

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a ‘mock’ examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 ‘key questions’ in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the ‘tests’ as follows. Is the draft local plan update:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#) and other statements of national planning policy, where relevant.

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. 00, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
Growth Strategy		
A	<p>In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area</p>	<p>A capacity-led approach, directing housing growth to sustainable non-Green Belt sites, with limited Green Belt release at the most sustainable settlements. Meeting the district’s housing needs and making a contribution to wider regional housing shortfalls of 640 dwellings.</p> <p>Gypsy and traveller requirements met as far as possible through intensification and extension of existing sites.</p> <p>Allocation of the existing pipeline of available employment land¹, and a new strategic employment site at M6 Junction 13, promoting strategic growth opportunities to meet the district’s needs and support wider regional requirements.</p> <p>Windfall developments and retail, service provision and office developments determined in accordance with the settlement hierarchy.</p>
B	<p>In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update</p>	<p>The distribution of residential, service and office development focuses growth on deliverable non-Green Belt sites at the most accessible and sustainable locations in accordance with the settlement hierarchy (Policy DS5), informed by the Rural Services and Facilities Audit 2021. Limited Green Belt development has been proposed at Tier 1 settlements, with the greatest range of existing services and facilities and strong and sustainable commuting linkages with the West Midlands conurbation.</p> <p>The distribution of employment land promotes growth at existing sites and has sought to identify new strategic sites in highly accessible locations with strong connections to the national transport infrastructure network.</p>

¹ where these sites did not have full/reserved matters permission at 1 April 2023

		Assessment				
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C	List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery	<p>Land East of Bilbrook (Policy SA1) Provide a minimum of 750 dwellings including specialist elderly provision and a community hub. Key infrastructure includes a new first school and vehicular access route onto Pendeford Mill Lane, Lane Green Road and Barnhurst Lane, and accessible green and blue infrastructure.</p> <p>Land North of Penkrige (Policy SA2) Provide a minimum of 1,029 dwellings including specialist elderly provision and a community hub. Key infrastructure includes a new first school, accessible green and blue infrastructure including a community park.</p> <p>West Midlands Interchange (Policy SA5) Provide 297 ha. of employment land for strategic logistics/warehousing. Already consented through DCO with key infrastructure secured through that process.</p> <p>I54 Western Extension(north) (Policy SA5) Provide 16.7 ha. of employment land (advanced manufacturing). Re allocation of remaining site allocated in 2018 Site Allocations Document. Key infrastructure includes access to the site that has already been delivered as part of an earlier phase of the site.</p> <p>M6, Junction 13, Dunston (Policy SA5) Provide 17.6 ha. of employment land (strategic employment land). New allocation</p> <p>ROF Featherstone (Policy SA5) Provide 36 ha. of employment land (general high quality employment). Access and key infrastructure already secured through reserved matters consent.</p>				
1.	Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF?	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Publication Plan 2024 Policy DS5 articulates where and how development will be distributed to meet local plan targets in accordance with the plan strategy. This strategy has been subject to public consultation and has been tested alongside other reasonable alternatives as detailed in the Spatial Housing				

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Strategy Topic Paper 2024 and the preferred approach has been the subject of an SA (Sustainability Appraisal 2024). It is considered that the preferred approach represents a sound and sustainable strategy for accommodating the required amount of growth in the district to 2041 as well as making a contribution of 640 dwellings to regional housing shortfalls. The Council consider that the approach taken balances the district's growth opportunities against the constraints that Green Belt land and sustainability factors places on the plan's ability to deliver housing growth.</p> <p>The details of the sites and the requirements for their delivery are set out in policies SA1, SA2, SA3, SA4, SA5 Appendix B, Appendix C, Appendix D, Appendix E and Appendix F.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: None</p> <p>Reviewer Comments: None</p>				
<p align="center">2.</p>	<p>Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?</p>	<p align="center">-2</p> <p>No, we do not meet this requirement</p>	<p align="center">-1</p> <p>No, we may not fully meet this requirement</p>	<p align="center">0</p> <p>Unclear whether our plan meets this requirement or not</p>	<p align="center">+1</p> <p>Yes, we are likely to meet this requirement</p>	<p align="center">+2V</p> <p>Yes, we are confident our plan will meet this requirement</p>
		<p>Reason for score: The Housing Site Selection Topic Paper 2024 and the Spatial Housing Strategy Paper 2024 provide the justification for the selection for the two strategic housing allocations. The amount of development identified on these sites has been informed by a masterplanning exercise with the site promoters and is confirmed through Statements of Common Ground.</p> <p>The yield on smaller housing site allocations (Policy S3) has been informed by our Strategic Housing Land Availability Assessment (SHELAA) assumptions, that has been subject to agreement with the SHELAA panel. However, on an individual site basis, the capacity of a small number of sites has been revised based on representations from site promoters and to reflect site specific constraints.</p> <p>The approach to the level of employment land growth has been informed by the findings of the Economic Development Needs Assessment Update 2024 and the West Midlands Strategic Employment Sites Study 2021. With respect to delivery no significant matters have been identified which would indicate that the strategic sites are not capable of delivery. The preferred strategy has been the subject of a Viability Study 2022 and 2024 Viability Study addendum, which concluded that the tested sites were viable.</p>				

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		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
3.	<p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	-2	-1	0	+1v	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score:</p> <p>The Local Plan meets the local housing need requirement as identified by the Standard Method, with an additional 640 homes contributing to unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). This contribution to unmet needs is an output of the capacity of the suitable sites (as assessed through the Housing Site Assessment Topic Paper 2024) that conform with the preferred spatial strategy (as determined through the Spatial Strategy Topic Paper 2024). The strategy includes Green Belt release at the district’s most sustainable Tier 1 settlements within walking distance of rail access, and therefore are in the Council’s view, the locations in the district that are well served by public transport, in accordance with NPPF para 147. Justification for this Green Belt release, including the strategic case setting out unmet need in the GBBCHMA, is set out in the Green Belt Exceptional Circumstances Topic Paper.</p> <p>A higher level of growth would result in additional incursions into the Green Belt but at less sustainable locations (sub Tier 1 settlements). This cannot be justified given that the Standard Method housing requirement can be met through the preferred strategy, alongside a contribution to unmet needs. Green Belt release as proposed is limited to the Tier 1 settlements with the best public transport links to neighbouring areas who are the source of unmet needs. There is therefore exceptional circumstances for Green Belt release at these locations, which is not the case for other less sustainable Green Belt locations in the district.</p> <p>A higher housing requirement was previously consulted on through the Council’s November 2022 Regualtion 19 consultation. However, the clarification provided through the NPPF December 2023 that it was authorities choice to review Green Belt, and the age of the Strategic Growth Study 2018 that the previous approach of meeting unmet needs in the 2022 Regualtion 19 consultation was based upon, meant that the previous strategy and higher housing requirements are no longer justified.</p>				

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		<p>A lower level of growth would likely be below our Standard Method requirement and would reduce the ability of the plan to deliver a number of key infrastructure improvements which would benefit local communities. Equally, this would see no contribution to unmet needs of the GBBCHMA, and therefore is not justified.</p> <p>A figure of an additional 10% has been identified to provide for plan flexibility, which we believe is appropriate given the high proportion of greenfield site allocations, and a very strong track record of these being delivered.</p>				
		<p>Implications of taking no further action: Potential Duty to Cooperate issues related to the scale of the housing shortfall in neighbouring areas.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: Once the scale and potential location of development to meet neighbouring housing shortfall is realised - through an update to the 2018 GBBCHMA Strategic Growth Study - this may require a re-examination of the present approach through the next review of the Local Plan.</p>				
		<p>Reviewer Comments: None</p>				
4.	<p>Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?</p>	-2	-1	0	+1	+2 ✓
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>80% of the district lies within the Green Belt, with 16% of the district beyond the Green Belt to the northwest defined as 'Open Countryside', and the remaining 4% made up of villages and smaller settlements with their own tightly drawn development boundary. Given this context, it is challenging therefore to meet the development needs of the district without considering the release of Green Belt sites.</p> <p>The Spatial Housing Strategy Topic Paper 2024 provides details of the various strategy options considered during the plan making process, including Option A first tested through the 2019 Spatial Housing Strategy and Infrastructure Delivery (SHSID) consultation. Option A sought to provide all development beyond the Green Belt in the open countryside, however this option would see unsustainable levels of growth in the Open Countryside and was discounted for performing poorly in the Spatial Housing Strategy Topic Paper 2024 and in the Sustainability Appraisal.</p> <p>The council has considered non-Green Belt site options in accordance with NPPF para 146. This includes assessing brownfield and 'Open Countryside' reasonable alternative site sites through the Housing Site Assessment Topic</p>				

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		<p>Paper 2024 and allocating these where they are assessed as suitable/sustainable. The council has set minimum density standards with a minimum requirement for 35dws per hectare in Tier 1 settlements well served by public transport, thereby keeping Green Belt release to a minimum. The Council has also written to neighbouring authorities to understand if supply in their areas would allow the district to reduce its housing target, but this did not elicit any responses which suggested that this could be reduced.</p> <p>The Council believes that both strategic considerations (e.g wider unmet need, approach to maximising non-Green Belt options in line with NPPF para 146) and site specific considerations, support the case for the amendment to Green Belt boundaries as proposed in the Local Plan. The Council therefore considers that the exceptional circumstances for its proposed Green Belt release have been demonstrated, and these are fully set out in the Council’s Exceptional Circumstances Topic Paper 2024.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: None</p> <p>Reviewer Comments: None</p>				
<p align="center">5.</p>	<p>Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?</p>	<p align="center">-2</p> <p>No, we do not meet this requirement</p>	<p align="center">-1</p> <p>No, we may not fully meet this requirement</p>	<p align="center">0</p> <p>Unclear whether our plan meets this requirement or not</p>	<p align="center">+1</p> <p>Yes, we are likely to meet this requirement</p>	<p align="center">+2V</p> <p>Yes, we are confident our plan will meet this requirement</p>
		<p>Reason for score: The Spatial Housing Strategy Topic Paper (2024) and the Housing Site Selection Topic Paper (2024) provide details on the site selection process and how this relates to the preferred strategy and the influence of studies such as the Sustainability Appraisal.</p> <p>Site options for housing have been assessed on a consistent basis through the 2023 SHELAA and the shortlist of sites then through the Housing Site Assessment Topic Paper 2024 against a consistent set our criteria, as detailed in the site assessment proformas appended to the topic paper. A number of evidence base studies directly feed into the site selection criteria (e.g Green Belt Assessment and Sustainability Appraisal).</p> <p>Whilst the viability study was not directly used to select sites, it has tested both site typologies and specific ‘non standard’ sites (e.g. where additional infrastructure is being provided). The viability study has had a greater role in testing the viability of the plan policies that result in a cost to the development (e.g affordable housing) and has helped confirm that the site we are proposing are viable for delivering the plans policy requirements.</p>				

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		<p>Employment site options have also been assessed against a consistent set of criteria as detailed in our Economic Strategy and Employment Site Selection Topic Paper 2024. As with housing site selection criteria, a number evidence base studies directly feed into the site selection criteria (e.g Green Belt Assessment, Sustainability Appraisal and EDNA).</p> <p>Gypsy and Traveller site options were assessed through our 2021 Pitch Deliverability Study with these assessments updated through our Gypsy and Traveller Topic Paper 2024. Site options have been assessed against a consistent set of site selection criteria, and informed by the 2024 GTAA, to ensure that where families have a 5 year need and there is capacity for intensification of these sites, then they are proposed for allocation.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: None</p> <p>Reviewer Comments: None</p>														
6.		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%; text-align: center;">-2V</th> <th style="width: 20%; text-align: center;">-1</th> <th style="width: 20%; text-align: center;">0</th> <th style="width: 20%; text-align: center;">+1</th> <th style="width: 20%; text-align: center;">+2V</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">No, we do not meet this requirement</td> <td style="text-align: center;">No, we may not fully meet this requirement</td> <td style="text-align: center;">Unclear whether our plan meets this requirement or not</td> <td style="text-align: center;">Yes, we are likely to meet this requirement</td> <td style="text-align: center;">Yes, we are confident our plan will meet this requirement</td> </tr> </tbody> </table> <p>Reason for score: Bilbrook Neighbourhood Plan group have requested a housing requirement for their area, but have not requested that this be identified through local plan policy. Nevertheless, the housing requirement provided reflects housing growth for Bilbrook proposed through the emerging Local Plan.</p> <p>Implications of taking no further action: None foreseen.</p> <p>Mitigation / Action required (if necessary) to move scale to right: Reference to Bilbrook Neighbourhood Groups request for a housing requirement figure could be referenced in the Local Plan if the inspector deems this necessary.</p> <p>Reviewer Comments: None</p>					-2V	-1	0	+1	+2V	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
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		<p>Reason for score: The strategic housing sites will include community facilities and services to support the scale of development being proposed. These requirements are set out in detail in their own standalone policies (Policies SA1 and SA2).</p>
		<p>In addition, site proformas in the Publication Plan 2024 (Appendix C, D, E & F) detail the quantum of development and key development and infrastructure requirements for all site allocations, including for small sites.</p>
		<p>These are complemented by a suite of policies cover a breadth of policy areas that clearly set out the policy requirements for sites, including in relating to design, affordable housing and sustainable construction. The Strategic Housing Market Assessment 2024 (and subsequent updates) will be the primary piece of evidence used to guide the detail of housing mix on new developments.</p> <p>The types of development considered acceptable on the proposed employment site allocations is stated in Policy SA5 of the Publication Plan 2024, including proposed use class.</p>
		<p>Implications of taking no further action: None</p>
		<p>Mitigation / Action required (if necessary) to move scale to right: None</p>
D	<p>What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?</p> <p>List these targets and the evidence source for this ‘need’ target?</p>	<p>The district is comprised of a number of villages with no single dominant settlement. Whilst supporting the vitality and viability of each of the village centres, the focus of these centres is primarily meeting the needs of the community within which they are situated. The Publication Plan 2024 has not sought to identify targets for additional retail floorspace, and this approach is support by our Retail Centres Study 2021. However, the plan does promote additional retail, commercial and community space to be provided to meet the needs generated by the two strategic housing allocations, reflected what would be expected on developments of this scale.</p>
		<p>The EDNA (2024) identified a total gross objectively assessed employment land need for the district of 62.4ha and supply of 90ha, with this 27.6ha ‘oversupply’ available to unmet needs of the Black Country FEMA. An additional allocation at M6 Junction 13 of 17.6ha means that that this ‘oversupply’ increases to 45.2ha to unmet needs of Black Country FEMA, and confirmed through a South Staffordshire FEMA Statement of Common Ground.</p> <p>The employment land requirement (excluding WMI) for the district up to 2041 is set out in Policy DS4. It reflects the existing supply 90ha, plus supply delivered through the new allocation (17.6ha).</p>

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		West Midlands Interchange is considered separately to other employment land supply given it's role in meeting a much wider regional need. Policy DS4 sets out that 18.8ha of WMI contributes towards South Staffordshire's needs, which is supported by the evidence (EDNA 2022 and EDNA update 2024).				
8.	Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: New community services and facilities (e.g retail) are to be provided as part of the two new strategic housing development and are a requirement of Policies SA1 and SA2. Indicative concept plans demonstrating how these facilities can be delivered are set out in the Local Plan, with further detail provided through detailed masterplans as required through Policy MA1.				
		Sufficient employment sites have been identified to meet the identified employment land requirement for the district, this includes an extension to an existing strategic employment land site at I54 and restating the commitment to a general employment land strategic site at ROF Featherstone. Additionally, the allocation of M6 Junction 13 site proposal will ensure that the district can demonstrate a healthy pipeline of sites for the foreseeable future and deliver the employment land requirement of 107ha up to 2041.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
Reviewer Comments: None						
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Likely infrastructure requirements have been identified through engagement with infrastructure providers and site promoters. These are set out in policies SA1 SA2 and SA3 and Appendix B and C. Further details on the delivery of these infrastructure items are set out in the Infrastructure Delivery Plan 2024.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reviewer Comments: None				
10. Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated? Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?		-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement ✓
		Reason for score: The strategic housing sites (Policy SA1 and SA2) and the new employment (Ref E30) allocation at M6, Junction 13 are subject of planning applications and are in the process of being determined through the Development Management process. These planning applications have considered other Local Plan proposals and committed developments in their TAs. The infrastructure delivery requirements have been identified and are the subject of on-going discussions. No issues have been identified through these applications which would indicate that the sites cannot be delivered due to an inability to deliver the necessary infrastructure.				
		As part of the councils ongoing requests for clarity on the requirements from National Highways, in November 2024, National Highways have now asked for a cumulative assessment that scopes in all of our allocations to assessment impact on the Strategic Road Network. This work is being progressed at pace, however it should be noted that all sites specifically referenced in National Highways Regualtion 19 representations (including all strategic sites) have been factored in as committed developments through the planning applications, as necessary, and informing the necessary infrastructure requirements proposed to mitigate the impact of these sites.				
		Implications of taking no further action: Lack of cumulative assessment likely to mean NH outstanding objections remain.				
		Mitigation / Action required (if necessary) to move scale to right: Progress cumulative assessment and agree position with National Highways.				
		Reviewer Comments: None				
Process and Outcomes (see also Toolkit Parts 2 and 3)						

	<p>KEY QUESTIONS</p>	<p>Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
<p>E</p>	<p>What are the cross boundary strategic matters affecting your local plan policies update? List these.</p>	<p>The following are the principal cross boundary strategic issues affecting the local plan review:</p> <p><u>Shortfall in housing provision across the Housing Market Area</u> The scale of this shortfall and the measures to address the requirement are the subject of ongoing discussions. A study, the ‘Birmingham and Black Country Housing Market Area Strategic Growth Study (2018)’ sought to address these issues. Progress on implementing proposals identified in the strategy stalled following the publication of the 2023 NPPF changes, in particular the introduction of a more clearly discretionary approach to the release of Green Belt land. The original 2018 Growth Study had limited support from other HMA authorities and is now considered dated and an updated study is now being commissioned. Governance/Strategic Planning arrangements are also being explored.</p> <p><u>Shortfall in employment land provision within Functional Economic Market Area (FEMA)</u> This has been evidenced in the EDNA update (2024) and the Black Country Employment Land Needs Assessment (2023) and confirmed through the South Staffordshire FEMA SoCG. South Staffordshire has a surplus of employment land when assessed against need and this surplus can make a potential contribution towards meeting the unmet employment needs of neighbouring authorities.</p> <p><u>Shortfall in provision of Gypsy and Traveller Accommodation within South Staffordshire.</u> The local plan identifies a supply of 37 pitches against a revised 5-yr requirement as identified in the Gypsy and Traveller Accommodation Assessment 2024 of 92 pitches. South Staffordshire has been actively engaging with neighbouring authorities to seek assistance in helping to meet this identified shortfall through duty to cooperate arrangements as set out in the Gypsy and Traveller Topic Paper 2024.</p> <p><u>Impacts of development on Cannock Chase SAC.</u> A joint agreement is in place between all Local Planning Authorities within a 15km radius of the SAC which provides a contribution for each new dwelling towards mitigating the impacts associated with increasing visitor numbers on the integrity of the site.</p> <p><u>Air Quality Impacts on designated habitat sites</u> An air quality evidence base has been prepared by 9 partner authorities across Staffordshire and the Black Country. The outputs have been agreed with Natural England as reflected in a SoCG agreed by all parties, and now subject to signing.</p>

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p><u>Highways</u> Highways has been identified as a cross boundary matter with City of Wolverhampton Council due to proximity of some site allocations to their network. Draft SoCG confirms that impacts can be considered and addressed when planning applications on relevant sites are submitted.</p>				
11.	<p>Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?</p>	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Statements of Common Ground cover all the issues identified in key question 11				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
Reviewer Comments: None						
F	<p>Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</p> <p><i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i></p>	<p>National policy (Planning Policy for Traveller Sites 2015) requires local plans to identify a supply of specific deliverable sites to provide 5 years' worth of sites to meet identified local needs and sites/broad locations to meet needs over a 6-10 year period and where possible 11-15 years.</p> <p>Against an identified five year need for 92 pitches (GTAA update 2024), the council has identified 37 pitches. The council has adopted a pro-active approach in attempting to identify alternative means of securing future provision including exploring public land options and approaching landowners of allocated housing sites. We have also requested Housing Market Area partners to provide assistance through Duty to Cooperate arrangements. The council will continue to pursue such options as well as responding positively to any applications for additional private sites through the development management process in line with policy HC9. The approach taken is set out in detail in the Gypsy and Traveller Topic Paper 2024.</p>				
12.	<p>Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g.</p>	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).				will meet this requirement ✓	
		Reason for score: South Staffordshire is adjacent to the West Midlands Combined Authority though the council is not a member. The council has however engaged positively with adjoining authorities through Duty to Cooperate arrangements and the former Local Economic Partnerships (LEP's). The council has also engaged with the various growth plans and studies such as the West Midlands Plan for Growth, and West Midlands Strategic Employment Site Study (2021). Recent allocations and proposals within South Staffordshire include a strategic logistics site (WMI) and a new strategic employment site at junction 13 M6 which will make a significant contribution towards realising the strategic growth ambitions of the wider region.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
13.	<p>Is the local plan policies update:</p> <ul style="list-style-type: none"> in conformity with any 'higher level' plans prepared by the Council; and properly reflecting provisions of any made neighbourhood plan? 	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The local plan aligns with the South Staffordshire District Council Plan 2024-2028 and will be integral to delivering a number of key objectives including supporting vibrant communities ensuring there is the right mix of future housing, supporting economic growth and helping to meet the target of reaching net zero carbon emissions by 2050.				
		There is presently one made neighbourhood plan in the district covering Kinver parish. The local plan has included the measures introduced by the neighbourhood plan, most notably by including the Local Green Space sites identified in the plan onto the local plan polices mapping.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
Reviewer Comments: None						
		-2	-1	0	+1	+2

KEY QUESTIONS		Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
14.	Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council’s adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement ✓
Reason for score: The council has complied with the requirements of the Local Plan regulations during all stages of the plan preparation process. The adopted SCI (2019) sets out the approach taken by the council in publicising and consulting on the plan at the various stages of plan preparation and has been fully adhered to.						
Implications of taking no further action: None						
Mitigation / Action required (if necessary) to move scale to right: None						
Reviewer Comments: None						
15.	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?	-2	-1	0	+1	+2✓
No, we do not meet this requirement		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
Reason for score: The Sustainability Appraisal (2024) has incorporated the requirements of the SEA and has evaluated a range of reasonable alternative growth and spatial distributions options. The reasoning behind site selection is outlined in the SA 2024 Appendix H, Volume 3 and the assessment of policy choices has been included as SA 2024 Appendix J, Volume 3.						
Implications of taking no further action: None						
Mitigation / Action required (if necessary) to move scale to right: None						
Reviewer Comments: None						
16.	Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?	-2	-1	0	+1	+2✓
No, we do not meet this requirement		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
Reason for score: The Sustainability Appraisal (2024) Volume 2 Chapters 7-15 presents a whole plan appraisal of the effects of policies and proposals within the plan.						
Implications of taking no further action: None						

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Sustainability Appraisal (2024) Volume 2 Chapter 18 identifies how the SA has influenced the development of the local site allocations and policy proposals. As noted, this has been an iterative process with the SA influencing all stages of the plan making process.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan as a whole and its policies are considered against the protected characteristics of the Equalities Act at each stage of the process. This ensures that any negative impacts are highlighted early on, and that the council can build on those policies which have a positive impact, where it is within the remit of the plan to do so. We have active engagement with our Gypsy and Traveller community and through 5 separate consultation exercises have identified issues raised by residents and others -for example in relation to specialist housing needs and housing for aged persons. This information has influence and informed plan preparation. At each stage of the process, the EqIA is moderated by an internal council assessment group who make an evaluation of the EqIA and make suggested amendments or highlight issues that need to be addressed; this provides a series of checks and balances.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Habitats Regulations Assessment (2024) para 1.30 notes the requirement for in-combination effects to be considered as part of stage 1 and stage 2 of the HRA process.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
Reviewer Comments: None						
20.	If the Habitats Regulations Assessment has identified, through ‘Appropriate Assessment’ that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Habitats Regulations Assessment (2024) references the known recreational impacts on the Cannock Chase SAC. A long standing strategic approach to mitigation is in place. This strategy has been reviewed and updated to take into account future proposed housing development and identified the necessary mitigation measures to ensure effectiveness. The mitigation is funded by a per dwelling contribution from all new residential developments occurring within a 15km zone of the SAC.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
Reviewer Comments: None						
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

	KEY QUESTIONS	Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>Reason for score: The Habitats Regulation Assessment (2024) has influenced the development of the local plan throughout the plan making process. The HRA conclusions noted the need for on-going mitigation measures to deliver the necessary protections for the Cannock Chase SAC. This is reflected in policy NB3 of the Publication Plan 2024. The HRA also highlighted the issue of air pollution impacts on SAC integrity particularly with reference to the Cannock Extension Canal SAC and Cannock Chase SAC. The issue of air quality impacts was examined in detail with Natural England and was satisfactorily addressed (as set out in air quality SoCG). No mitigation measures were considered necessary at this time.</p>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
	Housing Strategy					
22.	<p>Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?</p>	-2	-1	0	+1	+2V
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Strategic Housing Market Area Assessment 2022 and partial update 2024 (para 4.15) has identified the housing need for the district as calculated using the standard method. This established a figure of 4086 dwellings over the plan period between 2023-2041. The plans housing requirement exceed this, totalling 4726 dwellings, which incorporates a 640 home contribution towards unmet needs of the Great Birmingham and Black Country Housing Market Area (GBBCHMA). The Council is very confident that this housing requirement of 4726 dwellings can be achieved as a minimum given that the plan incorporates a modest windfall allowance and that supply incorporating the proposed allocations exceeds the housing by 10%, to ensure plan flexibility.</p>				
		Implications of taking no further action for local plan soundness and/or effectiveness: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
G	<p>Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.</p>	<p>There is emerging evidence of unmet needs in the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA) within which South Staffordshire is situated. A GBBCHMA Strategic Growth Study (2018) identified a total shortfall of 61,000 dwellings to 2036 and agreed a potential approach on how this shortfall might be addressed through Local Plans in the HMA. Progress on meeting this requirement stalled with the publication of</p>				

KEY QUESTIONS		Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>the revised NPPF 2023. This study is now considered dated and had limited support from other HMA authorities, and work has been ongoing which will update the scale of the housing market shortfall and identify potential strategic growth locations. South Staffordshire is committed to participating in updating the evidence base and considering its findings through future plan-making.</p> <p>Most recent consultation documents by Birmingham City Council and the Black Country authorities have set out that that their latest supply situation means that they expect the following shortfalls.</p> <ul style="list-style-type: none"> - Birmingham City Council (Regulation 18 Preferred Options consultation) – 46,153 dwelling shortfall - City of Wolverhampton Council –(Regualtion 19 Publication Plan consultation) 11,400 dwelling shortfall - Dudley MBC (Regulation 19 Publication Plan consultation)- 699 dwelling shortfall - Sandwell MBC (Regualtion 19 Publication Plan consultation) - 15,916 dwelling shortfall 				
		23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably to do so?	-2	-1	0
No, we do not meet this requirement	No, we may not fully meet this requirement			Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement ✓
Reason for score: The local plan proposes a contribution of 640 dwellings towards meeting the shortfall in housing provision within the wider Housing Market Area.						
Implications of taking no further action: None						
Mitigation / Action required (if necessary) to move scale to right: None						
Reviewer Comments: None						
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period? Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Publication Plan (2024) Appendix G sets out the Indicative Housing Trajectory.				
		The Publication Plan 2024 para 5.22 articulates the balanced approach to support the trajectory.				
Implications of taking no further action: None						

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
25.	Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.	-2	-1	0	+1 v	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The council is very confident it will be able to demonstrate a five year supply on plan adoption. There are approximately 1970 dwellings (Local Plan Publication Plan Policy SA3) allocated on modest scale predominantly greenfield sites with no known evident constraints to deliverability. The majority of these dwellings are anticipated to be completed within 5 years of the adoption of the Plan. Recent experience following the adoption of the Sites Allocation Document in 2018 would indicate that sites allocated within the district through a local plan are readily built out as evidenced by the district comfortably surpassing a 100% Housing Delivery Test over recent years (Housing Monitoring and Five Year Housing Land Supply). The supply would also include existing commitments, completions from the start of the plan period, a modest windfall allowance (in years 4 and 5) and supply from the two strategic sites in the later years of the 5-year supply. Based on a local plan requirement of 227 dwellings, the contribution 640 dwellings split evenly across the plan period and a potential 5% buffer, this would equate to a greater than 7 year supply.</p> <p>Beyond year 5 the land supply would be increasingly reliant upon the build out of the two larger strategic housing sites east of Bilbrook and north of Penkrige. Both of these sites have active developer interest and are the subject of ongoing planning applications which would suggest the sites will be capable of contributing to supply over the medium to long term. Statement of Common Ground with the site promoters have been prepared setting out trajectories for these sites</p> <p>A 10% addition has been added to the housing supply to ensure plan flexibility.</p>				
		Implications of taking no further action: There will be a lack of clarity beyond the housing trajectory to indicate which specific sites are considered delivered within the different timeframes set out in the question.				
		Mitigation / Action required (if necessary) to move scale to right: Provide details of site specific trajectories through Statements of Common Ground with site promoter.				
		Reviewer Comments: None				

KEY QUESTIONS		Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
26.	Does the level of supply provide any ‘head room’ (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?	-2	-1	0	+1	+2V
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: As indicated above, the district has a history of over-achievement in relation to housing delivery targets. A significant number of the proposed housing sites are modest in scale and have no known significant constraints which would suggest that delivery would be an issue in the future. The plan has however included a 10% surplus to ensure plan flexibility (see Table 8 of Publication Plan).				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
Reviewer Comments: None						
27.	Is the Council reliant on the delivery of any ‘windfall’ sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?	-2	-1	0	+1	+2V
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: A very modest windfall allowance of 40 dwellings per annum (from year 4 of the plan) has been factored into the calculations. An analysis of windfall developments in the SHELAA 2022 (paragraphs 5.55-5.66) indicates that between 2012 and 2020 windfall completions averaged 57 completions/annum. Past evidence does suggest that the figure of 40 dwellings/annum is an achievable level of small scale windfall development.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
Reviewer Comments: None						
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	-2	-1	0	+1	+2V
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

KEY QUESTIONS		Assessment														
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>														
		<p>Reason for score: Publication Plan 2024 policy HC1 specify that 70% of dwellings should be three beds or less and Policy HC3 establishes a 30% affordable housing requirement and provides a breakdown of the tenure type requirements associated with the affordable housing provision.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: None</p> <p>Reviewer Comments: None</p>														
29.		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; text-align: center;">-2</td> <td style="width: 20%; text-align: center;">-1</td> <td style="width: 20%; text-align: center;">0</td> <td style="width: 20%; text-align: center; color: red;">+1</td> <td style="width: 20%; text-align: center;">+2 v</td> </tr> <tr> <td style="text-align: center;">No, we do not meet this requirement</td> <td style="text-align: center;">No, we may not fully meet this requirement</td> <td style="text-align: center;">Unclear whether our plan meets this requirement or not</td> <td style="text-align: center;">Yes, we are likely to meet this requirement</td> <td style="text-align: center;">Yes, we are confident our plan will meet this requirement</td> </tr> </table>					-2	-1	0	+1	+2 v	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
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No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement												
		<p>Reason for score: In addition to affordable housing (Policy HC3), the Publication Plan 2024 addresses the need for dwellings for older people and those with special housing requirements (Policy HC4), specialist housing (Policy HC5), self build (Policy HC8) and Gypsy Travellers and Travelling Showpeople (Policy HC9).</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: None</p> <p>Reviewer Comments: None</p>														
30.		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; text-align: center;">-2</td> <td style="width: 20%; text-align: center;">-1</td> <td style="width: 20%; text-align: center;">0</td> <td style="width: 20%; text-align: center;">+1</td> <td style="width: 20%; text-align: center; color: red;">+2v</td> </tr> <tr> <td style="text-align: center;">No, we do not meet this requirement</td> <td style="text-align: center;">No, we may not fully meet this requirement</td> <td style="text-align: center;">Unclear whether our plan meets this requirement or not</td> <td style="text-align: center;">Yes, we are likely to meet this requirement</td> <td style="text-align: center;">Yes, we are confident our plan will meet this requirement</td> </tr> </table>					-2	-1	0	+1	+2v	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
-2	-1	0	+1	+2v												
No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement												
		<p>Reason for score: The Affordable Housing and Housing Mix Topic Paper (2024) Paragraph 3.2 provides data on Affordability Ratios. This demonstrates that there is sub-area variation, however all wards in the district have a ratio which is higher than the regional and national average. The need for affordable housing is district wide and this supports the blanket policy approach promoted by the Publication Plan 2024 Policy HC3.</p> <p>The Council’s proposed affordable housing policy (Policy HC3) confirms a requirement for all major development to provide 30% affordable housing. This closely reflects the findings of the 2024 Housing Market Assessment Update, which indicates a need for 28.8% of new housing to be affordable and recommends a 30% policy requirement to</p>														

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		allow for a small proportion of delivery through windfall sites of less than 10 homes. The Local Plan Viability Study also indicates a 30% requirement is appropriate.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
31. Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence? Does the local plan policies update make adequate provision for the identified needs?		Reviewer Comments: None				
		-2v	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: National policy (Planning Policy for Traveller Sites 2015) requires local plans to identify a supply of specific deliverable sites to provide 5 years' worth of sites to meet identified local needs and sites/broad locations to meet needs over a 6-10 year period and where possible 11-15 years. Against an identified five year need for 92 pitches (GTAA update 2024), the Publication Plan 2024 identifies a supply of 37 suitable pitch options. The council has undertaken a vigorous approach to attempting to identify alternative means of securing future provision including exploring public land options and approaching landowners of allocated housing sites. We have also requested Housing Market Area partners to provide assistance through Duty to Cooperate arrangements. The council will continue to pursue such options as well as responding positively through the development management process in line with policy HC9 to respond to any applications for additional private sites. The council has received no representations for traveller families or their agents, to suggest that the proposed approach, in terms of identifying needs or seeking to meet them, is not sound.				
		Implications of taking no further action: The majority of the identified needs for travellers and travelling showpeople will be dependent on windfall sites being approved through the Development Management process in accordance with policy HC9 of the Publication Plan (2024).				
		Mitigation / Action required (if necessary) to move scale to right: Continue to seek the identification of further sites, particularly a public site within the district and/or seek support from neighbouring authorities through Duty to Cooperate arrangements to secure additional provision.				
		Reviewer Comments: None				
		-2v	-1	0	+1	+2

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
32.	Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: No. Following extensive attempts to identify sites within the district and to gain support from neighbouring authorities the Publication Plan 2024 policy SA4 is able to identify a supply of 37 pitches towards an identified GTAA (2024) five year requirement of 92 pitches. This thorough examination of supply options is set out in the Gypsy and Traveller Topic Paper 2024.				
		Implications of taking no further action: There will be a shortfall in the provision of pitches in relation to 5-year supply requirements.				
		Mitigation / Action required (if necessary) to move scale to right: Continue to seek the identification of further sites, particularly a public site within the district and/or seek support from neighbouring authorities through Duty to Cooperate arrangements to secure additional provision.				
		Reviewer Comments: None				
H	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	<p>Publication Plan Policy SA4 includes the complete list of sites allocated (37 pitches) that contribute towards meeting our gypsy and traveller needs. These are listed below</p> <p>New Acre Stables, Penkridge – 4 pitches The Spinney, Slade Heath – 2 pitches The Bungalow, Coven – 3 pitches Brinsford Bridge, Coven Heath – 7 pitches Brickyard Cottage, Essington – 4 pitches The Stables, Upper Landywood – 3 pitches Park Lodge, Wombourne – 2 pitches Glenside, Slade Heath – 3 pitches Kingswood Colliery, Great Wyrley – 9 pitches</p> <p>The number of pitches above reflect the 5 year requirements for these sites (as evidenced by 2024 GTAA update) and therefore it is expected that these will be delivered in the next 5 years.</p>				
Justified approaches to plan policy and content						
		-2	-1	0	+1V	+2

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
33.	<p>Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text?</p> <p>[You may wish to check each policy setting a threshold]</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score:</p> <p>Retail: The following thresholds have been identified in the Publication Plan Policy EC8 establishes a threshold in relation to the requirement for the submission of an impact assessment threshold in relation to convenience and comparison good retail proposals in edge of and out of centre locations. This approach reflects National Policy and is based on the findings of the Retail Centres Study 2021 (Recommendation 6).</p> <p>Open Space: Threshold is 0.006ha of open space per welling as standard, with sites of 0.2ha or more requiring this to be delivered on site. As set out in the supporting text, this draws upon the recommendations of the council’s open space evidence base, specifically the Open Space Standards Paper 2020 (Table 3.4.3).</p> <p>Housing Mix: Major developments must ensure at least 70% of market housing contains 3 bedrooms or less. This reflects findings of the Housing Market Assessment, both across the district and by sub-area. This is detailed in para 7.1.</p> <p>Affordable Housing: The threshold for affordable housing in Policy HC3 is for major developments (10 or more dwellings) to deliver 30% affordable housing. Major developments is defined in the NPPF and aligns with the requirements of the PPG. This is explained in para 7.8</p> <p>M4(2) accessibility standards: Policy HC4 requires all major developments to ensure 100% of both the market and affordable housing meets the higher access standards Part M4(2) Category 2: Accessible and adaptable dwellings of Building Regulations. This reflects recommendations in the Housing Market Assessment, and is deliverable as per the Local Plan Viability Study (see supporting text para 7.12).</p> <p>Self and custom build: Policy HC8 requires major developments to have regard to the self and custom build register and make provision for self build to reflect this. This reflects that major developments will include a greater mix of housing due to their size, and therefore are best placed to consider these requirements.</p>				

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Health infrastructure: Policy HC14 requires major residential developments or specialist elderly accommodation to make an appropriate financial contribution where there will be impact on existing facilities, as per para 9.1. Appropriate assumptions for this have been tested in the Viability Assessment.</p>				
		<p>Sports Facilities and Playing Pitches: Policy HC18 requires major residential developments to make an appropriate contribution where there will be impact on existing facilities, as per para 9.14. Appropriate assumptions for this have been tested in the Viability Assessment.</p>				
		<p>Employment and skills: Policy EC3 requires developments of 100 or more residential units or 5000sqm of commercial floorspace to provide an Employment and Skills Plan (no material cost to the development). This threshold was deemed appropriate after being subject to formal Local Plan consultation.</p>				
		<p>Sustainable construction: NB6 policies set out a number of requirements related to certain thresholds. All were informed by the Sustainable Construction Policy NB6 review (2023) and 2024 addendum and are set out further in the supporting text.</p>				
		<p>Implications of taking no further action: Less clarity in the plan for reasoning behind the threshold.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: Include further reasoning behind the threshold in the policy justification/supporting text.</p>				
		<p>Reviewer Comments: Agree further clarity could be provided in supporting text</p>				
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?	-2	-1	0	+1	+2V
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Publication Plan does identify a number SPD’s to be produced to support plan policies. These SPD’s relate to technical matters or provide additional detail on the implementation of policies. The list of proposed SPD’s is as follows:</p> <p>Green Belt SPD – Provide further detailed guidance with respect new buildings in the Green Belt.</p> <p>Affordable Housing – provide detail on Council’s requirements for First Homes and eligibility criteria, integration of affordable housing, implementation of Vacant Building credit, the calculation of financial contributions – the</p>				

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Affordable Housing SPD is seeking to provide details and address technical matters which would be considered too detailed for inclusion within a strategic policy.</p> <p>Open Space Sport and Recreation SPD - will provide additional detail on the type of open space which will be expected from new development, provide guidance on any off-site provision and also on maintenance arrangements. These on the operation of are detailed and technical matters which would be considered too detailed for inclusion within a strategic policy.</p> <p>Green Infrastructure SPD - will provide strategic guidance on green infrastructure provision</p> <p>Rural Development SPD will provide additional guidance including details on the nature of business case requirements necessary to support applications for employment developments in rural areas outside development boundaries. These are detailed and technical matters which would be considered too detailed for inclusion within a strategic policy.</p> <p>Natural Environment and Biodiversity SPD -The Publication Plan indicates that this SPD will provide further detail on issues related to the plan policies NB1 and NB2 however no clear indication of what might form the contents of this guidance.</p> <p>Sustainable Construction and Carbon Offsetting SPD - will provide guidance on the operation of the sustainable construction policies and will set out how contributions to the carbon offset fund will be utilised including a list of projects to be funded. This SPD supports the implementation of Policy NB6A and will allow flexibility to update project lists which would not be applicable should such detail be included within the plan.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: None</p> <p>Reviewer Comments: None</p>				
35.	Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2V Yes, we are confident our plan will meet this requirement

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	<p>depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy?</p> <p>[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]</p>	<p>Reason for score: Hierarchies are defined for the following: Spatial Strategy (Policy DS5). The hierarchy identified in the spatial strategy establishes a clear framework which is reflected through the plan to guide development to the most sustainable locations. It influences the scale and type of development which is considered appropriate in both urban and rural areas within the district. Village Centres (Policy EC8). This is an approach which is supported by national policy. The policy aims to focus main town centre and office uses into the larger town centres. This supports the aim of promoting sustainable patterns of development and aligns with the overall development strategy of the Publication Plan as set out in Policy DS5. Natural Assets (Policy NB1). A distinction is made between the National Site Network, nationally designated and locally designated sites. The policy requires that planning decisions on applications which could impact on the hierarchy of sites should be determined in line with the principles set out in national legislation and policy.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: None</p> <p>Reviewer Comments: None</p>				
36.	<p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>	-2	-1	0	+1V	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Certain uses are limited by the Publication Plan in the following instances. Policy EC1 at site i54, uses limited to use class E(g) and B2. – this is an approach adopted in the council’s adopted Core Strategy and aligns with the masterplan for the site established through the substantive planning permission. Policy EC8 seeks to limit the concentration of non E-class uses within village centres as a means of protecting the traditional role of such locations in providing services, retail and community facilities. The supporting text indicates the balance which is being sought to protect existing centres whilst being open to diversification.</p> <p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) None</p> <p>Reviewer Comments: None</p>				
37.	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development? Where relevant, are they</p>	-2	-1	0	+1	+2V
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
consistent with the principles set out in the National Design Code and National Model Design Code? [For example, onsite provision of open space, optional technical standards, internal and external space standards.]					will meet this requirement	
	Reason for score: Plan promotes the following standards: Standards for space about dwellings and internal space. The promotion of space about dwellings reflects the national commitment in the NPPF to create high quality beautiful places, the internal space standards requirement follows the nationally prescribed internal space standards (Technical Housing Standards – Nationally Described Space Standards 2015). Parking Provision. These standards provide a starting point for discussion on the levels of parking in accordance with Publication Plan policy HC13. The decision to include standards aims to avoid under-provision whilst supporting the efficient use of land and seeking to prevent a cluttered unattractive street scene. The NPPF promotes the identification of local standards to reflect local requirements. Open Space Standards associated with new development are required to ensure that there is a satisfactory level of usable open space and associated facilities to support the needs of residents. The NPPF highlights the value of access to a high-quality network of open spaces. The standards identified in the Publication Plan 2024 draw on the recommendations of the Council’s open space evidence base and good urban design principles.					
	Implications of taking no further action: None					
	Mitigation / Action required (if necessary) to move scale to right: None					
	Reviewer Comments: None					
Deliverability						
38.	Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
Reason for score: The Publication Plan and a selection of sites have been subject to viability testing as detailed in the Viability Study 2022 this has included viability testing of the affordable housing requirement and other infrastructure and policy requirements identified in the plan. The Viability Study (2022 paragraph 9) has concluded that the site allocations are viable. A 2024 addendum to the viability study was produced to review representations received to the council’s 2024 Regualtion 19 consultation, including testing the viability implications of Policies NB6A/NB6C. It has concluded that the plans policies remain viable.						

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
39.	<p>Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?</p> <p>Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?</p>	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Publication Plan (2024) has reflected the recommendations identified in the Viability Study (2022). The study has influenced policy formulation and policy requirements including the level of affordable housing provision. The Viability Study 2022 (paragraph 9) has concluded that the site allocations will be viable.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
40.	<p>Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?</p>	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Publication Plan 2024 Appendix I details the Monitoring Framework and targets. This data is already being captured and has been designed in a way to ensure the targets are measurable, and to avoid subjectivity.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
41.	<p>Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u>?</p>	-2	-1	0v	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	Where triggers for plan review and/or update are identified are they justified and proportionate?					will meet this requirement
		Reason for score: The Monitoring Framework does cover a broad range of indicators covering all aspects of the plan. No triggers have been identified which would indicate the possible need for a plan review, however this is not considered necessary due to this being prescribed within the NPPF/PPG.				
		Implications of taking no further action: There will be a lack of clarity regarding which aspects may trigger the requirement for a plan review.				
		Mitigation / Action required (if necessary) to move scale to right: Identify situations/triggers associated with the framework which would indicate the need for a plan review.				
		Reviewer Comments: None				
Plan effectiveness (and associated policy clarity)						
42.	Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years from adoption? Does the evidence relied on to support those policies correspond/cover this whole period? Where larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)?	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The plan timeframe is clearly identified and covers a 15 year timeframe. The list of policies on page v1 of the Publication Plan 2024 identifies which policies are strategic/non-strategic. Key elements of the evidence base have been updated to align with the 15 year timeframe where necessary.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
Reviewer Comments: None						
43.	Does the local plan policies update clearly set out which adopted Development Plan policies it supersedes?	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Publication Plan (2024) paragraph 1.2 identifies the plans which will be superseded.				
		Implications of taking no further action: None				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
44.	Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Publication Plan 2024 objectives are clearly set out in Chapter 4. The policies are clear and have been formulated with input from the Development Management team to support implementation.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
45.	For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; <u>and</u> (ii) clearly defined on the Policies Map? Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?	-2	-1	0	+1	+2V
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Policy areas are clearly identified and the context justifying the policy areas and policies is outlined at the start of each chapter. The policies map references all relevant policies, where these policy areas have a specific spatial location/boundary (e.g allocations, conservation area, green infrastructure, villages centres).				
		The maps in the Publication Plan 2024 document are clear and provide supporting information which assist with understanding specific elements of the plan including such issues as the settlement hierarchy, development proposals in each of the localities. The site plans in the appendices will be a valuable tool when assessing submitted planning application proposals.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
		-2	-1	0	+1	+2V

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
46.	Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Plan policies in the Publication Plan 2024 are clearly identified in relation to the type of development to which they refer and are written positively.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
47.	Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed. [Note: If you have said ‘all development’ this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The policies in the Publication Plan 2024 clearly identify instances where policy requirements are to be applied to differently with respect to the scale or type of development. It is clear where policy requirements are to be applied to larger development proposals such as major housing sites e.g affordable housing (Policy HC2) or to particular settlements e.g. the spatial strategy (Policy DS5).				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
Reviewer Comments: None						
I	State how many policies are in your local plan update? Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.	There are 54 policies in the plan Cross Reference Policy DS1 cross-references HC6, SA1, SA3, SA5. Policy DS3 cross-references NB5, SA2, SA3, SA5. Policy DS4 cross-references HC9, DS5, MA1, SA2, SA3, SA4, SA5 Policy DS5 cross-references EC8, HC9 Policy MA1 cross-references SA1, SA2 Policy SA1 cross-references MA1, DS2 Policy SA2 cross-references MA1,				

KEY QUESTIONS		<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		Policy SA3 cross-references SA1, SA2 Policy SA4 cross-references HC9 Policy SA5 cross-references DS4 Policy HC1 cross-references HC2, HC3, HC4 Policy HC3 cross-references HC1, HC4 Policy HC9 cross-references NB2, HC11, DS1, SA4 Policy HC10 cross-references HC1, HC3 Policy HC17 cross-references HC19 Policy EC1 cross-references EC4 Policy EC4 cross-references EC2 Policy EC8 cross-references SA1, SA2				
48.	<p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p>	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement ✓
		Reason for score: The Plan has sort to avoid repetition of NPPF but has made reference to particular policies of the NPPF where relevant.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
49.	<p>Do policies avoid duplicating other regulatory requirements (for example, building regulations)?</p>	-2	-1	0	+1	+2v
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Publication Plan 2024 has sought to promote enhanced standards in certain areas such as climate change and sustainable development and has set out a clear policy approach as to how this should be met. In other respect the plan has not sought to repeat other existing regulatory requirements, however has referenced them where appropriate.				
		Implications of taking no further action: None				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				
50.	<p>Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?</p> <p>[For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The plan has been formulated with input from the Development Management team to promote clarity in the wording of policies to assist the decision making process. Where additional information is to be required to support applications this is clearly stated and it is the intention of the council to provide further guidance through SPD’s to support applications and decision makers.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: None				
		Reviewer Comments: None				

Date of assessment:	06/12/24
Assessed by:	Paul Rigby
Checked by:	Ed Fox
Overall Score:	+74
Comments:	Agree that the plan scores positively against most of the key questions. An exception being the provision for gypsies and travellers where we are unable to meet our needs. However, the council believe we have explored all possible supply options thoroughly, as evidenced in our Gypsy and Traveller Topic Paper 2024.

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