

PLANNING AND COMPULSORY PURCHASE ACT 2004

The Town and Country Planning (Local
Development) (England) Regulations 2004

Submission Core Strategy
Development Plan Document

Self Assessment Paper by Stafford Borough Council
(Core Documents Reference : CD051)

Date : 10/03/2006

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Core Strategy Development Plan Document

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Self Assessment Paper by Stafford Borough Council

Core Strategy Development Plan Document

(Core Documents Reference : CD051)

1.0 Introduction

- 1.1 *The key objective for planning policies in the Core Strategy Development Plan Document is to deliver the strategic approach for spatial planning across the Borough Council area. The Core Strategy Development Plan Document will be the principal planning document in the Stafford Borough Local Development Framework and will form part of the new Development Plan for Stafford Borough alongside the Regional Spatial Strategy for the West Midlands (RSS). The Core Strategy will aim to cover the same time period as the Regional Spatial Strategy.¹*
- 1.2 *The purpose of this Self Assessment Paper is to prepare for the independent Examination into the Submission Core Strategy Development Plan Document in accordance with Section 20 of the Planning & Compulsory Purchase Act 2004 and requirements set out in the Town & Country Planning (Local Development) (England) Regulations 2004. This Paper presents the Council's approach towards the preparation and production process of the Core Strategy Development Plan Document.*

¹ 2001-2021

2.0 Self Assessment Paper by Stafford Borough Council

Core Strategy Development Plan Document

Introduction

- 2.1 The purpose of this Self Assessment Paper is to set out the Council's approach and background information regarding the preparation and production of the Core Strategy Development Plan Document within the Stafford Borough Local Development Framework. The Paper is based upon the following tests used to assess the soundness of Development Plan Documents set out in the Planning Inspectorate's document entitled 'Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents' published in December 2005.
- 2.2 Section 20(5) of the Planning and Compulsory Purchase Act 2004 defines the purpose of the independent examination into Development Plan Documents, which is to determine:
- a) whether they satisfy the requirements of the Planning and Compulsory Purchase Act 2004 (s20(5)(a) and the Town and Country Planning (Local Development) (England) Regulations 2004;
 - b) whether they are sound (s20(5)(b)).
- 2.3 Local Development Documents (which include Development Plan Documents) must be sound in terms of their content and the process by which they are produced. They must also be founded on robust and credible evidence. The term "sound" is not defined in the 2004 Act. It may be considered in this context within its ordinary meaning of "showing good judgement" and "able to be trusted" and within the context of fulfilling the expectations of legislation.
- 2.4 Planning Policy Statement 12 (PPS12) – Local Development Frameworks (LDFs) sets out the 9 tests of soundness for examining Development Plan Documents and it states that "The presumption will be that the Development Plan Document is sound unless it is shown to be otherwise as a result of evidence considered at the examination".
- 2.5 The PPS12 soundness tests fall into three categories:
- Procedural Tests;
 - Conformity Tests; and
 - Coherence, Consistency and Effectiveness Tests.

Procedural tests

- i. has been prepared in accordance with the Local Development Scheme (LDS);
- ii. “has been prepared in compliance with the Statement of Community Involvement (SCI), or with the minimum requirements set out in the regulations where no SCI exists;
- iii. the plan and its policies have been subjected to Sustainability Appraisal.

Conformity tests

- iv. it is a spatial plan which is consistent with national planning policy and in general conformity with the Regional Spatial Strategy (RSS) for the region or the Spatial Development Strategy (SDS) if in London, and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas;
- v. it has had regard to the authority’s Community Strategy.

Coherence, consistency and effectiveness tests

- vi. the strategies / policies / allocations in the plan are coherent and consistent within and between Development Plan Documents prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant;
- vii. the strategies / policies / allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base;
- viii. there are clear mechanisms for implementation and monitoring;
- ix. it is reasonably flexible to enable it to deal with changing circumstances.

- 2.6 The following sections set out the Council's response in relation to the Core Strategy Development Plan Document to a series of key questions and evidence requirements for each test, which establishes the soundness of the Development Plan Document (DPD).

Procedural Tests

Test i: has been prepared in accordance with the Local Development Scheme

Key Questions:

- *Is the DPD identified in the authority's Local Development Scheme (LDS)?*
- *Have the details set out in the LDS such as the role, rationale or scope of the DPD been met?*

Evidence

The Local Planning Authority's LDS and their self-assessment of soundness, where produced. A DPD which was not included in the LPA's LDS should not come forward to examination.

- 2.7 The Core Strategy Development Plan Document is identified in the Local Development Scheme which came into effect by Stafford Borough Council's Cabinet meeting on 15 March 2005. For further information please refer to minute number CAB110 of the Cabinet meeting, agenda item number D2 (ii) and the following web-site link:

<http://www.staffordbc.gov.uk/live/Documents/Committee%20Minutes%2004-05/Cabinet---15-March-2005.pdf>

- 2.8 As part of the Local Development Scheme the table in Section 4 (page 6) identifies the Core Strategy Development Plan Document, including the following description "sets out the Vision, Sustainable Development Statement, Objectives and Strategy for the spatial development of the area". The timetable for preparing the Core Strategy Development Plan Document is set out in Section 9 (page 11) of the Local Development Scheme. Appendix 4 of the Local Development Scheme contains a profile for the Core Strategy Development Plan Document (page A21) setting out the document's role, geographical area, chain of conformity, timetable, resource requirements, community involvement and sustainability appraisal requirements.
- 2.9 Stafford Borough Council considers that the details set out in the Local Development Scheme including the role, rationale and scope of the Core Strategy Development Plan Document have been met by the Submission

document. Section 4.0 (pages 4 - 6) of the Core Strategy Development Plan Document sets out the Vision, Sustainable Development Statement and Spatial Objectives for the spatial development of the area whilst the strategy for the Borough is set out in the 10 Core Policies of the Submission Core Strategy Development Plan Document (pages 15 – 30).

2.10 Stafford Borough has considered the Core Strategy Development Plan Document preparation progress against that scheduled in the Local Development Scheme in terms of the following key milestones defined in Planning Policy Statement 12: Local Development Frameworks. The key milestones are:

- i. commencement of the preparation process of a development plan document;
- ii. public participation on preferred options;
- iii. submission of development plan document;
- iv. pre-examination meeting;
- v. commencement of the examination; and
- vi. adoption of the development plan document.

2.11 The Annual Monitoring Report for the Stafford Borough Local Development Framework was published in December 2005. Section 2.0 of the Annual Monitoring Report records implementation of the Local Development Framework process, with Table 1 (page 4) identifying that the key milestones for the Core Strategy Development Plan Document, as set out in the Local Development Scheme, have been met.

Test ii: has been prepared in compliance with the Statement of Community Involvement (SCI), or with the minimum requirements set out in the regulations where no SCI exists.

Key Questions

- *Having regard to the nature of the DPD, have all of the relevant consultation / participation procedures set out in the Statement of Community Involvement (SCI) been carried out?*
- *If no SCI exists, have the minimum requirements of the Town and Country Planning (Local Development) (England) Regulations 2004 been met?*

Evidence

The Local Planning Authority's SCI; the Consultation Statement produced for the DPD which should show how the LPA has carried out its consultation procedures and how these relate to their SCI or the Regulations; the Regulations; and the Local Planning Authority's self-assessment of soundness, where produced.

- 2.12 Stafford Borough has prepared and submitted the Statement of Community Involvement for the independent Examination process, which is still taking place. Following receipt of the Inspector's Binding Report the Council will adopt the Statement of Community Involvement. The Draft Statement of Community Involvement was consulted upon during October and November 2004 and the Statement of Community Involvement was submitted to the Secretary of State for the independent Examination process in April 2005.
- 2.13 The Core Strategy Development Plan Document has been consulted upon using the consultation procedures set out in the Statement of Community Involvement. In October 2005 the Council prepared and submitted the Pre-submission Consultation Statement (Regulation 28 Statement) setting out how the requirements in the Town & Country Planning (Local Development) (England) Regulations 2004 have been met. In December 2005 the Council prepared and submitted the Representations Statement (Regulation 31 Statement) for the Core Strategy Development Plan Document. For further information about the consultation process please refer to the Pre-submission Consultation Statement and the Representations Statement.

Test iii: the plan and its policies have been subjected to Sustainability Appraisal.

Key Question

- *Has Sustainability Appraisal (SA) been carried out in relation to the particular DPD in question?*

Evidence

The Sustainability Appraisal Report (SA Report). Local Planning Authorities are required to submit a SA Report with the DPD, identifying the process by which the SA has been carried out, the baseline information used, and the outcomes of the process.

Guidance on the SA process is provided in Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, issued by the Office of the Deputy Prime Minister, including advice on the requirements associated with bringing forward additional or alternative sites

late in the process (see also text box on page 38, PPS12). The outcome of the SA process will be tested under the later tests of coherence, consistency and effectiveness.

2.14 The Sustainability Appraisal process for the Core Strategy Development Plan Document has been carried out in accordance with Section 39 of the Planning and Compulsory Purchase Act 2004 and Government guidance detailed in the consultation document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' (September 2004). The following documents have been prepared in order to assess the Core Strategy Development Plan Document through the Sustainability Appraisal process:

- Sustainability Appraisal Scoping Report
- Initial Sustainability Appraisal Report
- Final Sustainability Appraisal Report
- Revised Final Sustainability Appraisal Report

2.15 In November 2004 the Sustainability Appraisal Scoping Report for the Core Strategy Development Plan Document, setting out the key sustainability issues and Sustainability Appraisal Framework to be used to assess the spatial objectives and core policies, was consulted upon. To facilitate this consultation process a response form with broad open-ended questions was made available in order to establish effective engagement with the community and key stakeholders. Following the consultation on the Core Strategy Development Plan Document's Sustainability Appraisal Scoping Report a Schedule of Representations was published setting out the responses received to the Scoping Report in January 2005.

2.16 Following the Scoping Report stage the Initial Sustainability Appraisal Report was prepared, published and consulted upon alongside the Core Strategy DPD Issues and Options Paper using the responses received to the Scoping Report. The Initial Sustainability Appraisal Report set out broad alternative options for the Core Strategy Development Plan Document as well as assessing the policy options against the Sustainability Appraisal Framework. To facilitate the consultation process for the Initial Sustainability Appraisal Report a response form with key questions was prepared and circulated for comments. Following the consultation on the Core Strategy Development Plan Document's Initial Sustainability Appraisal Report a Schedule of Representations was published setting out the responses received to the Initial Sustainability Appraisal Report in April 2005.

2.17 Following the Initial Sustainability Appraisal Report stage the Final Sustainability Appraisal Report was prepared, published and consulted upon alongside the Core Strategy DPD Preferred Options Report using the responses received to the Initial Sustainability Appraisal Report. The Final Sustainability Appraisal Report assessed the preferred core policies against the Sustainability Appraisal Framework. To facilitate the consultation

process for the Final Sustainability Appraisal Report a standard representation form was prepared and circulated based on the model form from the Planning Inspectorate's consultation draft document 'Assessing the Soundness of Development Plan Documents' published in February 2005. Following the consultation process on the Core Strategy Development Plan Document's Final Sustainability Appraisal Report a Schedule of Representations was published setting out the responses received to the Final Sustainability Appraisal Report in July 2005.

- 2.18 Following the Final Sustainability Appraisal Report stage the Revised Final Sustainability Appraisal Report was prepared and published alongside the Submission Core Strategy Development Plan Document using the representations received to the Final Sustainability Appraisal Report. The Revised Final Sustainability Appraisal Report assessed the submission core policies against the Sustainability Appraisal Framework.
- 2.19 The various Sustainability Appraisal Reports of the Core Strategy Development Plan Document have been consulted upon using the consultation procedures set out in the Statement of Community Involvement. In October 2005 the Council prepared and submitted the Pre-submission Consultation Statement (Regulation 28 Statement) setting out how the requirements for consulting upon the Sustainability Appraisal Reports have been met. For further information about the consultation process please refer to the Pre-submission Consultation Statement.

Conformity Tests

Test iv: it is a spatial plan which is consistent with national planning policy and in general conformity with the RSS for the region or the Spatial Development Strategy if in London, and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas.

This test needs to be broken down into its constituent parts:

- (a) It is a spatial plan which has regard to other relevant plans, policies and strategies;*
- (b) It is consistent with national planning policy; and*
- (c) It is in general conformity with the Regional Spatial Strategy (RSS) or the Spatial Development Strategy (SDS) in London.*

- a) *It is a spatial plan which has regard to other relevant plans, policies and strategies.*

Key Questions

- Does the DPD reflect the guidance on spatial planning which is set out in national planning policy?*
- Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel?*
- Is it clear how the DPD relates to other plans and strategies such as local transport plans which will influence the delivery of policies and proposals within the plan?*
- In two tier areas, does the DPD integrate effectively with plans prepared by the county council / district council?*

Evidence

Depending on the nature of the DPD, a range of documents may be relevant, similar to those set out under test vii below. The Local Planning Authority's self-assessment of soundness, where produced, should indicate how this test has been met. Of particular significance will be representations from bodies that consider that the DPD either does or does not have sufficient regard to other relevant strategies for which they are responsible.

- 2.20 During the preparation of the Core Strategy Development Plan Document (DPD) the Council has applied spatial principles as set out in national planning policy in order to prepare a spatial plan and provide effective integration of policies with other plans and strategies. The Core Strategy Development Plan Document sets out a clear vision for the Stafford Borough area as well as providing a mechanism for delivering sustainable development through Section 4.0 of the Submission Core Strategy DPD which clearly goes beyond the traditional land-use focus. This visionary and wide-ranging approach is further developed through the spatial objectives and core policies for the Stafford Borough locality.
- 2.21 Prior to the preparation of the Core Strategy Development Plan Document (DPD) the Council has sought to establish the relevant plans, policies and programmes to be used for integration into Development Plan Documents including those of utility companies and agencies providing services in the area. During this pre-production stage a Gathering Evidence questionnaire was circulated widely during February & March 2004 which asked a number of key questions concerning the preparation of Development Plan Documents including any plans, policies and programmes which may have

planning or land use implications to be identified. Over 800 individuals and organisations were included in this pre-production gathering evidence stage.

- 2.22 In July 2004 the Gathering Evidence Report was published including the relevant identified plans, policies and programmes, information and data profiles, as defined in Checklist 5a: Potential Components of the Evidence Base within the 'Draft Creating Local Development Frameworks: A Companion Guide' (October 2003) to be considered when preparing Development Plan Documents, including the Core Strategy Development Plan Document.
- 2.23 The Council has implemented a thorough community involvement and consultation process for the Core Strategy Development Plan Document in order to achieve participation and integration with other plans and strategies including the bodies listed in Planning Policy Statement 12 – Local Development Frameworks Annex E. This comprehensive list of bodies includes those responsible for the plans and strategies required for effective integration with the Core Strategy Development Plan Document. No consultation body has asked for any plan, policy or programme to be included that has not been taken into account.
- 2.24 Responses and representations to the Core Strategy Development Plan Document are set out in the Schedule of Representations to the Issues and Options Paper (April 2005) and the Schedule of Representations to the Preferred Options Report (September 2005). Further information regarding the consultation process for the Core Strategy Development Plan Document is set out in the Pre-submission Consultation Statement (Regulation 28 Statement) published with the Submission Core Strategy Development Plan Document in October 2005 and the Representations Statement (Regulation 31 Statement) published in December 2005. The following paragraphs set out the Core Strategy documentation consulted upon and how these documents have integrated with other plans and strategies to deliver a spatial plan.
- 2.25 The Sustainability Appraisal process sets out how the Core Strategy Development Plan Document relates to other plans and strategies which will influence the delivery of policies and proposals. The Sustainability Appraisal Scoping Report to the Core Strategy DPD (October 2004) established links between the Core Strategy Development Plan Document and other plans and strategies through Technical Appendix 1 – Assessment of Plans, Policies and Programmes of the Sustainability Appraisal Scoping Report.
- 2.26 In January 2005 the Core Strategy DPD Issues and Options Paper was published and consulted upon. Section 5.0 of the Core Strategy DPD Issues and Options Paper set out the vision and spatial objectives for the 'Regional Spatial Strategy', the purpose and guiding principles for the 'Sustainable Development Strategy for the UK' and the key requirements from the 'Sustainable Communities: Building for the Future' document used to prepare the vision and spatial objectives for the Development Plan Document. This material sets out the spatial development strategy for the document and is

also contained in Section 7.0 of the Core Strategy DPD Preferred Options Report, published in May 2005 and Section 5.0 of the Submission Core Strategy DPD published in October 2005.

- 2.27 Furthermore linkages between the Core Strategy DPD and various plans and strategies are contained in the Sustainability Appraisal Reports. In January 2005 the Initial Sustainability Appraisal Report for the Core Strategy DPD was published and consulted upon. Within Technical Appendix 1 of the Initial Sustainability Appraisal Report the key themes from various plans and strategies are linked to the spatial objectives and core policies of the Core Strategy Development Plan Document. This material is also contained in the Final Sustainability Appraisal Report for the Core Strategy DPD published in May 2005 and the Revised Final Sustainability Appraisal Report for the Core Strategy DPD made available alongside the Submission Core Strategy document in October 2005.

(b) *It is consistent with national planning policy.*

Key Question

- *Does the DPD contain any policies or proposals which are not consistent with national planning policy and, if so, is there a local justification?*

Evidence

Planning Policy Guidance Notes and Planning Policy Statements and any representations from the relevant GO. Any local studies or any other information which provide the basis for departing from national planning policy – such as those that may derive from the community strategy or local studies forming part of the evidence for the DPD.

- 2.28 During the preparation of the Core Strategy Development Plan Document (DPD) the Council has sought to be consistent with national planning policy whilst not repeating this national policy. Section 4.0 of the Core Strategy DPD Issues and Options Paper sets out how national planning policy has been taken into account and reflected locally through the spatial objectives and the core policies within the document. This material is also contained in Section 6.0 of the Core Strategy DPD Preferred Options Report, published in May 2005 and Section 6.0 of the Submission Core Strategy DPD published in October 2005. There are a number of variations from national policy in a number of core policies. Further information regarding these issues will be presented in due course through the Examination process.

2.29 Furthermore the Revised Final Sustainability Appraisal Report for the Submission Core Strategy Development Plan Document includes links to national policy through Section 9 'Relevant Plans, Policies and Programmes' and at a more detailed level through Technical Appendix 1 of the Revised Final Sustainability Appraisal Report.

2.30 The Council has implemented a thorough community involvement and consultation process for the Core Strategy Development Plan Document in order to achieve participation including the bodies listed in Planning Policy Statement 12 – Local Development Frameworks Annex E. A number of changes have been made to the Core Strategy Development Plan Document during its preparation to ensure consistency with national planning policy. Responses and representations to the Core Strategy Development Plan Document are set out in the Schedule of Representations to the Issues and Options Paper (February 2005) and the Schedule of Representations to the Preferred Options Report (July 2005).

(c) *The plan is in general conformity with Regional Spatial Strategy or, where relevant, the Spatial Development Strategy in London.*

Key Question

- *Does the DPD contain any policies or proposals which are not in general conformity with the RSS, or SDS in London? If so, is there a local justification?*

Evidence

The RSS (or SDS) and any representations from the Regional Planning Body (or Mayor, in London). Any local studies or any other information which provide the basis for departing from regional policy. NB it is only where an inconsistency or omission in a DPD would cause significant harm to the implementation of the RSS (or SDS) that it should be considered not to be in general conformity (see paragraph 4.20, PPS12).

Following commencement of the 2004 Act, there is no longer a requirement for local development documents to be in general conformity with structure plans, although these will remain a material consideration and part of the development plan until superseded by the regional spatial strategy. In the event of conflict between the structure plan and the regional spatial strategy, the last document to be adopted will take priority (see paragraph 4.22, PPS12).

2.31 On 24 November 2005 Stafford Borough Council received a letter from the Regional Conformity Advisor on behalf of the West Midlands Regional Assembly (the Regional Planning Body) stating that the Submission Core Strategy Development Plan is in general conformity with the Regional Spatial Strategy for the West Midlands.

- 2.32 During the preparation of the Core Strategy Development Plan Document (DPD) the Council has sought to be consistent with regional planning policy whilst not repeating this regional policy. Section 4.0 of the Core Strategy DPD Issues and Options Paper sets out how regional planning policy has been taken into account and reflected locally through the spatial objectives and the core policies within the document. This material is also contained in Section 6.0 of the Core Strategy DPD Preferred Options Report, published in May 2005 and Section 6.0 of the Submission Core Strategy DPD published in October 2005.
- 2.33 Furthermore the Revised Final Sustainability Appraisal Report for the Submission Core Strategy Development Plan Document includes links to regional policy through Section 9 'Relevant Plans, Policies and Programmes' and at a more detailed level through Technical Appendix 1 of the Revised Final Sustainability Appraisal Report.
- 2.34 The Council has implemented a thorough community involvement and consultation process for the Core Strategy Development Plan Document in order to achieve participation including the bodies listed in Planning Policy Statement 12 – Local Development Frameworks Annex E. A number of changes have been made to the Core Strategy Development Plan Document during its preparation to ensure consistency with national planning policy. Responses and representations to the Core Strategy Development Plan Document are set out in the Schedule of Representations to the Issues and Options Paper (April 2005) and the Schedule of Representations to the Preferred Options Report (July 2005).

Test v: it has had regard to the authority's Community Strategy.

Key Question

- *Does the DPD have regard to the Community Strategy, by setting out policies and proposals which deliver key components of that strategy so far as they are consistent with or in general conformity with higher-level planning policy and relate to the use and development of land?*

Evidence

The Community Strategy and any representations from the Local Strategic Partnership, where they have prepared the Community Strategy.

The Community Strategy may set out the spatial implications of the strategy and how the key components of the strategy which relate to the use and development of land might be delivered through the Local Development Framework. Local authorities should set out in their DPDs how the objectives of the Community Strategy relate to the plan.

- 2.35 The Stafford Borough Community Plan 2003-2006 and the Community Strategy for Staffordshire (Core Documents) cover the Stafford Borough Council area. The spatial aspects of these Community Strategies have been taken into account and are addressed through the Stafford Borough Local Development Framework process and the Core Strategy Development Plan Document. The Borough Council is aware that the Stoke-on-Trent & Staffordshire Strategic Partnership published the 'Shaping the Future of Staffordshire 2005-2020' in September 2005.
- 2.36 From the beginning of preparing the Core Strategy Development Plan Document (DPD) the Council has maintained links to the Community Strategies. The Sustainability Appraisal Scoping Report to the Core Strategy DPD (October 2004) established links between the Core Strategy Development Plan Document and the Community Strategies through Technical Appendix 1 – Assessment of Plans, Policies and Programmes of the Sustainability Appraisal Scoping Report. Furthermore presentations and reports on the Core Strategy Development Plan Document have been delivered to the Local Strategic Partnership since January 2005.
- 2.37 In January 2005 the Core Strategy DPD Issues and Options Paper was published and consulted upon. Section 5.0 of the Core Strategy DPD Issues and Options Paper set out the vision and key themes for the Community Strategies used to prepare the vision and spatial objectives for the Development Plan Document. This material is also contained in Section 7.0 of the Core Strategy DPD Preferred Options Report, published in May 2005 and Section 5.0 of the Submission Core Strategy DPD
- 2.38 Furthermore linkages between the Core Strategy DPD and the Community Strategies are contained in the various Sustainability Appraisal Reports. In January 2005 the Initial Sustainability Appraisal Report for the Core Strategy DPD was published and consulted upon. Within Technical Appendix 1 of the Initial Sustainability Appraisal Report the key themes of the Stafford Borough Community Plan 2003-2006 are linked to the spatial objectives and core policies of the Core Strategy Development Plan Document. This material is also contained in the Final Sustainability Appraisal Report for the Core Strategy DPD published in May 2005 and the Revised Final Sustainability Appraisal Report for the Core Strategy DPD made available alongside the Submission Core Strategy document in October 2005.
- 2.39 Throughout the process of preparing the Core Strategy Development Plan Document representations have been received from the Local Strategic Partnership as set out in the Schedule of Representations to the Issues and Options Paper (April 2005) and the Schedule of Representations to the Preferred Options Report (September 2005).

Coherence, Consistency and Effectiveness

Test vi: the strategies / policies / allocations in the plan are coherent and consistent within and between Development Plan Documents prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant.

Key questions

- *Do the policies clearly relate to the objectives in the submitted DPD or a related DPD (e.g. the Core Strategy)?*
- *Are the policy objectives within the DPD themselves consistent?*
- *Is it clear how the DPD relates to other plans in the authority's Local Development Framework and to other relevant plans prepared by neighbouring authorities?*
- *Where there are overlaps, are these consistent / complementary?*
- *Are there any obvious gaps in the coverage of the DPD having regard to its purpose and the relevant requirements set out in national planning policy statements?*
- *Is it clear how any cross boundary issues are addressed?*

Evidence

The LPA's Local Development Framework and neighbouring authorities' Local Development Frameworks will be the principal source of evidence.

The DPD should be clear what its purpose is: i.e. if it is a Core Strategy it should include a vision and a strategic framework for the preparation of more detailed plans such as Site Allocations and Area Action Plans.

The DPD should show how the policies and proposals within it relate to other parts of the Local Development Framework and, where relevant, to any neighbouring authority's Local Development Framework. The DPD should explain, where necessary, why there may be perceived inconsistencies.

LPAs should undertake joint studies where appropriate to ensure consistency between neighbouring authorities. For example, Planning Policy Guidance Note 3: Housing (PPG3)² states that housing capacity studies should consider brownfield land in adjoining areas.

2.40 The Core Strategy Development Plan Document is the key spatial planning document in the Local Development Framework and leads the approach for development of the Borough. As well as providing an approach for spatial development the Core Strategy also sets out the number of dwellings and area of employment land required within the Borough.

² See paragraphs 25-26, PPG3. View at:
http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/divisionhomepage/036667.hcsp
Stafford Borough Council – Local Development Framework
Examination – Core Strategy Development Plan Document
Self Assessment Paper (Core Documents Reference: CD051)

- 2.41 In October 2004 the Cabinet (Executive) of Stafford Borough Council considered and agreed the Core Strategy Development Plan Document – Issues and Options Paper for pre-submission consultation. The report to Cabinet explained that all Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) have to be in conformity with the Core Strategy Development Plan Document. Section 1.0 of the Core Strategy Development Plan Document sets the context for the document in relation to the other Development Plan Documents within the Stafford Borough Local Development Framework.
- 2.42 The relationship between the Core Strategy Development Plan Document and other Development Plan Documents within the Stafford Borough Local Development Framework are set out in Section 10 of the Local Development Scheme, which came into effect on 15 March 2005.
- 2.43 In order to establish the relationship with plans in neighbouring authorities Stafford Borough Council has carried out a thorough community involvement and consultation process for the Core Strategy Development Plan Document in order to achieve participation and integration with other plans and strategies including the bodies listed in Planning Policy Statement 12 – Local Development Frameworks Annex E. This comprehensive list of bodies includes those responsible for the plans and strategies required for effective integration with the Core Strategy Development Plan Document. Further information is set out in the Pre-submission Consultation Statement - Regulation 28 Statement published with the Submission Core Strategy Development Plan Document (October 2005).
- 2.44 Throughout the process of preparing the Core Strategy Development Plan Document representations have been received from the various bodies and individuals as set out in the Schedule of Representations to the Issues and Options Paper (April 2005) and the Schedule of Representations to the Preferred Options Report (September 2005).
- 2.45 Section 4.0 of the Core Strategy Development Plan Document contains a list of spatial objectives for the document and subsequent Development Plan Documents. The relevant spatial objectives for each core policy are identified with the specific core policies.
- 2.46 The Sustainability Appraisal Scoping Report for the Core Strategy Development Plan Document published in November 2004 sets out an assessment of consistency between the spatial objectives in Section 8.0. This assessment of consistency is also set out in Section 11 of the Initial Sustainability Appraisal Report for the Core Strategy Development Plan Document, Section 13.0 of the Final Sustainability Appraisal Report and Section 13 of the Revised Final Sustainability Appraisal Report for the Core Strategy Development Plan Document.
- 2.47 The recommended word changes to the spatial objectives as set out in the respective Sustainability Appraisal Reports have been considered by Members during April 2005 through the process of preparing the Core

Strategy Development Plan Document – Preferred Options Report and during September 2005 through the process of preparing the Submission Core Strategy Development Plan Document.

- 2.48 Stafford Borough Council considers that the Core Strategy Development Plan Document has had regard to the relevant requirements in national planning policy statements and is comprehensive in its coverage for the Borough area. Throughout the preparation process for the Core Strategy Development Plan Document Stafford Borough Council has implemented a thorough community involvement and consultation process in order to establish a robust and effective spatial plan to address the relevant requirements in national planning policy statements. This consultation process has included the bodies listed in Planning Policy Statement 12 – Local Development Frameworks Annex E. Further information is set out in the Pre-submission Consultation Statement - Regulation 28 Statement published with the Submission Core Strategy Development Plan Document (October 2005).
- 2.49 Representations have been received from the various bodies and individuals as set out in the Schedule of Representations to the Issues and Options Paper (April 2005) and the Schedule of Representations to the Preferred Options Report (September 2005). These representations have been used to prepare the Core Strategy Development Plan Document - Preferred Options Report and subsequently the Submission Core Strategy Development Plan Document. The requirements set out in national planning policy statements, effective coverage of the Core Strategy Development Plan Document and cross-boundary issues with neighbouring authorities have been taken into account and addressed as part of this consultation and revision process.

Test vii: the strategies / policies / allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base.

Key questions

- Is it clear that the Local Planning Authority considered all reasonable options and alternatives in preparing the DPD?*
- Are the assumptions in the DPD set out clearly and are they supported by evidence?*
- Does the evidence clearly support the policies in the DPD?*
- Is the evidence robust and credible – i.e. has it been prepared in accordance with national policy and good practice guidance?*
- Where a balance has been struck in taking decisions between competing alternatives – is it clear how those decisions have been taken?*

Evidence

Sustainability Appraisal Report (SA Report): The SA Report should set out the options and the process by which they have been objectively assessed. It will be a fundamental part of the evidence base.

Depending on the nature of the DPD and the character of the area, there will be a range of other evidence required to assess this test. The following are suggested examples only and do not constitute a definitive and inclusive list:

- If the DPD is a Core Strategy, the following documents, amongst other evidence, may be relevant: urban capacity studies; urban and rural regeneration strategies; local housing assessments; regional and local housing and economic strategies; retail capacity studies; community development strategies; local transport plans; health and education programmes and strategies; infrastructure providers' investment programmes and strategies; environmental programmes and assessments of waste management needs.*
- If the DPD is a Site Allocation Plan the evidence may include urban capacity studies; flood risk assessments; various environmental studies and assessments; transport assessments etc.*
- If the DPD is an Area Action Plan, evidence may include area assessments, market assessments, socio-economic assessments, and assessments of infrastructure.*
- If the DPD is an Area Action Plan relating to the regeneration of rural settlements the evidence may include Parish Plans, rural regeneration strategies, and local transport plans etc.*

2.50 From the beginning of preparing the Core Strategy Development Plan Document (DPD) the Council has sought to establish a robust and credible evidence base as well as broad issues and alternative options for consideration and debate. During the pre-production stage a Gathering Evidence questionnaire was circulated widely during February & March 2004, which asked a number of key questions concerning the preparation of Development Plan Documents including key issues to be addressed, evidence to be considered, relevant plans, policies and programmes as well as specific policy areas to be included. In June 2004 the Gathering Evidence Report was published including information used to underpin the contents and key issues to be addressed by Development Plan Documents and Sustainability Appraisal Reports, including for the Core Strategy Development Plan Document (DPD).

2.51 In November 2004 the Sustainability Appraisal Scoping Report for the Core Strategy Development Plan Document, setting out the key sustainability issues and Sustainability Appraisal Framework to be used to assess the spatial objectives and core policies, was consulted upon. To facilitate this consultation process a response form with broad open-ended questions was made available in order to establish effective engagement with the community and key stakeholders. Following the consultation on the Core Strategy Development Plan Document's Sustainability Appraisal Scoping Report a Schedule of Representations was published setting out the responses received to the Scoping Report in January 2005.

- 2.52 Following the Scoping Report stage the Initial Sustainability Appraisal Report was prepared, published and consulted upon alongside the Core Strategy DPD Issues and Options Paper using the responses received to the Scoping Report. The Initial Sustainability Appraisal Report included the details set out in the Sustainability Appraisal Scoping Report but also provided information on broad alternative options for the Core Strategy Development Plan Document beyond the boundaries of national and regional planning policy within Section 13.0 of the Report entitled 'Broad Options and Alternatives'. These broad alternative options were used to prepare the core policies and the three policy options within the Issues and Options Paper. Furthermore the three policy options for each core policy were assessed against the Sustainability Appraisal Framework with the results set out in Section 14.0 of the Initial Sustainability Appraisal Report 'Developing and Refining Options'. To facilitate the unconstrained and open consultation process for the Initial Sustainability Appraisal Report a response form with key questions was prepared and circulated for comments. Following the consultation on the Core Strategy Development Plan Document's Initial Sustainability Appraisal Report a Schedule of Representations was published setting out the responses received to the Initial Sustainability Appraisal Report in April 2005.
- 2.53 The structure of the Core Strategy Development Plan Document has been prepared in order to present key issues, set out the vision, spatial objectives and then show delivery through the core policies. The consultation exercise at the Issues & Options stage was designed to be open and stimulate alternative options to be provided, as well as seek feedback on the preferred option. The objective of consultation was sought in a number of ways:
- *Issues Questionnaire setting out broad questions around the key policy areas*
 - *Response Form asking a number of specific questions including the preferred option with associated reasoning and alternative options and policy wording with associated reasons*
 - *The Core Strategy DPD – Issues and Options Paper actually contained key questions to stimulate a discussion and responses throughout the document for key elements such as the Vision, Spatial Objectives and each Core Policy*
- 2.54 The Council has implemented a thorough community involvement and consultation process for the Core Strategy Development Plan Document in order to achieve participation and involvement through the Regulation 25 Issues and Options Paper stage. This consultation process has been carried out more comprehensively than required in Regulation 25 in order to ensure effective front-loading and community engagement takes place, including the bodies listed in Planning Policy Statement 12 – Local Development Frameworks Annex E. Further information is set out in the Pre-submission Consultation Statement - Regulation 28 Statement published with the Submission Core Strategy Development Plan Document (October 2005).

- 2.55 Following the Initial Sustainability Appraisal Report stage the Final Sustainability Appraisal Report was prepared, published and consulted upon alongside the Core Strategy DPD Preferred Options Report using the responses received to the Initial Sustainability Appraisal Report. The Final Sustainability Appraisal Report included the details set out in the Sustainability Appraisal Scoping Report and the Initial Sustainability Appraisal Report but also assesses the preferred policy options for each core policy against the Sustainability Appraisal Framework with the results set out in Section 16.0 of the Final Sustainability Appraisal Report 'Stage C – Appraising the Effects of the Plan'. To facilitate the unconstrained and open consultation process for the Final Sustainability Appraisal Report a representation form was prepared and circulated for comments. Following the consultation on the Core Strategy Development Plan Document's Final Sustainability Appraisal Report a Schedule of Representations was published setting out the representations received to the Final Sustainability Appraisal Report in July 2005.
- 2.56 Following the Final Sustainability Appraisal Report stage the Revised Final Sustainability Appraisal Report was prepared and published alongside the Submission Core Strategy Development Plan Document using the representations received to the Final Sustainability Appraisal Report. The Revised Final Sustainability Appraisal Report included the details set out in the Sustainability Appraisal Scoping Report and the Initial Sustainability Appraisal Report but also assessed the submission core policies against the Sustainability Appraisal Framework with the results set out in Section 16.0 of the Revised Final Sustainability Appraisal Report 'Stage C – Appraising the Effects of the Plan'. The Revised Sustainability Appraisal Report is not subject to a consultation process at the submission stage of the Core Strategy Development Plan Document.
- 2.57 The respective Sustainability Appraisal Reports show the evaluation process for the alternative policy options and preferred options for the core policies and provide recommendations and reasons for why the core policies were prepared and amended at each stage. Members approved the Core Strategy Development Plan Document at each stage of the process following detailed consideration of the Sustainability Appraisal Report and the individual representations received. The explanation for this process set out in Section 7.0 of the Submission Core Strategy Development Plan Document.
- 2.58 The Gathering Evidence Report has been prepared to set out robust and credible evidence for the Local Development Framework. Within the Gathering Evidence Report there is a section setting out an overview of the various plans and strategies relevant to the Stafford Borough area and the Local Development Framework. The Gathering Evidence Report also contains a set of Data Profiles detailing the data available, potential gaps in the data, interested stakeholders, links to other Data Profiles and links to National and Regional policy.

Test viii: there are clear mechanisms for implementation and monitoring

Key questions

- *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 these are to be measured and are these linked to the production of the Annual Monitoring Report?*
- *Are the delivery mechanisms and timescale for implementation for the policies clearly identified?*
- *Is it clear who is intended to implement each policy? Where the actions required to implement policy are outside the direct control of the LPA is there evidence that there is the necessary commitment from the relevant organisation to implementation of the policies?*
- *Do the processes for measuring the success of the DPD accord with national guidance?*
- *Does the DPD explain how its key policy objectives will be achieved?*

Evidence

The evidence will be broadly similar to that required to assess test vii. In relation to site-specific allocations, however, this may include viability assessments of alternative sites. Relevant evidence might include reports or representations by main public and private sector delivery bodies.

- 2.59 Following each core policy there is a section containing information for monitoring and implementation to ensure effective delivery mechanisms are established. This information includes indicators, targets, milestones, implementation bodies and timescales for delivery. Section 9.0 of the Submission Core Strategy Development Plan Document provides an explanation of the monitoring and implementation framework for the core policies, which will also be facilitated through more detailed Development Plan Documents. Further information about the Annual Monitoring Report process is set out in Annual Monitoring Report 2004/2005 and Section 14.0 of the Local Development Scheme.
- 2.60 The indicators within the Core Strategy Development Plan Document used to measure the success of the core policies have been sourced from the national core indicators contained in the Government guidance 'Local Development Framework Monitoring: A Good Practice Guide'. For each indicator listed a local target has been prepared and consulted upon. The targets associated with each of the core policies are considered to be realistic and based on professional knowledge, including appropriate studies where available.
- 2.61 The milestones set out 5 yearly intervals from 2006 through to 2021 for reviewing the performance of the core policies in terms of the indicators and targets. Monitoring and review takes place on an annual basis through the

Annual Monitoring Report. The overall timescale for delivery of the core policies are identified as being from 2001 to 2021.

- 2.62 The implementation title lists bodies required to deliver the means of implementation for the core policy. These bodies have been thoroughly consulted throughout the preparation of the Core Strategy Development Plan Document. The Data Profiles within the Gathering Evidence Report set out more details regarding the delivery mechanisms and actions being carried out other relevant organisations through related plans and strategies. The Council does not consider it is appropriate to specify to implementation bodies the detailed means of implementation required or to clarify their commitment to delivery of key policy objectives of the plan.
- 2.63 During preparation of the Core Strategy Development Plan Document the Council has implemented a thorough community involvement and consultation process in order to achieve participation and discussion with bodies listed in Planning Policy Statement 12 – Local Development Frameworks Annex E. This comprehensive list of bodies includes those responsible for the monitoring and delivery of plans and strategies required for effective implementation of the Core Strategy Development Plan Document. Further information about the consultation process implemented is set out in the Pre-submission Consultation Statement - Regulation 28 Statement published with the Submission Core Strategy Development Plan Document (October 2005). Throughout the process of preparing the Core Strategy Development Plan Document representations have been received from the main public and private sector delivery bodies as set out in the Schedule of Representations to the Issues and Options Paper (April 2005) and the Schedule of Representations to the Preferred Options Report (September 2005).
- 2.64 Furthermore the Council has implemented a thorough community involvement and consultation process for the Sustainability Appraisal process of the Core Strategy Development Plan Document in order to achieve clear mechanisms for implementation and monitoring, including the bodies listed in Planning Policy Statement 12 (PPS12) – Local Development Frameworks Annex E. This comprehensive list of bodies includes those responsible for clear mechanisms of implementation and monitoring required for an effective Sustainability Appraisal process of the Core Strategy Development Plan Document. No consultation body has asked for any change to the monitoring framework of the Sustainability Appraisal Reports which have not been taken into account. Further information regarding consultations is set out in the Pre-submission Consultation Statement - Regulation 28 Statement published with the Submission Core Strategy Development Plan Document (October 2005). The following paragraphs set out how the Sustainability Appraisal process for the Core Strategy documentation has been consulted upon and how these documents provide clear mechanisms for monitoring and review of the Core Strategy Development Plan Document.
- 2.65 The Sustainability Appraisal Scoping Report to the Core Strategy DPD (October 2004) established clear mechanisms for implementation and monitoring within Section 7.0 'Sustainability Objectives, Indicators and

Targets' of the Scoping Report. The Scoping Report was consulted upon during October and November 2004.

- 2.66 In January 2005 the Initial Sustainability Appraisal Report for the Core Strategy DPD was published and consulted upon with clear mechanisms for implementation and monitoring were set out in Section 10, prepared following consideration of the representations received to the Scoping Report stage. This material is also contained in the Final Sustainability Appraisal Report for the Core Strategy DPD published in May 2005 and the Revised Final Sustainability Appraisal Report for the Core Strategy DPD made available alongside the Submission Core Strategy document in October 2005.
- 2.67 Section 4.0 of the Core Strategy Development Plan Document sets out its key policy objectives through the list of spatial objectives for the document and subsequent Development Plan Documents. The key policy objectives will be achieved through implementation and delivery of the core policies as well as the subsequent Development Plan Documents. The relevant spatial objectives for each core policy are identified with the specific core policies, which includes monitoring and implementation framework information.

Test ix: it is reasonably flexible to enable it to deal with changing circumstances.

Key Questions

- *Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?*
- *Are Development Control Policies written in a generic form to enable them to provide a robust and consistent framework for considering planning applications?*

Evidence

The annual monitoring report will be an important source of evidence. For example, the LPA should be monitoring the effectiveness of their policies. Sensitivity testing³ of the policies in the DPD to potential changes in the assumptions that underpin them (such as economic growth or transport provision), and other sources of evidence for the DPD (see test vii) would help to demonstrate the robustness of the DPD to change.

For example, if the strategy of the DPD is dependent on the construction of a major transport scheme, the Local Planning Authority should carry out an assessment of the risk of the infrastructure not being delivered and the consequences of this failure for the DPD as a whole.

Where there is a significant risk, the Local Planning Authority should identify contingency options that will achieve the objectives of the DPD in the event that the policy in question cannot be delivered. The DPD should set out the basis for the contingencies identified.

³'Sensitivity testing', meaning testing the effect of changing local circumstances in various degrees (new roads, new employers or loss of) on , for example, the need for housing provision and other facilities.

- 2.68 Monitoring the effectiveness of core policies within the Core Strategy Development Plan Document will be reported through the Annual Monitoring Report. Following each core policy there is a section containing information for monitoring and implementation to ensure effective delivery mechanisms are established. This information includes indicators, targets, milestones, implementation bodies and timescales for delivery. Section 9.0 of the Submission Core Strategy Development Plan Document provides an explanation of the monitoring and implementation framework for the core policies, which will also be facilitated through more detailed Development Plan Documents. Further information about the Annual Monitoring Report process is set out in the Annual Monitoring Report 2004/2005 and Section 14.0 of the Local Development Scheme.
- 2.69 From the beginning of preparing the Core Strategy Development Plan Document (DPD) the Council has sought to establish a robust and credible evidence base as well as broad issues and alternative options for consideration and debate to address a variety of circumstances and potential unexpected changes. During the pre-production stage a Gathering Evidence questionnaire was circulated widely during February & March 2004, which asked a number of key questions concerning the preparation of Development Plan Documents including key issues to be addressed, evidence to be considered, relevant plans, policies and programmes as well as specific policy areas to be included. In July 2004 the Gathering Evidence Report was published including information to be taken into account when preparing the contents and key issues to be addressed by Development Plan Documents and Sustainability Appraisal Reports, including for the Core Strategy Development Plan Document (DPD).
- 2.70 In November 2004 the Sustainability Appraisal Scoping Report for the Core Strategy Development Plan Document, setting out the key sustainability issues and Sustainability Appraisal Framework to be used to assess the spatial objectives and core policies, was consulted upon. This provided the opportunity to consider other circumstances at the start of the Core Strategy Development Plan Document process. To facilitate this consultation process a response form with broad open-ended questions was made available in order to establish effective engagement with the community and key stakeholders. Following the consultation on the Core Strategy Development Plan Document's Sustainability Appraisal Scoping Report a Schedule of Representations was published setting out the responses received to the Scoping Report in January 2005.
- 2.71 Following the Scoping Report stage the Initial Sustainability Appraisal Report was prepared, published and consulted upon alongside the Core Strategy DPD Issues and Options Paper using the responses received to the Scoping Report. The Initial Sustainability Appraisal Report included the details set out in the Sustainability Appraisal Scoping Report but also provided information on broad alternative options for the Core Strategy Development Plan Document beyond the boundaries of national and regional planning policy within Section 13.0 of the Report entitled 'Broad Options and Alternatives'. Section 13.0 provided the opportunity to consider a wide variety of

circumstances. To facilitate the unconstrained and open consultation process for the Initial Sustainability Appraisal Report a response form with key questions was prepared and circulated for comments. Following the consultation on the Core Strategy Development Plan Document's Initial Sustainability Appraisal Report a Schedule of Representations was published setting out the responses received to the Initial Sustainability Appraisal Report in April 2005.

- 2.72 Clearly the broad alternative options detailed in Section 13.0 of the Initial Sustainability Appraisal Report for the Core Strategy Development Plan Document would conflict with the conformity test of soundness number (iv) as set out in PPS12 paragraph 4.24. The broad alternative options from the Initial Sustainability Appraisal Report were considered to ensure the Development Plan Document was prepared through the most flexible approach. Subsequently the core policies and the three policy options for the Issues and Options Paper were prepared within the context of national and regional policy. The policy options within the Issues and Options Paper were assessed with the results set out in Section 14.0 of the Initial Sustainability Appraisal Report 'Developing and Refining Options'.
- 2.73 The Council has implemented a thorough community involvement and consultation process for the Core Strategy Development Plan Document in order to achieve participation and involvement through the Regulation 25 Issues and Options Paper stage. This consultation process has been carried out more comprehensively than required in Regulation 25 in order to ensure a variety of circumstances and potential unexpected changes are considered through effective front-loading and community engagement. Further information is set out in the Pre-submission Consultation Statement - Regulation 28 Statement published with the Submission Core Strategy Development Plan Document (October 2005).
- 2.74 Following the Initial Sustainability Appraisal Report stage the Final Sustainability Appraisal Report was prepared, published and consulted upon alongside the Core Strategy DPD Preferred Options Report using the responses received to the Initial Sustainability Appraisal Report. The Final Sustainability Appraisal Report included the details set out in the Sustainability Appraisal Scoping Report and the Initial Sustainability Appraisal Report but also assesses the preferred policy options for each core policy against the Sustainability Appraisal Framework with the results set out in Section 16.0 of the Final Sustainability Appraisal Report 'Stage C – Appraising the Effects of the Plan'. Following the consultation on the Core Strategy Development Plan Document's Final Sustainability Appraisal Report a Schedule of Representations was published setting out the representations received to the Final Sustainability Appraisal Report in July 2005.
- 2.75 Following the Final Sustainability Appraisal Report stage the Revised Final Sustainability Appraisal Report was prepared and published alongside the Submission Core Strategy Development Plan Document using the representations received to the Final Sustainability Appraisal Report. The Revised Final Sustainability Appraisal Report included the details set out in

the Sustainability Appraisal Scoping Report and the Initial Sustainability Appraisal Report but also assessed the submission core policies against the Sustainability Appraisal Framework with the results set out in Section 16.0 of the Revised Final Sustainability Appraisal Report 'Stage C – Appraising the Effects of the Plan'. Furthermore through Section 17.0 'Cumulative effects including secondary, indirect or synergistic effects' of the Revised Final Sustainability Appraisal Report the effects of implementing the core policies have been assessed to set out assumptions and potential impacts. The Revised Final Sustainability Appraisal Report is not subject to a consultation process at the submission stage of the Core Strategy Development Plan Document.

- 2.76 The respective Sustainability Appraisal Reports show the evaluation process for the alternative policy options and preferred options for the core policies and provide recommendations and reasons for why the core policies were prepared and amended at each stage. Members approved the Core Strategy Development Plan Document at each stage of the process. This decision-making process to ensure a robust and effective Core Strategy Development Plan Document was facilitated through the detailed consideration of the Sustainability Appraisal Report and the individual representations received. The explanation for this process set out in Section 7.0 of the Submission Core Strategy Development Plan Document.
- 2.77 The Gathering Evidence Report has been prepared to set out robust and credible evidence for the Local Development Framework. Within the Gathering Evidence Report there is a section setting out an overview of the various plans and strategies relevant to the Stafford Borough area and the Local Development Framework. The Gathering Evidence Report also contains a set of Data Profiles detailing the data available, potential gaps in the data, interested stakeholders, links to other Data Profiles and links to National and Regional policy.

3.0 Conclusions

- 3.1 The Self Assessment Paper has set out how the Core Strategy Development Plan Document has met the tests laid down Planning Policy Statement 12 (PPS12) – Local Development Frameworks and the Planning Inspectorate's document entitled 'Development Plan Examinations – A Guide to the Process of Assessing the Soundness of Development Plan Documents' published in December 2005. The purpose of this Self Assessment Paper is to assist with the Examination of the Submission Core Strategy Development Plan Document. The Council considers that the Submission Core Strategy Development Plan Document is sound, following an assessment of the document through the tests of soundness defined above.