Soundness Self-Assessment Checklist (March 2014)

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

In summary – the key requirements of plan preparation are:

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

The Tests of Soundness at Examination

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

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

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

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

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

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

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- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

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

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

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

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

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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.*		

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Vision and Objectives 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? 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? 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? Have reasonable alternatives to the quantum of development and overall spatial strategy been considered? 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?	• 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.	Issues are clearly identified in Chapter 2 Key Issues and Challenges. Issues have been split into Social, Economic and Environmental issues that were highlighted in the Preferred Options and Issues and Options consultations. Chapter 3 Vision for the Area in 2036 which is specific to Wyre Forest District and includes Development Plan Aims and Objectives. The Plan Objectives include the historic environment, Green Belt and Community facilities which are then covered in chapters in either Part A Strategic policies, Part B Development Management policies or both. Reasonable alternatives – Preferred options considered a dispersed approach or a concentrated approach before a mixed approach in the Pre-Submission publication. Sites assessed to ensure availability and deliverability within plan period. Strategic sites masterplans to ensure infrastructure development alongside built

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		development. Housing trajectory is underpinned by detailed site phasing; information is gathered from site promoters/developers. Objectives in line with housing and employment requirements as well. The Sustainability Appraisal (SA) has appraised the sustainability impacts of the Local Plan's Vision and Objectives. The SA helped to fine tune these elements of the Plan.
The presumption in favour of sustainable development (NPPF paras 6-17)(7-14) Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or —specific policies in this Framework indicate	• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below). • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)	Evidence base includes Objectively Assessed Housing Need (OAHN) and an Employment Land Review (ELR) to establish development needs as well as a Green Belt Review in order to inform the Local Plan Review. Audit trail - Site selection paper explains why the amount of development is proposed and the reasons for using a higher housing figure one of which is to help with the overall national housing supply situation. The Housing Topic Paper will provide further justification.

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development should be restricted.		
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.	• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk)	Presumption in favour of sustainable development is covered in Policy 5A – Sustainable Development ..".Wyre Forest District Council will take a positive approach that reflects the presumption in favour of sustainable development"...
Objectively assessed needs 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. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	• 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.	Needs identified - Objectively Assessed Housing Need (OAHN), Employment Land Review 2018 (updated from 2016 report) Technical papers include Site selection paper, Housing Topic Paper, Green Belt Topic Paper.
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22) (80-82)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21), (81)	• 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.	Wyre Forest District Council is satisfied that this Local Plan has been designed to achieve sustainable economic growth throughout the plan period, in accordance with the requirements

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		of the NPPF. It has identified and promoted a range of sites suitable for housing, employment-generating activity, mixed-use, commercial and retail growth and appropriate rural diversification and enterprise activities.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	• 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)	A focus of the Wyre Forest District Local Plan is to provide development that supports the area's economic prosperity. The principal mechanisms to achieve this include making provision for the right amount of quality, readily available and type of land for employment uses in locations where business will thrive and be resilient to the challenges of competition and move towards a low-carbon economy and to facilitate inward investment and support businesses, particularly small and medium sized enterprises and creative industries to grow the employment base of the District. Local Development Order supports

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		this which is in place until August 2021. Sites that have previously been safeguarded for employment uses are now being released for residential-led regeneration in Kidderminster and Stourport. To help encourage business growth within the district a Local Development Order (LDO) for this area was implemented in August 2012. It has been adopted to August 2021. The LDO covers the main employment corridors in Kidderminster and has led to both refurbishment schemes and redevelopment of former employment sites. Several industrial premises are no longer suitable for use and it is considered that redevelopment or refurbishment with subdivision is the best solution. Lower land and rental costs than surrounding areas can be an incentive to relocate into

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		Wyre Forest District. Distance from the motorway network may not be such an issue in the future as congestion has decreased with Hoobrook link road and other road enhancements planned in the future.
2. Ensuring the vitality of town centres (paras 23-37) (85-90)		
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) (85)	• 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.	Policy 10B Town Centre Development, and Chapter 22 policies to promote town centre development, where development should be focussed, and other uses in town centres as the retail sector changes.
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) (85)	• 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.	Retail and Commercial Leisure Needs Study 2016 which is part of the evidence base concluded that no additional retail development was required in the District. Chapter 20 relates to community facilities. Strategic sites have mixed use allocations to include retail, community services, schools and

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		leisure. Two 3G pitch allocations for leisure use are also proposed.
3. Supporting a prosperous rural economy (para 28) (83-84)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28) (83)	• 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.	Support sustainable growth Policy 21B – Rural Employment ...to help promote rural regeneration. Policy 22E Specialist Retailing includes farm shops and garden centres.
4. Promoting sustainable transport (paras 29-41) (102-107)		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) 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) 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)	• 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.	Policy 9 Health and Wellbeing to maximise opportunities to ensure that people ...lead healthy, active lifestyles. Also Chapter 20 Community Facilities. Policy 13 Transport and Accessibility covers travel demand, providing alternative modes of transport and delivering transport infrastructure to support economic prosperity. Joint working with Worcestershire County Council Highways to ensure successful implementation of the Wyre Forest Local Plan. Many allocated sites chosen as

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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) 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) 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) Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35) 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) 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) The setting of car parking standards including provision for town centres. (39-40)		sustainable to reduce reliance on private vehicles and close to existing services and facilities to minimise travel. The strategic site at Lea Castle includes a mix of allocations to include retail, community services, schools, leisure and employment to minimise journeys. Policy 36.6 and Policy 36.6A allocates land for car parking adjacent to Blakedown Railway Station. The allocations will increase car parking capacity to address the current shortfall and provide capacity for rail passenger growth. Car parking standards are set by WCC. No additional retail is allocated in the town centres in the Submission Plan. In chapters 22E Specialist retailing, 23C Tourist Accommodation 27A Quality Design and Local Distinctiveness and 28C Equestrian Development reference is made to compliance with current parking standards.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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)		
5. Supporting high quality communications infrastructure (paras 42-46) (112-116)		
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) (112) 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) (114)	• Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.	Policy 24A supports telecommunications and broadband communication networks.
6. Delivering a wide choice of high quality housing (paras 47-55) (59-79)		
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) (73)	• Identification of: 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) (70) • A SHLAA	Housing allocations provided are above the requirements of the OAHN plus buffer of 15%. A minimum of 5 year housing land supply is required, currently WFDC have 7 years with a 5% buffer or 6.26 years with a 20% buffer. Five year housing land supply report provides historical evidence of healthy windfall supply and justification for windfall allowance

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		being used in supply. HELAA carried out as part of Local Plan review process.
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47). (67)	• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 (67)	Call for sites identified a supply of sites that will be developable within both 6-10 years and 11-15 years. The largest allocated sites will be developed over a 15 year timeframe.
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) (73)	• A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47)	Housing trajectory included in Submission Plan. Housing completions are monitored on a monthly basis. AMR and 5YHLS report are usually updated annually to show sites with planning permission, under construction and completed.
Set out the authority's approach to housing density to reflect local circumstances (47).	• Policy on the density of development.	Housing density will generally be expected to be of an appropriate density to reflect surrounding development.
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	• 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)	Policy 8A Housing Density and Mix suggest the mix required for both market and affordable dwellings.

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supply to meet this demand. (para 159)	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)	Policies in chapter 8 also include Affordable Housing Provision, Addressing Rural Housing Needs, Self Build and Custom Housing and Housing for Older People and others with special housing requirements. Evidence for housing provision based on higher than 2016 OAHN and buffer to take into account sites that may not come forward for development during the plan period. Identification of the size, type, tenure and range of housing not available at location level – data was removed as housing register data did not cover need outside of urban areas. Housing Needs Study published October 2018 gives detailed breakdown of need across different groups.
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	• 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	Rural housing needs are addressed in policy 8C. This policy also refers to residential schemes that take into account local housing need on

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where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new isolated homes listed at para 55.	windfall sites will be positively considered within rural areas. The policy also contains Rural Exception Sites. Enabling market housing on rural exception sites is subject to viability testing.
7. Requiring good design (paras 56-68) (124-132)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	• 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 (124-125,127)	Policy 11A Quality Design and Local Distinctiveness – All development within Wyre Forest District will be expected to exhibit high quality design.
8. Promoting healthy communities (paras 69-77) (91-95)		
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). (91)	• Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)	A number of chapters/policies are promoting healthy communities; Chapter 20 Community facilities (facilities in the community, does not actually say healthy communities), Chapter 9 Health and Wellbeing – development should help maximise opportunities to ensure that people in Wyre Forest District lead healthy, active lifestyles and experience a high quality of life. Policy22G Hot Food Takeaways.

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Policies should plan positively for the provision and use of shared space, community facilities and other local services (70). (92)	• 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.	Policy 20A Community Facilities address the provision of new community facilities and any proposal that would result in community facilities would only be permitted if it has been demonstrated that there is a surplus of similar provision in the catchment area.
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73). (96)	• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) (96) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) (97) • Protection and enhancement of rights of way and access. (75) (98)	Needs have been identified in the Playing Pitch Strategy which has informed the Development Plan, this includes the requirement for an additional two 3G pitches. Policy 20C Provision for Open Space, Sports Pitches and Outdoor Community Uses in Housing Development. The different types of open space have been identified, the current quantity of each typology has been calculated for each development site in order to maintain the same level of open space types, these include allotments, parks and gardens, amenity green space, cemeteries and civic spaces. For each allocated housing site an amount of open space/sports

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		pitches requirement has been calculated. Policy 20B – Open spaces sites will be safeguarded...Policy 20C requires any major development subject to viability to make provision for...open space, sport and play. Discussions took place with Sport England for the drafting of policies relating to open space, sports pitches and outdoor community uses and a Statement of Common Ground was signed by Sport England. Some sites were ruled out for development as there would be an adverse effect on rights of way. Strategic sites provide opportunities to enhance the local footpath network and provide links where currently there are none or very few, an example is Kidderminster Eastern Extension.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78). (99-100)	• 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.	Policies relating to Local green spaces that have been identified by communities as having particular importance have been included or are being included in

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	(78) (99-100)	Neighbourhood Plans. Local Plan Policy 20B – Open Space states: "Local Green Space allocated by Neighbourhood plans will be supported if the proposal is compliant with NPPF paragraph 100...".
9. Protecting Green Belt land (paras 79-92) (133-147)		
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) (141) Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83) (136) When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84) (138) Boundaries should be set using 'physical features likely to be permanent' amongst other	• Where Green Belt policies are included, these should reflect the need to: ○ Enhance the beneficial use of the Green Belt. (81) (141) ○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) (139) ○ Specify that inappropriate development should not be approved except in very special circumstances. (87) (143) ○ Specify the exceptions to inappropriate development (89-90) (146) ○ Identify where very special circumstances might apply to renewable energy development. (91) (147)	Policy 7A Strategic Green Belt Review states that opportunities to enhance the beneficial use of the Green Belt and improve public access will be supported. Policy 7A lists the areas that it is proposed to remove from the Green Belt to accommodate development needs. Policy 25 outlines that development will not be permitted except in very special circumstances and lists them. Very special circumstances for renewable energy not identified.

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things (85) (139)		
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108) (148-169)		
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) (149)	• 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))	Policy 24B – Location, siting, design and orientation to maximise the use of natural heat and light. Details of incorporating renewable and low carbon energy into new development to reduce greenhouse gases. This relates to new build and where possible redevelopment of existing buildings. Since the Plan was drafted, Government legislation on Climate Change has been issued and continues to evolve. Therefore, throughout the examination period Policy 24B may require some modification as climate change legislation evolves. Consultation on a review of Building regulations has closed. The Government has indicated that requirements for a building's sustainability is likely to be covered by building regulations. The present situation is that a response from the Government is awaited.

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		The Submission Plan also includes chapter 15: Water Management. This chapter includes policies on the mitigation of flood risk and surface water drainage including Sustainable Drainage Systems. The Wyre Forest District Council Corporate Plan 2019-2023 states that the Council will "work with partners to protect our environment, to address air quality issues and to help to tackle climate change." The Corporate Plan can be found on the Council's website. .
Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)	• A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) (151) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)	Policy 24B ...renewable and other low carbon energy schemes are welcomed. Identified renewable and low carbon energy sources - Solar panels, electric charging points, decentralised energy and heating network.

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Minimise vulnerability to climate change and manage the risk of flooding (99) (155-165)	• 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	Policy 15C takes into account allowances for climate change using the Environment agency's Climate Change Guide. The policy also steers new development to areas with lowest probability of flooding and Includes how to manage risk such as finished ground floor levels.
Take account of marine planning (105)	• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation • Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development • 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	Not Applicable for Wyre Forest District Council.
Manage risk from coastal change (106)	• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.	Not Applicable for Wyre Forest District Council.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
11. Conserving and enhancing the natural environment (paras 109-125) (170-183)		
Protect valued landscapes (109) (170)	• 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.	Policy 14 Strategic Green Infrastructure and Policy 11D Protecting and Enhancing Biodiversity – to deliver net gains in biodiversity. Green Infrastructure network to be safeguarded from inappropriate development. Policy 11C Landscape Character policy to protect and where possible enhance landscape character. New development must protect and where possible enhance the unique character of the landscape ....Opportunities for landscape gain will be sought alongside all new development in order that landscape character is strengthened and enhanced.
Prevent unacceptable risks from pollution and land instability (109) (170)	• 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.	Policy 16A Pollution and Land Instability policy to avoid any significant adverse impacts from pollution. Development proposals will not be permitted in locations where there are risks from land instability.
Planning policies should minimise impacts on biodiversity and geodiversity (117) (171)	• Identification and mapping of local ecological networks and geological conservation interests.	Worcestershire County Council Biodiversity Action Plan covers

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117) (171)	• Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species	Wyre Forest District and includes the Biodiversity Action Plan Mapping Tool. Geological sites are listed in Chapter 11 as well as important sites for Biodiversity. Policy 11D The Council will expect ....measurable net gains in biodiversity through the promotion and re-creation of priority habitats, ecological networks and the protection and recovery of legally protected and priority species populations.
12. Conserving and enhancing the historic environment (paras 126-141) (184-202)		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets • A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) (185)	Policy 11B Development proposals should protect, conserve and enhance all heritage assets and their settings...Their contribution to the character of the landscape or townscape should be safeguarded and protected in order to sustain the historic quality, sense of place, environmental quality and economic vibrancy of Wyre Forest District.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		WFDC has a local heritage at risk register last updated 2017. WFDC website has a publicly accessible mapping system for Listed Buildings and Locally Listed Buildings. Policy 11A Quality Design and Local Distinctiveness B New development ...ensure that it represents a positive addition to the streetscape or landscape.
13. Facilitating the sustainable use of minerals (paras 142-149) (203-208)		
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142) (203) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146) (207)	Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.	Minerals policy and proposals for the County of Worcestershire are set out in the Minerals Local Plan (1997) this was due to be replaced. The County Council has prepared a new Minerals Local Plan for Worcestershire and a Mineral Site Allocations Development Plan Document (DPD). The publication version was submitted to the Secretary of State for Housing, Community and Local Government on 17 December 2019 for independent examination. Examination was due to take place

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		May/June 2020 but this has been postponed due to the Covid-19 pandemic.
Justified: *The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.* To be 'justified' a DPD needs to be: • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives.		
Participation Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI	The Statement of Consultation (March 2020) sets out all details of the four consultations. Lists consultation events and other ways to reach residents such as twitter. WFDC have tried to inform as many groups as possible by using a wide range of consultation types such as leaflet drop, social media, posters, to reach all groups. Early in the review process discussions took place with local groups in Kidderminster. The Local Plan Review has involved four periods of public consultation – Issues and Options (1ST

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		September-16TH October 2015), Preferred Options (15th June-14th August 2017), Pre-submission consultation (1st November-17th December 2018) and Pre-Submission reopened consultation (2nd September 2019-14th October 2019). The consultation periods were undertaken in accordance with the requirements set out in the Council's adopted SCI. An equality impact assessment was undertaken for the Statement of Community Involvement in 2013. The consultation involved consulting key stakeholders, Duty to Co-operate partners, and private sector/landowner interests as well as residents. Awareness raising included: website; written material comprising of posters and leaflets. Posters displayed in

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Libraries; on Parish and Town councils notice boards and in shops including supermarkets. Also places that may be visited by residents such as GP surgeries, cafes. Also promoted through Press releases and social media. For each of the four consultations drop in sessions were held across the district, which included the three towns as well as a number of parishes in the District. The Statement of Consultation (March 2020) sets this out in more detail including dates, times and venues. Letters or emails were sent to all who had previously commented or who asked to be consulted.
Research / fact finding Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?	• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. AND • 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. OR • A very brief statement of how the main findings of consultation	The content of the Submission Document is based on an extensive raft of evidence. The Local Plan also includes reasoned justifications that link evidence to the policy adopted. A series of Topic Papers covering

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. OR • For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).	specific subjects are being prepared. These papers set out the issues arising around each subject. At each stage of consultation representations were assessed, whilst also taking into account changes in national policy and any other relevant new evidence. The Statement of Consultation (March 2020) gives a summary of consultation responses; it shows how key concerns raised were taken on board when moving forward. The Site Selection Paper also tells story. A series of studies were also carried out by, or on behalf of, the Council, and their findings used to inform the Strategy. These studies are all available on the Wyre Forest District Council website and include: • Wyre Forest District

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Housing Need Study (October 2018 Arc4) • Employment Land Review (2018, Lichfield's) • Heritage Impact Assessment (September 2019 WFDC) • Infrastructure Delivery Plan (June 2019 WFDC) • Viability Assessment Note (June 2019 HDH Planning & Development Ltd) • WFDC Golf Facility Review (June 2019 WFDC) • Burlish Golf Course Vision document (June 2019 WFDC) • Settlement Hierarchy (July 2019 WFDC) Key findings from the evidence base studies are summarised in the relevant chapter of the Submission Plan. This shows how the evidence base has helped to shape the policies in the Submission Plan.
Alternatives	• Reports and consultation documents produced in the early stages	Alternative approaches were

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?	setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.	considered during the previous stages of the Plan preparation. Issues and Options 2015 had 7 options: Option 1 (Brownfield regeneration which focuses on the main towns of Kidderminster and Stourport) Option 2 (Brownfield regeneration focussed on the main towns and expansion of Kidderminster to the North East via a sustainable urban extension) Option 3 (Brownfield regeneration focussed on the main towns and expansion of Kidderminster to the South East via a sustainable urban extension) Option 4 (Brownfield Regeneration Focus for Stourport) Option 5 (Allocate some development to Bewdley through an amendment to the town's settlement boundary to accommodate new development) Option 6 (Allocate more development to the villages and settlements within the District's

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Rural East) Option 7 (Allocate more development to the villages and settlements within the District's Rural West). These 7 options were reduced to 2 options in the Preferred Options consultation. Option A which was a concentrated approach, Option B was a dispersed approach and core sites which were common to both. The Strategy and supporting evidence base including SA and site selection paper show why options were taken forward or discounted at each stage, and why decisions were made in the case of competing options. The site selection paper brings together key conclusions arising from the following evidence base documents: Housing and Economic Land Availability Assessment, Green Belt Review – Stage 1 and 2, Sustainability

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Appraisal, Strategic Flood Risk Assessment / Water Cycle Strategy, Heritage Evidence Base, Ecological site appraisals and Green Infrastructure Concept Statements and Transport Evidence Base. Many sites have been discounted during the process due to assessing representations and taking them into consideration. The SA shows the assessment of options and alternatives. The HELAA document also provides evidence on sites considered.
Effective: *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.* To be 'effective' a DPD needs to: • Be deliverable • Demonstrate sound infrastructure delivery planning • 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		

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
• Be flexible • Be able to be monitored		
Deliverable and Coherent • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved?	• 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).	The Submission Document sets out the need for sustainable planned development. The Plan describes the Development Strategy necessary to address the identified issues and challenges to ensure that development is appropriate in scale and balanced. The DPD sets out the Vision for the Area and Development Plan Aims and Objectives help address the key issues and challenges facing Wyre Forest District. Throughout the Local Plan review process contact has been made with key infrastructure providers. The project plan (Local Development Scheme) provides up to date information for stakeholders and the general public about the status and coverage of Development Plan Documents. The project plan includes information relating to timescales and resources, the content of new plans and their scope and coverage. The Plan Objectives are all addressed

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		by policies. The policies are considered consistent. The Plan Objectives and polices have been appraised in the SA.
Infrastructure Delivery • 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?	• 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.	Policies relating to strategic sites in the Submission Document have their infrastructure needs identified. The Infrastructure Delivery Plan (IDP), which has been produced alongside the Local Plan, reviews and evaluates the social, environmental and economic infrastructure that are required to support the development and growth set out in the plan. It is a living document that details both the infrastructure required to support the proposals and development sites in the plan, the likely delivery partners e.g. developers, the district and county councils, government agencies and likely funding sources. The infrastructure requirements to support the specific policies and allocations in the Plan are identified within the individual site

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		allocation policies. Further infrastructure may be required as the detail of schemes are developed and for windfall development proposals, the Infrastructure requirements and any contributions required will need to be assessed as schemes are drawn up. Infrastructure can be provided in the following ways: • Directly by developers; • By planning contributions through Section 106 contributions and/or the Community Infrastructure Levy (CIL) if this is implemented by the Council. Contributions for infrastructure can be for provision both off or on-site and for new or improved infrastructure. These requirements have been identified in consultation with infrastructure providers and the measures required to support the

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		proposed growth levels. Identified infrastructure needs include primary schools, community facilities, playing pitches, changing room facilities, allotments/community orchard and highway improvements. Statements of Common Ground have been signed with developers/owners of strategic sites. Monitoring indicators form part of the submission plan. These have been based on the sustainability appraisal.
Co-ordinated Planning Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?	• 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	The Submission Plan is generally supported by other agencies such as Historic England. Statements of Common Ground have been signed with statutory organisations that show in general there is support for the strategies and policies contained in the Plan. Mixed use sites bring together policies from different organisations such as community hub, school and sports pitches brought together for the community with a wide range of

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		uses.
Flexibility • 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?	• 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: a. the effectiveness of policies and what evidence is being collected to undertake this b. changes affecting the baseline information and any information on trends on which the DPD is based • Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances • Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision • Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.	A flexible and responsive approach to employment and housing land delivery is enabled through the identification of strategic sites. The Council's monitoring of the provision of dwellings demonstrates that, whilst under normal economic circumstances, a fairly consistent supply can be achieved. Under unusually buoyant or depressed economic circumstances extremes (both high and low) of delivery can be evidenced. Positive planning measures may be required to help bring forward sites for development earlier in the plan period to ensure a five-year supply of sites is able to be sustained. Whilst not exhaustive such initiatives might include: • Working with house builders / landowners / Housing Association Registered Providers, to

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		monitor and progress the housing supply and to identify any causes of supply problems and where appropriate to act on feedback received. • Production of detailed Planning Briefs and / or area-based Supplementary Planning Documents, to increase certainty for developers on the progression of sites through the planning process. • Regular meetings with stakeholders about the major urban extensions. As part of the preparation of Planning Briefs, indicate different development permutations to accommodate different viability scenarios. • Pre-application discussions with developers, landowners and their agents to increase certainty in the development

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		management process. • Sensitive application of policy where issues around scheme viability have been clearly demonstrated. • Prioritise public sector land. • Potential funding streams, such as Homes England and other public funding sources. • Testing of viability through an independent study and liaison with developers about viability issues. • Annual update of the Council's Brownfield Land Register. • Bringing forward Reserved Housing Sites, subject to policies in the Submission Document.
Co-operation • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being	• 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	The Council has a duty to co-operate with other local planning authorities and other

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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?	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.	prescribed bodies in the formulation of development plan documents. Under the latest National Planning Policy Framework (NPPF) 2019, a requirement is placed on local planning authorities to produce Statements of Common Ground to detail cross boundary planning matters. Full details of how the Council has engaged with those bodies are available in the Statements of Common Ground, which will be submitted to the Planning Inspectorate. Duty to co-operate meetings have been held and Statements of common ground signed with Worcestershire County Council, all Neighbouring Local Authorities, Historic England, Natural England, Environment

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Agency, Sport England, Highways England, and developers/owners of strategic sites. The Statements of Common Ground give details of the Duty to Cooperate meetings that have taken place. Minutes from meetings are attached to the SofCG. Matters that parties can agree on or disagree on are listed including all issues and a response from Wyre Forest District Council. Appendices to the SofCG include their representations from WFDC consultations. The SofCG includes where appropriate ongoing engagement with Duty to Cooperate Partners. This may include deliverability of strategic sites. Through collaborative working arrangements the SofCG will be reviewed on a regular basis.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Monitoring • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?	• Sections of the DPD setting out indicators, targets and milestones • Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal	Housing trajectory included in Submission Plan. Housing completions are monitored on a monthly basis. AMR and 5YHLS report are usually updated annually to show sites with planning permission, under construction and completed. Housing target is 276 dwellings per annum.
Consistent with national policy: *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.* The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.		
• 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?	• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. • 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.	All policies within the Local Plan are consistent with national planning policy and guidance.

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Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

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Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement with both settled and traveller communities.	• Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.	Discussion with Travelling Showpeople to identify accommodation needs. Proposed allocated site agreed with Travelling Showpeople in Submission Document. Early Local Plan development was informed by the 2014 GTAA which engaged with the gypsy and traveller population in WF.
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.	• Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.	The 2014 GTAA identified numbers and these were met by development that addressed housing need until the later years of the plan (2030). The evidence base in now being updated.

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Policy Expectations	Possible Evidence	Evidence Provided
Policy B: Planning for traveller sites (paras 7-11)		
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs. Set criteria to guide land supply allocations where there is identified need. Ensure that traveller sites are sustainable economically, socially and environmentally.	• 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	This is included in the Gypsy and Traveller section but will need to be updated by the evidence base refresh currently underway.
Policy C: Sites in rural areas and the countryside (para 12)		
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		There is a broader policy on this in Chapter 8 for all development in rural settings.
Policy D: Rural exception sites (para 13)		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable	• If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.	The evidence base in now being updated until this is completed the Council will not know if the need has

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Policy Expectations	Possible Evidence	Evidence Provided
travellers' sites.		increased or decreased.
Policy E: Traveller sites in Green Belt (paras 14-15)		
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.	• Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.	Policy 8G: Site Provision for Travelling Showpeople - allocates a site for the needs of an existing Travelling Showpeople family currently living within the district. This site allocation is in the Green Belt and will therefore require land to be released from Green Belt.
Policy F: Mixed planning use traveller sites (paras 16-18)		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	• Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. • N.B. Mixed use should not be permitted on rural exception sites	
Policy G: Major development projects (para		

Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	Possible Evidence	Evidence Provided
19)		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	• Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.	

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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'.

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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 all[1] 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 decisions[2]

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.

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Policy Expectations	Possible Evidence	Evidence Provided
Key requirements under the Duty to Co-Operate		
Consistency between marine and terrestrial policy documents and guidance	• 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.	Not Applicable for Wyre Forest District Council
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	• 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	Not Applicable for Wyre Forest District Council
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	• 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	Not Applicable for Wyre Forest District Council

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Policy Expectations	Possible Evidence	Evidence Provided
	roles, and relevant marine plans	
Marine Policy Statement- Chapter 2: General Principles for Decision-Making[3]		
Sections 2.1 -2.2: The UK vision for the marine environment		
The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas') Achieving the vision through marine planning	• Reference in DPD where appropriate to UK vision for the marine environment • Contribution to the vision through local plan policies and supporting text	Not Applicable for Wyre Forest District Council
Section 2.4: Considering benefits and adverse effects in marine planning		
Consider benefits and adverse effects of plan policies	• Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal	Not Applicable for Wyre Forest District Council
Section 2.5: Economic, social and environmental considerations	•	
Contribute to the objectives of relevant	• Reference to relevant EU Directives in DPD and sustainability	Not Applicable for Wyre

[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.

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Policy Expectations	Possible Evidence	Evidence Provided
EU Directives (Marine Strategy Framework Directive and Water Framework Directive)	appraisal • Consideration of contribution of DPD policies to the objectives of relevant EU Directives	Forest District Council
Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities		
3.1 Marine Protected Areas		
Incorporate identified areas and features of importance for nature conservation Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts	• 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	Not Applicable for Wyre Forest District Council
3.4 Ports and shipping		
Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety Protect the efficiency and resilience of continuing port operations	• 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	Not Applicable for Wyre Forest District Council
3.8 Fisheries		
Consider potential economic, social	• Where relevant, evidence that other policies minimise negative	Not Applicable for Wyre

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Policy Expectations	Possible Evidence	Evidence Provided
and environmental impacts of other developments on fishing activity	impacts on fishing activity and/or aquaculture	Forest District Council
3.9 Aquaculture		
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	• Where relevant, evidence that the benefits of aquaculture industry development have been considered	Not Applicable for Wyre Forest District Council
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	• 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	Not Applicable for Wyre Forest District Council
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	• Where relevant, reference to marine tourism and recreation • Evidence that the potential for marine tourism and recreation has been recognised in plan-making	Not Applicable for Wyre Forest District Council

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Appendix One

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

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

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Stroud
Suffolk Coastal
Sunderland
Swale
Taunton Deane
Teignbridge
Tendring
Test Valley
Thanet
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