

LEEDS SITE ALLOCATION PLAN CONSULTATION

TEST OF SOUNDNESS

The Site Allocation Consultation is on the 'soundness' of the Site Allocation Plan.

The Planning Inspector must examine whether the Plan is 'sound', according to four tests (justified, positively prepared, effective, consistent with national policy), 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

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.

TESTS OF SOUNDNESS

Soundness is what the NPPF (the rule book for planning) 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

Link for NPPF

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

CPRE Recommend that you consider the following in their booklet explaining planning.

<http://www.cpre.org.uk/resources/housing-and-planning/planning/item/2654-planning-explained>

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