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

In summary – the key requirements of plan preparation are:

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

The Tests of Soundness at Examination

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

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

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

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

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

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

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and
The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

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

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.

The DPD should be flexible and able to be monitored.

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

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

The demonstration of this is a ‘lead’ policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy [www.planningportal.gov.uk](http://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](http://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.
South Staffordshire Council SAD – Soundness Self-Assessment

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<th>Soundness Test and Key Requirements</th>
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<tr>
<td><strong>Positively Prepared:</strong> 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.</td>
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### Vision and Objectives

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<td>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?</td>
<td>• 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.</td>
<td>The key issues, challenges and strategic objectives at a more general level are established in Sections 1-4 at the start of the Site Allocations Document Publication Plan 2017 (SAD). The SAD also includes more specific sections are also included addressing issues, objectives and resulting SAD policies. These are:</td>
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<tr>
<td>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?</td>
<td>• Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them.</td>
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<tr>
<td>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?</td>
<td>• 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.</td>
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<td>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</td>
<td>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</td>
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<td>Are the policies internally consistent?</td>
<td>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery.</td>
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<td>Are there realistic timescales related to the objectives?</td>
<td>• 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.</td>
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<td>Does the DPD explain how its key policy objectives will be achieved?</td>
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The key outcomes arising from these issues are set out in the relevant sections, and are also supported by Appendix 1 (showing housing site allocations), Appendix 2 (gypsy and traveller site allocations) and Appendix 3 (employment site allocations).

The above sections set out how the SAD will deliver the strategic objectives and policies of the adopted Core Strategy DPD 2012. In each of the relevant SAD sections, the relevant objectives of the Core Strategy are described to provide appropriate context for the new SAD policies. Working within the overarching framework of the CS also ensures that the new policies in the SAD are consistent with one another in...
The infrastructure required to deliver the SAD is detailed in the Council’s Infrastructure Delivery Plan (IDP) and the pro-formas for individual housing, employment and gypsy and traveller sites listed in Appendices 1-3 of the SAD. These requirements have resulted from extensive consultation with both infrastructure providers and site promoters to ensure they are both necessary and deliverable. Evidence of this consultation includes the responses received by the Council to its Issues and Options and Preferred Options consultation, and the accompanying consultation statements.

The SAD is a tier 2 plan which seeks to deliver sites to meet targets in the adopted Core Strategy. It is not within the scope of the SAD to revisit the adopted strategic policies set out in the Core Strategy.

The Local Development Scheme (LDS) provides information on the scope and content of each DPD, including the SAD and the Local Plan Review. The LDS can be viewed on the South Staffordshire Council website (www.sstaffs.gov.uk).

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<td>The presumption in favour of sustainable development (NPPF paras 6-17)</td>
<td>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</td>
<td>terms of their strategic aims.</td>
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<td>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).</td>
<td>The infrastructure required to deliver the SAD is detailed in the Council’s Infrastructure Delivery Plan (IDP) and the pro-formas for individual housing, employment and gypsy and traveller sites listed in Appendices 1-3 of the SAD. These requirements have resulted from extensive consultation with both infrastructure providers and site promoters to ensure they are both necessary and deliverable. Evidence of this consultation includes the responses received by the Council to its Issues and Options and Preferred Options consultation, and the accompanying consultation statements.</td>
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<td>An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</td>
<td>The SAD is a tier 2 plan which seeks to deliver sites to meet targets in the adopted Core Strategy. It is not within the scope of the SAD to revisit the adopted strategic policies set out in the Core Strategy.</td>
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<td>The quantum of development and spatial distribution of development allocated in the SAD is set out in the adopted Core Strategy. The scope of the SAD is not to revisit the strategic quantum and distribution of development within the district. Instead, it provides more detailed policies and allocations to support and deliver the Core Strategy strategic policies, vision and</td>
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Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
—specific policies in this Framework indicate development should be restricted.

• Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)

To this end, the SAD will facilitate allocations to ensure that at least 3850 homes are delivered between 2006-2028, in order to conform with Core Policy 6 of the adopted Core Strategy. As a result, sufficient land to provide a minimum of 1012 homes (the remaining target taking account of changes in land supply since the Core Strategy’s adoption) in the remainder of the plan period has been allocated in the SAD. In addition to this, the SAD allocates sufficient land to conform to the Core Strategy’s policy requirements regarding safeguarded land. The SAD also proposes Policy SAD1, which will ensure an early review of the Local Plan to come forward to address future development needs.

With regards to employment, paragraph 9.4 of the Core Strategy required a refresh of the Council’s Employment Land Study (ELS) be undertaken in order for it to be considered when allocating land in the SAD. The Council subsequently undertook a number of studies relating to the strategic need and distribution of employment land, including:
- the South Staffordshire ELS 2013
- the Black Country and South Staffordshire sub-regional High Quality Employment Land Studies 2014/2015
- the West Midlands Strategic Employment Sites Study 2015

The role of these studies and others in informing the Council’s approach is detailed in page 35-46 of the
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<td>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</td>
<td>• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at <a href="http://www.planningportal.gov.uk">www.planningportal.gov.uk</a>)</td>
<td>Sites and policies within the SAD sit within the context of the adopted Core Strategy which it is delivering. The adopted Core Strategy already includes National Policy 1: The Presumption in Favour of Sustainable Development, which reflects the model policy previously promoted. Any proposals brought forward through the SAD will be determined in accordance with the policies of the Core Strategy, including National Policy 1.</td>
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<td>Objectively assessed needs</td>
<td>• 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.</td>
<td>As set out above and in the Council’s Housing Background Topic Paper, the quantum of development and spatial distribution of development allocated in the SAD is largely set out in the adopted Core Strategy, particularly with regards to housing. The scope of the SAD is not to revisit the strategic quantum and distribution of development within the district, which will be addressed through a full review</td>
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## Soundness Test and Key Requirements

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of the Local Plan (as set out in Policy SAD1).

The Core Strategy (at para 9.4) does however require that a refresh of the Council’s Employment Land Study (ELS) should be undertaken to inform the allocation of employment land in the SAD. The Council subsequently undertook a number of studies relating to the strategic need and distribution of employment land, including:

- the South Staffordshire ELS 2013
- the Black Country and South Staffordshire sub-regional High Quality Employment Land Studies 2014/2015
- the West Midlands Strategic Employment Sites Study 2015

The role of these studies and others in informing the Council’s approach is detailed in page 35-46 of the SAD.

The Council has also published a Duty to Co-operate schedule (January 2017) which summarises how the Council has met the duty in the preparation of the SAD. This document addresses issues such as Green Belt, Housing and Employment, detailing how the Council is co-operating with neighbouring authorities and statutory bodies on these matters.

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Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).
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<td><strong>NPPF Principles: Delivering sustainable development</strong></td>
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<tr>
<td><strong>1. Building a strong, competitive economy (paras 18-22)</strong></td>
<td><strong>• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.</strong></td>
<td>The SAD takes forward and facilitates the delivery of the vision set out in the adopted Core Strategy, which is detailed in pages 29 – 35 of that document. The SAD also supports the delivery of the Strategic Objectives of the Core Strategy, which are set out on pages 37-39 of the Core Strategy and include objectives specifically designed to promote the economic vibrancy of the District. The economic elements of this vision are further articulated on page 35 of the SAD.</td>
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<td>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),</td>
<td><strong>• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</strong> <strong>• An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)</strong></td>
<td>The SAD is supported by a number of studies relating to the strategic need for and distribution of employment land, which also assess the deliverability of existing and potential allocations for employment sites. These include: - the South Staffordshire ELS 2013 - the Black Country and South Staffordshire sub-regional High Quality Employment Land Studies 2014/2015 - the West Midlands Strategic Employment Sites Study 2015 - ROF Featherstone Viability and Delivery Options Study 2014 The work undertaken to date has shown that the two road options for ROF Featherstone proposed in the</td>
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<td>2. ensuring the vitality of town centres (paras 23-37)</td>
<td>• The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</td>
<td>Village and neighbourhood centres have been identified in the SAD Publication Plan Policies Maps. There are no towns in South Staffordshire. The existing village and neighbourhood centres were subject to a SWOT analysis carried out as part of the ELS 2013 which concluded that there is generally a good retail offer provided to existing residents within the district. Therefore, no further allocations of retail areas have been identified.</td>
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<tr>
<td>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)</td>
<td>• 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.</td>
<td>Village and neighbourhood centres have been identified in the SAD Publication Plan Policies Maps. These existing centres were subject to a SWOT analysis carried out as part of the ELS 2013 which concluded that there is generally a good retail offer provided to existing residents within the district. Therefore, no further allocations of retail areas have been identified.</td>
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<tr>
<td>3. <strong>Supporting a prosperous rural economy</strong> (para 28)</td>
<td>- 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.</td>
<td>Core Policy1, Core Policy 9 and policy EV5 of the adopted Core Strategy set out how the Council will support the sustainable growth of rural businesses and tourism. Core Policy 14, policy HWB1 and policy EV9 support the provision and protection of local services and facilities within the district. The SAD does not propose to alter these policies.</td>
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<td><strong>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</strong></td>
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<td>4. <strong>Promoting sustainable transport</strong> (paras 29-41)</td>
<td>- Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. - Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. - A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. - Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.</td>
<td>The SAD delivers allocations in conformity with Core Policy 1 of the adopted Core Strategy, which seeks to allocate growth in the most accessible and sustainable locations within the district to meet local needs. In particular, this should ensure that allocated housing sites have access to a range of key facilities and sustainable transport modes, a principle which is further supported by Policy SAD9 within the SAD. The SAD also proposes the allocation of modest extensions to two of the district’s four strategic employment sites. These allocations are being proposed to meet the Black Country’s employment needs, as set out in the Black Country and South Staffordshire Sub Regional High Quality Employment Land Study 2014/15. This is set out in 9.16 – 9.22 of the SAD. Therefore, as the need for these allocations</td>
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<td><strong>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</strong></td>
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<td><strong>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)</strong></td>
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<td><strong>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)</strong></td>
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<td>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)</td>
<td>• If local (car parking) standards have been prepared, are they justified and necessary? (39)</td>
<td>arises from the Black Country conurbation, which the employment sites are located in close proximity to, the Council considers that modest extensions to these existing employment sites offers a satisfactory balancing of housing and employment provision. Where infrastructure is needed to deliver these sites this is set out in the Infrastructure Delivery Plan. The adopted Core Strategy contains an existing policy (Core Policy 11) which seeks to ensure that development proposals are provided in line with sustainable transport principles. Furthermore, the strategy and policies within the adopted Core Strategy have been informed by the Staffordshire Local Transport Plan.</td>
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<td>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</td>
<td>• Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</td>
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<td>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)</td>
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<tr>
<td>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</td>
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<td>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)</td>
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<td>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)</td>
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<td>The setting of car parking standards including provision for town centres. (39-40)</td>
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<td><strong>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)</strong></td>
<td>Policies supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44. Policies addressing electronic communications networks are already provided in the adopted Core Strategy, in particular Policy EV10 and Core Policy 9.</td>
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<td><strong>Support the expansion of the electronic communications networks, including telecommunications’ masts and high speed broadband. (43)</strong></td>
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<td>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)</td>
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<td><strong>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)</strong></td>
<td>The SAD allocates sufficient sites to meet the housing, gypsy and traveller and employment requirements set out in the Core Strategy. As such it delivers the remainder of the planned Core Strategy housing requirement through the allocation of land sufficient to deliver a minimum of 1,070 dwellings, which is sufficient to deliver the remainder of the Core Strategy’s housing requirement for 3850 homes to be built between 2006-2028. Further information on these matters is included in the Housing Background Topic Paper and pages 23-28 of the SAD.</td>
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<td><strong>Identification of:</strong></td>
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<td>a) five years or more supply of specific deliverable sites; plus the buffer as appropriate</td>
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<td>Where this element of housing supply includes windfall sites, inclusion of ‘compelling evidence’ to justify their inclusion (48)</td>
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<td>• A SHLAA</td>
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<td>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</td>
<td>• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</td>
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| Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47) | • A housing trajectory  
• Monitoring of completions and permissions (47)  
• Updated and managed SHLAA. (47)                                                                                                                                                                                                                                                       | The Council’s housing trajectory is set out in the adopted Core Strategy (page 205).                                                                                                                                                                                                                                                                                                                      |
| Set out the authority’s approach to housing density to reflect local circumstances (47).                                                                                                                                                                        | • Policy on the density of development.                                                                                                                                                                                                                                                                                                                                                                           | Policies on development design and character are set out in Policy EQ11 of the adopted Core Strategy and in the Council’s Village Design Guide. The SAD does not propose to alter these policies.                                                                                                                                                                   |
| Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159) | • Policy on planning for a mix of housing (including self-build, and housing for older people  
• SHMA  
• Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50)  
• Evidence for housing provision based on up to date, objectively assessed needs. (50)                                                                                                           | The adopted Core Strategy already includes policies governing the mix and types of housing provision to be delivered in the district, such as Policies H1, H2, H3 and H4. The SAD does not propose to alter these policies and further detail on their operation is given in the adopted Affordable Housing and Housing Mix SPD. |
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<td>• 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)</td>
<td>The adopted Core Strategy already includes Policy H3, which governs the delivery of rural exception sites, including sites which require cross-subsidy. Core Policy 1 makes clear the types of housing schemes which will be permitted outside of villages identified for housing growth. The SAD does not propose to alter these policies.</td>
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<td>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</td>
<td>• 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.</td>
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<td>7. Requiring good design (paras 56-68)</td>
<td></td>
<td>Policies on development design and character are set out in Policy EQ11 of the adopted Core Strategy and in the Council’s Village Design Guide. The SAD does not propose to alter these policies. However, supplementary design requirements for each allocation site are, where necessary, included in the site proformas in Appendix 1 of the SAD.</td>
</tr>
<tr>
<td>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</td>
<td>• 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</td>
<td></td>
</tr>
<tr>
<td>8. Promoting healthy communities (paras 69-77)</td>
<td></td>
<td>Policies on development design and character are set out in Policy EQ11 of the adopted Core Strategy and in the Council’s Village Design Guide. The SAD does not propose to alter these policies. However, supplementary design requirements for each allocation site are, where necessary, included in the site proformas in Appendix 1 of the SAD.</td>
</tr>
<tr>
<td>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).</td>
<td>• 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</td>
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<td>Soundness Test and Key Requirements</td>
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| Policies should plan positively for the provision and use of shared space, community facilities and other local services (70). | • Inclusion of a policy or policies addressing community facilities and local service.  
• Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure. | The adopted Core Strategy already contains Core Policy 10 and Policy EV9, which address the provision and retention of community facilities within the district. Furthermore, the spatial strategy set out in Core Policy 1 ensures that housing growth is allocated in the Main and Local Service Villages, which offer the greatest range of community facilities, key services and infrastructure.  
Where new community facilities have been agreed to be provided on allocation sites, details are included in the site proformas in Appendix 1 of the SAD. |
| 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). | • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)  
• A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74)  
• Protection and enhancement of rights of way and access. (75) | Quantitative and qualitative standards for new open space provision are set out in Policy SAD7 of the SAD. The adopted Core Strategy already contains Policy HWB1 and Core Policy 14, which require that existing open space, sport and recreation facilities are protected from development unless certain conditions are met. The SAD does not propose to alter this policy. |
<p>| Enable local communities, through local and neighbourhood plans, to identify special | • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be | The adopted Core Strategy does not contain a policy on the management of Local Green Spaces, and the |
|                                                                                                                                                                                                 |                                                                                                                                                      |                                                                                                                                                      |</p>
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<th>Soundness Test and Key Requirements</th>
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<td>protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</td>
<td>designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)</td>
<td>SAD does not propose to introduce one.</td>
</tr>
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</table>

9. Protecting Green Belt land (paras 79-92)

Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)

Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)

When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)

Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)

- Where Green Belt policies are included, these should reflect the need to:
  - 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)

The adopted Core Strategy already contains policies governing development in the Green Belt (Policy GB1). Policy GB2 governs development on safeguarded land and sets out the extent of safeguarded land to be considered for allocation for longer terms needs in the SAD. Policy SAD3 identifies the land to meet this requirement.

10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)

Adopt proactive strategies to mitigate and

- Planning of new development in locations and
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| adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94) | ways which reduce greenhouse gas emissions.  
- Support for energy efficiency improvements to existing building.  
- Local requirements for a building’s sustainability which are consistent with the Government’s zero carbon buildings policy. (95)) | the Council will ensure new development should meet national renewable energy and energy efficiency requirements. Core Policy 1 of the adopted Core Strategy also plans for future growth in a manner which would promote sustainable transport patterns. The SAD does not propose to alter either of these policies. |
| Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97) |  
- A strategy and policies to promote and maximise energy from renewable and low carbon sources,  
- Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)  
- Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97) | Policy EQ6 of the adopted Core Strategy governs renewable energy proposals, as well identifying locations with renewable energy potential. The SAD does not propose to alter this policy. |
| Minimise vulnerability to climate change and manage the risk of flooding (99) |  
- Account taken of the impacts of climate change. (99)  
- Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)  
- Policies to manage risk, from a range of impacts, through suitable adaptation measures | Allocations within the SAD have been informed by the South Staffordshire Strategic Flood Risk Assessment (2014) and have been subject to extensive consultation with the Environment Agency, Staffordshire County Council’s Flood Risk Team, South Staffordshire Water and Severn Trent Water. |
| Take account of marine planning (105) |  
- Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation  
- Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development | Given South Staffordshire’s inland location, this has not been identified as a strategic issue for the district. |
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| **Integrate as appropriate marine policy objectives into emerging policy**  
**Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS** | | |
| **Manage risk from coastal change (106)** | **Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas.**  
**Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.** | **Given South Staffordshire’s inland location, this has not been identified as a strategic issue for the district.** |
| **11. Conserving and enhancing the natural environment (paras 109-125)** | | |
| **Protect valued landscapes (109)** | **A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.**  
**Policy 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.** | **The adopted Core Strategy already contains Policy EQ4, which addresses how the Council will protect valued landscapes such as the Cannock Chase AONB and other locally valued landscapes. Policy EQ1 of the Core Strategy also indicates how the Council will protect and enhance the area’s ecological assets, whilst Policy HWB2 addresses the management and provision of green infrastructure within the District. The SAD does not propose to alter these policies. Site selection through the development of the SAD has taken account of landscape sensitivity through a bespoke study.** |
<p>| <strong>Prevent unacceptable risks from pollution and land instability (109)</strong> | <strong>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.</strong> | <strong>The relevant provisions are contained in Core Policy 3, Policy EQ9 and Policy EQ10 of the adopted Core Strategy. The SAD does not propose to alter these policies.</strong> |</p>
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<th>Soundness Test and Key Requirements</th>
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<tr>
<td>Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</td>
<td>• 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</td>
<td>Policy EQ1 of the adopted Core Strategy addresses the protection enhancement and expansion of natural assets, and the Core Strategy Policy Maps include the locations of local ecological and geological conservation interests (e.g. SBIs, SSSIs etc.). The SAD does not propose to alter these policies.</td>
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12. Conserving and enhancing the historic environment (paras 126-141)

Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126) | • A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets • A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) | Policy EQ3 of the adopted Core Strategy addresses the conservation, preservation and protection of heritage assets, and Policy EQ11 also addresses the need for new development to make a positive contribution to character and distinctiveness. Policy EQ3 indicates the need for developments to use the Staffordshire County Council Historic Environment Record and Conservation Area management plans and appraisals, which are available on the Council’s website. The SAD does not propose to alter these policies. Site specific mitigation for allocations within the SAD is informed by the findings of the Council’s Historic Environment Assessment 2017, carried out in consultation with Historic England. |

13. Facilitating the sustainable use of minerals (paras 142-149)

It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term | 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 | Staffordshire County Council is the Minerals and Waste planning authority. |
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<td>conservation (142)</td>
<td>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.</td>
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<td>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</td>
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**Justified:** The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

To be ‘justified’ a DPD needs to be:

- Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area.
- The most appropriate strategy when considered against reasonable alternatives.

**Participation**

Has the consultation process allowed for effective engagement of all interested parties?  

The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI

The council has an adopted Statement of Community Involvement (SCI) 2014, which has been complied with in consulting on the SAD during its preparation.

A Consultation Statement has been prepared by the Council and this forms part of the submission documents. In addition to the consultation undertaken by the Council, a number of consultation events were held by the Community Council of Staffordshire, which fed into a report titled ‘South Staffordshire Site Allocations Consultation – A Community View’.

**Research / fact finding**

Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?

What assumptions were made in preparing the DPD? Were they reasonable and justified?

- The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by.  
- Sections of the DPD (at various stages of development) and SA Report which illustrate how

The SAD has been prepared to conform to the existing Core Strategy. As such the Council have prepared a robust and up-to-date evidence base to support the SAD, insofar as it seeks to deliver the adopted strategic policies within the Core Strategy.

A wide-ranging and comprehensive evidence base
### Soundness Test and Key Requirements | Possible Evidence | Evidence Provided
--- | --- | ---
evidence supports the strategy, policies and proposals, including key assumptions.  
OR  
- A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.  
OR  
- For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD). supports the allocation of housing, safeguarded, employment and gypsy and traveller sites within the SAD. The role key evidence base documents has played in preparing the plan is set out in the SAD document itself, and the role that evidence has played in selecting sites is set out further in both the Site Assessments Paper and Discounted Sites Paper and an Assessment Criteria Topic Paper. A separate table has been prepared, listing all of the supporting documents and evidence base relating to the SAD.  
The wider evidence base which has informed the SAD includes the following documents, which have been prepared by the Council unless stated otherwise:  
- A Partial Review of the Green Belt 2013 (and updated in 2016) assessing housing, employment and gypsy and traveller sites (prepared by LUC)  
- South Staffordshire Strategic Housing Land Availability Assessment (SHLAA) updated annually and which supports the SAD  
- South Staffordshire Employment Land Study (ELS) 2013 (prepared by WECD)  
- Sub-Regional Black Country and South Staffordshire High Quality Employment Land Study 2015 (prepared by WECD)  
- ROF Featherstone Viability Study 2014 (prepared by WECD)  
- West Midlands Strategic Employment Sites Study 2015 (prepared by PBA & JLL)  
- South Staffordshire Landscape Sensitivity Studies – Housing and Employment Sites 2015 (and updated in 2016) (prepared, in part, by White Consultants)  
- Cannock Chase Special Area of Conservation (SAC)
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<td></td>
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<td>Evidence Base Studies (2012-2015)</td>
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<td>• Local Plan Viability Report 2015</td>
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<td>• Southern Staffordshire Strategic Flood Risk Assessment (SFRA) Level 1 (2014) (prepared by Capita)</td>
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<td>• Open Space Audit and Strategy 2015</td>
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<td>• Sports Facilities and Playing Pitch Strategy 2015 (prepared by Nortoft)</td>
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<td>• Historic Environment Character Areas, Extensive Urban Surveys, Conservation Area Appraisals and Conservation Area Management Plans</td>
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<td>• Sustainability Appraisal studies (prepared by Amec Foster Wheeler)</td>
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<td>• Habitat Regulations Assessments (prepared by Atkins)</td>
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<td>• Topic papers on Assessment Criteria, Housing, Open Space and Gypsy and Travellers</td>
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<td>• Accessibility Mapping Report 2014 (prepared by Staffordshire County Council)</td>
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<td>• Infrastructure Delivery Plan (updated 2016)</td>
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Key assumptions made in the preparation of the SAD are:
• The SAD will deliver the strategic policies set out in the adopted Core Strategy. A key element of this will involve the allocation of sites to deliver the remaining requirements for housing, employment and gypsy and traveller allocations set out in the adopted Core Strategy. Where necessary to do so within the framework of the adopted Core Strategy, additional evidence has been prepared to support these allocations (e.g. Partial Green Belt Review, Employment Land Studies etc.)
• The Council will undertake a Local Plan Review as set out in the Local Development Scheme (LDS) and Policy SAD1
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<th>Soundness Test and Key Requirements</th>
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<td><strong>Alternatives</strong></td>
<td>Can it be shown that the LPA’s chosen approach is the most appropriate given the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</td>
<td>The SAD has been informed at by iterative Sustainability Appraisals considering all reasonable alternatives at each stage of its production. This was an iterative process which started by assessing 138 housing sites, 11 employment sites and 31 gypsy and traveller sites which could, in principle, deliver the strategic policies contained within the adopted Core Strategy. This also included an assessment of Policies SAD1 – SAD9 against the SA objectives. The manner in which the SA has informed the development of the SAD is set out in further detail in the Sustainability Appraisal of the Site Allocations Document. A wide ranging evidence base, as detailed above, has informed the preparation of the SAD. The key documents setting out the site selection process and how the process of Sustainability Appraisal has fed into the wider assessment of policies in the SAD are: - Methodology Paper - Site Assessments Paper and Discounted Sites Paper - Assessment Criteria Topic Paper - Sustainability Appraisal of the Site Allocations Document</td>
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<td>• Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • 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.</td>
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**Effective:** the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

To be ‘effective’ a DPD needs to:
- Be deliverable
- Demonstrate sound infrastructure delivery planning
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<th>Soundness Test and Key Requirements</th>
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<td>• Have no regulatory or national planning barriers to its delivery</td>
<td>Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.</td>
<td>Section 1 of the SAD (The Local Plan – The Bigger Picture) sets out the role the adopted Core Strategy and SAD play alongside each other in forming a coherent Local Plan for the district. Policy SAD1 also indicates the need and timescales for the Local Plan Review; and these matters and the scope of each document are set out in the Council’s LDS.</td>
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<td>• Have delivery partners who are signed up to it</td>
<td>Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans).</td>
<td>The Council’s published Duty to Co-operate Schedule demonstrates how the Council has ensured that effective joint working with relevant agencies and stakeholders has informed the preparation of the SAD. Another key document setting out this information is the Council’s Infrastructure Delivery Plan (IDP).</td>
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<td>• Be coherent with the strategies of neighbouring authorities</td>
<td>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.</td>
<td>The delivery and monitoring of the SAD is set out in paragraph 3.4 (Delivery and Monitoring) of the document. The SAD has been prepared to be in accordance with the scope of the strategic policies within the Core Strategy, and key policies reference the need for consistency with Development Management policies contained within the adopted Core Strategy where necessary.</td>
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<td>• Demonstrate how the Duty to Co-operate has been fulfilled</td>
<td>Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).</td>
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<td>• Be flexible</td>
<td>• A section or sections of the DPD where infrastructure needs are identified and the</td>
<td>The Council’s Infrastructure Delivery Plan (IDP) sets</td>
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<td>• Be able to be monitored</td>
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**Deliverable and Coherent**

- Is it clear how the policies will meet the Plan’s vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?
- Are the policies internally consistent?
- Are there realistic timescales related to the objectives?
- Does the DPD explain how its key policy objectives will be achieved?

**Infrastructure Delivery**

- A section or sections of the DPD where infrastructure needs are identified and the
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| • 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? | 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. | out the strategic infrastructure delivery required to deliver the SAD, the key providers involved in achieving this and mechanisms, timescales and responsibilities for delivery. Site specific infrastructure requirements are also set out in the allocation site pro formas set out in Appendix 1, 2 & 3 of the SAD. Confirmation of joint working with relevant infrastructure providers are set out in the Council’s published Duty to Co-operate Schedule.  
The Local Plan Viability Report 2015 demonstrates plan-wide viability for the SAD proposals. |

**Co-ordinated Planning**

Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?

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<th>Evidence Provided</th>
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| • Sections of the DPD that reflect the plans or strategies of the local authority and other bodies | The SAD delivers the strategic policies of the adopted Core Strategy, which pulls together a number of different strategies outside of planning, including:  
• Stoke-on-Trent & Staffordshire LEP Strategic Economic Plan  
• The Sustainable Community Strategy for South Staffordshire  
• The Sustainable Community Strategy for Staffordshire  
• South Staffordshire Community Safety Partnership  
• South Staffordshire Older Persons Strategy  
• South Staffordshire Housing & Homelessness Strategy  
• South Staffordshire Open Space Strategy  
• The Staffordshire Local Transport Plan |
| • Policies which seek to pull together different policy objectives  
• Expressions of support/representations from bodies responsible for other strategies affecting the area |

**Flexibility**

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<td>• Sections of the DPD setting out the assumptions</td>
<td>Section 6 of the SAD addresses the flexibility in the</td>
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Site Allocations Document (SAD)  
Soundness Self-Assessment  
August 2017
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| • 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? | of the plan and identifying the circumstances when policies might need to be reviewed.  
• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:  
  a. the effectiveness of policies and what evidence is being collected to undertake this  
  b. changes affecting the baseline information and any information on trends on which the DPD is based  
• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances  
• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision  
• Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. | adopted Core Strategy and SAD, including the scope and need for a future review to address regional unmet housing need and updated evidence of housing and employment needs developed through future SHMAs, EDNAs and Strategic Green Belt Reviews. Certainty is offered on the need for a Local Plan review to be undertaken by Policy SAD1, and the SAD makes clear that this is aimed for completion by 2022. |

The SAD’s scope is to deliver the existing strategic policies detailed in the adopted Core Strategy, and as such the SAD’s effectiveness is primarily monitored through the existing monitoring framework set out in the adopted Core Strategy, as made clear in paragraph 3.4 (Delivery and Monitoring). Additional monitoring for new SAD policies can be found in Appendix 4 (pg. 146-147) of the SAD.

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<th>Co-operation</th>
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| • 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 | 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:  
  a. joint evidence for the policies  
  b. the Council’s published Duty to Co-operate Schedule demonstrates how the Council has ensured that effective joint working with relevant agencies and stakeholders has informed the preparation of the SAD.  
• The Council is actively engaged in Duty to Co-operate work with neighbouring authorities and the wider Greater Birmingham Housing Market Area (GBHMA) to inform the Local Plan Review indicated in Policy |
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<tr>
<th>Soundness Test and Key Requirements</th>
<th>Possible Evidence</th>
<th>Evidence Provided</th>
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<td>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?</td>
<td>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.</td>
<td>SAD1, however it is considered that this work falls outside of the SAD, the scope of which is to deliver the strategic policies of the adopted Core Strategy.</td>
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**Monitoring**
- Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)?
- Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?
- Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?
- Sections of the DPD setting out indicators, targets and milestones
- Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories
- Reference to any other reports or technical documents which contain information on the delivery of policies
- Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal

The delivery and monitoring of the SAD is set out in paragraph 3.4 (Delivery and Monitoring) of the document. Monitoring of the SAD will largely be carried out through the monitoring of the Core Strategy. However, additional monitoring for new SAD policies can be found in Appendix 4 (pg. 146-147) of the SAD.

The Council’s Authority Monitoring Report (AMR) indicates the Council’s performance against the Core Strategy monitoring framework in Appendix 2 of that document. The AMR also measures the Council’s progress against the Core Strategy Housing Trajectory and other relevant matters in section 7 of that document. The Council’s SHLAA 2016 sets out in further detail how the Council’s projected land supply (including SAD allocations) will deliver the housing trajectory envisaged by the Core Strategy.

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

The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.
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<td>• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? &lt;br&gt; • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?</td>
<td>• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. &lt;br&gt; • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. &lt;br&gt; • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. &lt;br&gt; • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement &lt;br&gt; • Reports or copies of correspondence as to how representations have been considered and dealt with.</td>
<td>The SAD is delivered in accordance with national policies which are relevant to its scope. The SAD does not revisit adopted policies within the Core Strategy, which are outside of the scope of the SAD will be reviewed through the Local Plan Review (Policy SAD1) to ensure that they are consistent with national policy.</td>
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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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<td><strong>Policy A: Using evidence to plan positively and manage development (para 6)</strong></td>
<td>• Early and effective engagement undertaken, including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups.</td>
<td>The Council has an adopted Statement of Community Involvement (SCI) 2014, which has been complied with in consulting on the SAD during its preparation. The Consultation Statement accompanying the SAD sets out how the gypsy and traveller community have been actively engaged throughout the preparation of the SAD, and the Council has had regard to representations from families and their representatives to inform the methodology used in selecting the SAD allocation sites, as set out on pages 12-13 of the SAD.</td>
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<td>Early and effective community engagement with both settled and traveller communities.</td>
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<td>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.</td>
<td>• 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 to inform the preparation of your local plan and make planning decisions.</td>
<td>The SAD allocates sufficient sites to meet the housing, residential gypsy pitch requirements and employment requirements set out in the Core Strategy. As such it delivers the remainder of the planned Core Strategy gypsy pitch requirement for 85 residential pitches up to 2028 through the allocation of land sufficient to deliver the remaining 20 pitches. Further information on these matters is included in the Gypsy and Travelling Showpeople Site Selection Background Paper.</td>
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<td><strong>Policy B: Planning for traveller sites (paras 7-</strong></td>
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<td>Policy Expectations</td>
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<td><strong>11)</strong> 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. Set criteria to guide land supply allocations where there is identified need. Ensure that traveller sites are sustainable economically, socially and environmentally.</td>
<td>• Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set targets. 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 account criteria a-h of para 11</td>
<td>The SAD delivers the remainder of the planned Core Strategy gypsy pitch requirement for 85 residential pitches up to 2028 through the allocation of land sufficient to deliver the remaining 20 pitches. Specific pitches have been allocated to meet this remaining requirement, and these are set out in Policy SAD4 of the SAD. Gypsy and traveller pitches are required to meet clear criteria set out in Policy H6 of the adopted Core Strategy, and the SAD does not propose to change this policy.</td>
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<td><strong>Policy C: Sites in rural areas and the countryside (para 12)</strong></td>
<td></td>
<td>In selecting sites, the Council has applied Policy H6 of the adopted Core Strategy, which requires that gypsy and traveller sites do not dominate the nearest settled community. Furthermore, the Council has applied a 15 pitch maximum threshold, in line with advice received from Staffordshire Police. Further information on these matters is set out in the SAD Publication Plan Methodology Paper 2017.</td>
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<td>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.</td>
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### Policy Expectations

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<th>Policy D: Rural exception sites (para 13)</th>
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<td>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.</td>
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<td>Possible Evidence</td>
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<tr>
<td>- If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.</td>
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<td>Evidence Provided</td>
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<tr>
<td>The SAD allocates sufficient sites to meet the housing, gypsy and traveller and employment requirements set out in the Core Strategy. As the Core Strategy did not identify the need for a rural exception site policy, none has been introduced in the SAD.</td>
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<th>Policy E: Traveller sites in Green Belt (paras 14-15)</th>
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<td>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</td>
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<td>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</td>
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<td>Possible Evidence</td>
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<tr>
<td>- Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.</td>
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<td>Evidence Provided</td>
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<td>The Council doesn’t consider it appropriate to alter Green Belt boundaries to accommodate the sites set out in Policy SAD4. The allocation of these sites within the Green Belt establishes the principle that extra residential pitches can be accommodated on these sites without creating a greater impact. The Council considers this an appropriate approach as the allocations will be delivered through converting existing pitches from temporary to permanent, intensifying existing sites or providing small scale extensions to existing sites where there is little or no impact on the surrounding area.</td>
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In light of this, it is considered that the allocations will strongly weigh in favour of any future planning application’s very special circumstances case to justify these inappropriate developments.
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| **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. | • 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 | The SAD allocates sufficient sites to meet the housing, gypsy and traveller and employment requirements set out in the Core Strategy. As the Core Strategy did not identify the need for mixed use traveller sites, none have been introduced in the SAD. |
| **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. | • Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community. | The Council has not had any such major development projects. |