Draft Isles of Scilly Local Plan 2015 – 2030

Including Minerals and Waste

Soundness Self-Assessment Checklist

Council of the
ISLES OF SCILLY

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

In summary – the key requirements of plan preparation are:

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

The Tests of Soundness at Examination

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

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

1.   Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

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

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

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

- Research/fact finding: the choices made in the plan are backed up by facts.

- Evidence of participation of the local community and others having a stake in the area; and

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

3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

This means the DPD should be deliverable, requiring evidence of:
- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

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

4. Consistent with national policy: enabling the delivery of sustainable development

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

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

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
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.		
Vision and Objectives Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve? Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives? Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? Have reasonable alternatives to the quantum of development and overall spatial strategy been considered? Are the policies internally consistent? Are there realistic timescales related to the objectives? Does the DPD explain how its key policy objectives will be achieved?	• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. • Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. • The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.	The Vision & objectives are set out in draft plan. They were subject to extensive consultation as the Plan was developed and stem from the issues that the Plan is seeking to address. The spatial portrait sets out the context of the islands and introduces the issues– these are set out in more detail in the relevant chapters. The relevant objectives are listed at the start of each Chapter of the Plan, to indicate which policies will help deliver the objectives. The Duty to Co-operate has been agreed with Cornwall Council and demonstrates agreement about the strategic priorities and cross-boundary issues that the Local Plan needs to address. The Local Plan does allocate sites for housing, as rural exceptions sites but does

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		not allocate sites for employment, but rather uses an exceptions site approach.
		The Strategic Housing Land Availability Assessment identified a potential stock of housing land to meet identified local needs where they arise. A Viability Study has also been undertaken to demonstrate various delivery mechanisms for providing affordable housing.
		The Infrastructure Capacity assessment confirms no strategic infrastructure needed or planning in the islands – confirmed by the relevant agencies / organisations.
		The Authority considered reasonable alternatives for its spatial strategy and housing development. The SA report documents how alternatives were considered, appraised and consulted on as part of the Plan preparation. The SA of the consultation draft Local Plan had a matrix of the SSA objectives and Local Plan policies to check whether there were any policies or objectives where a number of negative impacts were identified and if this could lead to cumulative impacts. The General Policies at the beginning of the Plan, set out the overall approach to all development. The other policies in the Plan lead on from these to provide more detail.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		This ensures internal consistency of the policies in the Plan
The presumption in favour of sustainable development (NPPF paras 6-17) Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: • any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or • specific policies in this Framework indicate development should be restricted.	• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below). • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)	Policy SS1 sets out the islands' approach for achieving sustainable development. However, in achieving sustainable development, policy SS1 provides that all proposals for new development, activities and land use will demonstrate that they are consistent with scenic beauty as an Area of Outstanding Natural Beauty. Consequently, although the policies do allow flexibility where appropriate, there may not always be sufficient flexibility to adapt to rapid change. The need for housing has been objectively assessed and updated and is evidenced in the Strategic Housing Market Assessment (SHMA) and the SHMA update which includes the Standardised Methodology for Assessing Housing Need and housing topic paper.
Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear	• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk)	The Model policy has been deleted from the Plan as it is in the NPPF. However, SS1 sets out the Local Plan approach to sustainable development.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
policies that will guide how the presumption should be applied locally.		
Objectively assessed needs The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.	The economic, social and environmental needs of the area have been assessed in a number of different ways which include the following: SHMA carried out in 2016, including a Housing Needs Survey. The SHMA was updated in 2018 to update the housing figure with the Standardised Method for calculating housing needs. There are gaps in the data for the islands but response from MHCLG confirmed Housing Topic paper. Strategic Housing Land Availability Assessment (SHLAA): A SHLAA has been undertaken . The Island Futures Strategic Economic Plan was produced in 2014 and included a Housing Growth Plan and Infrastructure Plan. Consultations: Extensive consultations have been undertaken to understand the needs of the local community including 'Local Plan Scoping Report' which involved consulting with the local schools and holding events across all 5 islands.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.	The Cornwall and Isles of Scilly Strategic Economic Plan provides the economic strategy for the area, and this is reflected in the Plan. Approved as part of the wider economic strategy, is the Islands Futures Strategic Economic Plan which provides for a 'strong, diverse and resilient economy where economic diversification that does not directly impact upon the islands' special qualities. This is being encouraged along with appropriate land management and rural enterprises which also play a lead role in conserving and enhancing the islands special qualities. This includes producing high quality food and other produce, and conserving local needs'... and where 'there is a sustainable tourism and recreation economy in harmony with local

AIM 4: creating a more competitive, diverse and resilient economy based on an exceptional and inspirational environment that can adapt to change and challenges and maximise the opportunities by building on its strengths which is underpinned by |

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		effective infrastructure and appropriately skilled workforce
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)	Policy WC1 seeks to strengthen, enhance and diversify the islands economy. Policy WC4 also seeks to safeguard existing employment sites in accordance with delineation of employment land on the policies map. However, as the supporting text stipulates, there is scope for appropriate change of use in certain circumstances including where employment sites or buildings cannot be made viable in the longer term. The Local Plan does not allocate additional employment sites, as the there is no demand to necessitate the need to allocate sites, rather the emphasis is on safeguarding existing employment sites. This should ensure that a supply of land is available for prospective businesses and minimises the need for, and avoids the cost and complication of developing new sites of which there is a limited supply. In turn, the Plan allows for businesses to expand appropriately in accordance with policies WC3 and WC5. In terms of infrastructure, although the Infrastructure Capacity Assessment does not identify any specific required infrastructure for the islands, policy SS4 provides for

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		safeguarding commercial services and community facilities that will benefit the local resident community and the needs of visitors but that are of a scale and in a location appropriate to the community they serve.
2. Ensuring the vitality of town centres (paras 23-37)		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	• The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; 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.	The Plan classifies the settlements of Hugh Town Old Town, Telegraph, Porthloo, Normandy, High Lanes and Holy Vale as being the largest settlements on St Mary's where there are already built-up areas, well-connected to services. Hugh Town however remains the settlement with the most extensive range of services in one place. The Spatial Strategy provides that 'Development should be located within the main settlements of Hugh Town and Old Town on St Mary's. This is in order to sustain and improve the range of services and facilities, to serve the needs of the settlement and surrounding communities, address locally identified needs for housing ...' and that new build development for 'local need affordable housing, business premises, and community services and facilities will be acceptable in principle where it is well related to existing buildings in the settlements.' Policy LC7: Windfall

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		Housing and SS4: Protection of Retailing and Community Facilities both seek to maintain sustainable communities and strengthen the economy. The plan recognises the important role of community services and facilities within the different island communities and for those who visit the islands. The plan is supportive of maintaining and enhancing their provision, whilst guarding against the loss of services and facilities, existing shops, services and facilities should be able to develop and modernise in a sustainable way so that they can be retained for the benefit of the community.
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	• An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages identified and allocated.	As the plan does not seek to generate significant growth in the islands' populations there would be no significant increase in demand for retail or leisure facilities within the Isles of Scilly, rather the emphasis is on enabling and supporting more modest scale improvements to the sectors. Policy SS4 provides for new or extended commercial services and community facilities where they will benefit the local community and needs of visitors, and are of an appropriate scale and location. The Local Plan does not allocate new employment sites on the basis of the

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		evidence of the Island Future report (2014) which shows that there is no need to allocate sites, rather the emphasis is on safeguarding existing employment land and buildings, particularly Porthmellon Industrial Estate on St Mary's, where there is already pressure for alternative uses. The Local Plan does allocate housing sites, for affordable homes, to address the need as evidenced by SHMA on sites assessed through the SHLAA. The approach in the plan is to fulfil this need through the development of sustainable locations on St Mary's as well as through windfall sites. Windfall sites have been the primary route for the development of affordable homes on the islands within the last 5 years. Policy LC1 (housing strategy), LC4 (staff accommodation) and LC6 (Housing Allocations) and LC7 (windfall housing) provides the basis for meeting the spatial strategy of the plan.
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	• Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities.	Section 5 of the plant is dedicated to supporting a sustainable economy and the enhancement and diversification of the islands economy. This section contains policies on business development across

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		the islands, where these avoid negative impacts upon the locality, through Policy WC1 and Policy WC2 encourages home-based businesses. Policy WC3 seeks to support new employment developments to existing settlement areas or in the countryside where appropriate. Policy WC4 seeks to safeguard existing employment land and buildings and Policy WC5 is supportive of new developments that support the island's visitor economy
4. Promoting sustainable transport (paras 29-41)		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29) Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)	• Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. • Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. • A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.	Section 2 of the Plan sets out, through Policy SS9, support for development proposals that have the potential to generate vehicular movements, providing that sustainable transport is promoted and it does not have an adverse impact on the local highway network. There are unlikely to be major developments given the nature of the islands but development that are considered to generate significant amounts of vehicular movements will be required to be supported by transport assessments and a travel plan. There are no parking standards on the islands on the basis that there are very much lower levels of development and no larger scale

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31) Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32) Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34) Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35) Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37) For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38) The setting of car parking standards including provision for town centres. (39-40)	• 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.	developments planned that would necessitate these.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)		
5. Supporting high quality communications infrastructure (paras 42-46)		
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)	• Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.	The islands have already achieved the roll-out of superfast broadband across the islands and have coverage of mobile telecommunications including 4g and network operator Vodafone will be rolling out 5g on the islands as one its test areas for effectiveness of this technology in rural areas. The plan is supportive of the Smart Islands and similar sustainable programmes, which build on this existing technology, to support the delivery of a range of opportunities for the islands. The scale of the Isles of Scilly does not require further large scale roll-outs of additional telecommunications development.
6. Delivering a wide choice of high quality housing (paras 47-55)		
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and	• Identification of: a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)	Within the context of restraint, the 2005 Local Plan provided that exceptionally, new affordable housing to meet local need should be delivered through a needs led exceptions approach to ensure that the needs of local communities were

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	• A SHLAA	prioritised. Underpinning this approach has been that the level of housing development should be compatible with the conservation and enhancement of the islands making maximum use of existing accommodation and buildings to reduce the need for greenfield development. Feedback from various stages of consultation on the emerging Local Plan gave support to the continuation of the adopted approach. The policies put forward in the Publication Draft Local Plan therefore provide for local need affordable housing through a rural exceptions approach, on a range of housing allocations specifically to enable the delivery of affordable homes. Policy LC1 of the Draft Isles of Scilly Local Plan 2015 - 2030 does permit a significant step-change with the 2005 local plan in that it recognises the significant viability and scale issues that often preclude the islands from sources of grant funding, which could otherwise be used to enable the delivery of affordable homes. In permitting open market housing, as a means only exceptionally on sites allocated for housing and as a mechanism only to deliver affordable homes, where it is evidenced that no other forms of funding would be available, the policy requires that consideration will be given to the provision of 'Principle Residence' housing, as a

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		response to the reduction in levels of public funding, where essential to deliver the required affordable housing.

The SHLAA demonstrated that there are a low number of brownfield sites suitable and available for new housing. If the few suitable housing sites are not used to provide local needs housing then it will put pressure on other sites outside allocated sites that have the potential to harm the wider landscape, proliferate private sewerage systems and make the delivery of planned infrastructure improvements on existing public networks, less viable in the long-term. The plan has a target to meet the 'need' element only of the housing needs of the islands' community. The approach of providing housing to meet local needs therefore has to be based on delivering those sites, identified as sustainable and identified as most suitable. Windfall housing will continue to be supported as this has clearly been the primary route for housing delivery on the islands in the last 5 years. This approach will ensure housing is located in the most suitable and least intrusive areas, based upon the needs evidence of the applicant.

A Viability Study has also been undertaken to demonstrate various delivery |

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		mechanisms for providing affordable housing in the Isles of Scilly.
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15	The SHLAA does identify a range of developable sites on St Mary's, that could come forward, to meet local housing needs, as above, within the first five years and for the proceeding 6-10 years and 11-15 years.
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	• A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47)	The Local Plan seeks to have a 'needs led' housing approach, facilitated by a range of sites identified specifically for affordable housing, as set out above. Due to the complexity of viability issues, single land ownership, the plan does not illustrate expected rate of housing delivery through a trajectory or set out a housing implementation strategy. There is no 5 year housing land supply calculation on the basis that the 2005 local plan did not set a figure for new homes so there is no under-supply to factor in moving forward. MHCLG have confirmed "the data that would inform part of the standard method is unavailable, you may find paragraph 013 of the housing need assessment planning practice guidance helpful. This refers to having the 'best available information on anticipated changes in households as well as local affordability levels' where available

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		data does not allow local housing need to be calculated using the standard method". Whilst it is not possible for MHCLG to endorse our approach given the independent examination required by the SoS this does provide the LPA with sufficient assurance given para 013 states: Where strategic policy-making authority boundaries do not align with local authority boundaries, or data is not available, should the standard method be used to assess local housing need?

Where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, where local authority boundaries have changed due to reorganisation within the last 5 years or local authority areas where the samples are too small, an alternative approach will have to be used. Such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels. |

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Paragraph: 014 Reference ID: 2a-014-201902 https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments I think it is clear that we have taken exactly that approach
Set out the authority's approach to housing density to reflect local circumstances (47).	• Policy on the density of development.	Policy LC1 sets out the need to deliver 105 affordable homes over the plan period, and Policy LC6 set out the housing allocations which give an indication of densities that could be achieved. These are relative densities based on the surrounding development so are provided as minimum figures, based on the finite amount of land the islands have and the need to balance housing needs with the extremely important and heavily designated environment.
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	• Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50)	The evidence for housing provision is provided in the SHMA and the Housing Topic Paper. Policy LC1 provides that the purpose of housing development will only be permitted to address the housing needs of the islands. The plan sets out in Policy LC3 the need to deliver a balanced housing stock and any open market housing will only be permitted where it is essentially

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	• 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. (50)	required to deliver affordable homes. The plan seeks to ensure that in the first instance, where justified as necessary, open market homes would be conditioned to be principal residence homes, unless a harmful or negative impact is demonstrated and pure open market, (unrestricted homes) are justified. The plan seeks to ensure that all new homes contribute towards achieving a balanced housing stock and a sustainable, balanced and inclusive community through the provision of a range of accommodation sizes, types and tenures to meet the needs of all sections of the community.

Policy LC7 relates to windfall housing which includes the delivery of custom/self-build and this will also have to ensure a balance of homes is achieved through an adherence to Policy LC3. |
| In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).
In rural areas housing should be located where it will enhance or maintain the vitality of rural communities. | • Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs.
• Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)
• Examples of special circumstances to allow new isolated homes listed at para 55. | See above. There is no case made to resist development of residential gardens as this could be a source of development potential on previously developed land. Policy LC7 does seek to restrict isolated new homes and the plan identifies settlement boundaries on ST Mary's as potential suitable locations for windfall development. |

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7. Requiring good design (paras 56-68)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	• Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues	In accordance with the vision of the Plan (pages 29-30) and Policy SS2 (Sustainable Quality Design and Place-Making) development is required to deliver high quality sustainable design that respects and reinforces the character, identity and local distinctiveness of the each area and island. Policy OE1 (Protecting and Enhancing Landscape and Seascape) requires development to preserve and, where appropriate, enhance the islands' landscape, seascape and scenic beauty.
8. Promoting healthy communities (paras 69-77)		
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).	• Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)	The spatial strategy (page 34) seeks to set out that new homes should be located in the already built up and sustainable locations of Hugh Town and Old Town, to encourage alternative means of movement to private car ownership. Policy SS2 (sustainable quality design and place making) also requires the promotion of physical activity by (h) incorporating Sport England Active Design principles into new development, where appropriate. It also requires developments to (j) build-in 'safer

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		by design to reduce actual or perceived opportunities for crime.

In relation to the promotion of new community facilities then Policy SS4 (Protection of Retailing, Recreation and Community Facilities) seeks to protect the existing recreation and community facilities. |
| Policies should plan positively for the provision and use of shared space, community facilities and other local services (70). | • Inclusion of a policy or policies addressing community facilities and local service.
• Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure. | Policy SS4 (Protection of Retailing, Recreation and Community Facilities) seeks ensure new community facilities, can come forward over the plan period, as well as seeking to resist the loss of shops and services, which support a sustainable community. Policy OE1 seeks to protect valued landscapes and seascapes and Policy SS2 (sustainable quality design and place making) also requires (b) development to take into consideration the impact upon important views and key landmark buildings including significant cultural and heritage features.

Windfall Housing (Policy LC7) requires new homes, outside of allocated housing sites, to be well related to existing built-up areas. |
| Identify specific needs and quantitative or qualitative deficits or surpluses of open space, | • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) | Policy SS4 (Protection of Retailing, Recreation and Community Facilities) seeks to protect the existing recreation and |

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
sports and recreational facilities; and set locally derived standards to provide these (73).	• A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75)	community facilities. There is no identified need for further recreational facilities over the plan period, on the basis of an assessment of current open spaces, relative to the size of the population as assessed in the Full Council Report of 02/10/2018: http://committees.scilly.gov.uk/documents /g1081/Public%20reports%20pack%2002n d-Oct-2018%2009.30%20FULL%20COUNCIL.pdf?T =10 (agenda item 10) which identifies around 69 square metres of recreation space per head of population. There are no Public Rights of Way on the Isles of Scilly but the Duchy of Cornwall allow many permissive footpaths for the public to use. All options to encourage walking and green infrastructure links are encouraged to promote walking opportunities.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)	Policy SS2 (Sustainable Quality Design and Place-Making) requires development to provide high-quality…public spaces including recreational facilities and green infrastructure where appropriate. The plan does not designate local green spaces due to the significant amount of public open space and permissive

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		footpaths and landscapes. Policy OE1 seeks to ensure that the important landscape and seascape character is maintained over the plan period. There are currently no plans to progress smaller neighbourhood plans due to the small scale of the Isles of Scilly and there is no intention to designate green belt land due the rural nature of the existing landscape, which remains open and is not dominated by urban sprawl.
8. Protecting Green Belt land (paras 79-92)		

Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)
 	
Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)
 	
When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)
	• Where Green Belt policies are included, these should reflect the need to:
	  o Enhance the beneficial use of the Green Belt. (81)
	  o Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)
	  o Specify that inappropriate development should not be approved except in very special circumstances. (87)
	  o Specify the exceptions to inappropriate development (89-90)
	  o Identify where very special circumstances might apply to renewable energy development. (91)
		n/a

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)		
9. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)	• Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy . (95))	The Sustainable Energy Strategy (2007) set out a range of responses to climate change, including managing flood risk and coastal change. Policy SS1 (Principles of Sustainable Development) seeks to encourage climate change mitigation and adaptation measures and to direct development away from areas at risk of flooding and encourages land management that reduces food risk. More specifically Policy SS1 seeks to promote the use of the energy hierarchy, to encourage measures that ensure sustainable and efficient water supplies and reduce the demand for water including through water conservation. Policy SS1 is supported by Policy SS7 on flood risk and a the Local Flood Risk Management Strategy (2017) which has taken into account tidal, and surface water flood risk and the implications of climate change.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Policy SS7 aims to respond to coastal change through avoiding development in low-lying areas of the islands, unless supported by a flood risk assessment and to promote a precautionary approach to development. Policy SS6 (Water and Waste Water Management) provides that development proposals should demonstrate how water conservation measures will be incorporated in proposals and how demand for water will be minimised. Policy SS1 Principles of Sustainable Development provides that proposals for new development should demonstrate that they will incorporate sustainable construction methods that promote the sustainable use of resources, reduce carbon emissions, future proof against climate change impacts and provide adequate storage for recycling waste.
Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)	• A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low	Policy CC-S5 provides a criteria based approach for small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	carbon supply systems and for co-locating potential heat customers and suppliers. (97)	Policy SS8 (Renewable Energy Developments) provides further detail on renewable energy developments. On the basis that the Written Ministerial Statement (WMS) requires a full assessment, identifying sites for on-shore wind turbines the policy does not include provision for wind energy development. The pre-amble to this policy clarifies that as there is no specific assessment for wind energy development due to the potential harm such a development could have in such an intimate landscape. Should such a renewable energy scheme become apparent over the plan period then this would need to be full assessed when the plan is reviewed within 5 years following adoption.
Minimise vulnerability to climate change and manage the risk of flooding (99)	• Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures	The Environment Agency (EA) do not cover the Isles of Scilly and as such the basis of Strategic Flood Risk Assessment (SFRA), which is the EA Flood Maps are not currently available for the islands. A SFRA therefore has not been carried out in support of the plan. Policy SS7 is informed by the Local Flood Risk Management Plan (2017) and the Shoreline Management Plan. Policy SS7 provides that proposals to adapt to the consequences of climate change will be encouraged by avoiding

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		development at risk of flooding and coastal erosion; improving the resilience of development, essential services and infrastructure to cope with changes in climate.
Take account of marine planning (105)	• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation • Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development • Integrate as appropriate marine policy objectives into emerging policy • Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS	
Manage risk from coastal change (106)	• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.	
10. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.	Policy OE1 seeks to ensure development will only be permitted where it aligns with the statutory purpose of Areas of Outstanding Natural Beauty (AONB), and

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	• 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.	therefore conserves, and where appropriate, enhances the islands' landscape, seascape and scenic beauty; Policy SS1 provides that development should promote the value of biodiversity, geodiversity and soils, including the potential contribution from natural capital and ecosystem services. The islands have not been classed in terms of the bestand most versatile agricultural land (Grades 1, 2 and 3a), although the plan would seek to protect land that is known to be important for economic purposes of agriculture and horticulture purposes. Policy OE2 Biodiversity and Geodiversity, provides for the conservation and enhancement of wildlife, habitats and sites of geological interest. It seeks to enhance biodiversity. Policy SS2 (e) seeks to encourage the creation of multi-functional green infrastructure. The plan promotes measures to enhance biodiversity, through enhancement and measurable net-gains to create opportunities for wildlife in new development commensurate with the scale of the proposal and intensity of activity expected. Proposals are encouraged where a range of green infrastructure benefits can be achieved.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Prevent unacceptable risks from pollution and land instability (109)	• Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.	Policy OE3 (Managing Pollution) sets out the Authority's policy on pollution. When considering the impact of development, the various forms of potential pollution including air, soil, water, noise and light, from both individual and cumulative sources will be considered. Applicants should firstly seek to avoid pollution where possible including through using preventative measures. Where pollution cannot be avoided, proposals will be expected to demonstrate that there will be no unacceptable adverse impacts individually or cumulatively on the environment, public health, communities, quality of life, amenity and neighbouring land uses.
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	• Identification and mapping of local ecological networks and geological conservation interests. • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species	Policies maps identify the nature and extent of natural environment designations that exist across the islands. These areas relate to Policy OE2 Biodiversity and Geodiversity which provides for the conservation and enhancement of wildlife, habitats and sites of geological interest. The plan promotes measures to enhance biodiversity, through enhancement and measurable net-gains to create opportunities for wildlife in new development commensurate with the scale

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		of the proposal and intensity of activity expected
11. Conserving and enhancing the historic environment (paras 126-141)		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets • A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)	The policies maps identify the existing historic environment designations including the locally defined archaeological constraint areas. These relate to Policy OE7 (Development affecting Heritage). Aim 1 of the Plan seeks to maintain an outstanding and world-class environment, by ensuring that its distinctive and significant seascape and landscape, heritage and nature conservation assets are protected and valued, and where appropriate, enhanced. Policy OE7 provides for the conservation and enhancement of the local distinctiveness, cultural heritage, and historic environment. The policy states that where development is likely to cause significant harm to or loss of designated heritage assets or assets of national significance, permission will be refused. Adverse impacts on locally important heritage assets are to be avoided. The policy goes on to provide that development proposals should positively reinforce the historic character of the

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		islands' through reflecting the traditional vernacular architecture and enhancing local distinctiveness.
12. Facilitating the sustainable use of minerals (paras 142-149)		
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within 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.	The Local Planning Authority has worked with Cornwall Council under it duty to co-operate. The plan recognises that there are no active minerals quarries on the islands and does not seek to encourage mineral extraction, on the basis of the harm that could arise to both the landscape and through harm to communities and the economy. It is recognised that the importation of materials, including minerals will have to be transported to the islands from the mainland, which would require movement of vehicles for this purpose, through Cornwall. Policy OE6 sets out that the use of local minerals would be encouraged, but that this would be through recycled materials rather than from direct extraction. The monitoring of this policy is considered necessary through the requirement of applicants to produce Site Waste Management Plans to set out where minerals are being sourced from, to build

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		up a picture of local aggregates and where imported materials, in particular are being sourced from. In accordance with policy OE7, with the exception of re-used and recycled materials, the minerals resources required will come from outside of the islands'. The islands have no active quarries and an extensive resource of building stone to meet building needs will need to be imported. The low levels of development proposed over the plan period are unlikely to require future small scale extraction, or have a significant impact upon Cornwall, when compared to the scale of mineral activity within Cornwall. It is not considered necessary to identify minerals safeguarding areas on the basis that there are not currently any active quarries on the islands.
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. To be 'justified' a DPD needs to be: • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives.		
Participation Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI	The Representation Statement sets out the stages of consultation which have briefly comprised of the following: Local Plan Scoping Report on Issues: Jun-Jul 2015:

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		All households and businesses on the islands were written to directly. This promoted the Council's intention to review the 2005 Local Plan and invited public contributions as to the issues the Local Plan should seek to address. All residents were invited to consider being included on the Local Plan Consultation Database. The Consultation included a mailout to all required Statutory Consultees. A total of 114 people came to see us at a series of drop-in sessions, which took place on each of the inhabited islands. A total of 81 written consultation responses were received during this period.

Draft Local Plan including Options: April-May 2018: Extensive community and stakeholder engagement took place over a period of 6 weeks, to enable local communities, young people, individuals, visitors and representatives of other bodies/organisations to participate in shaping the Local Plan for the Isles of Scilly. Again all households and businesses were written to directly to invite participation, all statutory consultees were consulted. A series of drop-in sessions, held on each of the inhabited islands took place where around 115 people came to speak to officers and members, about the plan. A |

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		total of 42 written representations were received. Throughout the preparation of the Local Plan elected Members have been engaged with the local plan preparation. In 2015 the Council re-established a Member Local Plan Working Group, in which all Members were invited to. A series of 11 meetings took place over a 2 year period during 2016-2018, which has helped steer the direction of the plan.
Research / fact finding Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?	• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. AND • Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. OR • A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. OR • For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence	Officers have engaged external environmental consultants to produce the SA/HRA including and SEA and EqIA as well as a full Appropriate Assessment of the Plan under the Habitat Regulations. Enfusion continue to work with the Council on this work leading up to submission and examination of the Local Plan. Other technical studies have included: • Strategic Housing Land Availability (SHLAA) to assess whether any potential sites would be available for housing. This supports the approach taken in allocating sites for affordable homes. • Strategic Housing Market Assessment 2016 (David Couttie

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).	Associates) and 2018 (Understanding Data): this established that there is an Objectively Assessed Need for 120 homes over the plan period, of which 105 equated to the 'need' element to support a sustainable community. The 2018 update focused on the revised standardised method for calculating housing need and concluded that the 'need' element had increased to 115 over the plan period. Both these studies have informed the plan as to how many homes should be supported to come forward over the plan period. • Infrastructure Capacity Assessment 2018 was produced by the Council's infrastructure to inform whether the proposed housing could be supported by the existing infrastructure of the islands in terms of water supplies, sewerage and waste management or whether additional improvements or sites would be required. The assessment concluded that significant improvements had been made over the preceding 3 years in

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		terms of transforming waste management that no further waste sites would be required. The report highlighted significant investments will be made to the islands water and sewerage over the plan period but that the level of development planned for would not impact upon that planned investments. Locating development in Hugh Town and Old Town would enable development to build on the planned investments and improvements to water supplies and public sewerage. • Housing Viability 2018. This assessment found that: o housing development on the Isles of Scilly would not be able to deliver schemes of purely affordable housing without significant levels of grant funding. In order to deliver affordable homes without grant, around 40% to 50% of dwellings will need to be market housing. Local Plan policy LC1 supports the

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		approach of allowing market homes where they enable the delivery of affordable housing. o Schemes maximising the proportion of affordable dwellings can be best delivered as a mix of tenures, with a combination of Affordable Rent, Shared Ownership and open market sale to meet a range of housing needs. o The policy of requiring open market dwellings to be sold to those who will occupy them as their principal residence is supported by the viability analysis. However, it should be noted that, in some cases, this restriction may marginally reduce the number of affordable dwellings delivered. But by optimising the mix of dwelling types and affordable housing tenures, the introduction

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		of principal residence should not impact on the overall level of affordable housing delivered. o Delivery of affordable housing is sensitive to development costs and it will be important that costs are minimised so that the maximum amount of affordable housing can be delivered.
Alternatives Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?	• 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. • Sections of the consultation document demonstrating how options were developed and appraised.	The SA provides an assessment of all the reasonable spatial options that were considered. The Submission SA provides a consideration of the reasonable alternatives, and the SA for the Local Plan Vision, Objectives and General Policies provides a more detailed consideration of the alternatives.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	• 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.	

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

To be 'effective' a DPD needs to:
- Be deliverable
- Demonstrate sound infrastructure delivery planning
- Have no regulatory or national planning barriers to its delivery
- Have delivery partners who are signed up to it
- Be coherent with the strategies of neighbouring authorities
- Demonstrate how the Duty to Co-operate has been fulfilled
- Be flexible
- Be able to be monitored

Deliverable and Coherent • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved?	• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.	At the beginning of each section, the Plan sets out which objectives will be fulfilled by the policies in that section. The indicators set out in the Monitoring Framework will be used to monitor the impact of the policies within each section of the Local Plan. The Framework shows where indicators link to objectives outlined in the Sustainability Appraisal Scoping Report.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	• Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).	
Infrastructure Delivery • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?	• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.	The Infrastructure Capacity Assessment contains the infrastructure implications for the Isles of Scilly. This assessment shows that the level of development during the plan period up to 2030 is not reliant on the provision of any major new infrastructure and does not in itself result in the need for any additional major infrastructure. Rather, the provision of key infrastructure will be enabled on an individual basis through the relevant policies for that particular development as well as through developer contributions and public and private sector funding.
Co-ordinated Planning 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?	• 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	The vision and objectives of the plan are for the islands' as a whole – hence the title of the Plan 'Isles of Scilly Local Plan. The Statement of Community Involvement and the Representation Statement both show the involvement of partners from public, private and voluntary sectors, residents and visitors alike and their expressions of support/representations on the policies of the Plan.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided

Flexibility
• Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?
• Does the DPD include the remedial actions that will be taken if the policies need adjustment?
	• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.
	• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:
	   a. the effectiveness of policies and what evidence is being collected to undertake this
	   b. changes affecting the baseline information and any information on trends on which the DPD is based
	• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances
	• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development 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.
		The Monitoring Framework (P.128) of the Local Plan sets out the approach to Implementation and Monitoring and identifies the indicators that will be used to monitor how the Local Plan is being delivered. The monitoring of the Local Plan will indicate whether parts of the Plan or specific policies will need review.

Co-operation • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?	• 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.	A Statement of Common Ground, with Cornwall Council, has been agreed under the Duty to Co-operate. Due to the remoteness of the islands this covers only the issue of transportation links which both

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
• 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?	• The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.	authorities agree should be protected in Cornwall
Monitoring • 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?	• 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	The approach to Implementation & Monitoring is set out in the section of that name in the Local Plan and includes the monitoring framework which identifies the indicators that will be monitored. This cross-references to the SSA objectives to ensure that the effects of the Local Plan against the SSA will be monitored. No significant adverse effects were identified in the SSA for monitoring. The implementation of the Local Plan will be monitored and reported on annually through the Annual Monitoring Report.

Consistent with national policy: *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?	• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement • Reports or copies of correspondence as to how representations have been considered and dealt with.	The Local Plan complies with national policy but in a number of cases an alternative approach has been taken, reflecting the islands unique status and the specific circumstances in the Isles of Scilly. The model policy on sustainable development is no longer included following determination that the inclusion of this policy is no longer necessary, and would be a repetition of national policy. The approach to housing is set out in the Housing Topic paper. This includes how the Objectively Assessed Need figure for housing was calculated, the decision to allocate sites on a needs-led approach and to identify an permit exceptional market housing, rather than a housing requirement. The Local Plan does not allocate employment land. This approach is set out the 'working community' section of the Plan and is supported by evidence from Islands Futures report: economic strategy.