

# Wiltshire and Swindon Aggregate Minerals Site Allocations Plan

## Soundness Self Assessment

Background Paper

June 2012

# Wiltshire & Swindon Minerals Site Allocations Local Plan – Soundness Self Assessment, June 2012

## Soundness tool

This Soundness Self Assessment should be considered alongside the NPPF Conformity Checklist for the Minerals Site Allocations Local Plan that the councils submitted to the Planning Inspectorate on the 31/5/12.

Key question	Possible evidence	Evidence provided
<b>Justified</b>		
<b>Participation</b>		
1. Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement	In the opinion of the councils, the process of preparing the Wiltshire and Swindon Minerals Site Allocations Local Plan <sup>1</sup> has been inclusive and designed to meet the requirements of national policy and commitments laid out in the councils' adopted Statements of Community Involvement (SCI).
<b>Research/ fact finding</b>		
2. Is the content of the development plan document justified by the evidence? 3. What is the source of the evidence? 4. How up to date and convincing is it?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals</li> <li>ii. Sections of the pre-submission proposals documents</li> <li>iii. Sections of the preferred strategy report</li> <li>iv. Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document</li> <li>v. Sections of the consultation statement</li> </ul> <p>OR</p> <p>A very brief statement of how the main findings of consultation support the policies, with reference to:</p> <ul style="list-style-type: none"> <li>o reports to the council on the issues raised during participation, covering both the front-loading and formulation phases</li> </ul>	<p>In the opinion of the councils, the Local Plan is justified by evidence and higher-order adopted minerals policies (CPP/54 – Minerals Core Strategy DPD).</p> <p>The Local Plan sets out a flexible framework of sites for minerals development to meet a locally derived forecast provision figure for sand and gravel production over the period to 2026. The starting point for our evidence is the adopted Minerals Core Strategy position, which in turn, took its lead from the draft RSS policies and forecasts of mineral supply and requirements for the period up to 2026. <b>Although the status of the draft RSS has recently changed (i.e. the proposed revocation), the councils have been</b></p>

<sup>1</sup> Until the publication of the 2012 plan making regulations, the Wiltshire and Swindon Aggregates Minerals plan was referred to as a "Development Plan Document" (DPD).

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Key question	Possible evidence	Evidence provided
	<ul style="list-style-type: none"> <li>○ any other information on community views and preferences</li> <li>vi. The studies, reports and technical papers that provide the evidence for the policies set out in the development plan document. The date of preparation and who they were produced by should be signposted</li> </ul> <p>OR</p> <p>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the development plan document)</p>	<p><b>advised to continue to rely upon the evidence that was developed to support the regional policy position as a material consideration until such time as the draft RSS is fully revoked.</b> The National Planning Policy Framework (NPPF) promotes an approach whereby the average of the last ten years sales data should be used to inform a local aggregates assessment of available resource when MPA's come to determine suitable provision figures to plan for.</p> <p>Alongside an ongoing assessment of the ten year average sales data (currently standing at 1.1 million tonnes per annum for sand and gravel), the challenge of identifying sites for future mineral development has not been easy. The councils have undertaken a comprehensive assessment of all possible site options and have made important and difficult decisions throughout the plan preparation process. The remaining sites are considered to offer the best opportunity for: a) the market in terms of supply/demand; and b) the councils in terms of location. Furthermore, the identification of a locally derived forecast provision figure of 1.2 million tonnes of sand and gravel per annum offers suitable flexibility should market conditions dictate/improve.</p> <p>The Local Plan has been prepared in an open and inclusive manner. All consultation and engagement activity has been widely publicised; and the plan has certainly benefitted from the comments and advice received. However, as set out above, difficult professional and political decisions have had to be made to ensure that the submitted Local Plan presents the best and most suitable site options for future minerals</p>

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Key question	Possible evidence	Evidence provided
		<p>development.</p> <p>Much of the objection to the plan relates to a general perception that mineral operations should not be located near communities. However, as minerals can only be worked where they exist, objections such as those submitted are not easy to reconcile. The councils have explored all reasonable options for minerals development from within the identified Mineral Resource Zones. In addition, the site assessments and SA/SEA processes have appropriately considered potential impacts / effects (direct, indirect and cumulative) on residential amenity / commercial properties. The importance of mineral supplies to the functionality of a successful and sustainable economy is vital. Local communities appear to accept a need for housing, employment and infrastructure (all requiring minerals / mineral products), but still appears unwilling to accept that operations for the winning and working of mineral can only occur where the mineral is located and this can often be in proximity to communities.</p> <ul style="list-style-type: none"> <li>• MIN/04 – Regulation 22 Statement</li> <li>• MIN/32 - Regulation 27 Statement</li> <li>• MIN/12/13/14/15/16/17/18 – Minerals Detailed Site Assessments</li> <li>• MIN/19/20 – Site Hydrological Assessments</li> <li>• MIN/22 – Summary of minerals site appraisals matrices</li> <li>• MIN/23 – Site selection and site appraisal methodology</li> <li>• MIN/30 – Minerals and Waste Evidence Base Part A: Spatial Context</li> <li>• MIN/31 – Evidence Base Part C: Minerals</li> </ul>

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Key question	Possible evidence	Evidence provided
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>i. Sections of the development plan documents setting out the assumptions</p> <p>ii. Sections of the sustainability appraisal report setting out the assumptions</p> <p>iii. A very brief statement for each assumption as to how the evidence led to the assumption</p> <p>iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions</p>	<p>The basic assumptions that had to be made relate to the councils' confidence in the evidential report on Wiltshire and Swindon's remaining sand and gravel resources provided by the British Geological Survey. This work presented estimated resource yields of the site options considered throughout the plan making process. Furthermore, the councils have relied on sales and reserve figures presented by mineral operators working quarries in the plan area. This evidence has been used to qualify the councils' understanding of current production figures and remaining reserves which, in turn, underpin the councils' landbank and locally derived forecast provision calculations.</p> <p>Taking the legislative and higher-order policy (e.g. NPPF, draft RSS, adopted Minerals Core Strategy) imperative, the councils are confident that the submitted Local Plan represents the best approach to addressing Wiltshire and Swindon's long-term supply of sand and gravel.</p> <ul style="list-style-type: none"> <li>• SUS/22/23 – Pre-submission SA Reports</li> <li>• SUS/29 – Submission SA Report Addendum</li> <li>• MIN/12/13/14/15/16/17/18 – Minerals Detailed Site Assessments</li> <li>• MIN/19/20 – Site Hydrological Assessments</li> <li>• MIN/22 – Summary of minerals site appraisals matrices</li> <li>• MIN/23 – Site selection and site appraisal methodology</li> </ul>
<b>Alternatives</b>		
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives</p>	<p>i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options</p> <p>ii. Documents used in community involvement with stakeholders and communities encouraging them to</p>	<p>At a fundamental level, the approach set out within the Local Plan presents a clear choice made by the councils to take the difficult decisions that accompany the identification of sites. By far the simplest method would have</p>

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Key question	Possible evidence	Evidence provided
<p>been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>identify the issues and options they wished to see considered</p> <p>iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised</p> <p>iv. Sections of the preferred strategy report explaining:</p> <ul style="list-style-type: none"> <li>• how alternatives were developed and evaluated, and</li> <li>• why alternatives were rejected in favour of the preferred strategy</li> </ul> <p>v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed</p> <p>vi. Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document</p> <p>vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions</p> <p>viii. Sections of the representations statement</p> <p>OR</p> <p>A brief statement of the influence upon decisions of: the issues raised during stakeholder and community engagement, and how they have been addressed</p> <p>ix. Any other documentation showing how alternatives were developed and evaluated</p> <p>x. A very brief statement and any other supporting documentation of the way decisions have been taken</p>	<p>been to present criteria based policy approach that merely directed how proposals for new mineral sites should be determined. However, the councils did not opt for such an approach and instead followed the policies of the adopted Minerals Core Strategy (Vision, Strategic Objectives, policies MCS1, 1(A), 1(B) and 1(C)) by systematically planning where new sites should be located.</p> <p>The process of identifying potential sites was aided by an iterative SA/SEA process and the councils own Site Appraisal Methodology. Detailed appraisals of individual sites allowed for choices and decisions to be made in terms of the environmental, economic and social impact of all proposed sites. In addition, early engagement (the Minerals Forum, 2005), the various ‘call for sites’ work (2004/2006), initial site identification workshops (2007) and consultation activity (2010, 2011 and 2012) have allowed for local input into the overall approach set out within the Local Plan.</p> <ul style="list-style-type: none"> <li>• SUS/22/23 – Pre-submission SA Reports</li> <li>• SUS/29 – Submission SA Report Addendum</li> <li>• MIN/04 – Regulation 22 Statement</li> <li>• MIN/27 – Wiltshire and Swindon Minerals Development Forum: Final Forum Report</li> <li>• MIN/24 – Report of results of consultation on initial site options</li> <li>• MIN/22 – Summary of minerals site appraisals matrices</li> <li>• MIN/23 – Site selection and site appraisal methodology</li> <li>• MIN/23 – Regulation 27 Statement</li> </ul>
<p>10. Does the sustainability appraisal show how the different options perform and</p>	<p>i. A structure to the development plan document which reports the sustainability appraisal findings in relation</p>	<p>The SA/SEA process has been continuous and challenging. At each stage of preparing the Local Plan, the councils have benefitted from the</p>

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Key question	Possible evidence	Evidence provided
<p>is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>to each policy</p> <ul style="list-style-type: none"> <li>ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings</li> <li>iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies</li> </ul>	<p>advice of the SA/SEA consultants. If needs be, the councils will involve the SA/SEA consultants in the examination to help demonstrate how the plan has evolved through time.</p>
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p><i>Following changes to the Planning System and introduction of the NPPF – The Planning Advisory Service has issued the following advice about the Soundness Self Assessment:</i></p> <p><i>‘For now, please ignore questions 11 and 12 in the ‘soundness’ part of the toolkit. We are planning a comprehensive review of the soundness toolkit that will incorporate any changes introduced by the new government. We will also be using this as an opportunity to simplify and improve the usability of the self-assessment toolkit.’</i></p>	



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Effective		
Deliverable		
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there</li> <li>ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in ‘Policies for spatial plans’ presented as part of the core strategy</li> <li>iii. A core strategy vision which is framed to set out the outcomes which are sought for the future</li> <li>iv. Sections of the development plan document which identify the main issues addressed</li> <li>v. Sections of the development plan document which indicate the priority outcomes</li> </ul>	<p>The Minerals Site Allocations Local Plan is influenced and guided by clearly articulated issues and projected solutions outlined in the councils adopted Minerals Core Strategy (Ref: CPP/54).</p> <p>The councils have identified a need for new minerals sites to sustainably supply the projected demand for mineral within strategic and local markets (Swindon, Chippenham, Trowbridge, Gloucester / Cheltenham, Bath and Bristol). Therefore, the overall priority for the councils is ensuring that there are sufficient and flexible sites allocated in the development plan for mineral development. The submitted Minerals Site Allocations Local Plan seeks to deliver this strategic priority and thereby support the objectives set out within the adopted Minerals Core Strategy.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<ul style="list-style-type: none"> <li>i. Sections of the regional special strategy which identify cross-boundary issues.</li> <li>ii. Sections of the development plan document setting out cross-boundary issues and the response to them</li> <li>iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations</li> <li>iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance</li> </ul>	<p>The councils have ensured that all necessary dialogue with neighbouring authorities has been undertaken throughout the plan preparation process and through consultation exercises and workshops.</p> <p>Officers representing the councils have attended RAWP meetings and been heavily involved in regional planning issues for a number of years. Throughout these meetings and regional working groups, the councils have consistently raised the issues that are addressed through the Minerals Site Allocations Local Plan relating to sub-regional apportionment figures and the move to the identification of a locally derived sand and gravel provision figure for Wiltshire and Swindon.</p>



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		<p>Officers have also attended meetings with neighbouring authorities, such as Gloucestershire, to discuss the implications of the councils' move to a locally derived apportionment figure as promoted through the Local Plan.</p> <ul style="list-style-type: none"> <li>• MIN/05 – Duty to Cooperate Statement</li> <li>• MIN/30 – Minerals and Waste Evidence Base Part A: Spatial Context</li> <li>• MIN/31 – Evidence Base Part C: Minerals</li> </ul>
<p>16. Does the development plan document contain clear objectives?</p>	<ul style="list-style-type: none"> <li>i. A spatial portrait which identifies the key issues facing the area</li> <li>ii. A core strategy vision which is framed to set out the outcomes which are sought for the future</li> <li>iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision</li> </ul>	<p>As outlined above, the submitted Minerals Site Allocations Local Plan takes its lead from the objectives set out within the adopted Minerals Core Strategy DPD (Ref: CPP/54), particularly in respect to the generic criteria for guiding the location of minerals development (policy MCS1(B)). In addition, every effort has been made to reflect higher-order objectives – such as those prescribed through the NPPF (e.g. the provision of a flexible and responsive framework of sites for minerals provision).</p>
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<ul style="list-style-type: none"> <li>i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it</li> <li>ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place</li> </ul>	<p>On both counts – yes. The adopted Minerals Core Strategy sets clear objectives applicable to issues affecting Wiltshire and Swindon. The submitted Minerals Site Allocations Local Plan is an expression of these objectives.</p> <p>As with all policies and proposals, the councils are committed to the principles of <i>plan, monitor and manage</i>. So, all aspects of planning for the needs of Wiltshire and Swindon's communities will be kept under review to ensure development patterns continue to meet local needs.</p> <ul style="list-style-type: none"> <li>• CPP/08 – Wiltshire Community Plan</li> <li>• CPP/12 – Swindon Sustainable Community Strategy</li> <li>• CPP/13 – Sustainable Community Strategy</li> </ul>

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		<p>for Wiltshire</p> <ul style="list-style-type: none"> <li>• CPP/54 – Wiltshire and Swindon Minerals Core Strategy DPD</li> <li>• MIN/30 – Minerals and Waste Evidence Base Part A: Spatial Context</li> </ul>
<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<ul style="list-style-type: none"> <li>i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them</li> <li>ii. Relevant sections of the sustainable community strategy which identify its objectives</li> <li>iii. Confirmation from the local strategic partnership and partner organisations that they believe the policies will achieve the agreed objectives</li> <li>iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed</li> <li>v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.</li> </ul>	<p>As above.</p> <ul style="list-style-type: none"> <li>• MIN/31 – Evidence Base Part C: Minerals</li> </ul>
<p>21. Are there realistic timescales related to the objectives?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives</li> <li>ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery</li> </ul>	<p>The Local Plan is a long-term plan (2026) which determines an appropriate and evidence based list of 7 potential sites to ensure a steady and sustainable supply of mineral.</p> <p>The Local Plan does not aim to state precisely <b>when</b> sites will be developed. In many ways it cannot possibly offer that level of precision. As outlined above, the Local Plan is designed to provide a flexible framework of site specific opportunity to express the strategy set out in higher order policy. All aspects of the Minerals Development Framework will be kept under continuous review to ensure that the councils have the right policies in place to address local circumstances.</p>

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<p>22. Are the policies internally consistent?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent</li> <li>ii. A very brief statement explaining how the council considers its objectives are consistent</li> </ul>	<p>In the opinion of the councils, there are clear links and synergies across the adopted and emerging policy framework for mineral development. These links have been forged from the moment the councils set out their commitment to reviewing the adopted joint Minerals Local Plan of old and laid out their proposals for the preparation of Minerals DPDs/and subsequent current Local Plans.</p> <ul style="list-style-type: none"> <li>• LDS/01 – Wiltshire LDS</li> <li>• LDS/02 – Swindon LDS</li> </ul>
<p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> <li>• is already in another plan</li> <li>• should be logically be in a different plan</li> <li>• should not be in a plan at all?</li> </ul>	<ul style="list-style-type: none"> <li>i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure</li> <li>ii. Representations from the Government Office</li> <li>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</li> </ul>	<p>No, the councils have deliberately ensured that the overall Wiltshire and Swindon Minerals Development Framework is laid out in succession to ensure a 'chain of conformity' from the adopted Minerals Core Strategy downwards into other DPDs/Local Plans. The submitted Minerals Site Allocations Local Plan represents the final element of the current Wiltshire and Swindon Minerals Development Framework.</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that identify the key objectives and how they will be delivered upon</li> <li>ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery</li> <li>iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document</li> </ul>	<p>Yes, the Minerals Site Allocations Local Plan essentially delivers Core Strategy policies MCS1,1(A), 1(B) and 1(C).</p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that show how the development management policies: <ul style="list-style-type: none"> <li>• will help to deliver the strategy</li> </ul> </li> <li>37. derive from, and elaborate on, the objectives and policies of the plan</li> </ul>	<p>Not applicable. The councils have already adopted their Minerals Development Control Policies DPD (September 2009) (Ref: CPP/55).</p>
<p>26. Have the infrastructure</p>	<ul style="list-style-type: none"> <li>i. A section or sections of the development plan</li> </ul>	<p>Yes. The evidence gathered through</p>

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<p>implications of the strategy/policies clearly been identified?</p>	<p>document where infrastructure needs are identified and the proposed solutions put forward</p> <ul style="list-style-type: none"> <li>ii. Representations in respect of infrastructure</li> <li>iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with</li> </ul>	<p>consultation, engagement and site appraisal have, in the opinion of the councils, sufficiently addressed issues of infrastructure connectivity. Where necessary improvements have been identified, the submitted Local Plan presents clear advice to any subsequent developer as to what will need to be addressed through a subsequent planning application process.</p> <p>In addition, the councils have adopted strategic and local policies to ensure that proposals for minerals development fully address issues relating to infrastructure connectivity.</p> <ul style="list-style-type: none"> <li>• MIN/12/13/14/15/16/17/18 – Minerals Detailed Site Assessments</li> <li>• MIN/19/20 – Site Hydrological Assessments</li> <li>• MIN/22 – Summary of minerals site appraisals matrices</li> <li>• MIN/23 – Site selection and site appraisal methodology</li> </ul>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out delivery mechanisms and timescale</li> <li>ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered</li> <li>iii. Research or studies that address matters of delivery and the realistic timescales</li> <li>iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms</li> <li>v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder</li> <li>vi. Correspondence from stakeholders on delivery mechanisms and timescale</li> <li>vii. Reports or copies of correspondence as to how representations on delivery and implementation have</li> </ul>	<p>The Local Plan sets out a clear monitoring framework; and, as with higher-order adopted minerals policies, the councils are committed to ensuring that proposals are brought forward in a timely manner to address supply needs.</p> <p>Without the Site Allocations Local Plan, the councils (and the wider minerals industry) may struggle to bring forward the right sites, in the right place, at the right time to meet changing market demand.</p>

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	been considered and dealt with	
<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<ul style="list-style-type: none"> <li>i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery</li> <li>ii. Representations in respect of infrastructure</li> <li>iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with</li> </ul>	<p>As far as is reasonably practicable – yes (bearing in mind the scope and subject matter of the submitted Local Plan). Detailed aspects of infrastructure connectivity will be matters for subsequent planning applications to address.</p>
<p>29. Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out responsibilities for delivery</li> <li>ii. Correspondence showing how other stakeholders intend to support the delivery of the policies</li> <li>iii. Reports by the council or the relevant stakeholder</li> <li>iv. Representations from stakeholders on implementation</li> <li>v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</li> </ul>	<p>Again, as far as is reasonably practicable – yes.</p>
<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that reflect the plans or strategies of other bodies</li> <li>ii. Expressions of support from bodies responsible for other strategies affecting the area</li> <li>iii. Representations in respect of services provided by other agencies</li> <li>iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation</li> </ul>	<p>Yes. The Minerals Site Allocations Local Plan presents spatial expression of the adopted Minerals Core Strategy Local Plan policies (MCS1(A) and MCS1(B)).</p> <p>Although mineral can only be worked where it exists, the geography of the plan area directly influences the opportunity (scale and location) for all forms of development, including mineral operations. The 3 Areas of Outstanding Natural Beauty and the New Forest National Park tend to restrain development opportunities, leaving a clear belt of land running from Swindon down through the Principal Settlements of Chippenham, Trowbridge and Salisbury where the vast majority of housing, commerce and jobs occurs. The Minerals Core Strategy identifies 5 mineral resource areas (labelled as Minerals</p>

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		<p>Resource Zones) within this belt of land where sand and gravel is located.</p> <p>As prescribed through the Minerals Core Strategy, proposals for new or extended sites for sand and gravel extraction should, where possible, be located within areas found in the 5 Mineral Resource Zones. The Minerals Site Allocations Local Plan adopts this approach to site identification.</p> <p>Links to other plans and strategies are continually being developed (e.g. the emerging Wiltshire Local Plan and the emerging Swindon Local Plan).</p> <ul style="list-style-type: none"> <li>• CPP/54 – Minerals Core Strategy DPD (Policy MCS1)</li> <li>• MIN/30 – Minerals and Waste Evidence Base Part A: Spatial Context</li> </ul>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<ol style="list-style-type: none"> <li>i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them</li> <li>ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</li> </ol>	<p>The Local Plan reflects policy direction from European, national, regional and local sources.</p>
<p><b>Flexible</b></p>		
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<ol style="list-style-type: none"> <li>i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed</li> <li>ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> <li>• the effectiveness of policies and what evidence is being collected to undertake this</li> </ul> </li> </ol>	<p>Yes. The Local Plan has been specifically designed to be flexible and not prescriptive. The needs of society and industry are constantly changing.</p> <p>The plan allows for flexibility to react to any future changes in market conditions by allocating sufficient sites to meet a locally derived apportionment figure for sand and gravel that is set slightly higher than the current 10 year</p>

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	<ul style="list-style-type: none"> <li>• changes affecting the baseline information and any information on trends on which the development plan document is based</li> <li>iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline</li> <li>iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> </ul>	<p>average of supply.</p>
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?</p>	<ul style="list-style-type: none"> <li>i. Sections within the development plan document 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</li> <li>ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> </ul>	<p>Yes. The Minerals Site Allocations Local Plan is geared towards delivering sites located within the Minerals Resource Zones as identified through the Minerals Core Strategy (policy MCS1(A)) and in proximity to key principle markets of demand.</p> <p>The identification of 7 sites, through the plan, for future minerals development in areas that have historically supplied sand and gravel demonstrates that the councils have considered the sustainability benefits of reducing vehicle mileage and locating sites as close as is reasonably practical to key principle markets.</p> <p>Furthermore, the plan allows for flexibility to react to any future changes in market conditions by allocating sufficient sites to meet a locally derived apportionment figure for sand and gravel that is set slightly higher than the current 10 year average of supply.</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<ul style="list-style-type: none"> <li>i. A section of the development plan document which expressly addresses flexibility</li> <li>ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing</li> </ul>	<p>Yes. The Local Plan sets out a monitoring framework which, along with the councils AMR processes will be used to ensure that policies and proposals are keeping abreast of changing circumstances.</p>



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<b>Monitoring</b>		
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>iii. Reference to any other reports or technical documents which contain information on the delivery of policies</li> </ul>	No. Unlike the emerging Local Plans being produced by the councils for wider development needs, the Minerals Site Allocations Local Plan is not rigidly driven by national policy targets for delivery. Monitoring indicators are included within the Minerals Site Allocations Local Plan relating to the delivery of the sites, and specific site restoration proposals, included in the Plan.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal</li> <li>iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators</li> </ul>	As above. The councils will use the AMR process to chart the success / failure of the Minerals Development Framework as a whole. In the broadest sense, the councils will be looking to ensure that sufficient sites are being developed to keep pace with the demand for mineral.
39. Are suitable targets and indicators present (by when, how and by whom)?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories</li> </ul>	As above.
<b>National policy</b>		
40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?  41. If yes, is there a local justification?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy</li> <li>ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy</li> <li>iii. Evidence provided from the sustainability appraisal</li> </ul>	In the opinion of the councils – no.  Although the Minerals Sites Local Plan has been predominantly developed in line with a suite of national planning policy guidance that has now been replaced by the National Planning Policy Framework, the councils consider that the Minerals Sites Local Plan (and the overall

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	<p>(including reference to the sustainability report) and/or from the results of community involvement</p> <ul style="list-style-type: none"> <li>iv. Representations from the Government Office on the preferred strategy or the submitted development plan document</li> <li>v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with</li> </ul>	<p>strategy of the Wiltshire and Swindon Minerals Development Framework) is consistent with the Framework’s presumption in favour of sustainable development and core land use principles.</p> <p>This Soundness Self Assessment should be considered alongside the NPPF Conformity Checklist for the Minerals Site Allocations Local Plan that the councils submitted to the Planning Inspectorate on the 31/5/12.</p>
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons</li> <li>ii. Representations from the Government Office</li> <li>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</li> </ul>	<p>As above.</p>



