

## APPENDIX R

# **LICHFIELD DISTRICT COUNCIL**

## **Local Plan Allocations**

### **PAS Soundness Self-Assessment Checklist March 2018**

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

<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed.</li> <li>• Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them.</li> <li>• The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another.</li> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery.</li> <li>• Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> </ul>	<p>The Lichfield Local Plan comprises two main elements: Local Plan Strategy (LPS) which was adopted in February 2015 and the Local Plan Allocations (LPA) which is the subject of this submission and examination.</p> <p>The vision and strategic priorities for Lichfield District are set out in Section 3 of the LPS. Section 4 of the LPS describe the spatial strategy for the District and includes allocations for strategic development areas together with the settlement hierarchy and the following chapters set out a series of core policies.</p> <p>The LPA document is in line with the adopted spatial strategy, allocating smaller sites to sit along the strategic sites and help deliver the housing provision identified within the LPS. Section 1 of the LPA outlines how this document seeks to help deliver the LPS.</p> <p>The LPA contains a series of development management policies that provide guidance in dealing with applications for development in line with the strategic priorities set in Chapter 3 of the LPS. Each element of the policies and allocations in the LPA seek to contribute to the achievement of the objectives, and the delivery of the vision set out in the adopted LPS. The approach is comprehensive, not leaving matters unaddressed and is logically constructed.</p> <p>The process of preparing the LPS included an assessment of reasonable alternatives in terms of the development strategy and quantum of development to be allocated in the Strategy through the strategic development areas. This</p>
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		<p>approach was found to be sound and NPPF compliant and was adopted in 2015.</p> <p>The LPA is positively prepared as the LPS outlines the quantum of growth to meet identified OAN covering the plan period up to 2029 and the LPA takes forward the process of allocating smaller sites to fulfil the OAN. The Council has considered reasonable alternatives in terms of the location of sites to fulfil the development needs of the Local Plan Strategy. The consultation at Regulation 18 stage, Regulation 19 and Regulation Focused Changes stages provided opportunities for the submission of alternative sites which have been taken into consideration. The Consultation Statement provide further information on this.</p> <p>The Authority Monitoring Report, monitors housing commitments and completions on annual basis to ensure that levels are consistent with the apportionment set out in adopted Core Policy 6. Further Table 4.1 Housing Distribution and Delivery in the LPA seeks to replace and update the Table 8.1 within the LPS.</p> <p>A Local Development Scheme showing the timetable for the production of DPDs has been prepared and kept up to date. The LDS details the scope and content of planned DPDs.</p>
<ul style="list-style-type: none"> <li><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></li> </ul> <p>Plans and decisions need to take local circumstances into account, so that</p>	<ul style="list-style-type: none"> <li>An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below).</li> </ul>	<p>Sustainable development is at the core of the adopted Local Plan Strategy and the Local Plan Allocations Publication document.</p> <p>Core Policy 2: Presumption in favour of sustainable development of the adopted LPS provides the</p>

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<p>they respond to the different opportunities for achieving sustainable development in different areas.</p> <ul style="list-style-type: none"> <li>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: <ul style="list-style-type: none"> <li>—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</li> <li>—specific policies in this Framework indicate development should be restricted.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</li> <li>Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)</li> </ul>	<p>overarching policy to support the presumption in favour of sustainable development within Lichfield District.</p> <p>The development needs of the District were established as part of the evidence to the Local Plan Strategy and included a SHMA, SHLAA, Housing Needs Assessment and Employment Land Review.</p> <p>Core Policy 1: The Spatial Strategy of the LPS states that a minimum of 10,030 dwellings will be delivered in the most sustainable locations within the plan period up to 2029 and Table 4.1 outlines the settlement hierarchy and identifies strategic development areas (SDA) within Lichfield, Burntwood, Rugeley, Tamworth and Fradley. Policy Rural 1: Rural Areas of the LPS refers to an approximate quantum of development being provided within Key Rural Settlements which allows for flexibility.</p> <p>The LPA document allocates sites where development will be delivered in line with the quantum of development set out in adopted policies Lichfield 4: Lichfield Housing, Burntwood 4: Burntwood Housing, Frad4: Fradley Housing, Alr4: Alrewas Housing, Faz4: Fazeley Housing, Shen4: Shenstone Housing and Whit4: Whittington Housing. The evidence base supporting the LPA demonstrates the process leading to the decisions taken on the site allocations.</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that</p>	<ul style="list-style-type: none"> <li>A policy or policies which reflect the principles of the presumption in favour</li> </ul>	<p>Core Policy 2: The Presumption in Favour of Sustainable Development of the adopted LPS is based upon the recommended model policy which</p>

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<p>development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<p>of sustainable development (see <a href="http://www.planningportal.gov.uk">model policy at www.planningportal.gov.uk</a>)</p>	<p>embodies all these matters. Achieving sustainable development is a key objective throughout the LPA as demonstrated through the various site allocation policies which promote proportionate levels of growth within sustainable locations.</p>
<p><i>Objectively assessed needs</i> The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> <li>• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs.</li> <li>• Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.</li> </ul>	<p>The spatial strategy and corresponding targets were set out in the adopted LPS. The extensive evidence base including documents such as the SHLAA and ELAA were used to determine the strategy and targets.</p> <p>The LPA allocates non-strategic sites in accordance with the LPS. An extensive evidence base has been provided to support the LPA including a Consultation Statement which was published at Regulation 18 stage and updated with the publication of LPA at Regulation 19. In addition a Duty to Cooperate statement was prepared and published under Regulation 18 and Regulation 19 to demonstrate how cross boundary issues have been considered.</p>
<b>NPPF Principles: Delivering sustainable development</b>		
<b>1. Building a strong, competitive economy (paras 18-22)</b>		
<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),</p>	<ul style="list-style-type: none"> <li>• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.</li> </ul>	<p>The adopted LPS sets an overarching vision to promote sustainable development and economic growth, with Strategic Priority 7 promoting economic prosperity and Strategic Priority 8 ensuring employment opportunities are created within the District. Further, specific policies, namely</p>

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		<p>Core Policy 7: Employment and Economic Development encourages economic growth and diversification.</p> <p>The LPA builds upon the strategic priorities outlined in the LPS and includes a range of policies that promote economic growth and diversification as part of mixed use or employment allocations, these include Policy EMP1: Employment Areas &amp; Allocation, Policy LC2: Lichfield City Mixed – Use Allocations and Policy B2: Burntwood Mixed – Use Allocations.</p>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<ul style="list-style-type: none"> <li>• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</li> <li>• An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)</li> </ul>	<p>Core Policy 4: Delivering our Infrastructure and Policy IP1: Supporting and Providing our Infrastructure of the adopted LPS seek to ensure all new development provides the necessary infrastructure facilities to create and support sustainable communities. An Infrastructure Delivery Plan has been prepared specifically to address the infrastructure required to deliver the Local Plan.</p> <p>The site allocations listed within the LPA include references to specific elements of infrastructure that will be necessary to bring the site forward for development.</p>
<p><b>2. Ensuring the vitality of town centres (paras 23-37)</b></p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> <li>• The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre</li> </ul>	<p>Core Policy 8: Our Centres of the adopted LPS provides a clear strategic approach to enhancing the vitality and viability of the strategic centre of Lichfield City and Burntwood Town Centre as well as other locations across the District.</p>



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	<p>sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</p>	<p>A number of allocations within the LPA, notably sites listed within Policy LC2: Lichfield City Mixed – Use Allocations and Policy B2: Burntwood Mixed – Use Allocations refer to a mix of uses as it is recognised that town centre locations can offer wider benefits if they provide a diverse mix of uses.</p> <p>Within the LPA document, Policy Lichfield 3: Lichfield Economy encourages a range of town centre uses and promotes primary frontages as the main focus for retail uses with other uses directed towards secondary frontages. Policy Burntwood 3: Burntwood Economy seeks to create a vibrant and diverse town centre through regeneration. These policies are based on updated evidence and supersede Policy Lichfield 3: Lichfield Economy and Policy: Burntwood 3: Burntwood Economy in the Local Plan Strategy</p>
<p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)</p>	<ul style="list-style-type: none"> <li>• An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses.</li> <li>• Primary and secondary shopping frontages identified and allocated.</li> </ul>	<p>The adopted policies map defines the town centre boundaries for Lichfield (Inset Map 1) and Burntwood (Inset Map 3).</p> <p>Lichfield City Centre (Inset Map 2) defines the primary and secondary retail frontages and this is supported by Policy Lichfield 3: Lichfield Economy of the LPA.</p>
<p><b>3. Supporting a prosperous rural economy (para 28)</b></p>		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<ul style="list-style-type: none"> <li>• Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support</li> </ul>	<p>Core Policy 1: The Spatial Strategy of the adopted LPS acknowledges the need for rural growth to be primarily directed towards the Key Rural Settlements in order to retain and enhance local services and facilities. The Key Rural Settlements</p>

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	<p>sustainable rural tourism and leisure developments, and support local services and facilities.</p>	<p>include Fradley, Alrewas, Armitage with Handscare, Fazeley, Shenstone and Whittington, with Fradley being identified as a focus for employment provision.</p> <p>Core Policy 7: Employment &amp; Economic Development of the LPS supports economic development diversification of the rural economy where it does not conflict with other Local Plan Policies. To ensure rural areas flourish adopted Policy Rural 1: Rural Areas supports rural employment and diversification including initiatives which provide support to existing businesses, home workers and the provision faster broadband and the provision of tourism and visitor facilities.</p> <p>The LPA includes further policies to support forms of economic development in rural areas with Policy EMP1: Employment Areas &amp; Allocations identifying Sites F2, OR6 and A6 as areas to accommodate a range of uses.</p>
<p><b>4. Promoting sustainable transport (paras 29-41)</b></p>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p>	<ul style="list-style-type: none"> <li>• Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31.</li> <li>• Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35.</li> </ul>	<p>Transport is co-ordinated by Staffordshire County Council through the Staffordshire Local Transport Strategy which seeks to reduce the reliance on private car and maximise the travel and accessibility through promoting the use of public transport, walking and cycling.</p> <p>One of the key priorities of the LPS, Strategic Priority 5: Sustainable Transport, aims to reduce the need for people to travel by directing most growth towards existing sustainable urban and rural</p>

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<p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be</p>	<ul style="list-style-type: none"> <li>• A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.</li> <li>• Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.</li> <li>• If local (car parking) standards have been prepared, are they justified and necessary? (39)</li> <li>• Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</li> </ul>	<p>settlements and by increasing the opportunities for travel using sustainable forms of transport by securing improvements to public transport, walking and cycling infrastructure. This is supported by Core Policy 5: Sustainable Transport of the adopted LPS which states accessibility will be improved and transport choices widened by ensuring that all new development is well served by an attractive choice of transport modes which provide alternatives to the use of the private car and promote healthier lifestyles.</p> <p>The LPS identifies Strategic Development Areas (SDA) and Broad Locations for Growth which are close to the existing urban areas of Lichfield, Burntwood, Rugeley, Fradley and Tamworth, to reduce reliance on the private car and maximise travel and accessibility through promoting the use of public transport, walking and cycling. The South of Lichfield SDA, East of Lichfield SDA, Fradley SDA, East of Rugeley SDA, Deans Slade SDA and Cricket Lane SDA all comprise of an element of mixed use development including housing, employment, and where necessary community and education facilities, thus reducing the need to travel by providing services and jobs locally or in areas which are accessible by public transport.</p> <p>Policy ST2: Parking Provision of the adopted LPS sets out the overarching strategy for appropriate provision to be made for off street parking in development proposals in line with the parking standards set out in the adopted Sustainable Design SPD. Further the policy requires the</p>

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<p>located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>provision of cycle parking and associated facilities within all new development to promote cycle use.</p> <p>The LPA document includes Policy ST3, ST4 and ST5 which specifically relate to safeguarding routes for development, and road and junction improvements within Lichfield City and Fradley.</p>
<p><b>5. Supporting high quality communications infrastructure (paras 42-46)</b></p>		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> <li>• Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.</li> </ul>	<p>Core Policy 4: Delivering Our Infrastructure of the adopted LPS specifies that new development must be supported by the required infrastructure at the appropriate stage.</p> <p>Policy Rural 1: Rural Areas of the LPS supports the provision of faster broadband and other technologies that help to develop the rural economy.</p> <p>No policy is in place to ensure that new buildings or other structures do not cause interference with broadcast or telecommunications. The NPPF is considered to sufficiently address individual applications where this applies.</p>
<p><b>6. Delivering a wide choice of high quality housing (paras 47-55)</b></p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and</p>	<ul style="list-style-type: none"> <li>• Identification of: <ul style="list-style-type: none"> <li>a) five years or more supply of specific deliverable sites; plus the buffer as appropriate</li> </ul> </li> </ul>	<p>The LPS established the OAN housing requirement for the District, which as set out in Core Policy 1 is: The Spatial Strategy is a minimum of 10,030 dwellings to be delivered across the plan period to 2029.</p>

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competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	<ul style="list-style-type: none"> <li>• Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)</li> <li>• A SHLAA</li> </ul>	<p>Core Policy 6: Housing Delivery of the adopted LPS establishes the housing priorities for the district. Policy H1 aims to deliver a balanced housing market and Policy H2 sets out the need for affordable housing provision within the District.</p> <p>The site allocation policies within the adopted LPS and the LPA refer to approximate and / or minimum numbers to provide flexibility in delivery.</p> <p>The Council has an extensive evidence base and updates the SHLAA annually. Supply and delivery of development is monitored in the Authority Monitoring Report which also details the Council's five year land supply.</p>
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	<ul style="list-style-type: none"> <li>• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</li> </ul>	The LPA identifies sites to meet the required level of deliver over the remaining plan period.
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	<ul style="list-style-type: none"> <li>• A housing trajectory</li> <li>• Monitoring of completions and permissions (47)</li> <li>• Updated and managed SHLAA. (47)</li> </ul>	The Authority Monitoring Report updates the LPS housing trajectory and details the five year land supply, including details on the delivery of strategic sites and monitoring of completions and permissions.
Set out the authority's approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> <li>• Policy on the density of development.</li> </ul>	There is no policy which defines specific density requirements, since the preference is for a flexible approach, however Policy H1: A Balanced Housing Market of the adopted LPS states where appropriate higher density provision will be sought around the most sustainable centres to assist in the provision of smaller units to meet a diverse range of housing needs.

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		The site allocations identified within the LPA list 'key development considerations' which where appropriate include density.
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	<ul style="list-style-type: none"> <li>• Policy on planning for a mix of housing (including self-build, and housing for older people</li> <li>• SHMA</li> <li>• Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50)</li> <li>• Evidence for housing provision based on up to date, objectively assessed needs. (50)</li> <li>• Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)</li> </ul>	<p>The strategy for housing provision and mix is contained within LPS, underpinned by extensive evidence base on housing matters, such as SHMA and SHLAA, providing for the OAN.</p> <p>Policy H1: A Balanced Housing Market of the adopted LPS acknowledges there is currently an imbalance of dwelling types within the District and to address this actively promotes the delivery of smaller properties, particularly 2-3 bedroom houses and 2 bedroom apartments to increase local housing choice and contribute to the development of mixed and sustainable communities. Further, supporting paragraph 8.11 sets out an indicative dwelling mix for new developments based on the SHMA comprising of 5% one bed, 42% two bed, 41% three bed and 12% four bed.</p> <p>Policy H2: Provision of Affordable Homes of the LPS seeks a target of 40% affordable housing provision subject to viability. A flexible approach is taken on thresholds, proportions, tenure, size and type on a site by site basis to reflect housing needs in the locality.</p>
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).	<ul style="list-style-type: none"> <li>• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs.</li> </ul>	<p>The LPS promotes development at sustainable locations. The Spatial Strategy sets out the Settlement Hierarchy which includes Key Rural Settlements and Other Rural Settlements.</p> <p>Policy Rural 1: Rural Areas of the adopted LPS enables flexibility within smaller villages to deliver</p>

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<p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> <li>• Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)</li> <li>• Examples of special circumstances to allow new isolated homes listed at para 55.</li> </ul>	<p>housing to accommodate local needs, namely met within village boundaries, through conversion of existing buildings and to meet local needs on rural exception sites. The policy details that Key Rural Settlements are expected to accommodate approximately 26% of the District’s housing growth across the plan period and Other Rural Settlements are anticipated to deliver approximately 5% of the District’s housing requirement.</p> <p>Policy OR1: ‘Other Rural’ Housing Land Allocations of the LPA allocates sites HR1, HR2, H1,, OR1, OR2, OR3, OR4, OR5 OR7 and OR8 for development.</p> <p>The Council has worked with a significant number of local communities throughout the preparation of Neighbourhood Plans and Little Aston, Shenstone, Stonnall and Wigginton, Hopwas and Comberford, Lichfield City and Whittington, all have made plans which include specific policies and where appropriate housing allocations.</p>
<p><b>7. Requiring good design (paras 56-68)</b></p>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<ul style="list-style-type: none"> <li>• Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues</li> </ul>	<p>Policy BE1: High Quality Development of the adopted LPS ensures all development proposals achieve a high quality sustainable built environment. All development is required to have a positive impact on the public realm and ensure a high quality, inclusive design is achieved by an appreciation of context, plan, scale, proportion and detail.</p>

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		<p>For larger sites, such as Strategic Development Areas, concept diagrams and key design principles are listed within the LPS.</p> <p>For smaller sites allocated within the LPA, 'key development considerations' including design considerations listed for each site.</p>
<p><b>8. Promoting healthy communities (paras 69-77)</b></p>		
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies on inclusive communities.</li> <li>• Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</li> </ul>	<p>Community interaction is promoted throughout the Local Plan. The Strategic Development Areas identified within the LPS will be a mixed use development comprising housing and employment uses as well as education facilities and community facilities where required. Furthermore, the LPA document aims to create communities that work, live and play in the area by allocating sites for mixed use development within Policy LC2: Lichfield City Mixed Use Allocations and Policy B2: Burntwood Mixed Use Allocations.</p> <p>Core Policy 3: Delivering Sustainable Development of the adopted LPS sets out criteria for developments to create and maintain sustainable communities which includes promoting social cohesion and inclusion and reducing inequalities.</p> <p>Core Policy 8: Healthy &amp; Safe Lifestyles of the adopted LPS supports developments which contribute to improved and accessible local health care, physical and mental wellbeing and safety of the community including active design and high quality design which minimise opportunities for crime and antisocial behaviour.</p>



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		<p>Policy BE1: High Quality Development of the adopted LPS requires development to design out crime. There is also a requirement for new developments to have a positive impact on the public realm and ensure high quality, inclusive design.</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies addressing community facilities and local service.</li> <li>• Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</li> </ul>	<p>The Spatial Strategy for the District promotes development in sustainable locations and this is in accordance with Strategic Priority 1: Sustainable Communities which aims to ensure development contributes to the creation of balanced and sustainable communities by being located in appropriate settlements and containing and contributing towards a mix of uses, facilities, and infrastructure appropriate to the location.</p> <p>Core Policy 10: Healthy and Safe Lifestyles of the adopted LPS specifies the Council will enable people to live healthy and safe lifestyles by facilitating access to a range of high quality and well maintained open spaces, playing pitches, sport, recreation, play facilities and cultural assets which meet the needs of local community.</p> <p>Furthermore, Policy HSC1: Open Space Standards and Policy HSC2: Playing Pitch and Sport Facility Standards of the adopted LPS support the retention, protection or enhancement of sport, recreation and open space.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<ul style="list-style-type: none"> <li>• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and</li> </ul>	<p>As outlined above, Policy HSC1: Open Space Standards and Policy HSC2: Playing Pitch and Sport Facility Standards of the adopted LPS support the retention, protection or enhancement of</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>recreational facilities in the local area. (73)</p> <ul style="list-style-type: none"> <li>• A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74)</li> <li>• Protection and enhancement of rights of way and access. (75)</li> </ul>	<p>sport, recreation and open space. These policies are supported by a range of evidence including the Open Space Assessment.</p> <p>Core Policy 10: Healthy and Safe Lifestyles seeks to preserve and improve footpath and cycle connections between urban areas and the countryside. Furthermore, this is strengthened by adopted Policy NR6: Linked Habitat Corridors &amp; Multi-functional Greenspaces which states proposals will be expected to create and link green infrastructure providing new and enhancing existing green and river corridors.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> <li>• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)</li> </ul>	<p>Where a Neighbourhood Plan designates a Local Green Space this is shown on the Policy Map for the relevant settlement.</p>
<p><b>9. Protecting Green Belt land (paras 79-92)</b></p>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p>	<ul style="list-style-type: none"> <li>• Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> <li>○ Enhance the beneficial use of the Green Belt. (81)</li> <li>○ Accord with criteria on boundary setting, and the need for clarity on</li> </ul> </li> </ul>	<p>Core Policy 1: The Spatial Strategy acknowledges the important role of the Green Belt noting that it will be recognised and protected with the majority of development being located within sustainable urban areas.</p> <p>Policy NR2: Development in the Green Belt of the adopted LPS sets out that opportunities to enhance</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)</p>	<p>the status of safeguarded land, in particular. (85)</p> <ul style="list-style-type: none"> <li>○ Specify that inappropriate development should not be approved except in very special circumstances. (87)</li> <li>○ Specify the exceptions to inappropriate development (89-90)</li> <li>○ Identify where very special circumstances might apply to renewable energy development. (91)</li> </ul>	<p>the beneficial use of the Green Belt will be supported. Inappropriate development is, by definition, harmful to the Green Belt and will not be approved except in very special circumstances and this is in line with Government policy set out in the NPPF and the construction of new buildings is regarded as inappropriate unless it is for one of the exceptions listed within the NPPF.</p> <p>A Strategic Green Belt Review (2012) and Supplementary Report (2013), as well as a Supplementary Green Belt Report (2016) form part of the evidence base to the LPA. These documents assess parcels of land to determine the extent to which they meet the purposes of the Green Belt as identified within the NPPF.</p> <p>The Local Plan Allocations document does not allocate any development sites within the Green Belt sites. Policy B1 removes the St Matthews estate from the Green Belt.</p>
<p><b>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</b></p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> <li>● Planning of new development in locations and ways which reduce greenhouse gas emissions.</li> <li>● Support for energy efficiency improvements to existing building.</li> <li>● Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy . (95))</li> </ul>	<p>The Spatial Strategy for the District seeks to locate development in the most sustainable locations that reduces the need for travel, thus reducing greenhouse gas emissions.</p> <p>Core Policy 3: Delivering Sustainable Development of the adopted LPS sets out key criteria for development, which includes minimise and manage water, waste and pollution in a sustainable way, guide development away from areas of flood risk,</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>maximise energy efficiency and utilise sustainable design. Further, this is supported by Policy SC1: Sustainability Standards for Development which ensures all development minimises environmental impacts, including lowering the demand for energy and water, securing efficient use of resources and achieving greater resilience to changes in climate.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> <li>• A strategy and policies to promote and maximise energy from renewable and low carbon sources,</li> <li>• Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</li> <li>• Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)</li> </ul>	<p>Core Policy 3: Delivering Sustainable Development of the adopted LPS seeks to facilitate energy conservation through energy efficiency measures as a priority and the utilisation of renewable energy sources wherever possible, in line with the energy hierarchy. This is supported by Policy SC1: Sustainability Standards for Development and Policy SC2: Renewable Energy.</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<ul style="list-style-type: none"> <li>• Account taken of the impacts of climate change. (99)</li> <li>• Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</li> <li>• Policies to manage risk, from a range of impacts, through suitable adaptation measures</li> </ul>	<p>Core Policy 3: Delivering Sustainable Development and Policy SC1: Sustainability Standards for Development of the adopted LPS seek to achieve sustainable design and reduce carbon emissions.</p> <p>Core Policy 3 requires development to prioritise utilising ground infiltration drainage techniques including SuDs to reduce flood risk and to guide development away from known areas of flood risk as identified within the SFRA and Surface Water Management Plan.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Take account of marine planning (105)	<ul style="list-style-type: none"> <li>• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation</li> <li>• Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development</li> <li>• Integrate as appropriate marine policy objectives into emerging policy</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	Lichfield District Council is an inland authority, therefore there are no marine planning policies.
Manage risk from coastal change (106)	<ul style="list-style-type: none"> <li>• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas.</li> <li>• Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.</li> </ul>	Lichfield District Council is an inland authority, therefore there are no coastal planning policies.
<b>11. Conserving and enhancing the natural environment (paras 109-125)</b>		
Protect valued landscapes (109)	<ul style="list-style-type: none"> <li>• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.</li> <li>• Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the</li> </ul>	Core Policy 13: Our Natural Resources of the LPS sets out the framework for protection of European, national and local sites of natural conservation importance. Of particular relevance is Policy NR7: Cannock Chase Special Area of Conservation which seeks to mitigate against any impact of development on Cannock Chase SAC. Further,

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>landscape and scenic beauty of National Parks, the Broads and AONBs.</p>	<p>Policy NR10: Cannock Chase Outstanding Area of Natural Beauty of the LPA states development on or within adjacent land will be expected to positively contribute to the setting of the AONB and avoid an adverse impact on the landscape and scenic beauty of the area wider views.</p> <p>Policy NR3: Biodiversity, Protected Species &amp; their Habitats states that development will only be permitted where it delivers a net gain for biodiversity and geodiversity within the district and Policy NR5: Natural &amp; Historic Landscape supports development where it does not negatively impact on the geological, archaeological and historically important landscapes in the District.</p>
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<ul style="list-style-type: none"> <li>• Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.</li> </ul>	<p>Core Policy 3: Delivering Sustainable Development of the adopted LPS seeks to minimise levels of pollution or contamination to air, land, soil or water including noise and light pollution.</p> <p>Contamination issues have been considered as part of the site assessments for the allocations in LPA.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)            Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> <li>• Identification and mapping of local ecological networks and geological conservation interests.</li> <li>• Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species</li> </ul>	<p>Policy NR3 Biodiversity, Protected Species &amp; their Habitats of the adopted LPS seeks to minimise the impacts on biodiversity and geodiversity and refers in general terms to delivering a net gain in biodiversity through supporting development that will conserve or enhance biodiversity and geodiversity.</p> <p>Policy NR6: Linked Habitat Corridors &amp; Multi-functional Greenspaces of the adopted LPS seeks to create new habitats and links between habitats</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>to enhance biodiversity and mitigate against climate change by providing opportunities for species to move or migrate.</p> <p>The site allocations identified within the LPA list 'key development considerations' which include references to biodiversity where relevant.</p>
<p><b>12. Conserving and enhancing the historic environment (paras 126-141)</b></p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> <li>• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</li> <li>• A map/register of historic assets</li> <li>• A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</li> </ul>	<p>Core Policy 14: Our Built &amp; Historic Environment of the adopted LPS relates to the built and historic environment. It provides detailed policy to guidance to ensure development protects heritage assets at a national level and local level where appropriate.</p> <p>The LPA includes Policy BE2: Heritage Assets which supports development proposals which conserve and enhance heritage assets and their settings where development will not result in harm to the significance of the heritage asset or its setting.</p>
<p><b>13. Facilitating the sustainable use of minerals (paras 142-149)</b></p>		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of</p>	<p>Staffordshire County Council is the Minerals and Waste planning authority.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.	
<p><b>Justified:</b> <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> <li>• Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area.</li> <li>• The most appropriate strategy when considered against reasonable alternatives.</li> </ul>		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc.</p> <p>Reference SCI</p>	<p>The Local Plan Allocations document has been subject to continuous public and stakeholder consultation throughout the course of its preparation. The details of the consultation are contained within the Consultation Statement and copies of the responses received are available online on the e-consultation portal.</p> <p>Public engagement at both Regulation 18 and Regulation 19 stages has followed the principles set out in the Statement of Community Involvement.</p>
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> <li>• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by.</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>• Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the</li> </ul>	<p>Lichfield District Council has maintained a robust, credible and up to date evidence base to inform the Local Plan Allocations. The evidence base is available to view online:</p> <p><a href="https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Evidence-base/Evidence-Base.aspx">https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Evidence-base/Evidence-Base.aspx</a></p>



Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>strategy, policies and proposals, including key assumptions.</p> <p>OR</p> <ul style="list-style-type: none"> <li>A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).</li> </ul>	<p>The Sustainability Appraisal (SA) forms part of the evidence base and considers how the LPA follows the spatial strategy established in the LPS.</p> <p>For reference, each chapter of the LPA outlines the relevant local evidence used to support the policies.</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> <li>Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</li> <li>An audit trail of how the evidence base, consultation and SA have influenced the plan.</li> </ul>	<p>The LPA progresses the Spatial Strategy established by the LPS and hence has not been produced on the basis of devising a new strategy or considering a full range of fundamental strategic options. However, as part of the site allocations process alternative sites have been considered to implement the strategy. Reasonable alternatives were tested through the Sustainability Appraisal process.</p> <p>The key stages for identifying and assessing different options have been the Local Plan Allocations Open Consultation as part of the Regulation 18 consultation process and both of the Regulation 19 consultations. The Statement of</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>• Sections of the SA Report showing the assessment of options and alternatives.</li> <li>• Reports on how decisions on the inclusion of policy were made.</li> <li>• Sections of the consultation document demonstrating how options were developed and appraised.</li> <li>• Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.</li> </ul>	<p>Consultation detailing the outcome of each of the consultations and the Sustainability Appraisal which identifies specific issues on which strategic decisions were required on alternatives and how the SA / SEA process informed this.</p> <p>A submission selection paper has also been produced to assist in articulating the process of site selection.</p>
<p><b>Effective:</b> <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> <li>• Be deliverable</li> <li>• Demonstrate sound infrastructure delivery planning</li> <li>• Have no regulatory or national planning barriers to its delivery</li> <li>• Have delivery partners who are signed up to it</li> <li>• Be coherent with the strategies of neighbouring authorities</li> <li>• Demonstrate how the Duty to Co-operate has been fulfilled</li> <li>• Be flexible</li> <li>• Be able to be monitored</li> </ul>		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> <li>• Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</li> <li>• Are the policies internally consistent?</li> <li>• Are there realistic timescales related to the objectives?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes</li> </ul>	<p>The vision and strategic priorities for Lichfield District are set out in Section 2 of the LPS. The Council is clear in Section 1 of the LPA that it must be read alongside the LPS to understand and complete the Development Plan policy framework. The Council is satisfied there are no gaps within the policy framework as it is set out.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> <li>Does the DPD explain how its key policy objectives will be achieved?</li> </ul>	<p>of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans).</p> <ul style="list-style-type: none"> <li>Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> <li>Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).</li> </ul>	<p>The LPA has been checked for internal consistency and for consistency with the vision and priorities set out in the LPS. The SA has also considered this.</p> <p>The LPS sets out the delivery framework for the Local Plan in its entirety. Elements of the evidence base provide additional information on anticipated delivery timescales in particular these include the Authority Monitoring Report and Infrastructure Delivery Plan.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> <li>Have the infrastructure implications of the policies clearly been identified?</li> <li>Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</li> <li>Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.</li> <li>A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.</li> <li>Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues.</li> <li>Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</li> </ul>	<p>The LPS and LPA are supported by a comprehensive assessment of infrastructure implications of the proposed level and distribution of development and a robust infrastructure delivery plan informed by consultation with delivery partners and an assessment of anticipated funding sources.</p> <p>With regards to plan- wide viability, Policy H2: Provision of Affordable Homes seeks up to 40% of new dwellings to be provided as affordable housing. However this is subject to viability. Lichfield District Council adopted its CIL in June 2016 and the proposed allocations in the LPA will be liable.</p>
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use</p>	<ul style="list-style-type: none"> <li>Sections of the DPD that reflect the plans or strategies of the local authority and other bodies</li> </ul>	<p>The Local Plan comprising of the LPS and LPA places a strong emphasis on its role as a spatial plan which sits within a wider suite of local strategy</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> <li>• Policies which seek to pull together different policy objectives</li> <li>• Expressions of support/representations from bodies responsible for other strategies affecting the area</li> </ul>	<p>and activity. Section 1 of LPA sets out the relationship of LPA with other plans. LPS and LPA are structured to reflect the Community Strategy.</p> <p>Co-ordination with other authorities and bodies responsible for strategies affecting the area has been undertaken by the Duty to Cooperate. Further information is provided within the Duty to Cooperate Statement.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> <li>• Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</li> <li>• Does the DPD include the remedial actions that will be taken if the policies need adjustment?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.</li> <li>• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> <li>a. the effectiveness of policies and what evidence is being collected to undertake this</li> <li>b. changes affecting the baseline information and any information on trends on which the DPD is based</li> </ul> </li> <li>• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> <li>• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that</li> </ul>	<p>References to housing requirements in the site allocations are expressed as 'approximate' and the policies are not overly prescriptive, with the details to be determined as part of the consideration of planning applications. This promotes flexibility throughout the LPA.</p> <p>The monitoring framework guides the assessment of the effectiveness of policies. Information contained within the AMR will show where policies may need to be reviewed. The housing delivery is of particular interest and the AMR provides detailed monitoring of delivery in relation to the housing trajectory and 5 year land supply.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>would impact on other aspects of the strategy and on infrastructure provision</p> <ul style="list-style-type: none"> <li>Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.</li> </ul>	
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> <li>Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?</li> <li>Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why.</li> <li>The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.</li> </ul>	<p>The Duty to Cooperate Statement provides full information on this.</p> <p>The LPS contains the implementation and monitoring framework for the plan as a whole within Appendix A. This includes details of the bodies who are expected to implement and monitor of each policy.</p> <p>The Infrastructure Delivery Plan accompanying the LPS and LPA sets out how the required infrastructure associated with planned development is to be delivered and the likely funding source.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> <li>Does the DPD contain targets, and milestones which relate to the delivery of the policies,</li> </ul>	<ul style="list-style-type: none"> <li>Sections of the DPD setting out indicators, targets and milestones</li> <li>Sections of the current annual monitoring report which report on</li> </ul>	<p>Appendix A of the adopted LPS details the Monitoring and Implementation and Appendix C of the LPA makes reference to this.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>(including housing trajectories where the DPD contains housing allocations)?</p> <ul style="list-style-type: none"> <li>• Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</li> <li>• Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</li> </ul>	<p>indicators, targets, milestones and trajectories</p> <ul style="list-style-type: none"> <li>• Reference to any other reports or technical documents which contain information on the delivery of policies</li> <li>• Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal</li> </ul>	<p>The Authority Monitoring Report includes specific monitoring indicators for key thematic areas such as housing and employment. It is used to monitor the delivery of the Local Plan and identify progress and provide an early indicator of issues to be addressed.</p> <p>Monitoring of significant effects is undertaken through the AMR process. The SA highlights the significant effects that require monitoring.</p>
<p><b>Consistent with national policy:</b> <i>the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> <li>• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification?</li> <li>• Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons.</li> <li>• Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy.</li> <li>• Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement.</li> <li>• Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement</li> </ul>	<p>The rationale behind the spatial strategy for the District is contained within the LPS, which also contains Core Policies which address the main areas of national policy.</p> <p>The SA has considered the developing policies and site allocations of the LPA against the NPPF.</p> <p>The section on NPPF Principles in this Self-Assessment shows in detail how the policies are relevant to particular parts of national guidance, particularly those concerned with the delivery of the NPPFs 13 strategic principles for delivering sustainable development. It is the intention of the LPA document that there are no proposals or policies which are a duplicate of national policy.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>• Reports or copies of correspondence as to how representations have been considered and dealt with.</li> </ul>	

## Planning policy for traveller sites

Policy Expectations	Possible Evidence	Evidence Provided
<p><b>Policy A: Using evidence to plan positively and manage development (para 6)</b></p>		
<p>Early and effective community engagement with both settled and traveller communities.</p>	<ul style="list-style-type: none"> <li>• Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.</li> </ul>	<p>The local authorities across Southern Staffordshire and Northern Warwickshire conducted a Gypsy and Traveller Accommodation Needs Assessment (GTAA) in association with Salford Housing and Urban Studies Unit and the Centre for Urban and Regional Studies and supported by members of the local Gypsy and Traveller communities to establish the pitch requirements for Lichfield District Council and adjacent authorities.</p> <p>The LPA Open Consultation at Regulation 18 stage invited comments on the provision of Gypsy, Traveller and Travelling Showpeople.</p>
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<ul style="list-style-type: none"> <li>• Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan.</li> <li>• Collaborative working with neighbouring local planning authorities.</li> <li>• A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.</li> </ul>	<p>The evidence gathering and plan making process has involved specific engagement with the Gypsy and Traveller community. This has been supporting by the Gypsy and Traveller Sites Methodology Paper.</p> <p>Preparation of the GTAA has involved collaborative and co-operative working between Local Authorities.</p>



Policy Expectations	Possible Evidence	Evidence Provided
<b>Policy B: Planning for traveller sites (paras 7-11)</b>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> <li>• Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15.</li> <li>• An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified.</li> <li>• Policy which takes into account criteria a-h of para 11</li> </ul>	<p>The GTAA identifies a need for 14 residential pitches and 5 transit pitches within Lichfield District to 2026.</p> <p>Policy H3: Gypsies, Travellers &amp; Travelling Showpeople of the adopted LPS sets out criteria to guide land supply allocations and determining planning applications. The policy makes specific reference to ensuring new sites have regard to the design guidelines detailed in National Guidance.</p> <p>Policy GT1: Gypsy &amp; Traveller Sites Allocations of the LPA allocated Site GT1 for Gypsy &amp; Traveller pitch provision and lists a number of key development considerations to guide a planning application.</p>
<b>Policy C: Sites in rural areas and the countryside (para 12)</b>		
<p>When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.</p>		<p>Policy H3: Gypsies, Travellers &amp; Travelling Showpeople of the adopted LPS is a criteria based policy which includes design criteria to ensure that Gypsy and Traveller pitches do not dominate the nearest settled community, with the criteria ensuring that sites are landscaped and screened to maintain visual amenity within the landscape / townscape and sites protect the</p>

Policy Expectations	Possible Evidence	Evidence Provided
		local amenity and environment and will have no significant detrimental impact to adjoining properties or neighbouring land.
<b>Policy D: Rural exception sites (para 13)</b>		
<p>If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.</p>	<ul style="list-style-type: none"> <li>If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.</li> </ul>	<p>The Gypsy and Traveller Sites Methodology Paper details the process to identify potential sites within the District suitable for allocation. Three potential GT sites are identified as policy compliant, however, due to a lack of landowner willingness, it concludes that only one site is suitable for allocation. Whilst this does not meet the pitch requirement for the Plan period, following a proactive approach there are no other identified options in terms of potential Gypsy and Traveller allocation sites at present.</p> <p>Lichfield District Council wrote to neighbouring Authorities to seek support in meeting its needs. However no authority was in a position to assist.</p>
<b>Policy E: Traveller sites in Green Belt (paras 14-15)</b>		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to</p>	<ul style="list-style-type: none"> <li>Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.</li> </ul>	<p>There is no provision being made for Green Belt amendments in the LPA for Gypsy and Traveller sites.</p>

Policy Expectations	Possible Evidence	Evidence Provided
accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.		
<b>Policy F: Mixed planning use traveller sites (paras 16-18)</b>		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	<ul style="list-style-type: none"> <li>• Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another.</li> <li>• N.B. Mixed use should not be permitted on rural exception sites</li> </ul>	The Gypsy and Traveller Methodology Paper outlines the process to identify potential sites within the District suitable for allocation. No sites were submitted during the Call for Sites and the Council took a proactive approach to locating suitable sites. There are no Gypsy and Traveller sites proposed on the mixed use SDAs as identified in the adopted LPS.
<b>Policy G: Major development projects (para 19)</b>		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	<ul style="list-style-type: none"> <li>• Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.</li> </ul>	This is not applicable for the LPA.

## Integration of marine and terrestrial planning

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

Policy Expectations	Possible Evidence	Evidence Provided
<b>Marine Policy Statement- Chapter 2: General Principles for Decision-Making<sup>1</sup></b>		
<b>Sections 2.1 -2.2: The UK vision for the marine environment</b>		
<p>The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')</p> <p>Achieving the vision through marine planning</p>	<ul style="list-style-type: none"> <li>• Reference in DPD where appropriate to UK vision for the marine environment</li> <li>• Contribution to the vision through local plan policies and supporting text</li> </ul>	<p>Lichfield District is an inland authority; therefore there are no maritime considerations.</p>
<b>Section 2.4: Considering benefits and adverse effects in marine planning</b>		
<p>Consider benefits and adverse effects of plan policies</p>	<ul style="list-style-type: none"> <li>• Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal</li> </ul>	<p>Lichfield District is an inland authority; therefore there are no maritime considerations.</p>
<b>Section 2.5: Economic, social and environmental considerations</b>		

<sup>1</sup> As the Marine Policy Statement was not targeted specifically at terrestrial planning authorities, some of its sections are, in practice, relevant to marine planning authorities only and/or there is already a comprehensive policy framework governing terrestrial development (e.g. energy infrastructure), Where this is considered to be the case, i.e. where it is considered likely that a terrestrial planning DPD would be found sound without referencing that section, the section in question has been omitted from this checklist.

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

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