

Oxford City Council Soundness Self-Assessment Checklist (March 2019)

In summary – the key requirements of plan preparation are:

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- 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 35): “ Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- a) Positively prepared - Providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective - deliverable over the period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – **enabling the delivery of sustainable development in accordance with the policies in this Framework.**

The following table sets out the requirements associated with these four tests of soundness.

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|---|---|
| <p>Positively Prepared:- Providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development (para 35)</p> | | |
| <p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the Local Plan is seeking to address? Have priorities been set so that it is clear what the Local Plan is seeking to achieve?</p> <p>Does the Local Plan contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the Local Plan ?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the Local Plan explain how its key policy objectives will be achieved?</p> | <p>The strengths, challenges and vision for Oxford are set out within the Introduction (page 1-4)</p> <p>The Local Plan vision is linked to the Council’s Oxford Vision 2050.</p> <p>The objectives for each section of the Plan are set out in Chapter 1 (pages 12-20)</p> <p>Page 21 paras 1.71 -173 details how the strategy will be delivered by the provision of infrastructure.</p> | |
| <p>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</p> | <p>Policy S1 (page 7) sets out detail on sustainable development principles.</p> <p>Policy RE1 (page 63) sets out detail on sustainable design and construction and Policy RE2 (page 65) sets out detail on most efficient use of land.</p> | <p>Sustainability Appraisal & Strategic Environmental Assessment (2018)</p> <p>Oxford Low Emissions Strategy 2016-2020 (2013)</p> <p>Oxfordshire 2030: A partnership plan for improving</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|--|--|
| <p>favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p> | | <p>quality of life in Oxfordshire (2008) Oxford Sustainability Index Report 2016 Sustainability Strategy 2011 – 2020 Rising to the Climate Crisis: A guide for Local Authorities on Planning for Climate Change (2018) Sustainable Energy Action Plan 2016 (Updated to Route Map to 2020)</p> |
| <p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 23 of the NPPF (see above).</p> | <p>Chapter 3 Part 1 Meeting Housing Needs (i) The scale of new housing provision (page 33 - 36) and Policy H1 (page 37).</p> | <p>Oxfordshire Strategic Market Assessment (SHMA (2014) Oxford City – Objectively Assessed Need Update (October 2018) Oxford Housing and Economic Land Availability Assessment (HELAA) (November 2017)</p> |
| NPPF PRINCIPLES: DELIVERING SUSTAINABLE DEVELOPMENT | | |
| 5. Delivering a sufficient supply of homes (paras 59 – 66) | | |
| <p>Strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approval which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within the neighbouring areas should also be taken into account in establishing the amount of housing to be planned for (para 60).</p> | <p>Paras 3.8 – 3.12 (pages 35 – 36) set out why Oxford has set a capacity based housing target and goes on to detail how Oxford’s unmet housing need is to be apportioned between the neighbouring districts.</p> <p>Policy H1 (page 37) provides detail on the scale of new housing provision</p> | <p>Housing Trajectory Oxford Housing and Economic Land Availability Assessment (HELAA) (November 2017) Assessing and Meeting Housing Need Background Paper (March 2019) Oxfordshire Strategic Market Assessment (SHMA (2014) Oxford City – Objectively Assessed Need Update (October 2018)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|---|--|
| <p>Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) specific, deliverable sites for years one to five of the plan period, and</p> <p>b) specific, deliverable sites or broad location for growth, for years 6-10 and, where possible, for years 11-15 of the plan (para 67)</p> <p>Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. LPAs should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in the adopted strategic policies, or against their local housing need where the strategic policies are more than 5 years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in plan period) (73)</p> | | |
| <p>The size, type and tenure of housing needed for different groups in the community should be assess and reflected in planning policies (61)</p> | <p>Policies H4 (page 43), H6 (page 45), H7 (page 47), H8 (page 50), H9 (page 51), H10 (page 52), H11 (page 54), H12 (page 54) and H13 (page 56) promote a mix of housing for the needs of different groups.</p> | <p>Houses in Multiple Occupation (HMO), Community Led and Self Build Housing, Student Accommodation, Language Schools and Private Colleges & Accessible and Adaptable Homes Background Papers (March 2019)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|---|--|
| Set out the authority's approach to housing density to reflect local circumstances (122). | Policy RE2 (page 65) promotes the efficient use of land. | Efficient Use of Land Background Paper (March 2019) |
| 6. Building a strong, competitive economy (paras 80-82) | | |
| Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration (81), | <p>The vision and Table 2 (pages 3 and 4) set out economic aspirations for the City.</p> <p>Chapter 2 and policies E1 to E4 inclusive (page 25 – 31) set out to support economic development within the city.</p> | <p>Economy Background Paper (March 2019)</p> <p>Oxford Employment Land Needs Assessment (October 2016)</p> <p>Oxfordshire Strategic Economic Plan (SEP) (March 2017)</p> <p>Local Industrial Strategy (LIS) (December 2018)</p> <p>Oxford Economic Profile (2018)</p> <p>NIC Report – Partnering for Prosperity: A new deal for the Cambridge – Milton Keynes – Oxford Arc (November 2017)</p> |
| Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment (81) | <p>The IDP identifies the infrastructure required to deliver the Local Plan and the delivery of infrastructure.</p> <p>New and enhanced green and blue infrastructure is promoted in Policy G9 (page 84). Policy G1 (page 76) seeks to protect existing Green and Blue Infrastructure network. Policy G8 (page 82) seeks to protect existing green infrastructure features. Policy G7 (page 81) is concerned with other green and open spaces. The Green and Blue Infrastructure Network is defined on the Policies Map.</p> <p>Policy V7 (page 126) seeks to improve access to community infrastructure in particular from new</p> | <p>Infrastructure Delivery Plan (IDP) (March 2019)</p> <p>Oxford Employment Land Needs Assessment (October 2016)</p> <p>Oxfordshire Infrastructure Strategy (OxIS) (November 2017)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|---|--|---|
| | <p>development.</p> <p>Policies DH1 (page 90) promotes good design and place making.</p> | |
| 7. Ensuring the vitality of town centres (paras 85-90) | | |
| <p>Policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation (85)</p> | <p>Chapter 1 – para 1.4 – 1.6</p> <p>Policy V1 (page 116) considers the vitality of centres whilst policy V2 (page 117) seeks to protect shopping frontages with the city centre.</p> | <p>Retail, Leisure and Vibrancy of Centres Background Paper (March 2019)</p> |
| <p>Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least 10 years ahead (85)</p> | <p>Policy V1 (page 116) requires demonstration of compliance with the sequential test.</p> <p>The Policies Map identifies allocated sites for development within the city centre and primary and secondary shopping frontages.</p> | <p>Retail, Leisure and Vibrancy of Centres Background Paper (March 2019)</p> <p>The Policies Map (March 2019)</p> |
| 8. Promoting healthy and safe communities (paras 91-101) | | |
| <p>Policies should aim to achieve healthy, inclusive and safe places which: promote social interaction; are safe and accessible; and enable and support healthy lifestyles (91).</p> | <p>Policy H2 (page 39) seeks to promote mixed housing provision. This is supported by the methodology set out in Appendix 3 (page 237)</p> <p>Policy H4 (page 43) seeks to promote a mix of dwelling sizes to create mixed and balanced communities.</p> <p>Policy H7 (page 47) supports community-led housing and self-build housing.</p> <p>Policy H11 (page 54) supports elderly-persons and specialist and supported living accommodation where it will contribute positively to the creation and maintenance of mixed and balanced communities.</p> | |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|---|---|
| | <p>Policy RE5 (page 70) seeks to promote strong, vibrant and healthy communities and reduce health inequalities.</p> <p>Policy RE7 (page 72) seeks to manage the impact of development.</p> <p>Policy DH1 (page 90) seeks to promote high quality design and place making.</p> | |
| <p>Policies should plan positively for the provision and use of shared space, community facilities and other local services, to provide the social recreational and cultural and services the community needs (92).</p> | <p>Policy V6 (Page 1240 promotes cultural and social activities.</p> <p>Policy V7 (Page 126) promotes provision of appropriate infrastructure, cultural and community facilities.</p> | <p>The Retail and Leisure Study (May 2017)</p> |
| <p>Policies should be based on robust and up to date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision (96).</p> | <p>Policy G1 (page 76) protects the green and blue infrastructure network.</p> <p>Policy G2 (page 77) protects biodiversity and geo-diversity.</p> <p>Policy G4 (page 79) protects allotment sites or plots. Protected allotment sites are also shown on the Policies Map.</p> <p>Policy G5 (page 80) protects outdoor sports facilities and is linked to the evidence base Green Spaces background paper.</p> <p>Policy G7 (page 81) protects other green and open spaces.</p> <p>Protection of important areas of open space and sports fields and facilities formed part of the site assessment methodology.</p> | <p>Green Spaces Background Paper (March 2019)</p> <p>Local Sites of Biodiversity Importance Background Paper (March 2019)</p> <p>The Oxford Green Infrastructure Study (2017)</p> <p>Site Audit Background Paper (March 2019)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|---|--|
| <p>The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect greens areas of particular importance to them. (99-101).</p> | <p>Policy G1 (page 76) protects the green and blue infrastructure network.</p> <p>Policy G2 (page 77) protects biodiversity and geo-diversity.</p> | |
| <p>9. Promoting sustainable transport (paras 102-111)</p> | | |
| <p>Transport issues should be considered from the earliest stage of plan making and development proposals (102)</p> <p>Planning system should manage patterns of growth in support of objectives. Significant development should be focused on locations which are/can be made sustainable, through limiting the need to travel and offering genuine choice of transport modes. Different solutions will vary from rural to urban areas (103)</p> <p>Policies should</p> <ul style="list-style-type: none"> a) support appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other | <p>Policy S1 (page 7) promotes all strands of sustainable development.</p> <p>Policy M1 (page 106) seeks to encourage development that minimises the need to travel and is laid out and designed in a way that priorities access by sustainable modes.</p> <p>Policies M3 (page 111) and M5 (page 114) address vehicular and cycle parking standards respectively. These standards are set out in further detail in Appendix 7 (pages 256 and 257 respectively).</p> <p>Policy RE7 (page 72) seeks to manage the impact of development.</p> <p>Policy G1 (page 76) seeks to protect the existing green and blue infrastructure network. This is also shown on the Policies Map.</p> | <p>Movement and Transportation Background Paper (March 2019)</p> <p>Local Transport Plan 4: <i>Connecting Oxfordshire</i> (2015-2016)</p> <p>Oxford Transport Strategy (2016)</p> <p>Site Audit Background Paper and Site Assessments (March 2019)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|---|---|-------------------|
| <p>facilities.</p> <p>b) Be prepared with the active involvement of local highways authorities, other transport infrastructure providers + operators + neighbouring councils, so that strategies + investments for supporting sustainable transport + development patterns are aligned</p> <p>c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.</p> <p>d) Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (104)</p> <p>The setting of car parking standards should take into account the accessibility of the development; the type mix and use of development, the availability of and opportunities for public transport , local car ownership levels and the need to ensure adequate provision for spaces for plug-in/ultra low-emissions vehicles (105-106)</p> <p>Appropriate Opportunities to promote sustainable transport modes can be - or have been given the type of development and its location(108)</p> <p>Applications should allow for the efficient delivery of goods, and access by service and</p> | <p>Joint work with the County Council has been undertaken to assess existing connectivity and opportunities to improve walking and cycling opportunities. For areas of change and site allocations (Chapter 9, pages 129 – 219) icons have been added to individual site allocation policies where it has been identified that there are opportunities to improve walking and cycling or where there is opportunity to enhance pedestrian and cycle links to the future Eastern Arc Rapid Transit (EART) station.</p> <p>Site Assessment Methodology included an assessment of the sites’ accessibility by walking, cycling and public transport.</p> <ul style="list-style-type: none"> ● Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. ● Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. ● A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. ● Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. ● If local (car parking) standards have been | |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|---|---|---|
| <p>emergency vehicles (110)</p> <p>All developments that will generate significant amounts of movement should be required to provide a travel plan, + the application should be supported by a transport statement or assessment so the likely impacts of the proposal can be assessed. (111)</p> | <p>prepared, are they justified and necessary? (39)</p> <ul style="list-style-type: none"> • Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan. | |
| 10. Supporting high quality communications (paras 112-116) | | |
| <p>Support the expansion of the electronic communications networks, including Next generation mobiles technology (such as 5G) and full fibre broadband connections (112)</p> <p>Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development or insist on minimum distances between new electronic telecommunications development and existing development. (114)</p> | <p>Policy V8 (page 127) is concerned with the capacity of utility providers.</p> | <p>Infrastructure Development Plan (2019)</p> <p>Oxfordshire Infrastructure Strategy (OxIS) (November 2017)</p> |
| 11. Making effective use of land (paras 117-123) | | |
| <p>Recognise that some undeveloped land can perform many functions (118)</p> <p>LPA's should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs including suitable sites on Brownfield registers (119)</p> <p>Set out the authority's approach to housing density to reflect local circumstances (122).</p> | <p>Policy G1 (page 76) seeks to protect the existing green and blue infrastructure network. This is also shown on the Proposals Map.</p> <p>Para 4.8 (page 64) refers to Brownfield registers.</p> <p>Policy RE2 (page 65) promotes the efficient use of land.</p> | <p>Oxford Green Infrastructure Study (2017)</p> <p>Efficient Use of Land Background Paper (March 2019)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|---|---|---|
| 12. Achieving Well Designed Places (paras 124-132) | | |
| <p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area.</p> <p>Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development (58 125).</p> | <p>Policy H14 (page 57), H15 (page 58) and H16 (page 60) seek to increase the quality of development.</p> <p>Policy RE1 (page 63) seeks to ensure that sustainable design and construction principles have been considered.</p> <p>Policy RE7 (page 72) seeks to manage the impact of development.</p> <p>Policy G6 (page 81) is designed to strike a balance between the contribution of gardens to the local character, and the need to ensure that suitable land can be used for well-designed residential development.</p> <p>Policy DH1 (page 90) seeks to ensure high quality design and good placemaking.</p> <p>Individual site allocation policies also consider individual site design consideration where necessary (through the use of icons and/or text).</p> <ul style="list-style-type: none"> • Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues | <p>Efficient Use of Land Background Paper (March 2019)</p> <p>Site Audit Background Paper (March 2019)</p> <p>High Buildings Study (October 2018)</p> |
| 13. Protecting Green Belt land (paras 133-147) | | |
| <p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for</p> | <p>Policy G3 (page 78) protects the green belt. The green belt boundary is defined on the Policies Map.</p> | <p>Oxford Green Belt Review background paper (March 2019)</p> <p>Oxford City Green Belt Study (May 2017)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|---|--|
| <p>outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (142)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. (138)</p> <p>Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent (139)</p> | | <p>Identification of opportunities to enhance the beneficial use of the Green Belt Land (September 2018)</p> <p>Policies Map (March 2019)</p> |
| <p>14. Meeting the challenge of climate change, flooding and coastal change (paras 148-169)</p> | | |
| <p>Plans should take a proactive approach to mitigating and adapting to climate change taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscape, and the risk of overheating from rising temperatures (149)</p> | <p>Policy S1 (page 7) promotes all strands of sustainable development.</p> <p>Policy RE1 (page 63) promotes sustainable design and construction.</p> <p>Policy RE3 (page 67) addresses flood risk</p> <p>Policy RE4 (page 68) addresses sustainable drainage, surface and groundwater flow.</p> <p>Policy RE7 (page 72) addresses managing the impact of development.</p> <p>Site Assessment Methodology included an assessment of flood risk.</p> <p>Site allocations have taken into account water supply and demand.</p> | <p>Carbon Related Issues, Climate Change and Fuel Poverty background paper.</p> <p>Flood Risk and Sequential Test of Sites background paper</p> <p>Floodzone 3b Assessment Methodology background paper.</p> <p>Enhanced Water Efficiency Building Regulations</p> <p>Site Audit background paper and Site Assessments</p> <p>Oxford City Strategic Flood Risk Assessment Level 1 (November 2017)</p> <p>Oxford City Strategic Flood Risk Assessment Level 1 (July 2018)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|---|---|---|
| | | Oxford City Council SUDS Design and Evaluation Guide (2018) |
| Help increase the use and supply of renewable and low carbon energy and heat through a positive strategy, that maximises the potential for suitable development, and identify opportunities for development to draw its energy from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers (151) | Policy RE1 (page 63) promotes sustainable design and construction. | Carbon, Climate Change, and Fuel Poverty background paper (March 2019) |
| All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – as to avoid, where possible, flood risk to people and property (157) | <p>Policy S1 (page 7) promotes all strands of sustainable development.</p> <p>Policy RE1 (page 63) promotes sustainable design and construction.</p> <p>Policy RE3 (page 67) addresses flood risk</p> <p>Flood risk assessment was considered as part of the site assessment methodology.</p> | <p>Carbon, Climate Change, and Fuel Poverty background paper (March 2019)</p> <p>Flood Risk and Sequential Test of Sites background paper (March 2019)</p> <p>Floodzone 3b Assessment Methodology background paper (March 2019)</p> <p>Enhanced Water Efficiency Building Regulations Site Audit background paper and Site Assessments (March 2019)</p> |
| 15. Conserving and enhancing the natural environment (paras 170-183) | | |
| Protect and enhance valued landscapes (170) | <p>Policy G1 (page 76) protects the green and blue infrastructure network.</p> <p>Policy G2 (page 77) protects biodiversity and geo-diversity.</p> | <p>Green Spaces Background Paper (March 2019)</p> <p>Local Sites of Biodiversity Importance background paper (March 2019)</p> <p>Oxford Green Infrastructure Study (2017)</p> <p>Technical Advice Note – Biodiversity (March 2019)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|--|--|
| Prevent unacceptable risks from pollution and land instability (170) | <p>Policy RE6 (page 71) addresses air quality</p> <p>Policy RE9 (page 74) addresses land quality</p> <p>Individual site allocation policies include detail on potentially contaminated sites and sites that have the potential to raise air quality concerns through the inclusion of an icon.</p> | <p>Site Audit background paper and Site Assessments (March 2019)</p> <p>Technical Advice Note – Air Quality Planning Application Guidance (March 2019)</p> |
| Planning policies should enhance and protect biodiversity and geodiversity (174) | <p>Policy G1 (page 76) protects the green and blue infrastructure network. These are also identified on the Policies Map.</p> <p>Policy G2 (page 77) protects biodiversity and geodiversity.</p> <p>Site assessments included consideration of the biological/geological importance of the site.</p> <p>Biodiversity formed part of the sustainability appraisal assessment.</p> | <p>Local Sites of Biodiversity Importance background paper (March 2019)</p> <p>Site Assessments</p> <p>HRA (September 2018)</p> <p>SA/SEA (September 2018).</p> <p>Policies Map (March 2019)</p> |
| 16. Conserving and enhancing the historic environment (paras 184-202) | | |
| Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (185) | <p>Policy DH2 (page 93) protects views and building heights.</p> <p>Policy DH3 (page 95) protects designated heritage assets.</p> <p>Policy DH4 (page 98) protects archaeological remains.</p> <p>Policy DH5 (page 100) protects local heritage assets</p> <p>Site assessments included consideration of heritage assets within or within close proximity to</p> | <p>Site Assessments</p> <p>Policies Map (March 2019)</p> <p>High Buildings TAN (October 2018)</p> <p>View Cones Assessment 2015 (January 2015)</p> <p>Oxford Heritage Assets Register (OHAR) (2012)</p> <p>Oxford Character Appraisal Toolkit Guidance Note (2009)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|---|-------------------------------|
| | <p>the site.</p> <p>The Policies Map includes details of view cones, historic core area, conservation areas and the city centre archaeological area.</p> | |
| <p>Justified: <i>The plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence (para 35).</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. | | |
| <p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p> | <p>The consultation statement demonstrates how planning officers have taken account of the public feedback to the preferred options as received during the Regulation 18 consultation, and how the proposed submission draft was shaped in response. It covers:</p> <ul style="list-style-type: none"> (i) An overview of the Proposed Submission Draft consultation, including which bodies and persons were invited to make representations, how they were consulted, how many comments were received, a summary of the main issues raised and responses by officers to these issues with proposed actions as appropriate; (ii) An overview of the Preferred Options consultation, including which bodies and persons were invited to make representation and how they were | <p>Consultation Statement</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|---|--|
| | <p>consulted;</p> <p>(iii) A summary of the received responses to the preferred options; and,</p> <p>(iv) A demonstration of how the proposed submission draft has been shaped in response to the public feedback.</p> | |
| <p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p> | <p>The plan is supported by a sound, credible and up to date evidence base which is listed in the Examination Library.</p> <p>The studies, reports and technical papers that provide the evidence for the policies are set out in the Local Plan.</p> | <p>Oxford Local Plan Examination Library Document List (March 2019).</p> |
| <p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p> | <p>Reports and consultation documents produced in the early stages of the Plan process set out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives.</p> | <p>Preferred Options 2017</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|--|--|
| <p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground (para 35)</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored | | |
| <p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the Local Plan? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the Local Plan explain how its key policy objectives will be achieved? | <ul style="list-style-type: none"> • The Spatial Strategy (Chapter 1 of the Plan (p7)) sets out how each chapter of the Plan meets links back to the plan objectives. This approach provides clear linkages between the policies (contained with the chapters) and the vision and objectives. • Housing delivery is addressed in chapter 3(p33) which clearly sets out the scale of housing need, the housing trajectory, as well as the scale of provision of housing and how Oxford's unmet housing need is being met through joint working with the neighbouring district councils. The Areas of Change and Site Allocations Chapter (p129) sets out all of the housing and employment allocations within Oxford. • The policies of the plan are internally consistent and support each other to deliver the plan's strategy. This is set out in the Spatial Strategy (p7) | <p>Sustainability Appraisal</p> <p>Housing and Employment Land Availability Assessment (HELAA)</p> <p>Housing Background Paper</p> <p>Duty to Co-operate Statement</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|---|--|
| | <p>which clearly shows how each section relates to the other sections and to the objectives.</p> <ul style="list-style-type: none"> • The SA sets out a comprehensive list of the plans and programmes that have been taken into account in the preparation of the Oxford Local Plan 2036 • The Duty to Co-operate Statement sets out alongside the Statements of Common Ground the relevant agencies support the objectives and means of delivery set out in the plan. | |
| <p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? | <ul style="list-style-type: none"> • Policy S2 of the Plan and paragraphs 1.71-1.74 set out how the strategy will be delivered. The Site Allocations policies (Chapter 9, page 129) individually refer to where key infrastructure upgrades may be required, e.g., water and wastewater infrastructure. • The Infrastructure Delivery Plan (IDP) sets out the delivery schedule for infrastructure associated with the plan. • Part II of Chapter 8 of the plan sets out the infrastructure needs of the plan. This is located on page 125 of the plan. • The Statements of Common Ground and Duty to co-operate statement sets out how the infrastructure providers have been engaged in the process. This is also reflected in the IDP. Infrastructure providers, including the Highways Authority, Highways England and the Environment Agency have set out their support through statements of common ground. The Plan makes reference to the requirements of the infrastructure providers, for instance Thames | <p>Infrastructure Delivery Plan Viability Study Statements of Common Ground Duty to Co-operate Statement (2019) Infrastructure Development Plan (2019)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|---|---|
| | <p>Water's requirements are set out through the reference in relevant site allocations policies.</p> <ul style="list-style-type: none"> The viability study sets out that the plan is viable, particularly in terms of its viability in relation to affordable housing and CIL contributions. | |
| <p><i>Co-ordinated Planning</i></p> <p>Does the Local Plan reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p> | <ul style="list-style-type: none"> Chapter 1 (page 7) sets out the plan's strategy and how the strategy is applied spatially. The Areas of Change (pages 131-160) give a locational dimension the application of the strategy. Page 36 sets out how Oxford's unmet need is being managed through its apportionment to the surrounding districts. Chapter 5 (page 75) provides for a Green Infrastructure Network which an example of a suite of policies which seek to pull together different policy objectives The statements of common ground/ Duty to co-operate statement/ consultation statement sets out expressions of support and representations from bodies responsible for other strategies affecting the area | <p>Duty to Co-operate Statement (2019)</p> <p>Examination Library</p> <p>Green Infrastructure Study (2017)</p> <p>Statements of Common Ground</p> |
| <p><i>Flexibility</i></p> <ul style="list-style-type: none"> Is the Local Plan flexible enough to respond to a variety of, or unexpected changes in, circumstances? Does the Local Plan include the remedial actions that will be taken if the policies need adjustment? | <ul style="list-style-type: none"> Plan to be reviewed in line with the legal requirements The Monitoring Framework (p260) sets out how the plan policies will be monitored. The framework includes both indicators and targets and how the information to monitor the plan will be sourced. The spatial application of the strategy (page8) and the site allocations and Areas of Change Policies (page129) demonstrate a flexible approach to the site allocations. The plan's site allocation policies | <p>Examination Library</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|---|---|--|
| | <p>are unrestrictive (in terms of numbers they are not specific). This forms the basis of the Plan's capacity-based approach. Policy H1 (p37) promotes an efficient use of use of land/ sites.</p> | |
| <p><i>Co-operation</i></p> <ul style="list-style-type: none"> • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? • Is it clear who is intended to implement each part of the Local Plan? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? | <ul style="list-style-type: none"> • An record of the extensive programme of co-operation that exists in Oxfordshire has been evidenced within the Duty to Co-operate Statement, Statements of Common Ground and the Examination Library. | <p>Duty to Co-operate Statement (2019) Statements of Common Ground Examination Library</p> |
| <p><i>Monitoring</i></p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? | <p>Housing Trajectory (page 35)</p> <p>Monitoring Framework (page 260 & 261) includes reference to the AMR.</p> <p>Monitoring Framework: Policies (page 262 – 275)</p> <p>Monitoring Framework: Sites (page 276 -287 inclusive)</p> <p>Sustainability Appraisal Report – Chapter 9 (page 90) sets out measures to monitor significant effects of implementing the Local Plan.</p> | <p>HELAA (2017)</p> <p>Annual Monitoring Report (AMR) (2018)</p> <p>Sustainability Appraisal Report (2018)</p> |

| Soundness Test and Key Requirements | Referenced in Local Plan | Evidence Provided |
|--|--|---|
| <p>Consistent with national policy: <i>the plan should enable the delivery of sustainable development in accordance with the policies in the Framework (para 35).</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p> | | |
| <ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? | <ul style="list-style-type: none"> • Policy H2 (ii) (Page 39) Affordable homes through financial contributions from smaller sites is not consistent with national policy. • Policy RE3 is not consistent with national policy in relation to development in flood zone 3B. • Associated site allocations in relation to Policy RE3 (chapter 9 of the Plan). | <p>Affordable Housing Background Paper</p> <p>Statement of Common Ground with Environment Agency.</p> |