

Stafford Borough Soundness Self-Assessment Checklist (April 2016)

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.

Stafford Borough Soundness Self-Assessment Checklist April 2016

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). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

In addition, the Legal Compliance checklist (a separate document, see www.pas.gov.uk) should be completed to ensure that this aspect is covered.

Stafford Borough Soundness Self-Assessment Checklist April 2016

The Duty to Co-operate will also be assessed as part of the examination process.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i>		

Stafford Borough Soundness Self-Assessment Checklist April 2016

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<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. 	<p>Key issues and challenges are established in Section 2 of the Plan for Stafford Borough Part 2 Publication Document (P2 A2)(PfsB P2 Publication) . This outlines the key issues that the DPD needs to address over the Plan period, the foundations of which are established in the adopted Plan for Stafford Borough 2011 -2031 (PFSB) (P2- C1) namely the development strategy and Spatial Principles (SP).</p> <p>SP 3 of the adopted PfsB sets out the Stafford Borough Sustainable Settlement Hierarchy, policy SP4 sets out the housing growth distribution and Policy SP7 on supporting the location of development states that settlement boundaries will be established in accordance with the criteria listed in the policy(P2 C1). Policy SB3 of the PfsB P2 Publication specifically identifies which settlement boundaries will be identified.</p> <p>Section 2 of the PfsB P2 Publication sets out the proposed settlement boundaries for Stafford, Stone and the Key Service Villages. It also includes a policy on social and community facilities and discusses Local Green Space and protecting Ministry of Defence Land. Section 3, 4 and 5 explores thematic policies and issues building upon strategic policies established in the adopted PfsB. The policies are therefore internally consistent.</p> <p>Each element of the package of policies and proposals in the Submitted Plan seeks to contribute to the achievement of the objectives, and the delivery of the vision, set out in the adopted PfsB. The approach is comprehensive, not leaving matters</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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		<p>unaddressed, and is logically constructed.</p> <p>The Proposal stage of the PFSB P2 considered the alternatives when establishing the proposed settlement boundaries and boundaries for the Recognised Industrial Estates (RIEs). This was informed by Development Management decisions; environmental and landscape designations; the extent of domestic gardens on the edge of settlements; recognised physical features; and neighbourhood plan proposals for new development.</p> <p>In addition Land for New Homes (P2 – E5) and Five Year Land Supply Statement (P2 E17) demonstrates an average build rate of 500 dwellings. The Authority Monitoring Report, monitors housing commitments and completions on an annual basis to ensure that the levels are consistent with the apportionment set out in adopted Policy SP4.</p> <p>The PFSB was initiated under the 2007 Local Development Scheme which came into effect on December 2007. This was subsequently revised in 2008, 2012 and 2013, 2014 and more recently in 2016 (P2 E10). This provides a timetable for delivery of each DPD and specifies the content of each Development Plan Document.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Plans and decisions need to take local circumstances into account, so that</p>	<ul style="list-style-type: none"> An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 	<p>Sustainable development is the central tenet at the heart of the adopted PFSB and the PFSB P2 Publication document. Adopted Spatial Principle 1 of the adopted PFSB (P2- C1) provides the locally</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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<p>they respond to the different opportunities for achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <p>—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<p>Effective', below).</p> <ul style="list-style-type: none"> • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area) 	<p>specific overarching policy to support the presumption in favour of sustainable development in Stafford Borough.</p> <p>Spatial Principle 1 sets out the key overarching priorities of the NPPF for sustainable development. To be able to deliver genuinely sustainable, high quality development, planning policies must facilitate development that improves the economic, social and environmental conditions of the area to enable planning officers, applicants and decision takers the tools to effectively shape the form and content of development on the ground. PFSB P2 Publication document and policy SB1 guides where new development will take place within Stafford, Stone and the Key Service Villages. It sets out an approach to development in the sustainable settlement hierarchy, establishes the settlement boundaries for Stafford, Stone and the Key Service Villages together with boundaries for Recognised Industrial Estates.</p>
<p>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.</p>	<ul style="list-style-type: none"> • A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk) 	<p>Adopted PFSB Spatial Principle 1 (P2- C1) is based upon the recommended model policy, which embodies all these matters. Achieving sustainable development is a key concern throughout the PFSB Part 2 and reinforced in policy SB1 Settlement boundaries; SB2 protected social and community facilities; and SB3 Stafford and Stone protected employment areas. This gives greater certainty to landowners and developers.</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> • Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate. 	<p>The Development Strategy for Stafford Borough over the Plan period (2011 - 2031) is set out in section 6 of the adopted PFSB (P2- C1). Spatial Principle 2 establishes the scale of change for the Borough which will take place over this period. It plans for 500 new houses a year (10,000 over the Plan period) and 8 hectares a year of new employment land (160 ha over the Plan period).</p> <p>The majority of the growth is to occur at key settlements identified in the sustainable settlement hierarchy, identified through adopted policy Spatial Principle 3.</p> <p>Spatial Principle 4 directs the majority of growth to the larger settlements in the hierarchy, and this will mainly be delivered at four Strategic Development Locations (SDLs), three at Stafford and one at Stone. Development at Stafford, Stone and the key service villages provides an opportunity to improve and regenerate the urban areas by introducing new investment, widening choice, and promoting the reuse of empty buildings and brownfield land.</p> <p>Cross boundary issues were identified as part of the plan making process for the adopted PFSB (P2- C1). The PFSB P2 has consulted neighbouring authorities as part of Duty to Co-operate and no cross boundary issues have been raised as part of this process.</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),</p>	<ul style="list-style-type: none"> • Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate. 	<p>The adopted PFSB (P2- C1) sets an overarching vision (page 15) to promote economic growth and sustainable development. The central tenets of the vision are then articulated through key objectives (pages 16-17) and Spatial Principle SP5 and Spatial Principle SP6, which provide positive support for new employment development. Of particular relevance are policies E1 and E2 which support the development of new economic development that will enhance employment opportunities and support new businesses investment, particularly new start-up businesses and rural diversification schemes. Each SDL at Stafford Town and Stone Town will provide sustainable economic growth by delivering high quality employment land alongside new housing development. In addition, policies E3, E4 and E5 provides for development, redevelopment and expansion (in the case of policies E3 & E4) of existing rural sites to provide employment for local communities. Policy SB3 of the PFSB P2 (P2 A1) seeks to specifically protect the Stafford and Stone employment areas.</p> <p>Paragraph 9.13 of the adopted PFSB states that formal boundaries for the Recognised Industrial Estates will be established with the exception of Moorfields. Section 4 of the PFSB P2 Publication (P2</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		A2) accordingly establishes these boundaries. PFSB P2 Publication policy SB3 (P2 A1), seeks to protect Stafford and Stone employment areas.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> • A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22) 	<p>To support inward investment, adopted Policies E1, E2 , Stafford 1 and Stone 1 (P2 C1) provides particular focus on the main sectors, clusters and local growth industries. These include high technology industries and creative knowledge based industries in and around Staffordshire University and Staffordshire Science park. Within the main settlements of Stafford and Stone each SDL will provide new employment allocations, whilst expansion and regeneration of existing Recognised Industrial Estates (RIEs) will provide rural employment opportunities alongside strategic allocations at Raleigh Hall and Ladfordfields.</p> <p>Much of the employment land within Stafford Borough is currently already developed and in active use. The principal focus of policies within the adopted PFSB is to regenerate existing estates and provide new employment land within the most sustainable locations. In addition Policy Stafford 1 and Stone 1 avoid the long term protection of employment land where there is no reasonable prospect of the site coming forward. The formal boundaries to the RIE's are established in section 4 of the PFSB P2 Publication (P2 A1).</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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<p>2. Ensuring the vitality of town centres (paras 23-37)</p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres. 	<p>The adopted PFSB (P2 C1) policy E8 provides a clear strategic approach to enhancing the vitality and viability of town centres of Stafford and Stone and other locations in the Borough. Adopted Policy Stafford 1 aims to regenerate the town centre through promoting diversity of uses in the town centre, as well as retailing, to support the role of Stafford as a County Town. The policy also promotes the development of the leisure and evening economy, and a growth in tourism and employment in the centre. This will help to ensure the local economy is resilient to changes in retailing due to the growth of online shopping, building on the wide offer of the Stafford Town Centre. A similar policy, Policy Stone 1 promotes diversity of uses within Stone town centre.</p>
<p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)</p>	<ul style="list-style-type: none"> An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. Primary and secondary shopping frontages identified and allocated. 	<p>The adopted policies maps for the PFSB Stafford Area Inset 1 (P2 C2) and Stone Area Inset (P2 C3), and adopted Policy E8, define the town centre boundaries and extent of the primary shopping area.</p> <p>The identification of the primary and secondary retail frontages is considered in section 3 of the PFSB P2 Publication (P2 A1). As the retail sector is changing it is considered that identifying frontages may have an impact on the vitality of Stafford and Stone Town Centres (paragraph 3.2 and 3.3). The Eccleshall Local</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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		Centre is defined on Inset Map P2-A5 and expanded at paragraph 3.6. The location of the village and neighbourhood shops are identified on the relevant inset maps and discussed in paragraphs 3.7 to 3.9.
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	<ul style="list-style-type: none"> Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities. 	<p>The adopted PFSB (P2 C1) policy Spatial Principle 6 supports the sustainable growth of rural businesses through the diversification of farm based enterprises the redevelopment, intensification and/or expansion of existing rural businesses. This will enable local people living in rural areas to reduce commuting and provide greater local access to jobs.</p> <p>To ensure that the rural areas flourish adopted Policy E1 recognises the important contribution that the rural economy makes to providing sustainable employment opportunities to local people in rural areas. To support prosperous economy outside Stafford and Stone Towns through increased growth and employment in rural areas, policies E3 and E4 support development of new employment opportunities land at existing Recognised Industrial Estates, whilst policy E5 provides for redevelopment of existing Major Developed Sites within the Green Belt for employment uses.</p> <p>With the exception of Stafford and Stone the Recognised Industrial Estates are located in the rural areas. The PFSB P2 Publication (P2 A1) sets the boundaries for these estates in section 4 namely at</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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		Hixon, Hixon Airfield, Ladfordfields, , Pasturefields and Raleigh Hall, these are supported by a suite of Inset Maps (P2 A14 to P2 A18).
<p>4. Promoting sustainable transport (paras 29-41)</p>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p>	<ul style="list-style-type: none"> • Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. • Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. • A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. • If local (car parking) standards have been prepared, are they justified and necessary? (39) • Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan. 	<p>Transport is co-ordinated by Staffordshire County Council through the Staffordshire Local Transport Strategy. The overall strategic approach is to reduce the reliance on the private car and to maximise the travel and accessibility through promoting the use of public transport, walking and cycling. To achieve the overall development strategy (Spatial Principle 4) within the adopted PfSB (P2 C1) specifies that the majority of housing will be focused on the main settlements of Stafford and Stone Towns with the remainder focused on the key service villages. These are the most sustainable locations in terms of accessibility to services and facilities and will provide the best opportunity to maximise sustainable transportation modes such as walking and cycling.</p> <p>The Strategic Development Locations (SDLs) are close to the existing urban areas of Stafford and Stone to reduce the reliance on the private car and to maximise the travel and accessibility through promoting the use of public transport, walking and cycling; thus reducing the need for major transport infrastructure. Both the Northern SDL (adopted Policy Stafford 2) and Western SDL (adopted Policy Stafford 3) will be mixed use development</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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<p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>comprising housing, employment, new educational facilities and local shops within walking distance, thus reducing the need to travel by providing services and jobs locally or in locations accessible by public transport, cycling and walking. Furthermore, adopted Policy Stafford 1 encourages housing to be provided as part of mixed use developments by bringing upper floors back into use for residential uses where practicable.</p> <p>Adopted PfsB (P2 C1) I1 covers implementation, including transport infrastructure. Appendix D of the plan provides the implementation framework, listing transportation infrastructure for each strategic allocation along with key funding partners required deliver the necessary infrastructure to deliver the plan.</p> <p>The adopted PFSB (P2 C1) at Appendix B sets local car parking standards and adopted Policy T2 sets out the overarching strategy to restrain the levels of car parking subject to adequate provision of more sustainable transportation modes.</p>
<p>5. Supporting high quality communications infrastructure (paras 42-46)</p>		
<p>Support the expansion of the electronic communications networks, including</p>	<ul style="list-style-type: none"> • Policy supporting the expansion of electronic communications networks, including 	<p>Adopted PfsB Policies E1 on the local economy and Policy I1- Infrastructure Delivery Policy (P2 C1)</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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<p>telecommunications’ masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<p>telecommunications and high speed broadband, noting the caveats in para 44.</p>	<p>specifies that new developments should provide appropriate levels of infrastructure. The supplementary text to support the policy highlights that the provision of high speed broadband is of high importance in meeting the development needs of the Borough. In addition a key infrastructure requirement is that each SDL will have Superfast Fibre Access Broadband.</p> <p>No policy is in place to ensure that new buildings or other structures do not cause interference with broadcast or telecommunications. The NPPF (F1) will be sufficient to address individual applications where this applies.</p>
<p>6. Delivering a wide choice of high quality housing (paras 47-55)</p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> • Identification of: <ul style="list-style-type: none"> a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of ‘compelling evidence’ to justify their inclusion (48) • A SHLAA 	<p>The Development Strategy for Stafford Borough over the Plan period (2011 - 2031) is set out in section 6 of the adopted PFSB (P2- C1). Spatial Principle 2 establishes the scale of change for the Borough which will take place over this period, it plans for 500 new houses a year (10,000 over the Plan period). Spatial Principle 4 directs the majority of growth to the larger settlements in the hierarchy, and the wider Plan sets out that this will mainly be delivered at four Strategic Development Locations (SDLs), three at Stafford and one at Stone.</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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		<p>Since the adoption of the PfSB many sites have been built out or have gained planning permission and are considered as "commitments". The current position is that at least 10,800 houses are either completed, committed through planning permissions or allocated through the Strategic Development Locations, since the start of the Plan period in 2011. Table 2 of the PfSB P2 Publication sets out the commitments as of 31st March 2015. Since such a substantial proportion of the housing requirement is already determined in this way, it is not necessary for the PfSB P2 Publication document to make specific allocations for additional housing sites. The figure of 10,000 does not represent a ceiling or a maximum, but establishes a context against which necessary supporting infrastructure can be planned. In addition, and more importantly for the work of Part 2, the Plan for Stafford Borough also establishes a clear intent that, in order to promote patterns of development that are sustainable, growth should be distributed to reflect the % split established in Spatial Principle 4 (SP4). In accordance with the adopted PfSB, Policy SB1 of the PfSB P2 (P2 A1) defines the settlement boundaries to provide sufficient land to meet the supply of developable sites.</p> <p>In addition Land for New Homes (P2 – E5) and the Five Year Land Supply Statement (P2 E17) demonstrates an average build rate of 500 dwellings. The Authority Monitoring Report, monitors housing completions on an annual basis to ensure that the</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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		levels are consistent with the apportionment set out in adopted Policy SP4. The SHLAA is reviewed on an annual basis. The most recent SHLAA was undertaken in 2015 (P2 E11).
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	<ul style="list-style-type: none"> • Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 	<p>For years 6 - 10 and 11 – 15, SHLAA sites in conjunction with existing planning permissions and Strategic Development Locations (SDL) provide sufficient supply of developable sites to achieve the required quantum of developable sites, delivered in accordance with the Housing Trajectories.</p> <p>Policy SB1 of the PfsB P2 together with the Inset Maps (P2 A1) defines the settlement boundaries for Stafford, Stone and the KSVs to provide sufficient land to meet the supply of developable sites.</p>
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	A five year housing land reservoir of sites will be maintained through the delivery of the Strategic Development Locations (SDLs), existing planning permissions and SHLAA sites. In addition Land for New Homes (P2 – E5) and Five Year Land Supply Statement (P2 E17) demonstrates an average build rate of 500 dwellings. The AMR will monitor housing completions on an annual basis to ensure that the levels are consistent with the apportionment set out in SP4.
Set out the authority’s approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> • Policy on the density of development. 	There is no policy which defines specific density requirements, since the preference is for a flexible

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>approach: adopted PFSB Policy C1 – Dwelling Types and Sizes (P2 C1) requires new development to be compatible with the character of the area.</p> <p>Furthermore, adopted PFSB Policy N1 Design also requires development to be in keeping with surrounding development.</p>
<p>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)</p>	<ul style="list-style-type: none"> • Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA • Identification of the size, type, 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) • Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50) 	<p>Adopted PFSB Policy C1 (P2 C1) relates to dwellings types and sizes. It requires housing proposals to provide for a mix of dwellings, in terms of size, type and tenure. In doing so it should take account of the existing household and dwelling size in the locality as well as current waiting list date for the locality.</p> <p>Adopted PFSB Policy C3 (P2 C1) sets out approach to specialist housing – there is an anticipated need to provide additional extra care bed units in Stafford Borough due to an ageing population.</p> <p>Adopted PFSB Policy C2 (P2 C1) requires a proportion of affordable housing to be provided in accordance with a series of thresholds.</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural</p>	<ul style="list-style-type: none"> • Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) 	<p>Adopted PFSB Spatial Principle 7 (P2 C1) Supporting the Location of New Development, provides market and affordable housing to take place in suitable locations, whilst adopted Policy C5 sets out the approach to Residential Proposals outside the Settlement Hierarchy and includes scope to provide an element of market housing where appropriate</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
communities.	<ul style="list-style-type: none"> Examples of special circumstances to allow new isolated homes listed at para 55. 	and sets out the approach to housing in the rural area and the policy on rural exception sites.
7. Requiring good design (paras 56-68)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	<ul style="list-style-type: none"> Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues 	<p>Adopted PfSB Policy N1 Design (P2 C1) sets out the central tenets for good design such as layout, form, safe design, biodiversity and local distinctiveness issues such as scale, views, character and materials. All development is required to have regard to good design, local character and to provide new biodiversity areas where practical. It also covers the importance of greater connectivity between people and places. For the larger sites, such as the Strategic Development Locations at a master plan is required.</p> <p>The settlement boundaries in the PfSB P2 (see inset maps P2 A2-A13) have been drawn to meet the scale of demand.</p>
8. Promoting healthy communities (paras 69-77)		
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).	<ul style="list-style-type: none"> Inclusion of a policy or policies on inclusive communities. Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community 	<p>Mixed use development and community interaction are promoted through a number of adopted policies within the PFSB.</p> <p>Each SDL site will be a mixed use development comprising housing and employment uses as part of the overall development master plan for each site. In addition, adopted Policies Stafford 1- Stone1 encourages conversions to housing use on upper floors in the Town Centres.</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</p>	<p>Adopted PfsB Policy N1 Design (P2 C1) requires development to design out crime. There is also a requirement for new developments to be accessible, legible and provision of overlooked public space, requiring places to be permeable and legible to provide for ease of movement to provide. The policy also addresses safety within public areas by requiring streets and public spaces to be attractive, usable and overlooked to create a safe and secure environment. In addition this overarching framework is also contained in the individual SDLs policies of PfsB.</p> <p>Policy SB2 of the PfsB P2 Publication seeks the protection of social and community facilities.</p>
	<ul style="list-style-type: none"> • Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure. 	<p>Adopted PfsB Policy C7 Open Space, Sports and Recreation (P2 C1) supports the retention, protection, supplementing or enhancing all types of sport, recreation and open space facilities.</p> <p>Policy SB2 of the PfsB P2 Publication, seeks to protect social and community facilities, stating that change of use will be resisted unless it can be established that the services provided by the facility are no longer required and it can be demonstrated that the site has been actively marketed for an alternative social or community use for over twelve months, or can be served in an alternative location within the same settlement, or in a manner that is equally accessible to the local community.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally</p>	<ul style="list-style-type: none"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and 	<p>Adopted PfsB Policy C7 Open Space, Sports and Recreation (P2 C1) supports the retention, protection, supplementing or enhancing all types of</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
derived standards to provide these (73).	<p>recreational facilities in the local area. (73)</p> <ul style="list-style-type: none"> • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75) 	<p>sport, recreation and open space facilities. Furthermore this is strengthened by adopted policy N4 on the Natural Environment and Green Infrastructure, this states that the green infrastructure network identified on the Policies Map will be protected, enhanced and expanded.</p>
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78) 	<p>The protection of Local Green Space (LGS) is expanded at paragraphs 2.32 – 2.35 of the PFSB P2 Publication (P2 A1). LGS was initially identified at the Proposals stage. However due to the lack of evidence to demonstrate that they met the requirements of the NPPF and the representations received it is considered that the most appropriate vehicle to make an assessment to designate a LGS is through Neighbourhood Plans, either prepared by a parish council or a Neighbourhood Forum. Where a Neighbourhood Plan designates a Local Green Space, this is shown on the Policy Map for the relevant settlement.</p>
9. Protecting Green Belt land (paras 79-92)		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt</p>	<ul style="list-style-type: none"> • Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> ○ Enhance the beneficial use of the Green Belt. (81) ○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) ○ Specify that inappropriate development should not be approved except in very 	<p>Adopted PFSB at paragraph 9.20 states that the Green Belt boundary will be maintained and protected from inappropriate development in line with Government policy as set out in the NPPF.</p> <p>Adopted PFSB includes a specific policy relating to the development of major developed sites in the Green Belt: Policy E5. These sites are large brownfield sites where sustainable redevelopment</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<p>special circumstances. (87)</p> <ul style="list-style-type: none"> ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	<p>for employment would contribute to balanced communities by meeting the local employment needs of the area.</p> <p>There has been no need to review the Green Belt within Stafford Borough as part of the preparation of the PfSB P2 as sufficient land is available in locations outside of the Green Belt to meet the development needs of the Borough. Therefore no review of the Green Belt has been undertaken (see paragraph 2.19 PfSB P2 Publication).</p>
<p>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> ● Planning of new development in locations and ways which reduce greenhouse gas emissions. ● Support for energy efficiency improvements to existing building. ● Local requirements for a building’s sustainability which are consistent with the Government’s zero carbon buildings policy . (95)) 	<p>The adopted PfSB (P2 C1) directs growth to the most sustainable settlements of Stafford (Policy Stafford 1- Stafford Town) and Stone (Policy Stone 1- Stone Town). Therefore there is a reduced need to travel to access services and facilities and greater use can be made of sustainable transport modes such as public transport services.</p> <p>Adopted Policy T1 directs new development to sustainable locations by requiring new development to reduce private car use and promotes the use of sustainable transport modes such as public transport, walking and cycling</p> <p>Adopted Policy N2 Climate Change includes a requirement that new homes meet specific targets in line with the Government’s buildings policy and</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		requires new developments to provide a proportion of their energy requirement from on-site renewable resources or low carbon energy equipment.
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)	<ul style="list-style-type: none"> • 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) 	<p>The adopted PfSB policy N2 Climate Change (P2 C1) requires new development to provide a proportion of their energy requirement from on-site renewable resources or low carbon energy equipment.</p> <p>Adopted Policy N3 is concerned with low carbon sources and renewable energy.</p>
Minimise vulnerability to climate change and manage the risk of flooding (99)	<ul style="list-style-type: none"> • Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures 	The adopted PfSB Policy N2 Climate Change (P2 C1) directs that new developments should protect developments from flooding and not worsen the potential for flooding. The use of appropriate Sustainable urban Drainage Systems (SuDs) is required to reduce the flood risk in new developments.
Take account of marine planning (105)	<ul style="list-style-type: none"> • 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 	Stafford Borough is an inland authority; therefore there are no marine planning policies.

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>marine-related economic development</p> <ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	Stafford Borough is an inland authority; therefore there are no coastal flooding risks
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	<ul style="list-style-type: none"> • A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. • Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs. 	<p>The adopted PfSB Policy N5 (P2 C1) sets out the overall framework for the protection of European, national and local sites of nature conservation importance. Of particular importance is the need for all new development to ensure that development does not significantly contribute to adverse effects on sites of European importance such as the Cannock Chase SAC. In addition, adopted policy N8 seeks to protect and conserve the natural landscape, whilst policy N7 deals specifically with the Cannock Chase Area of Outstanding Natural Beauty (AONB).</p> <p>The settlement boundaries defined in Section 2 of the PfSB P2 Publication, have been drawn to minimise the loss of higher quality agricultural land</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		and to protect the Cannock Chase AONB.
Prevent unacceptable risks from pollution and land instability (109)	<ul style="list-style-type: none"> Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity. 	The adopted PfSB policies N2, N4, N5, N6, N7 and N8 provide protection and enhancement of biodiversity and geodiversity assets and the provision of new green infrastructure (P2 C1).
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> Identification and mapping of local ecological networks and geological conservation interests. Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species 	The adopted PfSB policies N2 and N4, N5, N6, N7 and N8 provide protection and enhancement of biodiversity and geodiversity assets and the provision of new green infrastructure (P2 C1).
<p>12. Conserving and enhancing the historic environment (paras 126-141)</p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. A map/register of historic assets A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) 	<p>Adopted Policy N9 - Historic Environment provides a more detailed policy to guide development to ensure that it protects the heritage assets at the national level and local level and where appropriate, enhance the significance of those assets.</p> <p>The adopted PfSB seeks to protect and enhance the Historic Environment (P2 C1). Policy Stafford 1- Stafford Town, Policy Stone 1 - Stone Town, and Policy N1- Design all specify that development should protect heritage assets for the contribution that they make to the historic environment and local distinctiveness.</p>
<p>13. Facilitating the sustainable use of minerals (paras 142-149)</p>		
<p>It is important that there is a sufficient supply</p>	<p>Account taken of the matters raised in relation to</p>	<p>Staffordshire County Council is the Minerals and</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>Waste planning authority.</p>
<p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with 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</p>	<p>The PfSB P2 has been subject to continuous public and stakeholder consultation throughout the course of its preparation. The details of the consultation and the Borough Council's responses during these stages are contained in the 'The Plan for Stafford Borough Part 2 Consultation Regulation Statement (Reg 22 9) (c)'. Public engagement has followed the principles set out in the Adopted Stafford Borough Statement of Community Involvement (P2 A21)</p>
<p><i>Research / fact finding</i></p>	<p>The studies, reports and technical papers that</p>	<p>Stafford Borough council have maintained a robust,</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<p>provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by.</p> <p>AND</p> <p>Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions.</p> <p>OR</p> <p>A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</p> <p>OR</p> <p>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).</p>	<p>credible and up to date evidence base to inform 'The Plan for Stafford Borough Part 2'. This comprises the following key elements:</p> <p>Evidence base studies prepared to address issues to be covered in the PFSB P2 including the following: Land for New Homes P2 E5; Five Year Housing Land Statement (P2 E17); Authority Monitoring Report (P2 E1 and P2 E2); Planning Appeals and Development management decisions (P2 J) ; background paper on Retail Boundaries and Frontages (P2 G20); and the Gypsy and Traveller Accommodation Needs Assessment (GTAA) (P2 E16). With the exception of the GTAA which has been produced by ARC all the technical documents have been produced 'in house'.</p> <p>ii. Evidence provided by comments received from consultation responses. This is recorded in The Plan for Stafford Borough Part 2 Publication Summary of Representations Received (P2- A22); The Plan for Stafford Borough Part 2 Publication Summary of Representations Received Late (P2 A23); and Summary of Representations for Part 2 Proposals. The Regulation 22 Submission Consultation Statement (PA - A21) paragraphs 3.11- 3.44 summarises the response to comments made on the Publication document.</p> <p>iii. The information and guidance provided by the Sustainability Appraisal. The Sustainability Appraisal Report March 2016 has been updated following the Publication in 2015 taking into account comments</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		received from consultees.
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>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?</p>	<ul style="list-style-type: none"> • Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • 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 	<p>The Proposal stage of the PFSB P2 considered the alternatives when establishing the proposed settlement boundaries and boundaries for the Recognised Industrial Estates (RIEs). This was informed by Development Management decisions; environmental and landscape designations; the extant of domestic gardens on the edge of settlements; recognised physical features; and neighbourhood plan proposals for new development. Responses received on the PFSB P2 Proposals have also informed the settlement boundaries.</p> <p>A number of key decisions for the PFSB P2 were made in the adopted PFSB. Since the PFSB was adopted in 2014, a number of decision have been made by Development Management which has enabled us to draw the Settlement Boundaries for Stafford, Stone and the Key Services Villages.</p> <p>The Sustainability Appraisal process requires the identification and assessment of reasonable alternatives. Alternatives which were deemed to be</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>appraisal has influenced the choice of strategy and the content of policies.</p>	<p>reasonable were considered in the previous iteration of the Sustainability Appraisal (June 2015) which accompanied the Plan for Stafford Borough Part 2 Proposals document (June 2015). The reasonable alternatives identified related to two elements of the Plan: Policy RET1 Retail Boundaries; and the proposed policy approach to not allocating an additional site for eight pitches for gypsies, travellers and travelling show people, but to leave this to windfall applications. Following the assessment of these alternatives, feedback from the consultation period held in summer 2015 and updated evidence base, it was decided not to include a policy which related to retail frontages or the allocation of sites for gypsies, travellers and travelling show people within the Plan. These decisions were considered in terms of the SA findings, and no recommendations were judged necessary on the basis of the policy selection justification provided by Stafford Borough Council.</p>
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled 		

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Be flexible • Be able to be monitored 		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<ul style="list-style-type: none"> • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	<p>The adopted PfsB 2011-2031 sets out the strategic policies for the Borough. It contains the development strategy, including the identifying the sustainable settlement hierarchy, allocates significant development for Stafford and Stone through the SDL and details topic specific policies.</p> <p>Building upon the foundations of the adopted PfsB, Part 2 sets out specific policies to assist meeting the objectives and vision of the Plan. The PfsB P2 should not be read in isolation, it must be read in conjunction with the adopted Plan. Specifically in relation to Policies SB1 (Settlement Boundaries), SB2 (the protection of social and community facilities); and SB3 Stafford and Stone Protected Employment Areas. It also on the policy map for Stafford (P2 A2, identifies the Ministry of Defence protected area; and the inset plans to the KSVs identifies village shops and local centres.</p> <p>The PfsB was initiated under the 2007 Local Development Scheme which came into effect on December 2007. This was subsequently revised in 2008, 2012 and 2013, 2014 and more recently in 2016 (P2 E10). This provides a timetable for delivery of each DPD and specifies the content of each Development Plan Document.</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<ul style="list-style-type: none"> • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	<p>Adopted PFSB Policy I1 (P2 C1) sets out a summary of the critical infrastructure required for the delivery of the plan. Greater detail on specific infrastructure projects, timescales and key delivery partners is located Appendix D.</p> <p>Where Development Management have determined applications and where applicable, s106 agreements have sought to ensure that the necessary infrastructure is delivered.</p>
<p><i>Co-ordinated Planning</i></p> <p>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?</p>	<ul style="list-style-type: none"> • Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area 	<p>The adopted PFSB (P2 C1) clearly identifies a clear spatial vision for the Borough, which describes the collective aspirations for the future and shows how the spatial planning elements of the Sustainable Community Strategy will be achieved. These principles are articulated through the development strategy and policies to implement the key objectives of the plan. Through Duty to Co-operate and engagement with stakeholders and organisations, it has regard to all areas of the Borough according to their own characteristics, constraints, opportunities and needs and therefore goes beyond traditional land use planning to influence the nature of places and how they function as well as providing a framework for social, economic and social well-being for the Borough.</p> <p>In preparing the PFSB Part 2 the process has involved</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>full public engagement as set out in the Adopted Statement of Community Involvement (SCI) (P2 A21) as described in the Submission Consultation Statement (P2 B1). Each stage has undergone at least a six weeks consultation period and for both the Proposals (P2 G1) and Publication (P2 A1)</p> <p>As the PFSB Part 2 establishes the settlement boundaries for Stafford, Stone and the Key Service Villages (KSVs), it is considered that there are no 'strategic matters' included in this element of the Plan. Nonetheless, letters were sent out to all Duty to Co-operate organisations those who have responded, have confirmed that there are no Duty to Co-operate matters of importance to raise.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<ul style="list-style-type: none"> • Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed. • Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ol style="list-style-type: none"> a. the effectiveness of policies and what evidence is being collected to undertake this b. changes affecting the baseline information and any information on trends on which the DPD is based • Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances • Sections within the DPD dealing with possible 	<p>The adopted PFSB provides for a robust framework to deliver the appropriate level of growth over the Plan period (P2 C1).</p> <p>The delivery of each SDL provides for flexibility for unplanned events by detailing contingencies [Appendix E of the adopted PFSB] which introduces mechanisms to address the barriers to delivery. The Settlement Boundaries established in SB1 and shown on the Inset Maps for Stafford, Stone and the KSVs allow the scale of new development for which provision needs to be made in the Plan.</p> <p>Matters that may be imposed by circumstance beyond the Council's control include the provisions of national planning policy or a further deterioration of housing market conditions. In addition, future employment land supply is indicative in nature but</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>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</p> <ul style="list-style-type: none"> Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. 	<p>scope exists to adjust or manage such targets.</p> <p>Appendix E of the Adopted PfSB concerns Monitoring of the Plan (P2 C1) and Section 6 of the PfSB P2 Publication sets out the monitoring and review to assess proposed policy SB2 on Social and Community Facilities. Monitoring and reviewing of the policies will indicate what impact the policies are having and whether they need reviewing because they are not working as intended or require amendment in light of changed circumstances. Revisions to such policies could be made through future reviews of the Local Plan.</p>
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? 	<ul style="list-style-type: none"> A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate. 	<p>The Borough Council worked closely with key stakeholders, service providers and statutory agencies on the adopted PfSB, which identified the development strategy, sustainable settlement hierarchy and allocated significant development for Stafford and Stone through the Strategic Development Locations.</p> <p>As the PfSB Part 2 establishes the settlement boundaries for Stafford, Stone and the Key Service Villages (KSVs), it is considered that there are no 'strategic matters' included in this element of the Plan. Nonetheless, letters were sent out to all Duty to Co-operate organisations those who have responded, confirming that there are no Duty to Co-operate matters of importance to raise (see regulation 22 Statement P2 – A20)</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing 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? 	<ul style="list-style-type: none"> • Sections of the DPD setting out indicators, targets and milestones • Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal 	<p>Appendix E of the Adopted PfsB concerns the Monitoring of the adopted Local Plan (P2 C1) and Section 6 of the PfsB P2 Publication sets out the monitoring and review to assess Policy SB2 on Social and Community Facilities.</p> <p>The Authority Monitoring Report (P2 E1) includes specific monitoring indicators for key thematic areas such as housing, environment and employment. It is used to monitor the delivery of the Local Plan (and the sustainability indicators identified in the Sustainability Appraisal), and identify progress and provide any early indicators of issues to be addressed. This could include a critical shortfall in infrastructure provision or if particular policies and proposals are no longer appropriate or deliverable.</p>
<p><i>Consistent with national policy:</i> <i>the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<ul style="list-style-type: none"> • Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the 	<p>Earlier sections of the Soundness Self-Assessment Checklist set out that the plan is compliant with the NPPF (P2 F1), particularly those concerned with the delivery of the NPPF’s 13 strategic principles for delivering sustainable development. However, it is appropriate that some decisions should be left to national planning policy, which is perfectly adequate in some cases, and should not be duplicated. It has been the clear intention that there should be no</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>sustainability report) and/or from the results of community involvement.</p> <ul style="list-style-type: none"> • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement • Reports or copies of correspondence as to how representations have been considered and dealt with. 	<p>duplication of national policy in the proposals and polices contained in the PfSB Part 2 Publication (Submission) Document.</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

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

Stafford Borough Soundness Self-Assessment Checklist April 2016

Policy Expectations	Possible Evidence	Evidence Provided
<p>Policy A: Using evidence to plan positively and manage development (para 6)</p>		
<p>Early and effective community engagement with both settled and traveller communities.</p>	<ul style="list-style-type: none"> • Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups. 	<p>In 2007, the North Housing Market Area conducted a Gypsy and Traveller Accommodation Needs Assessment (GTAA) in association with Gypsy and Traveller groups by the Salford Housing and Urban Studies unit to establish the pitch requirements for Stafford Borough and the other adjacent authorities. This was subsequently updated in 2012 by Stafford Borough Council. The latest position published in November 2015 prepared by Arc in conjunction with Stoke-on-Trent, Newcastle und Lyme and Staffordshire Moorlands, provides an indicative target for Stafford Borough of 43 pitches up and until 2027. (P2 E16).</p> <p>The PfsB Part 2 Proposal and Publication stage invited comments on the provision of Gypsies, Traveller and Travelling Show People (section 5 (P2-A1)).</p>
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<ul style="list-style-type: none"> • Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the 	<p>Preparation of the GTAA has involved collaborative and co-operative working between the constituent Local Authorities. In addition as part of the Gypsy and Traveller Accommodation Needs Assessments (GTAAs) extensive interviews were conducted with residents of private and local authority sites as well as additional interviews across the Borough to determine the future pitch requirements.</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Policy Expectations	Possible Evidence	Evidence Provided
	preparation of your local plan and make planning decisions.	
Policy B: Planning for traveller sites (paras 7-11)		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> • Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 11 	<p>A Gypsy and Traveller Accommodation Needs Assessment (GTAA) was published in 2015 as evidence to support the PfSB. This document demonstrated a need for 43 new pitches up and until 2027. The Council has already made significant progress towards meeting the requirement of 43 new pitches over the Plan period with the granting of permission for 36 new pitches at St Albans Road (13/19256/FUL). This means that there are only 7 pitches required to meet the identified need.</p> <p>Adopted PfSB Policy C6 of the PfSB provides a policy framework for positively determining planning applications for gypsy and traveller accommodation. The intention at the time of writing the Plan for Stafford Borough was that the PfSB Part 2 document would identify specific sites for allocation as gypsy and traveller sites. However, because the site at St Albans Road has been granted planning permission, which meets 81% of the identified needs, the remaining requirement during the Plan period is for only 7 pitches. It is anticipated that this small number of pitches can be provided through windfall sites. Therefore no further allocation is being made for gypsy and traveller sites.</p>
Policy C: Sites in rural areas and the countryside (para 12)		

Stafford Borough Soundness Self-Assessment Checklist April 2016

Policy Expectations	Possible Evidence	Evidence Provided
<p>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.</p>		<p>Adopted PFSB Policy C6 of the PFSB is a criteria based policy which includes design criteria to ensure that Gypsy and Traveller pitches do not dominate the nearest settled community. Criteria b of the policy specifically ensures that sites should minimise the potential impact on the surrounding landscape, environment, heritage assets and biodiversity.</p>
<p>Policy D: Rural exception sites (para 13)</p>		
<p>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.</p>	<ul style="list-style-type: none"> • If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity. 	<p>Currently there is sufficient land as demonstrated by the St Alban's Road site. If there is insufficient land delivery for the remainder of the pitches (i.e. if sufficient sites have not been advanced independently), specific locations for new Gypsy and Traveller sites will form part of a Local Plan Review.</p>
<p>Policy E: Traveller sites in Green Belt (paras 14-15)</p>		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>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.</p>	<ul style="list-style-type: none"> • Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process. 	<p>There is no provision being made for Green Belt amendments in the PFSB Part 2 Publication submission document. Adopted PFSB (P2 C1) Part d of policy C6 sets out the policy position regarding sites within Green Belt.</p>
<p>Policy F: Mixed planning use traveller sites</p>		

Stafford Borough Soundness Self-Assessment Checklist April 2016

Policy Expectations	Possible Evidence	Evidence Provided
(paras 16-18)		
<p>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.</p>	<ul style="list-style-type: none"> • Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. • N.B. Mixed use should not be permitted on rural exception sites 	<p>36 new pitches at St Albans Road, Stafford have been granted planning. This is a sustainable location, being located adjacent to the St Albans Road business park and residential areas in the county town of Stafford and has access to a range of services. New sites will be assessed against adopted Policy C6 (P2 C1).</p>
Policy G: Major development projects (para 19)		
<p>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.</p>	<ul style="list-style-type: none"> • Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community. 	<p>This is not applicable for the PfSB Part 2.</p>

Stafford Borough Soundness Self-Assessment Checklist April 2016

Soundness Self-Assessment Checklist

Integration of marine and terrestrial planning

As the UK marine area and marine plan area boundaries extend up to the level of mean high water spring tides while terrestrial planning boundaries generally extend to mean low water spring tides (including estuaries), the marine plan area will physically overlap with that of some terrestrial plan. Local authorities with any tidal frontage, even if far inland and not conventionally regarded as coastal, must therefore take full account of the MMO, the MPS and marine plans under S.58 of the Marine and Coastal Access Act and the Duty to Co-operate in Section 110 of the Localism Act 2011. A full list of the local planning authorities whose areas overlap with the UK marine area appears in Appendix One.

Furthermore, the Duty to Co-Operate requires all local planning authorities, even if landlocked, to take account, where relevant, of the MMO's plans and activities when preparing their Local Plans. Finally, the NPPF requires LPAs to take the MPS into account under the tests of soundness (specifically, to test if an emerging DPD is consistent with national policy, which includes the MPS).

The Marine and Coastal Access Act 2009 (the Act) provided for the introduction of a marine planning system for England's inshore and offshore marine area, establishing the Secretary of State as the Marine Planning Authority for these areas. The Act also provided for the establishment of the Marine Management Organisation (MMO) and for the Secretary of State to delegate various planning functions. The planning functions including preparation and review were delegated to the MMO in 2010. The Act also provided for the adoption of the UK Marine Policy Statement (MPS). The MPS was adopted on 18 March 2011 and provides the policy framework for marine planning and for all decisions likely to affect the marine area.

There are eleven plan areas in English waters, for each of which a Marine Plan will be prepared by the MMO and adopted by the Secretary of State for the Environment, Food and Rural Affairs.

In practical terms, all activities undertaken in the marine area require land based infrastructure, without which our ability to benefit economically and socially from activities in the marine area would be extremely limited.

The UK Government's vision for the marine environment, as articulated in the MPS, is:

'clean, healthy, safe, productive and biologically diverse oceans and seas'.

Stafford Borough Soundness Self-Assessment Checklist April 2016

In the absence of a marine plan prepared by the MMO and adopted by the Secretary of State the MPS is the relevant marine policy document. Where a marine plan has been adopted both the MPS and the Marine Plan are relevant marine policy documents for the marine plan area.

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all¹ public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions²

In addition, the MPS seeks integration of marine planning and the terrestrial planning system through:

- Consistency between marine and terrestrial policy documents and guidance
- Liaison between respective responsible authorities for terrestrial and marine planning, including in plan development, implementation and review stages
- Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions

These aims are further supported by footnote 36 in the NPPF.

¹ Like the Duty to Co-Operate, no distinction is made by the Marine and Coastal Access Act between public authorities with a tidal frontage and those without. Emphasis is placed on the likelihood of the decision being made affecting the marine area.

² For example, decisions about what representations they should make as a consultee or about what action they should carry out themselves.

Stafford Borough Soundness Self-Assessment Checklist April 2016

Policy Expectations	Possible Evidence	Evidence Provided
Key requirements under the Duty to Co-Operate		
Consistency between marine and terrestrial policy documents and guidance	<ul style="list-style-type: none"> • Demonstration of consistency of aim between relevant local plan policies and marine policy documents (i.e. the MPS and any relevant adopted marine plans) • Proof of collaborative working with the MMO and that the MPS has been taken into account. 	The Marine Management Organisation has been consulted throughout the preparation of the PfsB Part. No comments have been received.
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	<ul style="list-style-type: none"> • Early and effective policy development engagement undertaken, including discussions with the MMO • Evidence of iteration of policies and plans as a result of engagement with the MMO • Evidence of engagement with the MMO in relation to monitoring, implementation and throughout the policy cycle • Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	The Marine Management Organisation has been consulted throughout the preparation of the PfsB Part. No comments have been received.
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	<ul style="list-style-type: none"> • Evidence that the LPA has shared or provided relevant data to the MMO that can help inform Marine Plans or MPS review • Demonstration that local plan policy has been underpinned by data provided by the MMO or the MPS • Explicit cross-referencing in local plan to MPS, the MMO, their roles, and relevant marine plans 	The Marine Management Organisation has been consulted throughout the preparation of the PfsB Part. No comments have been received.

Stafford Borough Soundness Self-Assessment Checklist April 2016

Policy Expectations	Possible Evidence	Evidence Provided
Marine Policy Statement- Chapter 2: General Principles for Decision-Making³		
Sections 2.1 -2.2: The UK vision for the marine environment		
<p>The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')</p> <p>Achieving the vision through marine planning</p>	<ul style="list-style-type: none"> Reference in DPD where appropriate to UK vision for the marine environment Contribution to the vision through local plan policies and supporting text 	Stafford Borough is an inland authority; therefore there are no coastal considerations.
Section 2.4: Considering benefits and adverse effects in marine planning		
<p>Consider benefits and adverse effects of plan policies</p>	<ul style="list-style-type: none"> Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal 	Stafford Borough is an inland authority; therefore there are no coastal considerations.
Section 2.5: Economic, social and environmental considerations	<ul style="list-style-type: none"> 	
<p>Contribute to the objectives of relevant EU Directives (Marine Strategy</p>	<ul style="list-style-type: none"> Reference to relevant EU Directives in DPD and sustainability appraisal 	Stafford Borough is an inland authority; therefore there are no coastal considerations.

³ As the Marine Policy Statement was not targeted specifically at terrestrial planning authorities, some of its sections are, in practice, relevant to marine planning authorities only and/or there is already a comprehensive policy framework governing terrestrial development (e.g. energy infrastructure), Where this is considered to be the case, i.e. where it is considered likely that a terrestrial planning DPD would be found sound without referencing that section, the section in question has been omitted from this checklist.

Stafford Borough Soundness Self-Assessment Checklist April 2016

Policy Expectations	Possible Evidence	Evidence Provided
Framework Directive and Water Framework Directive)	<ul style="list-style-type: none"> Consideration of contribution of DPD policies to the objectives of relevant EU Directives 	
Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities		
3.1 Marine Protected Areas		
<p>Incorporate identified areas and features of importance for nature conservation</p> <p>Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts</p>	<ul style="list-style-type: none"> Identification of relevant areas and features of importance for nature conservation within relevant marine plan area(s) Consideration of impacts of policy and/or terrestrial development on those areas and features of importance Measures to mitigate, monitor and manage negative impacts on those areas and features of importance 	Stafford Borough is an inland authority; therefore there are no maritime considerations.
3.4 Ports and shipping		
<p>Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety</p> <p>Protect the efficiency and resilience of continuing port operations</p>	<ul style="list-style-type: none"> Evidence that policy with potential impact on ports and shipping minimises negative impacts on sector Where relevant, evidence that economic, employment and transport policies are protective of ports and shipping sector 	Stafford Borough is an inland authority; therefore there are no maritime considerations.
3.8 Fisheries		
Consider potential economic, social and environmental impacts of other	<ul style="list-style-type: none"> Where relevant, evidence that other policies minimise negative impacts on fishing activity and/or aquaculture 	Stafford Borough is an inland authority; therefore there are no fishing considerations.

Stafford Borough Soundness Self-Assessment Checklist April 2016

Policy Expectations	Possible Evidence	Evidence Provided
developments on fishing activity		
3.9 Aquaculture		
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	<ul style="list-style-type: none"> Where relevant, evidence that the benefits of aquaculture industry development have been considered 	Stafford Borough is an inland authority; therefore aquaculture considerations.
3.10 Surface water management and waste water treatment and disposal		
Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment	<ul style="list-style-type: none"> Reference to and consideration of the co-existence of waste water infrastructure with other marine activities, including the potential for waste water infrastructure to mitigate marine impacts through design or location 	Stafford Borough is an inland authority; therefore there are no maritime considerations.
3.11 Tourism and recreation		
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and local communities	<ul style="list-style-type: none"> Where relevant, reference to marine tourism and recreation Evidence that the potential for marine tourism and recreation has been recognised in plan-making 	Stafford Borough is an inland authority; therefore there are no maritime considerations.

Stafford Borough Soundness Self-Assessment Checklist April 2016

Appendix One

This is an alphabetical list of all local planning authorities in England whose area overlaps with the UK marine area.

PAS

Adur
Allerdale
Arun
Babergh
Barking and Dagenham
Barrow-in-Furness
Basildon
Bassetlaw
Bexley
Blackpool
Boston
Bournemouth
Broadland
Broads Authority
Canterbury
Carlisle
Castle Point
Chelmsford
Cheshire West and Chester
Chichester
Chorley
Christchurch
City of London
City of Brighton and Hove
City of Bristol
City of Kingston upon Hull
City of Peterborough
City of Plymouth
City of Portsmouth
City of Southampton
City of Westminster
Colchester

Copeland
Cornwall
County Durham
Dartford
Doncaster
Dover
East Cambridgeshire
East Devon
East Lindsey
East Riding of Yorkshire
Eastbourne
Eastleigh
Exeter
Exmoor National Park
Fareham
Fenland
Fylde
Gateshead
Gloucester
Gosport
Gravesham
Great Yarmouth
Greenwich
Halton
Hambleton
Hammersmith and Fulham
Hartlepool
Hastings
Havant
Havering
Horsham
Hounslow

Huntingdonshire
Ipswich
Isle of Wight
Isles of Scilly
Kensington and Chelsea
King's Lynn and West Norfolk
Lake District National Park
Lambeth
Lancaster
Lewes
Lewisham
Liverpool
Maidstone
Maldon
Medway
Middlesbrough
New Forest
New Forest National Park
Newark and Sherwood
Newcastle upon Tyne
Newham
North Devon
North East Lincolnshire
North Lincolnshire
North Norfolk
North Somerset
North Tyneside
North York Moors National Park
Northumberland
Norwich
Poole
Preston

Purbeck
Redcar and Cleveland
Richmond upon Thames
Rochford
Rother
Scarborough
Sedgemoor
Sefton
Selby
Shepway
South Cambridgeshire
South Downs National Park
South Gloucestershire
South Hams
South Holland
South Lakeland
South Norfolk
South Ribble
South Somerset
South Tyneside
Southend-on-Sea
Southwark
Stockton-on-Tees
Stroud
Suffolk Coastal
Sunderland
Swale
Taunton Deane
Teignbridge
Tendring
Test Valley
Thanet

Stafford Borough Soundness Self-Assessment Checklist April 2016

Thurrock
Tonbridge and Malling
Torbay
Torridge
Tower Hamlets
Wandsworth
Warrington
Waveney
Wealden
West Devon
West Dorset
West Lancashire
West Lindsey
West Somerset
Weymouth and Portland
Winchester
Wirral
Worthing
Wyre
York