



planning advisory service

Stafford Borough Soundness Self-Assessment Checklist (August 2013)

This note was prepared by AMEC 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 has 12 principles through which it 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:

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- 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.
- 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.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>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.</i>		

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<p><i>Vision and Objectives</i></p> <p>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?</p> <p>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?</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 DPD?</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 DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> • 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 	<p>Following and derived from the spatial portrait (The Plan for Stafford Borough- Publication (Submission) Document (A1) Section 2), key issues and challenges are established in Submission Document Section 4. This provides an outline of the key issues that the DPD needs to address over the plan period. From these flow the Plan’s response, in the form firstly of the spatial vision and the key objectives (Section 5). The means of achieving the vision and objectives is then identified firstly in terms of the overall development strategy (Section 6), and then by the area based proposals (Sections 7 and 8), and finally by thematic policies (Sections 9 to 13). The whole Plan has thus been developed to meet the objectives, and thus address the key issues and challenges.</p> <p>The evolution of the objectives and the spatial vision can be identified in particular through the Issues and Options document (G6), Strategic Policy Choices Document (G1), Borough Wide Development Strategy Document(G9) and the Draft Publication Document (G2)</p> <p>Each element of the package of policies and proposals in the Submitted Plan seeks to contribute to the achievement of the objectives, and the delivery of the vision, set in Section 5 of the Submission Plan. The approach is comprehensive, not leaving matters unaddressed, and is logically constructed.</p> <p>Full alternatives concerning the quantum of development and its distribution were considered during the formulation of the Plan. These are considered in detail under the Justification test, below.</p> <p>The Infrastructure Delivery Plan (IDP) (D57 & D58) sets out realistic timetables, costs and means of delivery of the infrastructure required to deliver the Submission DPD. It has been undertaken in partnership with each of the relevant delivery agencies. A detailed list of the infrastructure required for each site is set out in Appendix D- Infrastructure of The Plan for Stafford Borough- Publication (Submission) Document (A1). In addition,</p>

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	<p>showing how they combine to provide a coherent policy structure.</p>	<p>the housing trajectories (Appendix G of The Plan for Stafford Borough-Publication (Submission) Document (A1)) illustrate that an average build rate of 500 dwellings can be sustained over the Plan period. The AMR will monitor housing completions on an annual basis to ensure that the levels are consistent with the apportionment set out in SP4. Where completions are substantially greater than those in SP4, a housing moratorium will be imposed.</p> <p>The Local plan was initiated under the 2007 Local Development Scheme (LDS) (C10) which came into effect on December 2007. This was subsequently revised in 2008 (C9)), 2012 (C8) and 2013 (C7). The 2013 LDS came into effect in August 2013 and provides a timetable for delivery of each DPD and specifies the content of each Development Plan Document.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <p>—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</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<ul style="list-style-type: none"> • 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. 	<p>Sustainable development is the central tenet at the heart of the Submission Document. Spatial Principle 1 of the Plan for Stafford Borough-Publication (Submission) Document (A1) (Page 22) provides the locally specific overarching policy to support the presumption in favour of sustainable development in Stafford Borough.</p> <p>Spatial Principle 1 sets out the key overarching priorities of the NPPF (F1) for sustainable development. To be able to deliver genuinely sustainable, high quality development, planning policies must facilitate development that improves the economic , social and environmental conditions of the area to enable planning officers, applicants and decision takers the tools to effectively shape the form and content of development on the ground.</p> <p>The evolution of the Plan’s proposed quantum of development, preferred overall strategy and plan area distribution of development was set out under the Vision and Objectives section above.</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of</p>	<ul style="list-style-type: none"> • A policy or policies which reflect the principles of the 	<p>Spatial Principle 1 of the Plan for Stafford Borough- Publication</p>

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<p>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 policies that will guide how the presumption should be applied locally.</p>	<p>presumption in favour of sustainable development (see model policy at www.planningportal.)</p>	<p>(Submission) Document (A1) is based upon the recommended model policy, which embodies all these concerns – and achieving sustainable development is a key concern throughout the Plan.</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 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> • 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. 	<p>A number of factors have been taken into account when establishing future housing and employment land requirements for the Borough including household projections and past completion rates, as well as other aspirations such as the Stafford Town growth point and future growth linked to employment. Assessing the feasibility of meeting these needs has taken into account the Infrastructure Delivery Plan (D57 & D58) and the SHLAA (D2) and Employment Land Survey (D14).</p> <p>Background evidence papers will be prepared for the Examination explaining these matters in detail. A separate Duty to Co-operate Statement (B3) explains how cross-boundary matters have been identified and addressed. Wider geographic areas and cross boundary issues have been considered including the impact on regeneration of the north Staffordshire conurbations, in migration from the Black Country, proximity to Cannock Chase Special Area of Conservation and sub-regional logistics and employment sites.</p> <p>The Plan for Stafford Borough- Publication (Submission) Document (A1) includes large-scale urban extensions for Stafford and Stone with an emphasis on integrated housing and community uses, with employment provision.</p>
<p>NPPF Principles: Delivering sustainable development</p>		
<p>1. Building a strong, competitive economy (paras 18-22)</p>		

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<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),</p>	<ul style="list-style-type: none"> • Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy and LEP Strategy where appropriate. 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) sets an overarching vision (page 17) to promote economic growth and sustainable development. The central tenets of the vision are then articulated through key objectives (page 19) and Spatial Principle SP5 (page 31) and Spatial Principle SP6 (page 32), which provide positive support for new employment development. Of particular relevance are policies E1 (page 74) and E2 (page 75) which support the development of new economic development that will enhance employment opportunities and support new businesses investment, particularly new start-up businesses and rural diversification schemes. Each SDL at Stafford Town and Stone Town will provide sustainable economic growth by delivering high quality employment land alongside new housing development. In addition, policies E3 (page 77), E4 (page 78) and E5 (page 9) provides for development and redevelopment and expansion (in the case of policies E3 & E4) of existing rural sites to provide employment for local communities.</p>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<ul style="list-style-type: none"> • 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 	<p>To support inward investment, The Plan for Stafford Borough- Publication (Submission) Document (A1) Policy Stafford 1 (page 37) provides particular focus on the main sectors, clusters and local growth industries. These include high technology industries and creative knowledge based industries in and around Staffordshire University and Staffordshire Science park. Within the main settlements of Stafford and Stone each SDL will provide new employment allocations, whilst expansion and regeneration of existing Recognised Industrial Estates (RIEs) will provide rural employment opportunities.</p> <p>Much of the employment land within Stafford Borough is currently already developed and in active use. The principal focus of policies within The Plan for Stafford Borough- Publication (Submission) Document (A1) is to regenerate existing estates and provide new employment land within the most sustainable locations. In addition Policy Stafford 1 (page 38) and Stone 1 (page 62) avoids the long term protection of employment land</p>

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	<p>being used for that purpose) para (22)</p>	<p>where there is no reasonable prospect of the site coming forward.</p> <p>The Infrastructure Delivery Plan (IDP) (D57 and D58) sets out the timetables, costs and means of delivery of the infrastructure required to deliver the Submission DPD. It has been undertaken in partnership with each of the relevant delivery agencies. A detailed list of the infrastructure required for each site is set out in Appendix D- Infrastructure of The Plan for Stafford Borough- Publication (Submission) Document (A1).</p> <p>A review was undertaken of existing employment sites through the Employment Land Review (ELR) (D14). The Employment Land Review has been updated at regular intervals, the most recent being 2013. Its assesses the demand for and the supply of, land for employment use, by forecasting future employment land needs by using labour forecasting and projecting previous employment trends forward. In addition the ELR also determines the suitability existing portfolio of land for employment uses, by assessing which sites are deliverable, and therefore will be retained, and which sites are not deliverable, and could be released for housing.</p>
<p>2. Ensuring the vitality of town centres (paras 23-37)</p>		
<p>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)</p>	<ul style="list-style-type: none"> 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 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) policy E8 (page 82) provides a clear strategic approach to enhancing the vitality and viability of town centres of Stafford and Stone Towns and for elsewhere in the Borough. This is underpinned by the evidence from the 2011 Stafford and Stone Retail Capacity Assessment (D16) and the update published in May 2013(D15). In addition it also establishes the network and hierarchy of centres for the Borough.</p> <p>The Plan for Stafford Borough- Publication (Submission) Document (A1) policy Stafford 1 (page 37) aims to regenerate the town centre through promoting diversity of uses in the town centre, as well as retailing, to</p>

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	<p>accommodated in or adjacent to town centres.</p>	<p>support the role of Stafford town as a County Town. The policy also promotes the development of the leisure and evening economy and a growth in tourism and employment in the centre. This will help to ensure the local economy is resilient to changes in retailing due to the growth of online shopping, building on the wide offer of the Stafford Town Centre. This strategy is supported by measures in Stafford Borough Integrated Transport Strategy (D18) to promote public transport use. A similar policy, The Plan for Stafford Borough- Publication (Submission) Document (A1) Policy Stone 1 (Page 62) promotes diversity of uses within Stone town centre.</p>
<p>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)</p>	<ul style="list-style-type: none"> • 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. 	<p>The Policies Maps (A3 and A4) and The Plan for Stafford Borough- Publication (Submission) Document (A1) policy E8 defines the town centre boundaries and the extent of the primary shopping area. The identification of the primary and secondary retail frontages as well as the potential allocation of sites for town centre development will be undertaken through the proposed Site Allocations DPD.</p>
<p>3. Supporting a prosperous rural economy (para 28)</p>		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<ul style="list-style-type: none"> • 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. 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) policy Spatial Principle 6 (page 32) supports the sustainable growth of rural businesses through the diversification of farm based enterprises the redevelopment, intensification and/or expansion of existing rural businesses. This will enable local people living in rural areas to reduce commuting and provide greater local access to jobs.</p> <p>To ensure that the rural areas flourish The Plan for Stafford Borough- Publication (Submission) Document (A1) Policy E1 recognizes the important contribution that the rural economy makes to providing</p>

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		<p>sustainable employment opportunities to local people in rural areas. To support prosperous economy outside Stafford and Stone Towns through increased growth and employment in rural areas, policies E3 (page 77) and E4 (page 78) support development of new employment opportunities land at existing Recognised Industrial Estates, whilst policy E5 (page 9) provides for redevelopment of existing major developed sites within the green belt for employment uses.</p>
<p>4. Promoting sustainable transport (paras 29-41)</p>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>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)</p> <p>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)</p> <p>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)</p> <p>Opportunities for sustainable transport modes</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 	<p>Transport is co-ordinated by Staffordshire County Council through the Staffordshire LTP (E30). The overall strategic approach is to reduce the reliance on the private car and to maximise the travel and accessibility through promoting the use of public transport, walking and cycling. To achieve the overall development strategy (Spatial Principle 4) within The Plan for Stafford Borough- Publication (Submission) Document (A1) specifies that the majority of housing will be focused on the main settlements of Stafford and Stone Towns with the remainder focused on the key service villages. These are the most sustainable locations in terms of accessibility to services and facilities and will provide the best opportunity to maximise sustainable transportation modes such as walking and cycling.</p> <p>The key infrastructure requirements have been derived from extensive workshops and consultation with key partner authorities, particularly Staffordshire County Council through the Stafford Borough Infrastructure Delivery Plan (IDP) (D57 & D58) and the Stafford Borough Integrated Transport Strategy (D18) to deliver major infrastructure projects. In addition, the whole plan viability (D52) study highlights that the levels of infrastructure required to deliver sustainable development will not compromise the plans economic viability.</p>

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<p>have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>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)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>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)</p> <p>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)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>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)</p>	<p>promotes a mix of uses and access to key facilities by sustainable transport modes.</p> <ul style="list-style-type: none"> • 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. 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) (Sections 7&8) Strategic Development Locations (SDLs) are close to the existing urban areas of Stafford and Stone Towns to reduce the reliance on the private car and to maximise the travel and accessibility through promoting the use of public transport, walking and cycling; thus reducing the need for major transport infrastructure.</p> <p>Policy I1 (page 117) of The Plan for Stafford Borough- Publication (Submission) Document (A1) covers implementation, including transport infrastructure. Appendix D (Page 149) of the plan provides the implementation framework, listing transportation infrastructure for each strategic allocation along with key funding partners required deliver the necessary infrastructure to deliver the plan.</p> <p>The Plan for Stafford Borough- Publication (Submission) Document (A1) (Sections 7&8) Strategic Development Locations (SDLs) comprise mixed use developments. Both the Northern SDL (Policy Stafford 2, page 46) and Western SDL (Policy Stafford 3, page 51) will be mixed use development comprising housing, employment, new educational facilities and local shops within walking distance, thus reducing the need to travel by providing services and jobs locally or in locations accessible by public transport, cycling and walking. Furthermore, Policy Stafford 1 (Page 37) encourages housing to be provided as part of mixed use developments by bringing upper floors back into use for residential uses where practicable.</p> <p>The Plan for Stafford Borough- Publication (Submission) Document (A1) Appendix B (Page 135) sets local car parking standards. The Plan for Stafford Borough- Publication (Submission) Document (A1) Policy T2 (Page 87) sets out the overarching strategy to restrain the levels of car parking subject to adequate provision of more sustainable transportation modes</p>

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		such as public transportation and cycle lanes.
5. Supporting high quality communications infrastructure (paras 42-46)		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>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)</p>	<ul style="list-style-type: none"> • Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44. 	<p>Policy I1- Infrastructure Delivery Policy (page 117) of The Plan for Stafford Borough- Publication (Submission) Document (A1) specifies that new developments should provide appropriate levels of infrastructure. The supplementary text (para 13.13, page 118) to support the policy highlights that the provision of high speed broadband is of high importance in meeting the development needs of the Borough. Also a key infrastructure requirement is that each SDL will have Superfast Fibre Access Broadband.</p> <p>No policy is in place to ensure that new buildings or other structures do not cause interference with broadcast or telecommunications. The NPPF (F1) will be sufficient to address individual applications where this applies.</p>
6. Delivering a wide choice of high quality housing (paras 47-55)		
<p>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 competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> • Identification of: <ul style="list-style-type: none"> 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) • A SHLAA 	<p>To meet the housing requirement, The Plan for Stafford Borough- Publication (Submission) Document (A1) makes provision for an average of 500 dwellings a year until 2031. Within the Plan a combination of Strategic Development Locations (SDLs), existing planning permissions and SHLAA sites will provide a five year land supply plus a 20 % buffer of deliverable sites.</p> <p>The SHLAA is reviewed on an annual basis to provide the most to date information to inform the housing supply. The most recent SHLAA (D2) has been published alongside The Plan for Stafford Borough- Publication (Submission) Document (A1).</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible,</p>	<ul style="list-style-type: none"> • Identification of a supply of developable sites or broad 	<p>For years 6 - 10, and 11 – 15, SHLAA sites in conjunction with existing</p>

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years 11-15 (47).	locations for: a) years 6-10; b) years 11-15	planning permissions and Strategic Development Locations (SDL) provide sufficient supply of developable sites to achieve the required quantum of developable sites, delivered in accordance with the Housing Trajectories.
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)	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	A five year housing land reservoir of sites will be maintained through implementing the Strategic Development Locations (SDLs), existing planning permissions and SHLAA sites. The housing trajectories (Appendix G of The Plan for Stafford Borough- Publication (Submission) Document (A1)) illustrate that an average build rate of 500 dwellings can be sustained throughout the Plan period. The AMR will monitor housing completions on an annual basis to ensure that the levels are consistent with the apportionment set out in SP4. Where completions are substantially greater than those in SP4, a moratorium on grant of housing permissions may be imposed.
Set out the authority's approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> • Policy on the density of development. 	There is no policy which defines specific density requirements, since the preference is for a flexible approach: Policy C1 – Dwelling Types and Sizes (page 90) of The Plan for Stafford Borough- Publication (Submission) Document (A1) requires new development to be compatible with the character of the area. Furthermore, Policy N1 Design (page 99) also requires development to be in keeping with surrounding development. Within the Borough the average density for residential areas is approximately 40 dwellings per hectare with higher densities in Stafford and Stone Town centres. Therefore, to maintain the existing character of these areas, new development is likely to be approximately 40 dwellings per hectare.
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)	<ul style="list-style-type: none"> • Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA • Identification of the size, type, 	The Plan for Stafford Borough- Publication (Submission) Document (A1) seeks to provide an additional 10,000 dwellings over the plan period to 2031. The majority of this new development will be located at Strategic Development Locations. To enable housing proposals to provide a balanced and mixed community, each SDL in Stafford Town will be expected to achieve 30% affordable housing delivery with a mix of 25% social rented housing and 5% being intermediate housing, whilst the Stone

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	<p>tenure and range of housing) required in particular locations, reflecting local demand. (50)</p> <ul style="list-style-type: none"> • Evidence for housing provision based on up to date, objectively assessed needs. (50) • 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) 	<p>SDL (page 68) will be required to achieve 40 % affordable housing. In addition, Each SDL policy sets out the broad mix of housing, including affordable housing and specialist housing. To achieve this, individual targets for property types are set out in the monitoring framework for the Strategic Development Locations, in line with Strategic Housing Market Area (D5 and E13) evidence.</p> <p>Policy C1 (page 90) of The Plan for Stafford Borough- Publication (Submission) Document (A1) relates to dwellings types and sizes. It requires housing proposals to provide for a mix of dwellings, in terms of size, type and tenure. In doing so it should take account of the existing household and dwelling size in the locality as well as current waiting list date for the locality.</p> <p>Policy C3 (page 92) sets out approach to specialist housing – there is an anticipated need to provide additional extra care bed units in Stafford Borough due to an ageing population. In addition, Lifetime Homes (E72 & E73) will increase the availability of housing in the private sector which can be built or readily adapted to cater for people’s needs throughout their lifetime and to allow people to remain in their homes longer rather than having to move to more specialist accommodation.</p> <p>Policy C2 (page 90) of The Plan for Stafford Borough- Publication (Submission) Document (A1) requires a proportion of affordable housing to be provided in accordance with the most up to date Strategic Housing market Assessment (SHMA) (D5). This policy has been adjusted to take account of the most recent evidence base as well as the Stafford Borough viability report (D10 & D11) published in 2011 and the Whole Plan Viability (D52) published in 2013. The proportion of affordable housing units to be provided will be on a variable scale from a target of 40% at Stone, Eccleshall, Gnosall, Woodseaves, Barlaston, Tittensor and Yarnfield, whilst 30% is the target in Stafford Town and in all other areas of the Borough subject to specific site size thresholds. This proportion may be reduced by negotiation where the provision of affordable housing, would render the</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>site unviable in prevailing market conditions. The policy generally requires on site provision of affordable housing, though supporting material has been produced to set out the circumstances in which off-site provision will be acceptable.</p>
<p>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).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> • 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. 	<p>Spatial Principles 7 (page 33) of The Plan for Stafford Borough- Publication (Submission) Document (A1) would allow market and affordable housing to take place in suitable locations, whilst Policy C5 (Page 94) sets out the approach to Residential Proposals outside the Settlement Hierarchy and includes scope to provide an element of market housing where appropriate. Part two of Policy C5 (Page 94) sets out approach to housing in the rural area and the policy on rural exception sites.</p>
<p>7. Requiring good design (paras 56-68)</p>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</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>Policy N1 –Design (page 99) of The Plan for Stafford Borough- Publication (Submission) Document (A1) sets out the central tenets for good design such as layout, form, safe design, biodiversity and local distinctiveness issues such as scale, views, character and materials. All development is required to have regard to the local character and to provide new biodiversity areas where practical. It also covers the importance of greater connectivity between people and places.</p> <p>For the larger sites, such as the Strategic Development Locations at</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Stafford and Stone Town, masterplanning will be required. Building for Life assessments, Design and Access statements and Secured by Design assessments will be required to independently assess design quality and to promote higher quality design in residential areas.</p> <p>Policy N2- Climate Change (page 101) of The Plan for Stafford Borough- Publication (Submission) Document (A1) sets out the sustainable design features to mitigate the effects of climate change. Code for Sustainable Homes BREEAM will be required to promote higher quality design new developments.</p>
<p>8. Promoting healthy communities (paras 69-77)</p>		
<p>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).</p>	<ul style="list-style-type: none"> • 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 	<p>Mixed use development and community interaction are promoted through a number of Local Plan policies. Each SDL site (A1, Sections 7&8) identified will be a mixed use development comprising housing and employment uses as part of the overall development master plan for each site. In addition, Policy Stafford 1- Stafford Town (A1, page 39) encourages conversions to housing use on upper floors in Stafford Town Centre.</p> <p>In The Plan for Stafford Borough- Publication (Submission) Document (A1) Policy N1- Design (page 101) requires development to design out crime. There is also a requirement for new developments to be accessible, legible and provision of overlooked public space, requiring places to be permeable and legible to provide for ease of movement to provide. The policy also addresses safety within public areas by requiring streets and public spaces to be attractive, usable and overlooked to create a safe and secure environment. In addition this overarching framework is also contained in the individual Strategic Development Location policies (Sections 7 and 8) of The Plan for Stafford Borough- Publication</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>routes, and high quality public space, which encourage the active and continual use of public areas. (69)</p>	<p>(Submission) Document (A1).</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> • 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. 	<p>Within The Plan for Stafford Borough- Publication (Submission) Document (A1) each SDL policy (Sections 7&8) will comprise a new mixed use development that includes community use elements such as open space and sports facilities.</p> <p>The Plan for Stafford Borough- Publication (Submission) Document (A1) policy C7 (Page 97) supports the retention of existing and provision of new community facilities, requiring justification for their loss. New facilities will also be required to be accessible.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<ul style="list-style-type: none"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) policy C7 (Page 97) is based on evidence from an Open Space Needs Assessment. This has been supplemented by an updated by the Green Infrastructure, greenspace and Sport and Recreation Strategy.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> • 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) 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) policy C7 (Page 97) seeks to limit the loss of designated open space which is in, or has the potential of being put to, beneficial and viable use unless better quality facilities would be provided or that redevelopment would not result in a deficiency in the local area. These will only be permitted if it can be shown that redevelopment would bring demonstrable and overriding benefits.</p> <p>There is a large network of designated public rights of way within Stafford Borough The largest concentration of these is within the Cannock Chase Area of Outstanding Natural Beauty (AONB). Policy N7 (Page 112) of The Plan for Stafford Borough- Publication (Submission) Document (A1) promotes the enhancement and conservation of the Cannock Chase AONB. In addition although there is a well-used network of formal and informal footpaths and designated cycle routes. Policy T1 (Page 86) promotes greater use of walking and cycling through greater use of secure facilities whilst Policy N1 (Page 99) encourages developments with legible, accessible and permeable layouts providing for easy access on foot and effective linkages to the existing network of pedestrian and cycle routes.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> • 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 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) recognizes that Local Green Spaces as an integral component of Green Infrastructure (GI) are a vital multi-functional resource that provides landscape and ecological value as well as contributes to the well-being of local residents. Policy N4 (page 107) and the Green Infrastructure Strategy (D34) facilitate the enhancement, protection of existing GI, whilst new Local Green Spaces may be created through the neighbourhood planning process where such open space are not identified as part of the existing Green Infrastructure network. In addition, the extent of GI resources highlighted on the Policies Maps (A2, A3&A4).</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	should be consistent with policy for Green Belts. (78)	
9. Protecting Green Belt land (paras 79-92)		
<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 outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</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 local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<ul style="list-style-type: none"> • Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> ○ Enhance the beneficial use of the Green Belt. (81) ○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) ○ Specify that inappropriate development should not be approved except in very special circumstances. (87) ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) (para 9.20) states that the Green Belt boundary will be maintained and protected from inappropriate development in line with Government policy as set out in the NPPF. The extent of the Green Belt is illustrated by the Policies Map (A2, A3 & A4).</p> <p>The Plan for Stafford Borough- Publication (Submission) Document (A1) includes a specific policy relating to the development of major developed sites in the Green Belt: Policy E5 (page 79). These sites are large brownfield sites where sustainable redevelopment for employment would contribute to balanced communities by meeting the local employment needs of the area.</p>
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>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)</p>	<ul style="list-style-type: none"> • 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)) 	<p>The overall spatial strategy (Spatial Principle 3, page 26) of The Plan for Stafford Borough- Publication (Submission) Document (A1) directs growth to the most sustainable settlements of Stafford (Policy Stafford 1- Stafford Town, page 37) and Stone (Policy Stone 1- Stone Town, page 37), therefore there is a reduced need to travel to access services and facilities and greater use can be made of sustainable transport modes such as public transport services.</p> <p>The Transport policy T1 (page 86) of the Submission Document (A1) also directs new development to sustainable locations by requiring new development to reduce private car use and promotes the use of sustainable transport modes such as public transport, walking and cycling</p> <p>The policy on climate change (Policy N2- Climate Change, page 101) includes a requirement that new homes meet specific targets in line with the Government’s buildings policy. It specifies that new homes should incorporate sustainable design and construction techniques and new non-residential development should incorporate BREEAM standards. In addition, the policy requires the use of Sustainable urban drainage to manage the flood risk in new developments.</p> <p>In terms of renewable energy, Policy N2- Climate Change (page 101) requires new developments to provide a proportion of their energy requirement from on-site renewable resources or low carbon energy equipment</p> <p>Where proposals affect a building of traditional construction energy efficiency will be expected to be improved as far as possible without prejudicing the character of the building or increasing the risk of long term deterioration of the fabric.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy,</p>	<ul style="list-style-type: none"> • A strategy and policies to promote and maximise 	<p>Policy N2 - Climate Change of The Plan for Stafford Borough- Publication (Submission) Document (A1) (page 101) requires new developments to</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<p>energy from renewable and low carbon sources,</p> <ul style="list-style-type: none"> • 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 carbon supply systems and for co-locating potential heat customers and suppliers. (97) 	<p>provide a proportion of their energy requirement from on-site renewable resources or low carbon energy equipment.</p> <p>Policy N3 of The Plan for Stafford Borough- Publication (Submission) Document (A1) (page 103), supporting text and accompanying map sets out where potential renewable energy opportunities exist. This is supported by work undertaken as part of The Staffordshire Wide Renewable Energy Study (D45, page 164, 165).</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<ul style="list-style-type: none"> • 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 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) is supported and has been informed by a level 1 Strategic Flood Risk Assessment (D46); Water Cycle Study (D43 & D44) and Surface Water Management Strategy (D40, D41 & D42). The Strategic Flood Risk Assessment and Water Cycle Study show that the locations of the Strategic Development Locations (SDLs) at Stafford and Stone ensure that development is located away from areas of high flood risk. Each SDL policy requires the development to have the necessary flood mitigation measures and not to contribute to flooding elsewhere.</p> <p>Policy N2- Climate Change (Page 101) of The Plan for Stafford Borough- Publication (Submission) Document (A1) directs that new developments should protect developments from flooding and not worsen the potential for flooding. The use of appropriate Sustainable urban Drainage Systems</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		(SuDs) is required to reduce the flood risk in new developments.
Manage risk from coastal change (106)	<ul style="list-style-type: none"> • 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. 	Stafford Borough is an inland authority; therefore there are no coastal flooding risks.
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	<ul style="list-style-type: none"> • A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. • 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. 	<p>Policy N5 of The Plan for Stafford Borough- Publication (Submission) Document (A1) (page 109) sets out the overall framework for the protection of European, national and local sites of nature conservation importance. Of particular importance is the need for all new development to ensure that development does not significantly contribute to adverse effects on sites of European importance such as the Cannock Chase SAC. In addition, Policy N8 (page 112) seeks to protect and conserve the natural landscape, whilst policy N7 (Page 112) deals specifically with the Cannock Chase Area of Outstanding natural Beauty (AONB).</p> <p>The Green infrastructure and Biodiversity Strategy for the area, based on evidence from the Green Infrastructure Strategy (D34) and Staffordshire Biodiversity Action Plan (E63), is set out in policy N4 (page 107). The GI strategy (D34) sets out the key existing GI assets and highlights potential enhancement areas as well as areas where new biodiversity areas could</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>be created within Stafford Borough. In addition, it also provides a framework that enables greater accessibility of existing GI through sustainable modes of transport.</p>
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<ul style="list-style-type: none"> 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. 	<p>Environmental protection policies (N2, N4, N5, N6, N7 and N8) within The Plan for Stafford Borough- Publication (Submission) Document (A1) provide protection and enhancement of biodiversity and geodiversity assets and the provision of new green infrastructure. In addition, these suite of policies specific.</p> <p>Policy N2 of The Plan for Stafford Borough- Publication (Submission) Document (A1) (page 101) sets out to minimise pollution by requiring new development to provide recycling facilities and ensure waste minimisation. There are no policies in relation to specific environmental hazards including subsidence, noise or contamination as it is considered that national legislation in these areas is sufficient. There are no air quality zones or areas protected from noise identified in the document.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> 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 	<p>Policy N4 of The Plan for Stafford Borough- Publication (Submission) Document (A1) (page 107) provides the strategic framework and protection and enhancement of the Boroughs for Green Infrastructure (GI) and biodiversity assets. Proposed Green Infrastructure areas for are mapped as part of the Policies Maps (A2, A3 & A4). As part of the policy, development is required to make appropriate provision for both the protection of existing, and the provision of new green infrastructure and habitat networks, as an integral part of the overall design of new development. In addition, Green infrastructure assets in the major settlements are also included within their respective key diagrams present in the supporting text to policies Policy Stafford 1 (page 42) and Policy Stone 1 (page 66) of The Plan for Stafford Borough- Publication</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>(Submission) Document (A1).</p> <p>Policy N5 of The Plan for Stafford Borough- Publication (Submission) Document (A1) (page 109) provides specific protection and enhancement of European, National, and Local Conservation Importance. Sites of national importance such as SSSIs and European sites such as Special Areas of Conservation (SAC) are mapped on the Policies Map (A2 & A3). Policy N6 (page 111) provides specific protection for the Cannock Chase Special Area of Conservation (SAC) from new development. The accompanying text makes clear that a partnership has been set up to establish suitable mitigation measures to address the negative impacts of water abstraction, air quality and particularly from recreation to ensure that the unique character of the SAC is maintained.</p> <p>The concept diagrams (pages 50, 55, 60 & 72) within the Submission Document (A1) for each Strategic Development Location (SDL) also provide for new Green Infrastructure</p>
<p>12. Conserving and enhancing the historic environment (paras 126-141)</p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> • 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) 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) seeks to protect and enhance the Historic Environment. Policy Stafford 1- Stafford Town, Policy Stone 1 - Stone Town, and Policy N1- Design all specify that development should protect heritage assets for the contribution that they make to the historic environment and local distinctiveness. This will be achieved by placing significant emphasis on conservation area appraisals to guide the design of new developments.</p> <p>Policy N9 - Historic Environment (page 113) provides a more detailed policy to guide development to ensure that it protects the heritage assets at the national level and local level and where appropriate, enhance the significance of those assets.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Site specific policies (Policy Stafford 3- West of Stafford, page 51, and Policy Stafford 4- East of Stafford, page 56) of the Submission Document (A1) also specify the key heritage assets and the measures to preserve and enhance the historic environment.</p> <p>Conservation Areas and the Historic Environment Record are identified on the Policies Maps (A2, A3 & A4).</p>
<p>13. Facilitating the sustainable use of minerals (paras 142-149)</p>		
<p>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)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>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.</p>	<p>Staffordshire County Council is the Minerals and Waste planning authority.</p> <p>The Staffordshire and Stoke-on-Trent Minerals Local Plan is currently emerging and consultation on the Draft Plan is due to begin in November 2013.</p> <p>Note: waste managed matters are not covered in the NPPF (but in PPS10). However, in relation to waste matters, the Staffordshire and Stoke-on-Trent Waste Local Plan (F10) was adopted in 2013. Policy 4.2 Protection of Environmental Quality of the Staffordshire and Stoke-on-Trent Waste Local plan provides for protection of environmentally sensitive sites with a specific presumption(Para 5.122) against waste development within the Cannock Chase Area of Outstanding except in exceptional circumstances</p>
<p>Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</p>		

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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. This should set out what consultation was undertaken, when, with who 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</p>	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) has been subject to continuous public and stakeholder consultation throughout the course of its preparation. This has included a pre-production stage, two Statutory stages including Issues and Options (February 2009) (G6) and The Plan for Stafford Borough- Publication (Submission) Document (A1) (January 2013) (A1) as well as six informal stages, including The Borough Wide Development Strategy (January 2008) (G9), Draft Core Policies (February 2010) (G5), Local Choices (November 2010) (G4), Strategic Policy Choices (G1) and Draft Publication (September 2011) (G2). The details of these consultations and our replies during these stages are contained in the 'The Plan for Stafford Borough Consultation Statement (A14) and Appendices (A15)(August 2013). Public engagement has followed the principles set out in the Stafford Borough Statement of Community Involvement (SCI) (A16).</p> <p>To facilitate community engagement in the preparing of the Development Plan Document (DPD) a number of consultation methods were deployed, including:</p> <ul style="list-style-type: none"> • Extensive press releases to raise public awareness on each Local Plan stage. • A number of council publications including the published newsletter and the council tax booklet informing the public of the progress of the Local Plan and how to participate. • Public meetings and Exhibitions to raise public awareness and participation of the LDF process. • Parish and Borough Council meetings to raise the profile of the LDF within the community, enabling them to act as information resources in their local areas. • Extensive coverage of the LDF consultations and supplementary LDF material is available

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>on the Stafford Borough Councils Website.</p> <ul style="list-style-type: none"> Local Plan consultation database used as a basis to either send e-mails or letters notifying the public of a consultation event <p>A number of performance indicators are recorded in the Submission Consultation Statement (A14), which help to measure the effectiveness of the community engagement and the degree to which the community has had the opportunity to influence the scope and form of each plan making stage. These indicators include:</p> <ul style="list-style-type: none"> Number and range of people participating in consultation Number of people attending exhibitions. Range of LSPs participating in the consultation. Number of people responding online during formal consultations. <p>The Submission Consultation Statement (A14) sets out in detail the range of consultees and other relevant stakeholders that were consulted, and how their comments were taken account of, during the plan preparation process. The results of consultations, emerging evidence and separate engagement with stakeholder groups have informed the development of The Plan for Stafford Borough- Publication (Submission) Document (A1) at each consultation stage.</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? What assumptions</p>	<ul style="list-style-type: none"> 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. <p>AND</p> <ul style="list-style-type: none"> Sections of the DPD (at various stages of 	<p>Stafford Borough council have maintained a robust, credible and up to date evidence base to inform 'The Plan for Stafford Borough'. This comprises the following key elements:</p> <ol style="list-style-type: none"> Evidence base studies prepared to address issues to be covered in the Local Plan The evidence provided by comments received from consultation responses The information and guidance provided by the Sustainability Appraisal <p>i. The evidence base studies (set out in Appendix A of A1, page 130) support specific components of the Core Strategy. The most important of these were:</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>were made in preparing the DPD? Were they reasonable and justified?</p>	<p>development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions.</p> <p>OR</p> <ul style="list-style-type: none"> 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. <p>OR</p> <ul style="list-style-type: none"> 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 DPD). 	<ul style="list-style-type: none"> Revised Assessment of Services and Facilities (D54) Strategic Housing Land Availability Assessment (D2) Strategic Flood Risk Assessment (D46) Water Cycle Study (D44) Infrastructure Delivery Plan (IDP) (D57 &D58) Strategic Housing Market Assessment (SHMA) (D5) Employment Land Review (D14) Town Centre Capacity Assessment (D15) <p>Individual evidence studies are referenced within the justification text where appropriate. This provides a detailed explanation of how the evidence has been used and informed the policy within the Plan for Stafford Borough. Each study has been prepared using established methodologies and has taken account of the most up to date information during their preparation. Many of the evidence based studies have been jointly commissioned with neighbouring authorities to better inform all planning authorities within the North Staffordshire subregion.</p> <p>The development of policies based on the evidence provided by these studies is explained within the submitted Plan:</p> <p>The Revised Assessment of Services and Facilities (D54) provides the main justification for the selection of the main towns and key service villages identified within the settlement hierarchy defined in Spatial Principle 3 of The Plan for Stafford Borough- Publication (Submission) Document (A1) (A1, page 26)</p> <p>The Strategic Housing Land Availability Assessment (SHLAA), 2013(D2), Water Cycle Study (D44) and IDP(D57 &D58) have been undertaken following best practice and government guidance where appropriate. These have contributed to the determination of the locational strategy for the Strategic Development Locations at the main towns of Stafford and Stone.</p> <p>The Housing Market Areas Assessment (D5) (2012) was prepared by Arc⁴, a specialist consultancy with considerable experience in analysing housing needs. It provides the main basis for the approach adopted in relation to the size and tenure and appropriate amounts of affordable</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>housing (Policy C2, page 90).</p> <p>The Employment Land Review (2012) (D14) was prepared by the Forward Planning Department and provides the main context for determining the appropriate scale and distribution of employment land (as set out in Spatial Principle 5) and the level of new employment provision (paras. 6.58-6.59).</p> <p>The Stafford and Stone Town Centre Capacity Assessment (D15) provide the context for the approach to retail and town centre development in the main towns of Stafford (paras. 7.10 – 7.16) and Stone (paras. 8.10 – 8.14);</p> <p>ii. Public consultation responses received during the progression of the Plan represent another key element of the evidence base on which the Local Plan is based, reflecting the general consensus reached from responses to the Plan. This is recorded in the Submission Consultation Statement (A14). On the basis of the general support received to the preferred approach, but taking account of comments received, The Plan for Stafford Borough- Publication (Submission) Document (A1) was prepared. As an expression of general support for the fundamentals of the preferred approach set out in the Draft Publication (G2) and Strategic Policy Choices (G1), the majority of respondents agreed that the focus of development should be on the main settlements of Stafford and Stone with lesser amounts to the villages.</p> <p>The Regulation 22 Submission Consultation Statement (A14) Section 6.11 summarises the response to comments made on the Draft Publication document (G2), and the changes made in preparing the submitted Document (A1). A separate Appendix as part of the Regulation 22 Submission Consultation Statement (A14) ‘The Plan for Stafford Borough Consultation Statement Appendices (A15) (January 2013)’ provides a detailed summary of each representation received, which were taken into account in formulating the submission Document.</p> <p>iii. The final main component in the evidence base supporting the contents of the submitted Plan is provided by the Sustainability Appraisal. The Final Sustainability Appraisal Report [the Revised Sustainability Appraisal Report (A10) (November, 2012)], assesses the Submission Document. The SA concludes that the Spatial Framework is based on the most sustainable strategy having</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>examined all previous alternatives.</p> <p>The assumptions for The Plan for Stafford Borough- Publication (Submission) Document (A1) are predicated on accommodating objectively assessed needs for housing and employment within Stafford Borough over the period 2011-2031, providing the infrastructure and supporting services appropriate to that level of growth and seeking to direct and locate it sustainably and responsibly, with significant employment growth and a realistic level of new housing allocations focused at both of the key settlements of Stafford and Stone.</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? Does the sustainability</p>	<ul style="list-style-type: none"> • 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. 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) provides a balanced and consistent approach to determining the levels of development and the most suitable locations, having considered all reasonable alternatives. At each stage of the planning process there was a full discussion on the relevant options and alternatives regarding different levels of development and where that development should be located, and the consequences for the Borough. Arising from these discussions, the preferred approach emerged through successive plan documents, rejecting alternatives throughout this process, before the final Submission Document was developed. Further details are given below.</p> <p>At the preliminary stage in 2008 (responses summarised in the Submission Consultation Statement Appendices for the Borough Wide Development Strategy (A15)). The consultation process sought views on the where the main focus development should be from a number of alternative development strategies.</p> <p>At the first formal stage of preparation of the Local Plan, consultation on Issues and Options was undertaken (responses summarised in the Submission Consultation Statement Appendices (A15), page 10). The consultation sought views covering the broad range of issues and potential development options suggested within the main settlements of Stafford and Stone as well as a number of village location options that would be addressed by the Local Plan. Views were asked generally on issues set out and the development options suggested to focus discussion. In addition, each section concluded with specific question inviting responses based on degree of</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • 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. 	<p>support for propositions, whilst also giving scope for addition of the respondent’s own views. This approach enabled greater understanding of the potential advantages and disadvantages for each growth options put forward and their likely implications.</p> <p>At the Preferred Options Stage, consultation on the Draft Publication document (G2) set out the Council’s preferred options to be taken forward. Following the intended abolition of the Regional Spatial Strategy (F6) and the replacement of Planning Policy Statements with the National Planning Policy Framework (F1).</p> <p>The Strategic Policy Choices (G1) document was published in May 2012 setting out various options for consideration. It set out the options for the different scales of growth, alternative settlements in the hierarchy, and different proportions between the levels of the hierarchy, different development locations around Stafford, Stone and the Key Service Villages. Summary sections within the document set out the option chosen and the reasons why other alternatives were not selected. It also sets out the rationale for the selection of the Strategic Development Locations against alternative sites and sets out the reasoning for rejecting alternative sites The options included three options for the level of development, three options for the settlement hierarchy, two options for an affordable housing policy and two options for delivery of the strategy.</p> <p>In parallel with, and supporting the development of the finally selected approach, the Sustainability Appraisal process has played an integral role in shaping the Plan for Stafford Borough, having assisted with the identification of sustainable options, taking into account the likely social, environmental and economic effects of implementing the different strategic alternatives. The process has helped to illustrate how policies and objectives could be made more sustainable and provided an evaluation of the comparative merits of identified alternatives and helped formulate the preferred options for development. The SA Commentary Volume 2 (H7), the Revised SA Report (A10) and the Revised Sustainability Appraisal Report Addendum (A12), provided a full assessment of the Preferred Options selected, and those options not selected and the reasons why each option was eliminated.</p> <p>Having exploring the options through this process, The Plan for Stafford Borough- Publication</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>(Submission) Document (A1) sets out the strategy for achieving sustainable development to achieve a sustainable future for Stafford Borough. The Addendum SA (A12) and the Planning Strategy Statement (A13) evaluates the approach adopted in relation to Strategic Development Locations, and concludes that there are no more sustainable approaches that could be adopted, in locating development around Stafford and Stone.</p>
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</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 DPD? • Are the policies internally consistent? 	<ul style="list-style-type: none"> • 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). • 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. 	<p>Policy I1 (page 117) of The Plan for Stafford Borough- Publication (Submission) Document (A1) sets out a summary of the critical infrastructure required for the delivery of the plan. Greater detail on specific infrastructure projects, timescales and key delivery partners is located Appendix D of the Submission document. Throughout the plan preparation stage consultation has taken place with service and infrastructure providers. Infrastructure providers and key partner organisations are supportive of the approach which seeks to concentrate development, and encourage the provision of new infrastructure in the most sustainable areas around the main towns of Stafford and Stone. As part of the development of the IDP Stage 2(D57, page 2), extensive discussion and agreement has been reached</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<ul style="list-style-type: none"> • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	<p>regarding the level of infrastructure necessary to deliver the quantum of housing.</p>
<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"> • 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. 	<p>The Stafford Borough Infrastructure Delivery Plan (IDP) parts 1 (D58) and part 2 (D57) identified the infrastructure requirements for 10,000 additional dwellings within Stafford Borough within the plan period. The IDP parts 1(2009) (D58) and part 2 (D57) (2012) assess the infrastructure requirements, based on up to date information derived from extensive consultation with infrastructure and service providers.</p> <p>Policy I1 (page 117) of The Plan for Stafford Borough- Publication (Submission) Document (A1) sets out a summary of the infrastructure delivery with greater detail included in Appendix D. This sets out the infrastructure required to deliver the plan, where it is needed, detailed delivery and costings, as well as phasing and delivery partners. The full IDP parts 1 (D58) and part 2 (D57) form part of the evidence base which includes more detail regarding how the delivery plan has evolved and who and when the necessary infrastructure is likely to be delivered.</p> <p>Additional work with stakeholders and infrastructure providers has also been completed to demonstrate that the whole plan is economically viable. The Whole Plan Viability study (D52) and detailed modelling work carried out by Level for each SDL (D51) takes all of the specific policy requirements, particularly housing delivery. An analysis of the overall development costs to deliver each SDL has indicated that</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>each of the SDLs are deliverable and can provide all the requirements that are set out in The Plan for Stafford Borough- Publication (Submission) Document (A1).</p>
<p><i>Co-ordinated Planning</i> Does the DPD reflect the concept of spatial planning? 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 agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> • 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 • 	<p>The strategy for the Borough set out in The Plan for Stafford Borough- Publication (Submission) Document (A1) and is accompanying evidence base draws on a wide range of spatial connections, frameworks, policies and programmes including The Cannock Chase AONB Partnership, Staffordshire and Stoke on Trent LEP and joint evidence based documents with a number of adjoining authorities.</p> <p>The Plan for Stafford Borough- Publication (Submission) Document (A1) clearly identifies a clear spatial vision for the Borough, which describes our collective aspirations for the future and shows how the spatial planning elements of the sustainable Community Strategy will be achieved. These principles are articulated through the development strategy and policies to implement the key objectives of the plan. It has regard to all areas of the Borough according to their own characteristics, constraints, opportunities and needs and therefore goes beyond traditional land use planning to influence the nature of places and how they function as well as providing a framework for social, economic and social well-being for the Borough.</p> <p>The plan preparation process has involved full public engagement as set out in the Statement of Community Involvement (SCI) (A16) as described in the Submission Consultation Statement (A14). Each stage has undergone at least a six weeks consultation period and for both the Draft Publication (G2) and Issues and Options (G6), a series of staffed exhibitions were undertaken to increase public participation in the process.</p> <p>Throughout the plan preparation stage consultation has taken place</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>with service and infrastructure providers. Infrastructure providers and key partner organisations are supportive of the approach which seeks to concentrate development, and encourage the provision of new infrastructure in the most sustainable areas around the main towns of Stafford and Stone.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • 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? 	<ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> 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. 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) provides for a robust framework to deliver the appropriate level of growth at each SDL over the plan period. The delivery of each SDL provides for flexibility for unplanned for events by detailing contingencies [Appendix E of The Plan for Stafford Borough- Publication (Submission) Document(A1, page 158)] which introduces mechanisms to address the barriers to delivery and, failing that, a single issue review if required. Matters that may be imposed by circumstance beyond the Council’s control include the provisions of national planning policy or a further deterioration of housing market conditions. In addition, future employment land supply is indicative in nature but scope exists to adjust or manage such targets.</p> <p>The Plan for Stafford Borough- Publication (Submission) Document (A1) Appendix E (page 158) concerns the Monitoring of the DPD. Monitoring and reviewing of the policies will indicate what impact the policies are having and whether they need reviewing because they are not working as intended or require amendment in light of changed circumstances. Revisions to such policies could be made through limited reviews of the Local Plan.</p> <p>The Annual Monitoring Report (AMR) (C1) includes specific monitoring indicators for key thematic areas such as housing, environment and employment. It is used to monitor the delivery of the Local Plan (and the sustainability indicators identified in the Sustainability Appraisal), and identify progress and provide any early indicators of issues to be addressed. This could include a critical shortfall in infrastructure</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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 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? 	<ul style="list-style-type: none"> • 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. • 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. 	<p>provision or if particular policies and proposals are no longer appropriate or deliverable.</p> <p>The Plan for Stafford Borough- Publication (Submission) Document (A1, page 12) details that there has been extensive cross-boundary initiatives between neighbouring Authorities as well as with Staffordshire County Council on key strategic issues. These include managing the Cannock Chase Area of Outstanding Natural Beauty and associated Special Area of Conservation with neighbouring districts and working with the North Staffordshire Conurbation to promote regeneration in the inner urban core.</p> <p>Much of the evidence base for The Plan for Stafford Borough- Publication (Submission) Document (A1) has been commissioned jointly with steering groups made up from officers from each local authority throughout the process. The full list of evidence base is set out in Appendix A (page 131) of the Submission Document.</p> <p>A separate Duty to Co-operate Statement (B3) has been prepared that sets out the key cross boundary initiatives with adjoining local authorities in detail and how these have been resolved.</p> <p>Appendix D (page 150) of The Plan for Stafford Borough- Publication (Submission) Document (A1) sets out the critical infrastructure requirements for the delivery of the plan and the key delivery partners.</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 	<ul style="list-style-type: none"> • 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 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) contains a monitoring framework in Appendix E. Within the monitoring framework (Page 158) each policy has a specific indicator or set of indicators, the main delivery agencies that have responsibility for implementing the policy, a target and a contingency strategy. The housing trajectory is set out in Appendix F of the Submission document (A1) provides further information about the projected housing</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>trajectories where the DPD contains housing allocations)?</p> <ul style="list-style-type: none"> • 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? 	<ul style="list-style-type: none"> • 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 	<p>completions in the period 2011-2031. The trajectory shows how the annualised housing target is anticipated to be met.</p> <p>The AMR (C1) reports on a series of indicators relating to the economy, housing and the environment and contains a housing trajectory. Each indicator is updated revised annually to reflect changes that have occurred throughout the monitoring year. The AMR is flexible enough to enable additional indicators and modify existing ones should the need arise</p> <p>The Revised Sustainability Appraisal Report (A10) contains a detailed monitoring Framework which links to indicators within the AMR.</p> <p>The Sustainability Report (H4) contains a detailed monitoring Framework which links to indicators within the AMR, to assess the sustainability effects of implementing the Local Plan (Section 6 page 77). Monitoring of these significant effects indicators will be undertaken through the AMR</p>
<p><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</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? 	<ul style="list-style-type: none"> • 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 	<p>Earlier sections of the Soundness Self-Assessment Checklist (B4) set out that the plan is compliant with the NPPF (F1), particularly those concerned with the delivery of the NPPF's 13 strategic principles for delivering sustainable development. However, it is appropriate that some decisions should be left to national planning policy, which is perfectly adequate in some cases, and should not be duplicated. It has been the clear intention that there should be no duplication of</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none">Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?	<p>from the results of community involvement.</p> <ul style="list-style-type: none">Reports or copies of correspondence as to how representations have been considered and dealt with.	<p>national policy in the proposals and policies contained in The Plan for Stafford Borough- Publication (Submission) Document (A1).</p> <p>The policies and strategies in the Submission document interpret and apply national policy as it relates to the local context in Stafford Borough</p>

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Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

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Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement with both settled and traveller communities.	<ul style="list-style-type: none"> • Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups. 	<p>In 2007, the North Housing Market Area conducted a Gypsy and Traveller Accommodation Needs Assessment (GTAA) (E14) in association with Gypsy and Traveller groups by the Salford Housing and Urban Studies unit to establish the pitch requirements for Stafford Borough and the other adjacent authorities. The report, published in 2007, showed a need for 72 pitches across the Borough (70 residential and 2 transit) from 2006-2026. Subsequently, a further assessment was commissioned and undertaken by ARC⁴ (D4) in 2012, engaging proactively with gypsy and traveller community representatives to establish accommodation needs across the Borough and set an indicative target to 2031. The current GTAA published in November 2012, provides an indicative target 44 pitches.</p>
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	<ul style="list-style-type: none"> • Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs 	<p>Preparation of the North Housing Market Area GTAA (E14) published in 2007 and the updated version in 2012 (D4) has involved collaborative and co-operative working between the constituent Local Authorities. In addition as part of both Gypsy and Traveller Accommodation Needs Assessments (GTAAs) extensive interviews were conducted with residents of private and local authority sites as well as additional interviews across the Borough to determine the future pitch requirements.</p>

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Policy Expectations	Possible Evidence	Evidence Provided
	<p>to inform the preparation of your local plan and make planning decisions.</p>	
<p>Policy B: Planning for traveller sites (paras 7-11)</p>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> • Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into 	<p>The Plan for Stafford Borough- Publication (Submission) Document (A1) specifies that there is a requirement for 44 permanent pitches across the Borough in the period 2011 to 2031. Therefore the five year requirement for additional pitches across the Borough is approximately 11. At least 25 pitches of the eleven pitches will be provided through a new site at St Albans road. The identification of future pitches to meets the target set out in the GTAA will be determined through a future Sites and Allocations Documents, if there is an identifies need.</p> <p>Broad criteria on the design, location and onsite are contained within The Plan for Stafford Borough- Publication (Submission) Document (A1) Policy C6 (page 96) to guide future planning applications for traveller sites.</p>

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Policy Expectations	Possible Evidence	Evidence Provided
	account criteria a-h of para 11	
Policy C: Sites in rural areas and the countryside (para 12)		
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		Policy C6 (Page 96) is a criteria based policy which includes design criteria to ensure that Gypsy and Traveller pitches do not dominate the nearest settled community. Criteria b of the policy specifically ensures that sites should minimise the potential impact on the surrounding landscape, environment, heritage assets and biodiversity.
Policy D: Rural exception sites (para 13)		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers sites.	<ul style="list-style-type: none"> If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity. 	If necessary (i.e. if sufficient sites have not been advanced independently), the specific location for new Gypsy and Traveller sites will be determined as part of the preparation of the Sites and Allocations DPD, utilising the criteria outlined in Policy C6.
Policy E: Traveller sites in Green Belt (paras 14-15)		
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green	<ul style="list-style-type: none"> Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process. 	There is no provision being made for greenbelt amendments in the submission document. Part d of policy C6 (Page 96) sets out the criteria regarding sites within green belt.

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Policy Expectations	Possible Evidence	Evidence Provided
Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.		
Policy F: Mixed planning use traveller sites (paras 16-18)		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	<ul style="list-style-type: none"> • Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. • N.B. Mixed use should not be permitted on rural exception sites 	At least 25 pitches of the eleven pitches will be provided through a new site at St Albans road. The site at St. Albans road for 25 pitches is the most sustainable location, being located adjacent to a St Albans Road business park and residential areas. The future locations of sites for new Gypsy and Traveller sites will be determined through a Sites and Allocations DPD
Policy G: Major development projects (para 19)		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	<ul style="list-style-type: none"> • Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or 	The Strategic Development Locations (SDLs) proposed will not require the temporary or permanent relocation of a traveller site

[Type text]

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Policy Expectations	Possible Evidence	Evidence Provided
	sites suitable for re-location of the community.	

End