUMENT%20-%20SAP%20-%202005%20Green%20Belt%20Review%20Background%20Paper%20Final.pdf>

Green belt land should be enhanced see NPPF 81; not something that is mentioned to any extent in the **Leeds LDF**. Note: In your response consideration should be given as to how Green Belt could be enhanced to benefit the community, and whether there is evidence that enhancement would be more sustainable.

- Providing opportunities for access to the open countryside for the urban population
- Providing opportunities for outdoor sport and outdoor recreation near urban areas
- The retention of attractive landscapes and the enhancement of landscapes, near to where people live
- Improvement of damaged and derelict land around towns
- The securing of nature conservation interests
- The retention of land in agricultural, forestry and related uses.

APPENDIX 2: LEEDS SITE ALLOCATIONS PLAN - PRO-FORMA FOR SITE ASSESSMENT

Green Belt Review Methodology - complete this section only where a site lies within the existing Green Belt

Once the general extent of a Green Belt has been approved, boundaries should only be altered in exceptional circumstances. It is therefore necessary to assess which land within the Green Belt can make a significant contribution to meeting long term development land supply needs which would be least damaging to the purposes and integrity of the overall Green Belt in the Leeds Metropolitan District.

When assessing a site that is only partially in the Green Belt, only assess the part that is Green Belt.

Purpose	Criteria and definitions	Assessment
1. Check the unrestricted sprawl of large built up areas	<p>This is not the same as urban development per se. It is a judgement as to whether a development would result in inefficient use of land considering the following criteria:</p> <p>i. Would development of the site lead to/ constitute ribbon development YES/NO</p> <p>ii. Would development result in an isolated development site not connected to existing boundaries YES/NO</p> <p>iii. Is the site well connected to the built up area? – Does it have 2 or more boundaries with the existing built up area? YES/NO</p> <p>iv. Would development of the site effectively 'round off' the settlement pattern YES/NO/PARTIAL</p> <p>v. Do natural and physical features (major road, river etc.) provide a good existing</p>	<p>i. If response yes, high potential for unrestricted sprawl.</p> <p>ii. If response yes, result would be isolated development, high potential for urban sprawl.</p> <p>iii. If a site is well connected i.e. has several boundaries with the adjacent urban area, lower potential for urban sprawl. If only one boundary with existing urban area, development would 'jut out' or not be as well related and has more potential to result in urban sprawl.</p> <p>iv. If response yes, development would 'round off', low potential for unrestricted sprawl.</p> <p>v. If yes, higher potential for urban sprawl.</p>

LEGAL AND BACKGROUND DOCUMENTS TO NOTE

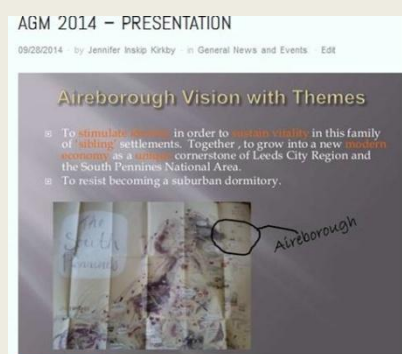
Useful document, if you want to look for more detail for your response.

1. SAP EVIDENCE BASE

The Evidence Base consists of a range of research, statistics and information, important for different aspects of the plan, eg Landscape Character Assessments, Transport Studies, Green Space Audits. These policies adopted in the SAP must be supported by this evidence, for the plan to pass the 'tests' of soundness. The Evidence base supports the **Sustainability Assessments** and the **Green Belt Purpose Review**. Some of the Evidence Base is in the background documents, but only some.

2. AIREBOROUGH NEIGHBOURHOOD PLAN VISION

A Neighbourhood Plan has to start with a Vision for its area eg Leeds Plan Vision is to be the Best City in the UK. The Vision, should include a vision statement, and the key themes it will cover. The Aireborough Neighbourhood Area vision was produced following research and collaboration with local people in the Spring of 2013. Note; Leeds City Council, have not included this in their thinking for the SAP. Our vision research documents are on our website in Training and Reference.



<https://aireboroughnf.files.wordpress.com/2013/06/anf-vision-april-2013.pdf>

This is the Leeds Vision- <http://www.leeds.gov.uk/docs/Vision%20for%20Leeds%202011%20-%202030.pdf>

3. AIREBOROUGH NEIGHBOURHOOD PLAN SITE SUSTAINABILITY REPORTS

In the spring of 2015, the ANDF together with members and volunteers started putting together Sustainability Reports for the different housing sites, rooted in an Evidence Base specifically for Aireborough. You will find those reports here. If you would like to discuss further details of these we can put you in touch with the Group Leader for each report.

<https://aireboroughnf.wordpress.com/2015/06/10/aireborough-site-allocations-preferred-sites-to-be-announced-in-june/>



4. AIREBOROUGH EVIDENCE BASE

Just like Leeds City Council, the Aireborough Neighbourhood Plan, needs to have an Evidence Base. You will find lots of information on key topics for Aireborough on our website. If you cannot find what you want then email us at aireboroughnp@gmail.com, and we will try and help you.

<https://aireboroughnf.wordpress.com/library/>

5. BRADFORD DRAFT LOCAL PLAN

Leeds Council and Bradford Council legally have a Duty to Co-Operate over planning issues that affect them both – this must happen in border area. There is a background paper called Duty to Co-operate, which you will find here.

<http://www.leeds.gov.uk/SiteAllocationMaps/SAP%20and%20AVL%20Documents/08%20Duty%20to%20Co-operate%20Background%20Paper%20Publication%20Draft%20Final.pdf>



To judge the co-operation, you will find Bradford's Draft Local Plan Documents, including potential sites in neighbouring areas. Note; Local Authorities should have meeting minutes available for inspection.

http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/core_strategy_dpd_submission

6. LEEDS STATEMENT OF COMMUNITY INVOLVEMENT

Statements of Community Involvement (SCI) are produced by Local Authorities, to explain how the public will be involved in the preparation of Local Plans.

Leeds SCI is below. It was written in 2007, and is now out of date; it does not, for example, include any mention of Neighbourhood Planning collaborations – as this was only introduced in the 2011 Localism Act.

Note; Although the Council ask about the SCI compliance at section 4.2 of their response form, they have not included it in the SAP documents.

Note; 3.19 To ensure effectiveness the Council will focus on the following key questions



- I. How have the views of the community and other stakeholders influenced documents and the planning of developments?
- II. How satisfied have participants been with the consultation and the process used?

Your SAP response may be a good time to give your view on this.

<http://www.leeds.gov.uk/council/Pages/Statement-of-community-involvement.aspx>

TESTS OF SOUNDNESS

Soundness is what the NPPF says the Planning Inspector will be looking for in order to pass or fail the Leeds Site Allocation Plan. This is why you are being asked to classify your comments in your response under the relevant tests for soundness.

NPPF - EXAMINING LOCAL PLANS

182 The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

Part 3 - Is the Plan sound?

At this stage, before the Plan is sent to the Secretary of State for Public Examination, we are asking for your views about the 'soundness' of the plan. An independent Inspector will examine the plan against the 'tests of soundness' (Please read the guidance notes on how to complete this section)

3.1. Do you consider the plan to be sound?
☐ Yes (go to Q3.3) ☐ No (go to Q3.2)

3.2. Which test of soundness are your comments about? (You must select at least one option)
☐ Positively Prepared ☐ Effective
☐ Justified ☐ Consistency with National Policy

3.3. Please set out why you think the Plan is sound / unsound? Your comments should briefly cover all the evidence and supporting information necessary to support or justify your view. It helps us if you can use subheadings to deal with specific issues. Please continue on a separate sheet if you need to. There may not be another opportunity to make further comments before the plan is sent to examination.

3.4. Please set out what change(s) you consider necessary to make the Plan sound. You will need to say why this change will make the Plan. It helps us if you can be precise as possible and providing any suggested revised wording. Please continue on a separate sheet if you need to.

CPRE Recommend that you consider the following in their booklet explaining planning. Questions to ask yourself:

● **Is the plan positively prepared?** Does the plan seek to objectively meet local needs for housing, land for businesses, community facilities, infrastructure (e.g. transport, water, energy), education, shops, facilities for sport & leisure etc., **which have been identified** through the studies which make up the evidence base? Has it considered all relevant facts eg LBA extension? **PLACE MAKING NEEDS**

● **Is it justified?** Is the chosen strategy the best one compared with the alternatives considered? Is it clear how the Sustainability Appraisal (SA) has informed the choice (the SA report should set and compare alternative options)? 1. Has the plan been prepared with participation of the community? 2. Is it clearly founded on valid, research & studies using reliable methodology? Is the data consistently applied? Are mitigation suggestions for harm correct? **VALID EVIDENCE OF RIGHT WAY**

● **Is it effective?** Is there information on how the plan will be delivered up to 2028? (e.g. an 'implementation plan')? Does it fit with plan of neighbouring Councils eg Bradford? Are other delivery partners (e.g. strategic rail and highway authorities, the Environment Agency, water companies) signed up to the plan? Is there an indication of when sites will come forward? Is it clear how the plan will be monitored? Is it flexible – able to deal with changing circumstances (e.g. what if a big site doesn't come forward for development when expected)? **CAPABLE OF DELIVERY**

● **Is it consistent with national policy as set out in the National Planning Policy Framework?**

Keeping these key points of Soundness in mind may help when making your response.

SOUNDNESS

POSITIVELY PLANNED



JUSTIFIED

EFFECTIVE



CONSISTENT WITH NPPF