

**South Staffordshire Local Development Framework – Submission Core Strategy Development Plan Document
Soundness Self Assessment**

Soundness tool

Key question	Possible evidence	Evidence provided
Justified		
Participation		
<p>1. Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement</p>	<p><u>Core Strategy Statement of Consultation Regulation 30 (1) (d) Statement</u> - concludes that the level and method of consultation undertaken throughout the preparation of the Core Strategy has complied with the relevant regulations and the District Council's Adopted Statement of Community Involvement (SCI).</p>
Research/ fact finding		
<p>2. Is the content of the development plan document justified by the evidence? 3. What is the source of the evidence? 4. How up to date and convincing is it?</p>	<p>i. Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals ii. Sections of the pre-submission proposals documents iii. Sections of the preferred strategy report iv. Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document v. Sections of the consultation statement OR A very brief statement of how the main findings of consultation support the policies, with reference to:</p> <ul style="list-style-type: none"> o reports to the council on the issues raised during participation, covering both the front-loading and formulation phases 	<p>The evidence base documents used to inform the spatial strategy and the Core Policies and Development Policies in the Submission Core Strategy are listed as 'Key Evidence' after the explanatory text to each policy. A signposting document has been produced listing the studies and background documents that have provided evidence for the Core Strategy and this is published on the Council's website at www.sstaffs.gov.uk . A more detailed evidence base report has also been produced.</p> <p><u>Residents' Panel Survey</u> conducted in September 2005 which identified key issues for consideration in the LDF.</p> <p>Further Resident's Panel Survey undertaken in November/December 2006 seeking opinions on</p>

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	<ul style="list-style-type: none"> o any other information on community views and preferences <p>vi. The studies, reports and technical papers that provide the evidence for the policies set out in the development plan document. The date of preparation and who they were produced by should be signposted</p> <p>OR</p> <p>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the development plan document)</p>	<p>the LDF (Copies of research reports are available on request).</p> <p><u>Core Strategy Issues and Options Paper</u> – Chapter 8 – Green Belt and Open Countryside; Chapter 9 – Sustainable Communities; Chapter 10 – Locations for Growth; Chapter 11 – Housing; Chapter 12 – Local Economy; Chapter 13 - Village Centres and Shopping; Chapter 14 -Natural Environment; Chapter 15 – Historic Environment; Chapter 16 – Transport and Accessibility; Chapter 17 – Leisure, Recreation and Culture; Chapter 18 - Community Safety and Good Design; and Appendix 2 South Staffordshire Facts and Figures.</p> <p><u>Core Strategy Issues and Options Paper Statement of Consultation</u> - sets out the responses to the issues and options.</p> <p><u>Wolverhampton Airport Issues and Options Paper (January 2007)</u> sets out the key issues relating to the airport.</p> <p><u>Wolverhampton Airport Issues and Options Paper Statement of Consultation (July 2008)</u> sets out the outcome of the issues and options consultation.</p> <p><u>Development Policies Consultation Paper</u> - identifies the responses received to the Core Strategy Issues and Options consultation relevant to the consideration of development policies.</p> <p><u>Core Strategy Preferred Spatial Strategy</u></p>

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		<p><u>Consultation Document</u> – Chapter 2 – Portrait of South Staffordshire; Chapter 4 Issues and Challenges Facing South Staffordshire; Map 2 South Staffordshire District in Context; Table 1 - Housing Growth Proposals; Chapter 8 - Policy Choices; Appendix 4 - Housing Supply; Appendix 7 – Evidence Base.</p> <p><u>Preferred Spatial Strategy Consultation Document Statement of Consultation</u> - sets out the responses to proposed spatial strategy and indicative planning policies.</p> <p><u>Submission Core Strategy Chapter 3</u> - sets out the key issues and challenges facing South Staffordshire developed from previous documents and consultations.</p> <p><u>Sustainability Appraisal Scoping Report</u> – Appendix E Baseline Data</p> <p><u>Sustainability Appraisal Report</u> – Section 4 and Appendix C.</p> <p><u>Core Strategy Statement of Consultation Regulation 30 (1) (d) Statement</u> - Sections 3, 4, 5, 6, 7 and 8 set out the main issues raised in the earlier rounds of public consultation and how the representations received have been used to inform the development of the Submission Core Strategy.</p> <p>The evidence base documents relied upon to justify and support the policies in the Core Strategy are clearly identified in the plan and in the reasoned justification for each policy.</p>

Key question	Possible evidence	Evidence provided
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>i. Sections of the development plan documents setting out the assumptions</p> <p>ii. Sections of the sustainability appraisal report setting out the assumptions</p> <p>iii. A very brief statement for each assumption as to how the evidence led to the assumption</p> <p>iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions</p>	<p><u>Submission Core Strategy Section 2</u> - sets out a spatial portrait of South Staffordshire and Section 3 identifies the key issues and challenges facing the District that need to be addressed. These have been informed by the evidence base, including Residents' Panel survey, work on the Sustainable Community Strategy and wider community engagement work.</p> <p><u>Sustainability Appraisal Scoping Report</u> - Appendix E Baseline Data.</p> <p><u>Sustainability Appraisal Report</u> – Sections 3, 4 and 5.</p> <p>The Sustainability Appraisal was informed by a large number of relevant plans, policies and programmes which are set out in Appendix B of the Scoping Report.</p> <p><u>Submission Core Strategy Paragraphs 1.12 – 1.15</u> - refer to the Phased Revision of West Midlands Regional Spatial Strategy (WMRSS). Reference is also made in the Core Strategy to the evidence base which underpinned the WMRSS.</p>
Alternatives		
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing</p>	<p>i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options</p> <p>ii. Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered</p>	<p><u>Core Strategy Statement of Consultation Regulation 30 (1) (d) Statement</u> - Sections 3, 4, 5, 6, 7 and 8 demonstrate how stakeholders and the local community were involved in the development of the Submission Core Strategy.</p> <p><u>Core Strategy Documents</u> -</p>

	Possible evidence	Evidence provided
<p>how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised</p> <p>iv. Sections of the preferred strategy report explaining:</p> <ul style="list-style-type: none"> • how alternatives were developed and evaluated, and • why alternatives were rejected in favour of the preferred strategy <p>v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed</p> <p>vi. Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document</p> <p>vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions</p> <p>viii. Sections of the representations statement</p> <p>OR</p> <p>A brief statement of the influence upon decisions of: the issues raised during stakeholder and community engagement, and how they have been addressed</p> <p>ix. Any other documentation showing how alternatives were developed and evaluated</p> <p>x. A very brief statement and any other supporting documentation of the way decisions have been taken</p>	<p>Core Strategy Issues and Options Paper October 2006; Wolverhampton Airport Issues and Options Paper January 2007; Development Policies Paper August 2008; Preferred Spatial Strategy Consultation Document January 2009; Policy Choices Consultation Document January 2010; Consultation on Policy H4 Gypsies, Travellers and Travelling Showpeople March 2010.</p> <p>Core Strategy Issues and Options Paper – Statement of Consultation.</p> <p>Wolverhampton Airport Issues and Options Paper - Statement of Consultation.</p> <p><u>Core Strategy Preferred Spatial Strategy Consultation Document January 2009</u> – paragraphs 7.8 – 7.14 and Appendix 3 Spatial Strategy Options Considered but Rejected.</p> <p><u>Settlement Study (2010).</u></p> <p><u>Core Strategy Alternative Spatial Strategy Options Interim SA</u> - Sections 2.2, 2.3, 2.4 and 2.5 and Appendix B.</p> <p><u>Interim Sustainability Appraisal of the Preferred Spatial Strategy</u> - Section 4 and Appendix A.</p> <p><u>Sustainability Appraisal Report - Section 4</u> gives a comparison of alternative strategies and Section 5 sets out the impact of the sustainability appraisal process.</p> <p><u>Reports and Decisions</u> – Residents’ Panel</p>

Key question	Possible evidence	Evidence provided
		<p>Research Report (2/07); Executive Report – Wolverhampton Airport Issues and Options Paper (10/10/06); Executive Report to Council – Core Strategy Working Towards a Preferred Option (24/4/07); Deputy Leader Strategic Services decision - Core Strategy Development Policies Consultation Paper (30/6/08); Deputy Leader Strategic Services decision - Core Strategy Preferred Spatial Consultation Document (15/1/09); Deputy Leader Strategic Services decision - Core Strategy Policy Choices Consultation Document (17/12/09); Overview and Scrutiny Committee Report - Core Strategy Policy H4 Gypsies, Travellers and Travelling Showpeople (16/3/10); Deputy Leader Strategic Service decision - Core Strategy Policy H4 Gypsies, Travellers and Travelling Showpeople (29/3/10); Overview and Scrutiny Committee Report - Publication of Proposed Submission Core Strategy (18/1/11); Executive Report on Publication of Proposed Submission Core Strategy (8/2/11); Council Report - Publication of Proposed Submission Core Strategy (22/2/11).</p> <p><u>Core Strategy Statement of Consultation – Regulation 30 (1) (d) Statement</u> - Sections 3, 4, 5, 6, 7 and 8 set out the main issues raised in the earlier rounds of public consultation and how the representations received have been used to inform the development of the Submission Core Strategy. Summaries of all the representations received on the Core Strategy consultation documents are contained in separate consultation statements which are published on the Council's website.</p>

Key question	Possible evidence	Evidence provided
		<p><u>Core Strategy Statement of Publication Consultation Regulation 30(1) (e) Statement</u> - sets out the representations received at Publication Stage and the main issues raised. It also sets out how the representations have been addressed.</p> <p><u>Sustainability Appraisal Report</u> Section 4 - demonstrates how the alternative strategy options have been assessed and the conclusions reached. The SA process has helped to align the Core Strategy more closely with sustainability objectives.</p> <p>The development of the Core Strategy has been shaped by the Sustainability Appraisal process and the outcome of community and stakeholder involvement.</p>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<ul style="list-style-type: none"> i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies 	<p><u>Sustainability Appraisal Report</u> - Sustainability Appraisal has been an integral part of the production of the Core Strategy. Section 2.3 records the stages that have accompanied the evolution of the Core Strategy, providing both background and a commentary on the emerging strategy, options and policy and these are:</p> <p><u>Core Strategy SA Scoping Report</u> – September 2006 (updated); <u>Core Strategy Issues and Options Interim SA</u> - September 2006; <u>Wolverhampton Airport Issues and Options Interim SA</u> (January 2007); <u>Core Strategy Alternative Spatial Strategy Options Interim SA</u> - January 2008; <u>Core Strategy Preferred Spatial Strategy</u></p>

Key question	Possible evidence	Evidence provided
		<p><u>Consultation Document Interim SA</u> – January 2009;</p> <p><u>Core Strategy Policy Choices Consultation Document Interim SA</u> – January 2010;</p> <p><u>Core Strategy SA Report</u> – January 2011 (Updated August 2011)</p> <p><u>Core Strategy Preferred Spatial Strategy Consultation Document</u> - Appendix 3 sets out the spatial strategy options considered but rejected and how each of the options perform in relation to sustainability objectives.</p> <p><u>Core Strategy Preferred Spatial Strategy Consultation Document Interim SA</u> - Section 4 assessed the performance of the plan options and Section 5 tested the components of the proposed settlement hierarchy and the indicative policies.</p> <p><u>Core Strategy Policy Choices Consultation Document Interim SA</u> - Appendix A tested the Draft Core Policies and Development Policies. The report concluded that the proposed policies perform strongly against sustainability objectives.</p> <p><u>Sustainability Appraisal Report</u> Section 4 - appraises the spatial strategy and gives a comparison of the alternative options developed and the SA conclusions reached. Appendix C appraises the individual Core Strategy policies. Section 5 sets out conclusions on the impact of the SA process on the preparation of the Core Strategy.</p>

Key question	Possible evidence	Evidence provided
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy iii. Representations received from the regional development agency/regional planning body iv. Representations from the Government Office v. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p><u>Submission Core Strategy Introduction paragraphs 1.12 – 1.15</u> - set out the background relating to the phased revision of the West Midlands Regional Spatial Strategy (WMRSS). The Phase 2 Revision sets out the housing and employment requirements for South Staffordshire. The Council has used the housing target and the underpinning evidence based of the WMRSS as the basis for developing the spatial strategy.</p> <p>Reference is made to the WMRSS Phase 2 Revision in Chapter 8 - Housing and Chapter 9 – Economic Vibrancy.</p> <p>It should be noted that work has not been taken any further on the Phase 2 Revision following the winding up of the West Midlands Regional Assembly. The Phase 1 Revision for the Black Country (January 2008) is the approved Regional Spatial Strategy for the West Midlands.</p> <p><u>Regional Planning Body</u> - West Midlands Regional Assembly (WMRA) no longer exists and there is no organisation able give a conformity opinion on the Submission Core Strategy. The Council has prepared the Core Strategy against the context of the WMRSS and the thrust and direction of the strategy has remained consistent throughout. The Council has prepared a WMRSS Conformity Self Assessment and considers that the Submission Core Strategy is in general conformity with the approved WMRSS.</p>

Key question	Possible evidence	Evidence provided
		<p>WMRA representations made on the Core Strategy pre-submission consultations - Issues and Options Paper, Preferred Spatial Strategy Consultation Document and Policy Choices Consultation Document are available on request. WMRA also responded to the Wolverhampton Airport Issues and Options consultation.</p> <p><u>Meetings with Government Office for the West Midlands (GOWM)</u> – various meetings held during the preparation of the Core Strategy. The representations received from GOWM on pre-submission consultations - Issues and Options Paper, Preferred Spatial Strategy Consultation Document and Policy Choices Consultation Document are available on request. GOWM also responded to the Wolverhampton Airport Issues and Options consultation.</p> <p><u>Core Strategy Statement of Consultation Regulation 30(1) (d) Statement</u> - sets out the key issues raised in the earlier rounds of public consultation and how representations were taken into account. Summaries of all the representations received on the Core Strategy consultation documents are contained in separate consultation statements which are published on the Council's website.</p>

Effective		
Deliverable		
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy iii. A core strategy vision which is framed to set out the outcomes which are sought for the future iv. Sections of the development plan document which identify the main issues addressed v. Sections of the development plan document which indicate the priority outcomes 	<p><u>Submission Core Strategy Introduction paragraphs 1.17 – 1.22</u> - set out the key priorities in the Sustainable Community Strategy and the aims and objectives of the Council's Corporate Strategy.</p> <p><u>Submission Core Strategy Chapter 2</u> - sets out a Spatial Portrait of South Staffordshire.</p> <p><u>Submission Core Strategy Chapter 3</u> - sets out the Issues and Challenges facing South Staffordshire and these are summarised under the six Sustainable Community Strategy Themes.</p> <p><u>Submission Core Strategy Chapter 4</u> - sets out the vision for South Staffordshire and this is expressed further in relation to each of the five locality areas. The vision supports the vision and priorities of the South Staffordshire Sustainable Community Strategy.</p> <p>A number of responses were received to consultations on the Core Strategy Issues and Options Paper and the Preferred Spatial Strategy document relating to the issues to be addressed in the plan and these are set out in the Core Strategy Statement of Consultation Regulation 30 (1) (d) Statement. The Statement also summarises the responses received to the Wolverhampton Airport Issues and Options consultation. The outcome of the</p>

		<p>consultations can be found in the separate consultation statements prepared for these documents which are on the Council's website.</p> <p><u>Submission Core Strategy Appendix 1 - Delivery and Monitoring Framework</u> sets out the aims and outcomes of each of the policies in the plan.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<ul style="list-style-type: none"> i. Sections of the regional special strategy which identify cross-boundary issues. ii. Sections of the development plan document setting out cross-boundary issues and the response to them iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance 	<p><u>WMRSS Phase 1 Policy PA9 – Regional Logistics Sites</u> - identifies the need to make provision for an RLS in the region. WMRSS Phase 2 Revision set out a proposed revised policy identifying the potential for a new rail based RLS to serve the needs of the Black Country located in Southern Staffordshire. The Policy refers to the need for discussions between relevant authorities.</p> <p><u>WMRSS Phase 2 Revision Policy CF3 – Level and Distribution of New Housing Development</u> identifies that dependent on the outcome of further local studies some of Stafford Town Allocation could be made adjacent to the settlement in South Staffordshire.</p> <p>It should be noted that the WMRSS Phase 2 Revision has not been taken any further following the winding up of the WMRA and that the Phase 1 Revision for the Black Country is the approved WMRSS.</p> <p><u>Submission Core Strategy Chapter 3 - Issues and Challenges facing South Staffordshire - Paragraph 3.2 Cross Boundary Issues.</u></p> <p><u>Cross Boundary Studies</u> – The following cross boundary studies have informed the</p>

		<p>preparation of the Core Strategy: C3 Strategic Housing Market Assessment; Southern Staffordshire and North Warwickshire Gypsy and Traveller Accommodation Assessment; Staffordshire County-Wide Renewable/Low Carbon Energy Study; Southern Staffordshire Outline Water Cycle Study; Southern Staffordshire Surface Water Management Plan Phase 1; Evidence Base relating to Cannock Chase SAC and the Appropriate Assessment of Local Authority Core Strategies; and Cannock Chase SAC Visitor Impact Mitigation Strategy.</p> <p><u>Cross boundary meetings</u> – meetings held on the following dates: Cannock Chase Council (17/1/07), Stafford Borough Council (8/3/07, 8/10/08, 20/1/09, 22/7/09), Wolverhampton City Council (25/4/07 & 30/6/11), Telford and Wrekin Borough Council (9/7/07), Wyre Forest District Council (13/7/07), Bridgnorth District Council 24/7/07) and Shropshire Council 26/11/08).</p>
<p>16. Does the development plan document contain clear objectives?</p>	<ul style="list-style-type: none"> i. A spatial portrait which identifies the key issues facing the area ii. A core strategy vision which is framed to set out the outcomes which are sought for the future iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision 	<p><u>Submission Core Strategy Chapter 2</u> - sets out the Spatial Portrait of South Staffordshire.</p> <p><u>Submission Core Strategy Chapter 3</u> - sets out the Issues and Challenges facing South Staffordshire.</p> <p><u>Submission Core Strategy Chapter 4</u> - sets out the vision for South Staffordshire and this is expressed further in relation to each of the five locality areas.</p> <p><u>Submission Core Strategy Chapter 5</u> - sets out the Strategic Objectives to achieve the long-term vision and these are set out under the Sustainable Community Strategy themes. They</p>

		<p>are derived from the spatial portrait, issues and challenges and the vision for the District.</p>
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<ul style="list-style-type: none"> i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place 	<p><u>Submission Core Strategy Chapter 2</u> – sets out a Spatial Portrait of South Staffordshire.</p> <p><u>Submission Core Strategy Chapter 5</u> - sets out the Strategic Objectives to achieve the long-term vision and these are set out under the Sustainable Community Strategy themes. They are derived from the spatial portrait, issues and challenges and the vision for the District.</p> <p><u>Links between the Local Strategic Partnership and the LDF</u> – close links were established at the outset and a joint visioning event was held early in the plan making process to identify key issues and priorities/objectives. The objectives have been developed in close consultation with the LSP and partner organisations. The Core Strategy has been discussed at various LSP meetings including the housing, environment and economic theme groups and the Officer Steering Group (OSG). The locality based approach of the LSP has been taken on Board in the Core Strategy.</p> <p>The Chair of the LSP responded to the Publication Core Strategy and referred to the strong links and partnership working. The Chair of the LSP has endorsed the Core Strategy on behalf of the Partnership.</p>
<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<ul style="list-style-type: none"> i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them ii. Relevant sections of the sustainable community strategy which identify its objectives iii. Confirmation from the local strategic partnership 	<p><u>Submission Core Strategy</u> – Chapters 6-12 are structured in the same way and commence by setting out the strategic objectives and then identify a series of Core Policies and supporting Developments Policies to meet/deliver those objectives.</p>

	<p>and partner organisations that they believe the policies will achieve the agreed objectives</p> <p>iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed</p> <p>v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.</p>	<p><u>Sustainable Community Strategy</u> - sets out priorities and actions under the following themes:</p> <ul style="list-style-type: none"> - Environmental Quality - Housing - Economic Vibrancy - Community Safety - Health and Wellbeing - Children and Young People <p><u>Links between the Local Strategic Partnership and the LDF</u> – close links were established at the outset and a joint visioning event was held early in the plan making process to identify key issues and priorities/objectives. The objectives have been developed in close consultation with the LSP and partner organisations. The Core Strategy has been discussed at various LSP meetings including the housing, environment and economic theme groups and the Officer Steering Group (OSG). The locality based approach of the LSP has been taken on Board in the Core Strategy.</p> <p>The Chair of the LSP responded to the Publication Core Strategy and referred to the strong links and partnership working. The Chair of the LSP has endorsed the Core Strategy on behalf of the Partnership.</p> <p><u>Research reports and studies</u> – The following are examples of some of the reports and studies that have informed the development of Core Strategy policies: Staffordshire County-Wide Renewable/Low Carbon Energy Study; Southern Staffordshire Outline Water Cycle Study, Southern Staffordshire Surface Water</p>
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<p>21. Are there realistic timescales related to the objectives?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery 	<p><u>Submission Core Strategy Chapter 5</u> – sets out the issues relating to the delivery of infrastructure and Core Policy 5 identifies the policy requirements.</p> <p><u>Submission Core Strategy Core Strategy Appendix 1 Delivery and Monitoring Framework</u> - provides details of the process of monitoring and review of the Core Strategy policies.</p> <p><u>Infrastructure Delivery Plan (IPD)</u> - identifies infrastructure needs, responsibilities and timescales for delivery and is cross referenced to Core Policy 5 in the Submission Core Strategy.</p>

<p>22. Are the policies internally consistent?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent ii. A very brief statement explaining how the council considers its objectives are consistent 	<p><u>Submission Core Strategy Chapter 3</u> – sets out the Issues and Challenges facing South Staffordshire.</p> <p><u>Submission Core Strategy Chapter 4</u> – sets out Vision for South Staffordshire and vision for each of the locality areas.</p> <p><u>Submission Core Strategy Chapter 5</u> – sets out the Strategic Objectives.</p> <p>The Core Strategy is structured in such a way that each strategy theme starts with the relevant Strategic Objectives and these are followed by the Core Policies and Development Policies.</p> <p><u>Links to other Council Strategies and Plans</u> - There has been extensive frontloading and liaison with other Service Units within the Council including Development Management, Housing and Regeneration, Conservation and Design, Landscape and Policy and Partnerships together with liaison with the LSP.</p> <p>The policies in the Submission Core Strategy reflect the Council's key priorities and objectives as set out within the Corporate Strategy and as identified in other strategies and plans including protecting and enhancing the quality of the environment and providing affordable housing. The Council considers that the objectives set out in the Core Strategy and the policies that have developed from them are internally consistent.</p>
<p>23. Does the development plan document contain material</p>	<ul style="list-style-type: none"> i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan 	<p><u>Local Development Scheme (February 2011)</u> – sets out the scope and content of the Core Strategy DPD. It states that the Core Strategy</p>

<p>which:</p> <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? 	<p>document. This should show how they combine to provide a coherent policy structure</p> <ol style="list-style-type: none"> ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p>will identify the local planning strategy for South Staffordshire and set out the vision, objectives and spatial strategy to guide the future development of the District up to 2027.</p> <p><u>Liaison with the Government Office for the West Midlands (GOWM)</u> - throughout the development of the Core Strategy there has been extensive liaison with GOWM including guidance on the form and content of the document and conformity with national policy.</p> <p>Copies of representations made by GOWM on the Core Strategy are available on request.</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<ol style="list-style-type: none"> i. Sections of the development plan document that identify the key objectives and how they will be delivered upon ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document 	<p><u>Submission Core Strategy Chapter 5</u> – sets out the key strategic objectives for the plan and how they will be delivered through the Core Policies and Development Policies in the plan.</p> <p><u>Submission Core Strategy Appendix 1 Delivery and Monitoring Framework</u> - sets out the aims and outcomes for each of the policies that will help to deliver the plan objectives.</p> <p><u>Stakeholder engagement</u> - In January 2008, a stakeholder workshop was held with key service and infrastructure providers to assist in the formulation of a Preferred Option for the Core Strategy and to discuss infrastructure issues. The workshop was attended by representatives from Staffordshire County Council, Environment Agency, Natural England, Highways Agency and other agencies. Two workshops were held in March and April 2009 following publication of the Preferred Spatial Strategy; one for delivery agencies and one for developers and agents. In March 2010</p>

		<p>infrastructure and delivery agencies were consulted on the Draft Infrastructure Delivery Plan (IDP).</p> <p>Representations received from consultations on the Core Strategy are set out in the individual consultation statements. The Core Strategy Statement of Consultation Regulation 30 (1) (d) Statement sets out the main issues raised at each stage of the consultation and how they were addressed.</p> <p><u>Infrastructure Delivery Plan (IDP)</u> – the IDP has been prepared following extensive consultation with key delivery agencies and sets out the infrastructure required to deliver the policy objectives of the plan.</p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<p>i. Sections of the development plan document that show how the development management policies:</p> <ul style="list-style-type: none"> • will help to deliver the strategy • derive from, and elaborate on, the objectives and policies of the plan 	<p><u>Submission Core Strategy</u> - contains detailed development management policies to support the strategic Core policies and these will help to deliver the spatial strategy. The development policies are derived from the Core policies and are linked to the strategic objectives.</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<p>i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward</p> <p>ii. Representations in respect of infrastructure</p> <p>iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with</p>	<p><u>Submission Core Strategy Core Policy 5 Infrastructure Delivery</u> – the policy seeks to ensure the co-ordinated delivery of facilities and infrastructure to support sustainable communities.</p> <p><u>Infrastructure Delivery Plan (IDP)</u> - includes infrastructure schedules setting out the physical, social and community and green infrastructure required in the plan period.</p> <p>There has been close liaison with service and infrastructure delivery agencies throughout the</p>

		<p>development of the Core Strategy involving consultation on the Infrastructure Delivery Plan and attendance at workshops. A summary of the outcome of the workshops is available on request.</p>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out delivery mechanisms and timescale ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered iii. Research or studies that address matters of delivery and the realistic timescales iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder vi. Correspondence from stakeholders on delivery mechanisms and timescale vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	<p><u>Submission Core Strategy</u> - The delivery mechanisms for each of the policies are set out after each policy. The links with other Council strategies and delivery plans and working with key partners are also clearly identified.</p> <p><u>Site Allocations DPD</u> – the proposed DPD will be progressed during 2011/2012 and will help to deliver the site specific elements of the local planning strategy.</p> <p><u>Affordable Housing Viability Study 2011</u> – addresses the delivery of affordable housing in the District with policy recommendations.</p> <p><u>Stakeholder engagement</u> - key stakeholders and delivery agencies have contributed to the development of the policies in the Core Strategy and this has been achieved through an extensive frontloading process. This has involved stakeholder workshops and ongoing consultation/liason with key stakeholders including infrastructure delivery agencies. The key stakeholders involved in delivering the policies are set out after each policy in the plan.</p> <p><u>Local Strategic Partnership (LSP) Delivery/Action Plans</u> – the delivery and action plans prepared by the LSP theme groups such as those covering housing and economic vibrancy identify projects and initiatives that will contribute to the delivery of the Core</p>

		<p>Strategy policies such as the provision of affordable housing. The delivery and action plans are supported by LSP partners.</p> <p>See also response to key question 26 above.</p>
<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<ul style="list-style-type: none"> i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery ii. Representations in respect of infrastructure iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with 	<p>Please refer to all the points set out under key questions 26 and 27 above.</p> <p><u>Submission Core Strategy</u> – the plan places strong emphasis on delivery and identifies those key stakeholders and partners who will contribute to the delivery of the local planning strategy. The LSP partners will play a particularly important role in delivering key elements of the strategy and planning policy objectives.</p>
<p>29. Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out responsibilities for delivery ii. Correspondence showing how other stakeholders intend to support the delivery of the policies iii. Reports by the council or the relevant stakeholder iv. Representations from stakeholders on implementation v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	<p>Please refer to all the points set out under key questions 26, 27 and 28 above.</p>
<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes</p>	<ul style="list-style-type: none"> i. Sections of the development plan document that reflect the plans or strategies of other bodies ii. Expressions of support from bodies responsible for other strategies affecting the area iii. Representations in respect of services provided by other agencies iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised 	<p><u>Submission Core Strategy Chapter 1 Introduction</u> - identifies the links with other policies and strategies and the principles of sustainable development which the Core Strategy seeks to follow. The Core Strategy will help to deliver other strategies and plans that cover the District including the Sustainable Community Strategy and the Staffordshire Local Transport Plan.</p>

<p>from a variety of organisations that influence the nature of places and how they function?</p>	<p>in the representation, or include a copy of the substance of the representation</p>	<p><u>Stakeholder engagement</u> - representations were received from adjoining local authorities and other bodies on the Preferred Spatial Strategy Consultation Document and Publication Core Strategy expressing support for the strategy. These are summarised in the Preferred Spatial Strategy Consultation Statement and the Core Strategy Statement of Consultation Regulation 30 (1) (d) Statement.</p> <p>The representations received at each stage of consultation on the Core Strategy are set out in the individual Consultation Statements. These include representations from the key stakeholders.</p>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<ul style="list-style-type: none"> i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy 	<p><u>Submission Core Strategy Core Policy 6 Housing Delivery</u> – the policy identifies that additional housing development will be considered in the plan period to respond to changing circumstances. The Core Strategy includes recognition of cross boundary issues relating to housing and employment provision linked to the West Midlands Regional Spatial Strategy (WMRSS).</p> <p><u>Preferred Spatial Strategy Consultation Document Appendix 3</u> - contained an evaluation of alternative options considered and these were also appraised in the Sustainability Appraisal process.</p> <p><u>Sustainability Appraisal Report</u> - Section 4 appraises the spatial strategy and gives a summary of the alternative options developed and the SA conclusions reached. Appendix C appraises the individual Core Strategy policies. Section 5 sets out conclusions on the impact of</p>

		the SA process on the preparation of the Core Strategy.
Flexible		
34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	<ul style="list-style-type: none"> i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> • the effectiveness of policies and what evidence is being collected to undertake this • changes affecting the baseline information and any information on trends on which the development plan document is based iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	<p><u>Submission Core Strategy Appendix 1 Monitoring Framework</u> - sets out the performance indicators that will be used to monitor the plan and the implementation of policies. Paragraph 8 of Appendix 1 indicates that if as a result of monitoring, objectives are not being met, or circumstances change this may give rise to a review of the Core Strategy.</p> <p><u>LDF Annual Monitoring Report</u> - includes specific indicators to assess the implementation of policies relating to key issues such as housing, employment and the environment.</p> <p><u>Sustainability Appraisal Report Appendix D</u> - sets out sustainability monitoring indicators.</p> <p><u>Submission Core Strategy Appendix 5</u> - provides a housing trajectory and this is linked to Core Policy 6 – Housing Delivery.</p> <p><u>Monitoring</u> - The District Council has excellent working arrangements with Staffordshire County Council and other stakeholders in providing monitoring information. Officers are part of a countywide monitoring group and this provides a co-ordinated approach to monitoring information.</p> <p>The Council is confident that through the monitoring and review process the plan is flexible enough to respond to changing circumstances.</p>

<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional spatial strategy?</p>	<ul style="list-style-type: none"> i. Sections within the development plan document dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	<p>Please refer to the response set out under key question 34 above.</p> <p><u>Site Allocations DPD</u> – the DPD will set out policies relating to the phasing of development and mechanisms to monitor the rate of development linked to the annual monitoring process.</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<ul style="list-style-type: none"> i. A section of the development plan document which expressly addresses flexibility ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing 	<p>Please refer to the response set out under key question 34 above.</p>
Monitoring		
<p>37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories iii. Reference to any other reports or technical documents which contain information on the delivery of policies 	<p><u>Submission Core Strategy Appendix 1</u> - includes a monitoring framework which identifies monitoring indicators relating to the delivery of policies including housing. A housing trajectory is set out in Appendix 5 which provides further information about the projected housing completions in the period 2006-2027.</p> <p><u>LDF Annual Monitoring Report (AMR)</u> - reports on a series of indicators relating to the economy, housing and the environment and contains a housing trajectory. The housing trajectory is revised each year to reflect completions and new residential permissions.</p>
<p>38. Is it clear how these are to be measured and are these linked to the production of</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report 	<p><u>Submission Core Strategy Appendix 1</u> - includes a monitoring framework which identifies monitoring indicators relating to the</p>

<p>the annual monitoring report?</p>	<p>and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal</p> <p>iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators</p>	<p>delivery of policies including housing. A housing trajectory is set out in Appendix 5. Many of the indicators set out in the monitoring framework are already reported in the AMR.</p> <p><u>Sustainability Appraisal Report Appendix D</u> - includes sustainability monitoring indicators.</p>
<p>39. Are suitable targets and indicators present (by when, how and by whom)?</p>	<p>i. Sections of the development plan document setting out indicators, targets and milestones</p> <p>ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories</p>	<p><u>Submission Core Strategy Appendix 1</u> - includes a monitoring framework which identifies monitoring indicators relating to the delivery of policies including housing. A housing trajectory is set out in Appendix 5.</p> <p><u>LDF Annual Monitoring Report</u> - reports on a series of indicators relating to the economy, housing and the environment and for housing contains a housing trajectory. The housing trajectory is revised each year to reflect completions and new residential permissions. The housing supply position is reported in a Housing Land Availability Report.</p>

National policy		
<p>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement iv. Representations from the Government Office on the preferred strategy or the submitted development plan document v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with 	<p><u>Submission Core Strategy</u> – the plan is considered to be consistent with National Planning Policy. Paragraphs 1.10 and 1.11 refer to the need for consistency with national planning policy. The Core Strategy does provide a local interpretation in respect of certain policies but does not vary or conflict with national policy and guidance. The links with national planning policy are expressed elsewhere in the Core Policies and Development Policies and in the supporting text.</p> <p>An assessment has been carried out of the Core Strategy policies against the Draft National Planning Policy Framework (NPPF).</p> <p><u>Submission Core Strategy Appendix 3</u> – sets out a list of national planning policies.</p> <p><u>Government Office for the West Midlands (GOWM)</u> - There has been close liaison with the GOWM throughout the preparation of the Core Strategy. Representations were received from GOWM on the Preferred Spatial Strategy Consultation Document and the Policy Choices Consultation Document which did not raise any fundamental issues relating to consistency with national planning policy.</p> <p>Preferred Spatial Strategy Consultation Statement Appendix G and Policy Choices Consultation Statement Appendix E set out the representations received from GOWM and the Core Strategy Statement of Consultation</p>

		Regulation 30 (1) (d) Statement sets out how the representations were taken into account in developing the Submission Core Strategy.
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p><u>Submission Core Strategy</u> – it is considered that the plan does not contain any unnecessary policies. The Submission Core Strategy has been formulated in line with PPS12 and other national planning policy statements and in close liaison with the Government Office for the West Midlands.</p>