

# Bromsgrove

## District Plan

### Soundness Self- Assessment Checklist

**MARCH 2014**

● Planning and Regeneration  
**Strategic Planning**



**Bromsgrove**  
District Council  
[www.bromsgrove.gov.uk](http://www.bromsgrove.gov.uk)



## Soundness Self-Assessment Checklist (January 2013)

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

**In summary – the key requirements of plan preparation are:**

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

### **The Tests of Soundness at Examination**

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

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

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

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF has 12 principles through which it expects sustainable development can be achieved.

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

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

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

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

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

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

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

### **4. Consistent with national policy: enabling the delivery of sustainable development**

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy [www.planningportal](http://www.planningportal.gov.uk)). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

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

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

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

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<b>Soundness Test and Key Requirements</b>	<b>Possible Evidence</b>	<b>Evidence Provided</b>
<p><i>Vision and Objectives</i></p> <p>1. Has the LPA clearly identified what the issues are that the DPD is seeking to address?</p> <p>2. Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>3. Does the DPD contain clear vision(s) and objectives which are specific to the place?</p> <p>4. Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>5. Is it clear how the policies will meet the objectives?</p> <p>6. Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>7. Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>8. Are the policies internally consistent?</p> <p>9. Are there realistic timescales related to the objectives?</p> <p>10. 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>Bromsgrove District Plan</p> <ul style="list-style-type: none"> <li>• District profile (Chapter 2)</li> <li>• Challenges (Chapter 3)</li> <li>• Vision (Chapter 4)</li> <li>• Strategic Objectives (Chapter 5)</li> </ul> <p>Five key themes emerged from the strategic objectives and these have been used as a basis to structure the policies (Chapter 6).</p> <p>The “At a glance Policy Context” (appendix I) provides a summary for each policy and linkages to the objectives and also the wider evidence base.</p> <p>Sustainability Appraisal</p> <p>Infrastructure Delivery Plan</p> <p>BDP6 Infrastructure Contributions</p> <p>Timescales provided by IDP, 5 year land supply and Green Belt Review</p> <p>Issues and Options consultations in</p>

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		<p>2005 and 2007 explored alternatives.</p> <p>The Local Development Scheme outlines the timetable for the Bromsgrove District Plan (BDP) and its accompanying Policies Map DPD</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/LDS%2008-08-13.pdf">http://www.bromsgrove.gov.uk/cms/pdf/LDS%2008-08-13.pdf</a></p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <p>—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<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> <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> </ul>	<p>BDP3 Future Housing and Employment Development</p> <p>Evidence to identify the objectively assessed need were initially provided with in the Worcestershire Strategic Housing Market Assessment, 2012</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/worcestershire-shma.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/worcestershire-shma.aspx</a></p> <p>Further Evidence has since been gathered in the document entitled ‘North Worcestershire Demographic Forecasts’. This has ensured that the housing evidence is up to date and robust.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-</a></p>

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		<p><a href="http://www.bromsgrove.gov.uk/planning/evidence-base.asp">planning/evidence-base.asp</a></p> <p>Future employment land needs are identified in the Employment Land Review, 2012</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/employment-land-review.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/employment-land-review.aspx</a></p> <p>The Settlement Hierarchy sets out the hierarchy of the District based on each settlements sustainability credentials and forms the basis on which to assess future development potential.</p> <p>Settlement Hierarchy Background Paper, September 2012</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/CD%200049%20Settlement%20Hierarchy%20Background%20Paper.pdf">http://www.bromsgrove.gov.uk/cms/pdf/CD%200049%20Settlement%20Hierarchy%20Background%20Paper.pdf</a></p> <p>The Bromsgrove District Area Assessments Study looks in detail at each large settlement and identifies potential development sites around them. It then examines constraints, visual criteria and the relative potential of each site for future development.</p>

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		<a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/area-assessment-study.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/area-assessment-study.aspx</a>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> <li>• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see <a href="http://www.planningportal.gov.uk/model-policy">model policy at www.planningportal</a>).</li> </ul>	<p>BDP 1 Sustainable Development principles incorporates the model policy as set out in the NPPF.</p> <p>The principle of sustainable development runs as a golden thread throughout the Plan and is intrinsic in many policies.</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> <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>Evidence to identify the objectively assessed need were initially provided with in the Worcestershire Strategic Housing Market Assessment, 2012</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/Main%20SHMA%20Report%20February%202012.pdf">http://www.bromsgrove.gov.uk/cms/pdf/Main%20SHMA%20Report%20February%202012.pdf</a></p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/Appendix%20-%20Bromsgrove%20Overview%20Report.pdf">http://www.bromsgrove.gov.uk/cms/pdf/Appendix%20-%20Bromsgrove%20Overview%20Report.pdf</a></p>

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		<p>Further Evidence has since been gathered in the document entitled 'North Worcestershire Demographic Forecasts'. This has ensured that the housing evidence is up to date and robust.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base.asp">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base.asp</a></p> <p>BDP3 sets out the housing requirement of 7,000 which represents the full objectively assessed housing need.</p> <p>The Council has addressed strategic cross-boundary issues. The Council has pro-actively engaged with Redditch Borough Council to address the issue of insufficient housing land availability within Redditch. This has resulted in the allocation for land for 3,400 homes on the edge of Redditch in policy RCBD1 within the BDP.</p> <p>The Council is also working with the authorities within the Greater Birmingham and Solihull LEP to address the potential housing shortfall within the West Midlands conurbation. The need to potentially identify land for the growth needs of</p>



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		<p>the conurbation in the future is set out within BDP4.</p> <p>Duty to co-operate Statement of Compliance sets out further detail on these matters.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/PDF/BDC%20DTC%20Statement.pdf">http://www.bromsgrove.gov.uk/cms/PDF/BDC%20DTC%20Statement.pdf</a></p> <p>Employment Land Review, 2012</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/employment-land-review.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/employment-land-review.aspx</a></p> <p>Bromsgrove Retail Study 2013</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/bromsgrove-town-retail-study.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/bromsgrove-town-retail-study.aspx</a></p>
<b>NPPF Principles: Delivering sustainable development</b>		
<b>1. Building a strong, competitive economy (paras 18-22)</b>		
Set out a clear economic vision and	<ul style="list-style-type: none"> <li>• Articulation of a clear economic vision and strategy for</li> </ul>	The Bromsgrove Vision for the District

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strategy for the area which positively and proactively encourages sustainable economic growth (21),	the plan area linked to the Economic Strategy and LEP Strategy where appropriate.	<p>is: “We will make Bromsgrove District the place to live, do business and to visit”.</p> <p>Bromsgrove is a member of two LEPs, namely the Greater Birmingham and Solihull LEP (GBSLEP) and the Worcestershire LEP (WLEP). The GBSLEP is a partnership of businesses, local authorities and universities which supports private sector growth and job creation. The role of the GBSLEP is to create and support a globally competitive knowledge economy, ensuring the LEP area is recognised as the natural home for Europe’s entrepreneurs and wealth creators.</p> <p>The WLEP’s vision is “to create the right economic environment to inspire businesses, encourage investment and to create lasting and sustainable employment in Worcestershire by 2017 and beyond.”</p> <p>The vision of the BDP is outlined on page 12, which also details the economic vision of the Plan. Regarding the economy “Bromsgrove will maintain low levels of unemployment by providing a range of jobs in various sectors, with growth primarily focussed on knowledge based industries and manufacturing situated</p>

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		<p>at the Bromsgrove Technology Park and at Longbridge. Existing employment will have been supported, whilst opportunities for entrepreneurship, diversification and innovation will have been encouraged. Diversification of sustainable rural enterprises will also have been encouraged, helping to improve prosperity in both Bromsgrove Town Centre and the rural areas". The vision goes further to state that "a regenerated Town Centre will be the key centre for services in the District".</p> <p>Sustainable Economic Growth is addressed in various parts of the BDP. BDP1 establishes sustainable development principles. BDP13, BDP14, BDP15 are all related to the sustainable growth of employment and job opportunities.</p>
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> <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>The Infrastructure Delivery Plan (IDP) is a key component of the evidence base to support the Bromsgrove District Plan. The IDP provides a baseline of the existing infrastructure capacity and needs in the District and highlights the infrastructure requirements to support the predicted growth set out in the Bromsgrove District Plan. The IDP provides a snapshot at the time of submission of the Bromsgrove District Plan. Over the</p>

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		<p>plan period, new funding opportunities will arise and, equally, infrastructure priorities may change. This version of the IDP has been published to support the submission of the Bromsgrove District Plan. It will then be reviewed on an annual basis subsequent to Adoption.</p> <p>BDP 19 High Quality Design aims to deliver high quality people focused places and BDP 17 Town Centre Regeneration looks to revitalise Bromsgrove Town Centre, which can encourage development.</p> <p>BDP 13 and BDP 14 are related to employment and promoting economic growth, which creates investment. BDP14 in particular avoids the long term protection of employment land where there is no reasonable prospect of the site coming forward. The Employment Land Review 2012 assesses the existing employment land situation, establishes future requirements and identifies a new portfolio of sites. Annual monitoring in the form of the Employment Land Availability Report will ensure that employment permissions are being allocated and identify if a shortfall exists.</p> <p>BDP6 identifies that development and</p>

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		infrastructure provision will be coordinated to ensure that growth in the District is supported by the provision of infrastructure, services and facilities needed to maintain and improve quality of life and respond to the needs of the economy.
<b>2. Ensuring the vitality of town centres (paras 23-37)</b>		
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)	<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 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.</li> </ul>	<p>BDP 2 Settlement Hierarchy</p> <p>BDP 17 Town Centre Regeneration</p> <p>Town Centre Health Checks (annual monitoring)</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/town-centre-health-check.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/town-centre-health-check.aspx</a></p> <p>Bromsgrove Retail Studies</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/bromsgrove-town-retail-study.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/bromsgrove-town-retail-study.aspx</a></p> <p>Town Centre Conservation Area Appraisal</p>

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		<p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/conservation.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/conservation.aspx</a></p> <p>Draft Town Centre Area Action Plan, January 2011</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/Town%20Centre%20AAP%20low%20resolution%2031-01-11.pdf">http://www.bromsgrove.gov.uk/cms/pdf/Town%20Centre%20AAP%20low%20resolution%2031-01-11.pdf</a></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>BDP 17 Town Centre Regeneration identifies 10 sites which are suitable for a range of town centre uses as set out within the plan. The sites were originally identified in the Draft Town Centre Area Action Plan, January 2011.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/Town%20Centre%20AAP%20low%20resolution%2031-01-11.pdf">http://www.bromsgrove.gov.uk/cms/pdf/Town%20Centre%20AAP%20low%20resolution%2031-01-11.pdf</a></p> <p>Bromsgrove Retail Study 2013</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/bromsgrove-town-retail-study.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/bromsgrove-town-retail-study.aspx</a></p>

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		<p>Employment Land Review 2012</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/Bromsgrove%20District%20Employment%20Land%20Review%202012%20-%20Final%20Report.pdf">http://www.bromsgrove.gov.uk/cms/pdf/Bromsgrove%20District%20Employment%20Land%20Review%202012%20-%20Final%20Report.pdf</a></p> <p>Policies Map</p>
<b>3. Supporting a prosperous rural economy (para 28)</b>		
<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 sustainable rural tourism and leisure developments, and support local services and facilities.</li> </ul>	<p>BDP15 Rural Renaissance indicates that the Council will support proposals that satisfy the social and economic needs of rural communities. The policy encourages development that contributes to diverse and sustainable rural enterprises within the District, rural diversification schemes, as well as the provision of live-work units and the principle of home working. The policy goes further to allow appropriate development of infill sites and previously developed land within existing settlements that enhance the vitality of rural communities. It also encourages sport, recreation and/or tourism related initiatives appropriate to a countryside location; small scale renewable energy projects and business to serve the industry; and</p>

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		improvement of public transport links to service centres and employment areas, as well as development that reduce the need to commute.
<b>4. Promoting sustainable transport (paras 29-41)</b>		
<p>1. Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>2. Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>3. 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>4. 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>5. 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</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> <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>BDP 16 Sustainable Transport</p> <p>BDP 25 Health and Well Being recognises the importance of encouraging healthy lifestyles. Halcrow/WCC modelling work done partly jointly with Redditch on cross boundary work.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base.aspx</a></p> <p>Approach verified by Highways Agency in letter 1.7.2013</p> <p>Worcestershire LTP 3 which includes:</p> <ul style="list-style-type: none"> <li>• Multi Modal Freight Policy</li> <li>• Smarter Choices Policy.</li> <li>• Traffic Management and Parking Policy</li> </ul>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>infrastructure. (32)</p> <p>6.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>7.Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>8.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>9.For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>10.The setting of car parking standards including provision for town centres. (39-40)</p> <p>11.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>		<ul style="list-style-type: none"> <li>LTP3 car parking standards (Appendix A) linked to Single Sustainable Community Strategy for Worcestershire</li> </ul> <p><a href="http://www.worcestershire.gov.uk/cms/local-transport-plan/the-local-transport-plan.aspx">http://www.worcestershire.gov.uk/cms/local-transport-plan/the-local-transport-plan.aspx</a></p> <p><a href="http://www.worcestershire.gov.uk/cms/pdf/LTP3_HIGHWAYS%20DESIGN%20GUIDE.pdf">http://www.worcestershire.gov.uk/cms/pdf/LTP3_HIGHWAYS%20DESIGN%20GUIDE.pdf</a></p> <p>BDP 17 Town Centre Regeneration states provide an integrated and regular bus service which will connect new and existing residential areas to the railway station, with the Town Centre acting as the focal hub.</p> <p>BDP 16 Sustainable Transport Policy states: A "clover leaf" Silver Standard bus route is included in the draft Infrastructure Delivery Plan and this route will connect Bromsgrove"s Town Expansion Sites and existing residential areas to Bromsgrove railway station, with the Town Centre as the focal hub.</p> <p>BDP5A Town Expansion Sites</p> <p>RCBD1 Redditch Cross Boundary</p>

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Development</p> <p>2.1.2 Traffic and Parking Management policy LTP3 is biased towards short stay to encourage high turnover and optimum footfall. Long stay in peripheral locations.</p> <p>Encourages car parking at rail stations BDP16.5</p> <p>Transport improvements identified within the Infrastructure Delivery Plan.</p>
<b>5. Supporting high quality communications infrastructure (paras 42-46)</b>		
<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>BDP1 Sustainable Development principles provision of communication infrastructure to allow for future technology enhancements ie fibre optic ducting</p> <p>The BDP does not repeat National Policy and does not impose a ban.</p>
<b>6. Delivering a wide choice of high quality housing (paras 47-55)</b>		

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> <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> <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>The Council's 5 Year Land Supply Document (April 2013) is available via the following link:</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/shlaa/five-year-land-supply.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/shlaa/five-year-land-supply.aspx</a></p> <p>This document sets out that council has a 5.83 years supply of housing, when including a 5% buffer. The document highlights that there is not a record of persistent under-delivery and therefore a 20% buffer is not appropriate.</p> <p>The document sets out the delivering of housing will come from the following sources over the next 5 years:</p> <ul style="list-style-type: none"> <li>• Commitments</li> <li>• SHLAA sites; and</li> <li>• A windfall allowance</li> </ul> <p>The document includes a full justification for a windfall allowance of 30 per year by assessing the number of windfalls that have been built over</p>

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>the past 11 years.</p> <p>The sites included from the SHLAA (July 2013) are considered to be suitable, available and deliverable as set out within the SHLAA which can be viewed via the following link:</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/shlaa.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/shlaa.aspx</a></p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<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>	<p>The Bromsgrove SHLAA is an entirely site specific document and does not rely on broad locations. Table 8 on page 17 of the SHLAA identifies the following:</p> <ul style="list-style-type: none"> <li>• Years 6-10 -1470 dwellings</li> <li>• Years 11-17 – 384 dwellings</li> </ul> <p>The SHLAA emphasises that there is a clear shortfall against identified targets after year 10 (approximately 2023) therefore a Green Belt Review is proposed to identify land for the period 2023-2030. Currently the SHLAA identifies a total capacity of 4,624 meaning there is a shortfall of 2,376 houses if the target of 7,000 by</p>

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>2030 is to be achieved.</p> <p>The Green Belt potential category within the SHLAA (table 6, p.14) highlights that there are 71 sites with a capacity of 6616 dwellings that have been submitted to the SHLAA that have been discounted solely on the grounds of being in the Green Belt. This means that there is more than enough land available for development in the long term when the Green Belt Review is undertaken following Plan adoption.</p>
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)</p>	<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>	<p>A housing trajectory is included in the SHLAA (figure 6, p.18) and this is replicated in the BDP. Appendix K of the SHLAA sets out in a table the expected delivery on a site by site basis throughout the plan period.</p> <p>Many of the sites required to ensure delivery over the next 10 years are already under construction, have planning permission or are in formal pre-application discussions. It is acknowledged that there is a significant shortfall for the period 2023-2030 therefore BDP4 Green Belts sets out a framework for a Green Belt review which will identify land for this period.</p>

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
		<p>To ensure that delivery is happening at the rate expected the Council will continue to monitor completions and commitments on an annual basis within the Housing Land Availability Report. This can be found via the following link:</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/authority-monitoring-report/housing-land-availability.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/authority-monitoring-report/housing-land-availability.aspx</a></p> <p>This information is then included within the Annual Monitoring Report (AMR) where performance can be checked against indicators. The rate of supply in the short term will then influence the quantum of land that needs to be identified through the Green Belt Review. The AMR can be found via the following link:</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/authority-monitoring-report.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/authority-monitoring-report.aspx</a></p>
Set out the authority's approach to housing density to reflect local	<ul style="list-style-type: none"> <li>• Policy on the density of development.</li> </ul>	Housing density is addressed within BDP 7 Housing Mix and Density. The

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
circumstances (47).		Council is taking a design-led approach and is not imposing density targets. It is considered that this offers greater flexibility and should result in a higher quality design outcome.
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 SHMA is a key piece of evidence behind the BDP. The Full Report and the separate Bromsgrove Overview Report can be accessed via the following links:</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/Main%20SHMA%20Report%20February%202012.pdf">http://www.bromsgrove.gov.uk/cms/pdf/Main%20SHMA%20Report%20February%202012.pdf</a></p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/Appendix%20%20%20Bromsgrove%20Overview%20Report.pdf">http://www.bromsgrove.gov.uk/cms/pdf/Appendix%20%20%20Bromsgrove%20Overview%20Report.pdf</a></p> <p>The SHMA was completed in February 2012 and identifies 5 different growth scenarios which are underpinned by the ONS 2008-based sub-national population projections (SNPP) and a sensitivity scenario is also tested. The most relevant scenario is migration-led (core scenario 3) which results in a requirement of 6,980. The SHMA has a base date of 2006 and covers the period to 2030 and a 3% vacancy rate has been included. To ensure that emerging plans have forward looking</p>

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
		<p>plan periods completions for the period 2006-11 have been taken away from the forecast household change for the period 2006-2030 leaving a net requirement for the period 2011-2030. This ensures that that the full housing requirement from 2006 onwards is being met and there is no past under supply being ignored. It was considered logical to round these numbers up to 7,000 to provide a robust figure of 7,000 that meets the full objectively assessed needs of the district. This target is identified in BDP3 Future Housing and Employment Development.</p> <p>To further test the robustness of the 7,000 figure further work has been undertaken. The North Worcestershire Demographic Forecasts Report (March 2014) tests a range of demographic and employment constrained scenarios using up to date household projections and recommended methods for determining headship rates. Based on the demographic scenarios run, that in one case takes into account increased levels of migration from the conurbation it is considered that the figure of 7,000 over the period 2011-2030 meets the full objectively assessed housing</p>



## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
		<p>needs of the housing market.</p> <p>The SHMA highlights that average household sizes are falling in the district meaning that there is an increased need and demand for smaller properties. BDP7 Housing Mix and Density identifies that a high proportion of 2 and 3 bedroom properties are required.</p> <p>The SHMA also acknowledges that Bromsgrove District has an ageing population and pressure for specialist accommodation will grow throughout the plan period. The Council has therefore included a policy to specifically address this issue: BDP10 Homes for the Elderly</p> <p>The SHMA identifies an annual need for 219 affordable homes over each of the next 5 years.</p> <p>In an attempt to maximise the delivery without compromising viability an Affordable Housing Viability Assessment was completed:</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/affordable-housing-viability.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/affordable-housing-viability.aspx</a></p>

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
		<p>On the basis of this evidence BDP8 Affordable Housing proposes up to 40% affordable housing on all greenfield sites and brownfield sites over 200 dwellings and up to 30% affordable housing on all brownfield sites below 200 dwellings. In all cases a threshold of 10 dwellings is imposed. In all cases affordable housing is expected on site rather than via a financial contribution.</p> <p>Further affordable housing can be delivered through BDP9 Rural Exception Sites where a need has been identified.</p> <p>Self-build is not specifically highlighted as there is nothing to add locally to national Policy.</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<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> <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>The Council addresses this issue through BDP 9 Rural Exception Sites. This ensures that any rural exception housing should only be in sustainable locations within or on the edge of settlements. Isolated developments in open countryside are not permitted. The policy allows the inclusion of some market housing to help maintain viability where necessary.</p> <p>BDP 19 High Quality design sets out</p>

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
		<p>criteria for the development of garden land. This ensures that development is only approved where it can fully integrate into the residential area and is in keeping with the character and quality of the local environment. (garden grabbing issue)</p> <p>There is no evidence locally to justify a policy on isolated new homes in countryside; particularly as all such areas within the District are Green Belt. It would be for any applicant to justify very special circumstances to support their case.</p>
<b>7. Requiring good design (paras 56-68)</b>		BDP 19 High Quality Design incorporating standards
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	<ul style="list-style-type: none"> <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>The quality of development is addressed by BDP19 High Quality Design, page90. Design issues such as local distinctiveness, sustainable design and construction, functional residential space, development in residential gardens, design and criminal behaviour and pollution are covered by the policy.</p> <p>BDP24 Green Infrastructure, page112 expects development to adopt a holistic approach to deliver the multiple benefits and vital services of Green Infrastructure in development.</p>

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>BDP10 Homes for the Elderly, page55 encourages developers to build new homes to the Lifetime Homes standards.</p> <p>BDP5A Bromsgrove Town Expansion Sites requires development to be of a high quality, locally distinctive, create a coherent sense of place and achieve the Lifetime Home Standards.</p> <p>RCDB1 Redditch Cross Boundary Development expects development to be designed sensitively, to integrate with the surrounding existing environment, landscape, and be locally distinctive.</p>
<b>8. Promoting healthy communities (paras 69-77)</b>		
<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>In line with the NPPF and the social role to sustainable development, BDP12 ensures provision is made for services and facilities to meet the needs of local communities and aims to retain existing facilities and services. These facilities and services are vital for local people and offers locations for community interaction to take place. BDP18 continues in the same manner by protecting uses in local centres and ensuring the retail elements of such centres are maintained for the existing</p>

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
		<p>communities.</p> <p>The Council will deliver high quality people focused space through BDP19. This policy supports all major developments that help facilitate interactions between future occupants and requires residential developments to provide sufficient functional space for everyday activities. It will also ensure developments are accessible to all users and ensure permeable, safe and easy to navigate streets layout. The policy also looks to provide safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion by ensuring developments meet 'Secured by Design' standard.</p> <p>BDP18 identifies a number of opportunities for mixed-use development and the Strategic Site at Perryfields (BROM2) as part of BDP5A looks to create employment as well as residential opportunities. This has the potential to bring together those who work and live in the vicinity.</p> <p>The Cross Boundary Development Policy (RCBD1) promotes a range of uses including schools and local centres which will deliver sustainable</p>

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
		<p>mixed use development that encourage community interaction.</p> <p>BDP25 identifies standards for access to a number of public open spaces for amenity and recreation purposes. By adhering to these policy standards, future developments will have accessible locations for residents to play and meet other members of the public.</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>BDP12 ensures provision is made for services and facilities to meet the needs of local communities and aims to retain existing facilities and services. These facilities and services are vital for local people and offers locations for community interaction to take place. New communities that individually or cumulatively add to requirements for services will be expected to contribute to the provision of necessary improvements. BDP18 continues in the same manner by protecting uses in local centres and ensuring the retail elements of such centres are maintained for the existing communities.</p> <p>BDP2 advocates that proposals for new development should be located in accordance with the District's settlement hierarchy. This will ensure development contributes to the</p>

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		regeneration priorities for the area and promotes sustainable communities based on the services and facilities that are available in each settlement and will assist villages to remain viable and provide for the needs of the catchment population that they serve.
<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 recreational facilities in the local area. (73)</li> <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>The 2007 Open Space, Sport and Recreation Local Needs Assessment and Playing Pitch Strategy audits existing open space, sport and recreation facilities across Bromsgrove. It identifies local needs and aspirations through consultation, a strategic review and a review of existing provision standards, as well as recommends standards of provision. The document provides evidence to inform the future enhancement and management of open space, sport and recreation facilities.</p> <p>BDP25 regarding health and wellbeing uses information within the Local Needs Assessment to set accessibility standards for the open space, sport and recreation facilities in the District. The policy not only supports proposals and activities that protect, retain and enhance existing sport, recreational and amenity assets; but also supports those that lead to the provision of additional assets or improve access to</p>

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>facilities. BDP25 will not permit the loss of such facilities unless robust evidence can be provided to demonstrate the appropriate loss. In such circumstances, the Council will require appropriate compensatory measures for the loss in the form of equivalent or improved facilities and/or financial contributions.</p> <p>Worcestershire County Council's Local Transport Plan 3 has been expanded to include the development and maintenance of Worcestershire's Public Rights of Way. The Worcestershire Public Rights of Way Improvement Plan now forms part of the LTP3 and assesses the extent to which the local rights of way meet the present and likely future needs of the public.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/ppg17-study.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base/ppg17-study.aspx</a></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</li> </ul>	<p>There are numerous references throughout the BDP in relation to enabling local communities through neighbourhood plans. The</p>



## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)</p>	<p>Bromsgrove Priorities section of the Single Sustainable Community Strategy for Worcestershire 2011-2021 acts as a starting point for the development of Neighbourhood Development Plans by local communities and for decisions on all new development proposals. The BDP vision clear states that “The local people of Bromsgrove will be more actively involved in decision making for their communities and neighbourhood plans will have an increased role to play in planning the future of these communities”.</p> <p>The BDP does not repeat National Guidance and legislation in this respect</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> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set</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 the status of safeguarded land, in particular. (85)</li> <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> </ul> </li> </ul>	<p>BDP4 Green Belt specifies what could be considered as appropriate developments in the Green Belt. The policy also explains that the Green Belt boundary in the Policies Map will be revised and outlines the Green Belt Review Framework that would be used for carrying out Green Belt review after the adoption of the Bromsgrove District Plan to meet the needs of the District and the</p>

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	<i>Possible Evidence</i>	<i>Evidence Provided</i>
<p>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>	<ul style="list-style-type: none"> <li>○ Identify where very special circumstances might apply to renewable energy development. (91)</li> </ul>	<p>Conurbation.</p> <p>Prior to the full Green Belt Review the Bromsgrove District Plan proposes two Green Belt boundary changes to meet Redditch’s housing needs. Justifications for the proposed change and how the boundaries are chosen are included in the Housing Growth Development Study 2013.</p> <p><a href="http://www.redditchbc.gov.uk/KeyDocuments/PDF/HG%20development%20study%20latest%20low%20res%2031-03-13%20(2).pdf">http://www.redditchbc.gov.uk/KeyDocuments/PDF/HG%20development%20study%20latest%20low%20res%2031-03-13%20(2).pdf</a></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>BDP 22 Climate Change, page 104 addresses the climate change mitigation and adaptation issues.</p> <p>BDP 23 Water Management addresses the increasing risk of flooding and potential water shortfall as a result of climate change. The Level 1 and Level 2 Strategic Flood Risk Assessments have modelled the risk of flooding with the impact of climate change. The Outline Water Cycle Study explains that the baseline balance of</p>

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>supply calculated by Severn Trent has also taken climate change into account.</p> <p>BDP 21 Natural Environment requires development to address fragmentation and restore the ecological network so that wildlife is also more resilient to climate change.</p> <p>BDP 24 Green Infrastructure expects development to adopt a holistic approach to deliver the multiple benefits and vital services of Green Infrastructure in development, including the mitigation and adaptation to climate change.</p> <p>BDP5A Bromsgrove Town Expansion Sites and RCBD1 Redditch Cross Boundary Development both require development to address the risk of flooding. BDP5A also expects development to incorporate zero or low carbon energy generation technologies.</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</li> </ul>	<p>BDP 22 Climate Change, page 104 expects development to meet the Code for Sustainable Homes and BREEAM standards. Both standards expect the development to meet a certain level of energy efficiency, which may include using renewable/</p>

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
	<p>supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)</p>	<p>low carbon energy. The policy also refers to several evidence that identifies key energy sources:</p> <p>The resource assessment in the Renewable Energy Capacity Study for the West Midlands (2011) reveals considerable potential for renewable energy generation from wind and micro-generation in Bromsgrove</p> <p>The Worcestershire County Council Renewable Energy Study and the Planning for Renewable Energy in Worcestershire report have identified areas where renewable resources are available/ technically feasible.</p> <p>The Department of Energy and Climate Change has published a new National Heat Map, identifying locations where heat distribution is most likely to be beneficial and economical.</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>BDP 22 Climate Change addresses the climate change adaptation issues.</p> <p>BDP 23 Water Management addresses the increasing risk of flooding as a result of climate change. The Level 1 and Level 2 Strategic Flood Risk Assessments have modelled the risk of flooding with the impact of climate</p>

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>change. BDP 21 Natural Environment requires development to address fragmentation and restore the ecological network so that wildlife is also more resilient to climate change.</p> <p>BDP 24 Green Infrastructure expects development to adopt a holistic approach to deliver the multiple benefits and vital services of Green Infrastructure in development, including adaptation to climate change.</p> <p>Flood risk was taken into account during the site selection process with many sites falling entirely within flood zone 1. Where sites have small areas of flood zone 2 and 3 development is not proposed and such land would generally form part of the Green Infrastructure.</p> <p>BDP5A Bromsgrove Town Expansion Sites and RCBD1 Redditch Cross Boundary Development both require development to address the risk of flooding.</p>
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</li> </ul>	Not applicable

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.	
<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 landscape and scenic beauty of National Parks, the Broads and AONBs.</li> </ul>	<p>BDP 20 Managing the Historic Environment supports developments that sustain and enhance the historic landscape and designated landscapes in the District. The Worcestershire Historic Landscape Characterisation provides relatively objective material to inform direction and guidance on how the different landscapes can be managed in respect of its historic character and sustainability.</p> <p>BDP 21 Natural Environment seeks to enhance the local landscape character through expecting development to take into account the Worcestershire Landscape Character Assessment.</p> <p>Bromsgrove District Council has endorsed the Worcestershire Landscape Character Assessment Supplementary Guidance as a material consideration for planning purposes to aid interpretation and application of the Worcestershire Landscape Character Assessment (LCA) when considering planning issues.</p> <p>BDP 24 Green Infrastructure expects</p>

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
		development to adopt a holistic approach to deliver the multiple benefits and vital services of Green Infrastructure in development, including landscape character.
Prevent unacceptable risks from pollution and land instability (109)	<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>BDP 1 Sustainable Development Principles expects development to mitigate against any implications for air quality and ensure compatibility with adjoining uses and the impact on residential amenity.</p> <p>BDP 19 High Quality Design addresses the air, noise pollutions and land contamination issues</p> <p>BDP 21 Natural Environment expects development to adopt good environmental site practices to minimise the risks of pollution during construction.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> <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>BDP 21 Natural Environment adopts the 5 components ecological network approach to address fragmentation and restore the ecological network in landscape scale. The policy also requires development to protect, restore and enhance features of natural environmental importance.</p> <p>The Green Infrastructure Baseline Report outlines the biodiversity and</p>

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>geodiversity assets in the District.</p> <p><a href="http://www.worcestershire.gov.uk/cms/pdf/Worcestershire%20Green%20Infrastructure%20Framework%202.pdf">http://www.worcestershire.gov.uk/cms/pdf/Worcestershire%20Green%20Infrastructure%20Framework%202.pdf</a></p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/GI%20Baseline%20Report%20put%20on%20website.pdf">http://www.bromsgrove.gov.uk/cms/pdf/GI%20Baseline%20Report%20put%20on%20website.pdf</a></p> <p>Account has been taken of the Worcestershire Biodiversity Action Plan which sets local environmental targets.</p> <p><a href="http://www.worcestershire.gov.uk/cms/planning/environmental-planning/biodiversity-action-plan/action-plans.aspx">http://www.worcestershire.gov.uk/cms/planning/environmental-planning/biodiversity-action-plan/action-plans.aspx</a></p>
<b>12. Conserving and enhancing the historic environment (paras 126-141)</b>		
<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>BDP 20 Managing the Historic Environment states that the District Council advocates a holistic approach to the proactive management of the historic environment which encompasses all heritage assets recognised as being of significance for their historic, archaeological,</p>



## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
		<p>architectural or artistic interest.</p> <p>In terms of Buildings at Risk, Bromsgrove District has relatively few Designated Assets on the English Heritage at Risk Register. However, the absence of a local list means that large numbers of locally important heritage assets have not been formally identified.</p> <p>The policy therefore states that the District Council will update the current draft local list of assets and formally adopt it. It would include all heritage assets recognised as being of local importance, including those which are locally distinctive such as nailers cottages, assets associated with the scythe industry and assets associated with the use of the Worcester and Birmingham canal which runs the length of the District, to name but a few.</p> <p>Furthermore BDP 19 High Quality Design states that the Council will deliver high quality people focused space through ensuring development enhances the character and distinctiveness of the local area.</p>
<b>13. Facilitating the sustainable use of minerals (paras 142-149)</b>		

# Soundness Self-Assessment Checklist (January 2013)

<b>Soundness Test and Key Requirements</b>	<b>Possible Evidence</b>	<b>Evidence Provided</b>
<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>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</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 land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>Minerals planning is the responsibility of the Worcestershire County Council.</p> <p>The adopted Worcestershire Minerals Local Plan can be found here:</p> <p><a href="http://www.worcestershire.gov.uk/cms/planning/planning_policy_strategy/adopted_minerals_local_plan.aspx">http://www.worcestershire.gov.uk/cms/planning/planning_policy_strategy/adopted_minerals_local_plan.aspx</a></p> <p>The emerging Minerals Local Plan is programmed for adoption in Autumn/Winter 2015. Details of this emerging plan can be found here:</p> <p><a href="http://www.worcestershire.gov.uk/cms/planning/planning_policy_strategy/emerging_minerals_local_plan.aspx">http://www.worcestershire.gov.uk/cms/planning/planning_policy_strategy/emerging_minerals_local_plan.aspx</a></p>
<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 who and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>The Consultation Statement can be accessed via the following link :</p> <p><a href="http://www.bromsgrove.gov.uk/cms/PDF/Consultation_Statement_Final%202013.pdf">http://www.bromsgrove.gov.uk/cms/PDF/Consultation_Statement_Final%202013.pdf</a></p> <p>It sets out that through every consultation period what consultation was undertaken, who got involved and how it influenced the plan. Efforts</p>

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
		<p>were also made to reach hard reach groups through specific targeted events in line with the Statement of Community Involvement. This document is available here:</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning-documents/community-involvement.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning-documents/community-involvement.aspx</a></p> <p>The Equality Impact Assessment also provides further details on the efforts made to engage with specific groups.</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 strategy, policies and proposals, including key assumptions.</li> </ul> <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>By involving the community, the Council will gain a greater understanding of the needs of the community and can develop a Plan that is better suited to the needs of the people of Bromsgrove. The SCI explains why involving the community is important; describes what the Council intend to involve the public in and how and when they can be involved; and explains how people will be informed of any outcomes.</p> <p>A Consultation Statement has been produced at each stage of the District Plan, with the most recent produced</p>

## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
	<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>as part of the Proposed Submission version. This describes the consultation process carried out and results obtained by the Council in relation to both the Draft Core Strategy and Redditch Growth consultations. In order to gain the full picture of the consultation carried out to date on the whole Core Strategy process (including issues and options) it should be read in conjunction with the previous Consultation Report issued alongside Draft Core Strategy 1 published in October 2008. The report also sets out how feedback from these consultations has helped to inform the Draft Core Strategy II. This document shows how the new version of the Plan has evolved from taking account of consultation feedback, evidence and national planning policy.</p> <p>The BDP is based on technical evidence including feedback from infrastructure / service providers, specific technical reports including the required Sustainability Appraisal and feedback from various public consultations. As well as National Guidance, there are a number of evidence papers prepared locally, either for Bromsgrove; Bromsgrove and Redditch; or Worcestershire County, which have been used to shape and support the BDP. These are</p>

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>available to view on the Council's Website, as well as within the Plan itself at Appendix 1 'At a Glance'. This appendix summarises the Plan's policies; relates them to the Strategic Objectives; comments on the policy context and their compatibility with the NPPF; and lists the extensive evidence based documents which the policies are built upon.</p> <p>The reasoned justification of each policy also describes how evidence documents are relied upon and how they support the policy.</p> <p>All the evidence base documents are on the website:</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/evidence-base.aspx</a></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</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> </ul>	<p>Issues and Options</p> <p>2005:</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/bdc-planning-lplan-corestrategy-issues_and_options2005.pdf">http://www.bromsgrove.gov.uk/cms/pdf/bdc-planning-lplan-corestrategy-issues_and_options2005.pdf</a></p>


## Soundness Self-Assessment Checklist (January 2013)

<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
<p>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>• An audit trail of how the evidence base, consultation and SA have influenced the plan.</li> <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>2007:</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/bdc-planning-ldf-core_strategy_issues_and_options2007.pdf">http://www.bromsgrove.gov.uk/cms/pdf/bdc-planning-ldf-core_strategy_issues_and_options2007.pdf</a></p> <p>A Sustainability Appraisal (SA) has been undertaken at each stage of the Plan.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/sustainability-appraisal.aspx">http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/sustainability-appraisal.aspx</a></p> <p>The Consultation Statement highlights how the Plan and its policies have evolved through consultation feedback.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/PDF/Consultation_Statement_Final%202013.pdf">http://www.bromsgrove.gov.uk/cms/PDF/Consultation_Statement_Final%202013.pdf</a></p> <p>Development Options Joint Consultation with Redditch Borough Council 2010 and Sustainability Appraisal 2010</p> <p><a href="http://www.bromsgrove.gov.uk/cms/environment-and-">http://www.bromsgrove.gov.uk/cms/environment-and-</a></p>

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		<p><a href="http://redditch.whub.org.uk/cms/environment-and-planning/planning-services/consultation-site.aspx">planning/planning/strategic-planning/bromsgrove-district-plan/previous-consultations/redditch-growth.aspx</a></p> <p>The Housing Growth Development Study 2013 and Sustainability Appraisal considered all realistic alternatives around the periphery of Redditch.</p> <p><a href="http://redditch.whub.org.uk/cms/environment-and-planning/planning-services/consultation-site.aspx">http://redditch.whub.org.uk/cms/environment-and-planning/planning-services/consultation-site.aspx</a></p>
<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> <li>• Does the DPD explain how its key policy objectives will be achieved?</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 of other bodies have been taken into account (e.g. Water Resources Management Plans).</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> <li>• Section in the DPD that shows the linkages between the objectives and the corresponding policies, and</li> </ul>	<p>BDP includes a chapter entitled Implementation and Monitoring and Appendix III outlines the housing trajectory for the plan period.</p> <p>The plan is supported by an Infrastructure Delivery Plan which shows how proposed developments may be delivered.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/Bromsgrove%20IDP.pdf">http://www.bromsgrove.gov.uk/cms/pdf/Bromsgrove%20IDP.pdf</a></p> <p>LDS</p>

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	<p>consistency between policies (such as through a matrix).</p>	<p><a href="http://www.bromsgrove.gov.uk/cms/pdf/LDS%2008-08-13.pdf">http://www.bromsgrove.gov.uk/cms/pdf/LDS%2008-08-13.pdf</a></p> <p>Appendix I of the BDP sets out in table form the links between policies and strategic objectives.</p> <p>The Sustainability Appraisal (SA) assesses whether policies are internally consistent</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 Infrastructure Delivery Plan identifies anticipated infrastructure requirements of the BDP and indicates which policy infrastructure items are relevant to; relevant timescales and who will deliver the required infrastructure.</p> <p>Specific items of infrastructure are identified in the Plan as appropriate for example, transport infrastructure is discussed in the District profile and addressed in BDP 16 Sustainable Transport policy.</p> <p>Viability testing work on affordable housing has been carried out by Levvels and can be found here;</p> <ul style="list-style-type: none"> <li>• <a href="#">Affordable Housing Viability Study</a> </li> </ul>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> <li>• Appendices </li> <li>• Annex A </li> </ul> <p>CIL Viability across Worcestershire has been assessed and can be found here:</p> <p><a href="http://www.swdevelopmentplan.org/wp-content/uploads/2013/02/Worcestershire-CIL-Viability-Study-Final-1-2-13.pdf">http://www.swdevelopmentplan.org/wp-content/uploads/2013/02/Worcestershire-CIL-Viability-Study-Final-1-2-13.pdf</a></p> <p>Work has also been recently undertaken to confirm that the whole plan is viable.</p>
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for development and the 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>• Sections of the DPD that reflect the plans or strategies of the local authority and other bodies</li> <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> <li>•</li> </ul>	<p>The SA Scoping Report shows how the plan was influenced by the social, environmental or economic objective of other relevant international (treaties), national, regional, county and local plans and strategies.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/SA%20scoping%202012%20October12%20(website).pdf">http://www.bromsgrove.gov.uk/cms/pdf/SA%20scoping%202012%20October12%20(website).pdf</a></p> <p>The spatial vision of Bromsgrove District Plan covers the social, economic and environmental aspects which the Plan as well as other strategies and plans aim to achieve.</p>

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<i>Soundness Test and Key Requirements</i>	Possible Evidence	Evidence Provided
		<p>The Infrastructure Delivery Plan shows the infrastructure required to deliver the Plan. The document takes into account plans and strategies of the infrastructure providers.</p> <p>The supporting text to BDP16 Sustainable Transport makes specific reference to the improvements to Alvechurch Railway Station that are being delivered by Network Rail. There is also reference to the new Bromsgrove Railway Station that is being developed by Worcestershire County Council, Network Rail, Centro and the Department for Transport.</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</li> </ul>	<p>Annual Monitoring Report (AMR) is still prepared annually and has been expanded to include the monitoring indicators (Appendix V) within the BDP. This could act as a trigger to highlight when particular policies need reviewing.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/AMR%202013%20low%20res%2024-01-14.pdf">http://www.bromsgrove.gov.uk/cms/pdf/AMR%202013%20low%20res%2024-01-14.pdf</a></p> <p>To ensure flexibility the BDP contains phrases like “up to” (40% affordable housing) and “where viable/feasible”</p> <p>The intention to review the Plan and</p>

## Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</p> <ul style="list-style-type: none"> <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>undertake a Green Belt Review builds flexibility into the Plan. This will ensure that an appropriate number of additional sites are identified and allocated when they are required.</p>
<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>BDC DTC Statement of Compliance sets out how the Duty to Cooperate has been undertaken in Bromsgrove District.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/PDF/BDC%20DTC%20Statement.pdf">http://www.bromsgrove.gov.uk/cms/PDF/BDC%20DTC%20Statement.pdf</a></p> <p>The Council has pro-actively engaged with Redditch Borough Council to address the issue of insufficient housing land availability within Redditch. This has resulted in the allocation for land for 3,400 homes on the edge of Redditch in policy RCB1 within the BDP.</p> <p>The Council is also working with the authorities within the Greater Birmingham and Solihull LEP to address the potential housing shortfall within the West Midlands conurbation. The need to potentially identify land for the growth needs of the conurbation in the future is set out within BDP4.</p>

# Soundness Self-Assessment Checklist (January 2013)

<b>Soundness Test and Key Requirements</b>	<b>Possible Evidence</b>	<b>Evidence Provided</b>
<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, (including housing trajectories where the DPD contains housing allocations)?</li> <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>	<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 indicators, targets, milestones and trajectories</li> <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>Appendix V of the BDP identifies the target indicators that will be used to monitor the effectiveness of each policy. Appendix III contains a housing trajectory based on the target of 7,000 dwellings by 2030. This trajectory also identifies where monitoring and management are required throughout the Plan period.</p> <p>Chapter 9 of the BDP explores the implementation and monitoring aspects of the Plan, which is illuminated and expanded upon by the IDP. The planning system places greater emphasis on the importance of flexibility in plan making. In order to make the planning system more responsive to changing circumstances, flexible wording has been used in the plan wherever applicable.</p> <p>In order to deliver the BDP it is important that clear monitoring indicators are identified, which it is acknowledged are likely to evolve over time in order to be responsive to changing circumstances. Monitoring provides information on the performance of policy, the delivery of development and impacts on the environment. It is therefore important that the plan can be easily monitored and that this process is aligned with</p>

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		<p>the way we assess the sustainability of the Plan. We are therefore intending to use the key indicators from the Sustainability Appraisal process to form the basis of monitoring. A key component of this process is the Annual Monitoring Report (AMR) which is prepared at the end of December every year and reflects activity in the previous financial year. It looks at how policies are working in practice; how policies are being implemented; how plans affect socio-economic indicators and how the work programme is progressing. Other regular monitoring which takes place is the housing and employment land availability studies and the Town Centre Health Check.</p> <p>The most recent Annual Monitoring Report (2012/13) has been expanded to monitor many of the indicators within the BDP.</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/AMR%202013%20low%20res%2024-01-14.pdf">http://www.bromsgrove.gov.uk/cms/pdf/AMR%202013%20low%20res%2024-01-14.pdf</a></p> <p>Housing and Employment monitoring is carried out annually.</p> <p>Housing:</p>

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		<p><a href="http://www.bromsgrove.gov.uk/cms/pdf/BLAH%202013.pdf">http://www.bromsgrove.gov.uk/cms/pdf/BLAH%202013.pdf</a></p> <p>Employment:</p> <p><a href="http://www.bromsgrove.gov.uk/cms/pdf/LAE%202013%20low%20res%2008-08-13.pdf">http://www.bromsgrove.gov.uk/cms/pdf/LAE%202013%20low%20res%2008-08-13.pdf</a></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>• Reports or copies of correspondence as to how representations have been considered and dealt with.</li> </ul>	<p>Para 157 of NPPF states that Local Plans should be drawn up over an appropriate timescale preferably a 15 year time horizon, take account of longer term requirements and be kept up to date.</p> <p>The Plan identifies a need for 7000 houses over the Plan period, of which 4,600 have been identified. It proposes a phased approach by which 4,240 will be completed by 2023. Following the adoption of the Plan it is proposed that a Green Belt Review will be commenced to identify further sites to accommodate the remaining requirements within the District (2,400 dwellings) and potentially unmet housing needs from Birmingham(not yet quantified). The justification for this approach is that the District is designated as approximately 90% Green belt. 4600</p>

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		<p>houses can be accommodated without a GB Review and emphasis has been placed on getting a Plan in place as quickly as possible as a GB Review would be a lengthy process. There would be a need to fully engage with local communities on this issue, for example, via Neighbourhood Plans. Also to be borne in mind is the likely local opposition that this controversial issue it is likely to generate which is likely to take time to successfully resolve.</p>

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## Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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



## Soundness Self-Assessment Checklist (January 2013)

Policy Expectations	Possible Evidence	Evidence Provided
<b>Policy A: Using evidence to plan positively and manage development (para 6)</b>		
Early and effective community engagement with both settled and traveller communities.	<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>GTAA 2008</p> <p><a href="http://www.bromsgrove.gov.uk/cms/PDF/gtaa_final_report_5-3-08.pdf">http://www.bromsgrove.gov.uk/cms/PDF/gtaa_final_report_5-3-08.pdf</a></p> <p>A new GTAA is currently being undertaken which is due for completion in Spring 2014.</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.	<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>Housing Strategy 2011-2015</p> <p><a href="http://www.worcester.gov.uk/fileadmin/assets/pdf/Housing/New_Files/Strategies/Worcestershire_Housing_Strategy.final.pdf">http://www.worcester.gov.uk/fileadmin/assets/pdf/Housing/New_Files/Strategies/Worcestershire_Housing_Strategy.final.pdf</a></p> <p>GTAA 2008</p> <p><a href="http://www.bromsgrove.gov.uk/cms/PDF/gtaa_final_report_5-3-08.pdf">http://www.bromsgrove.gov.uk/cms/PDF/gtaa_final_report_5-3-08.pdf</a></p> <p>A new GTAA is currently being undertaken which is due for completion in Spring 2014.</p>

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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>Early indications suggest that there is no need for additional accommodation in the next 5 years. Policy BDP11 allows the identification of further sites through the proposed Green Belt Review if required.</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>BDP 11 Accommodation for Gypsies, Travellers and Showpeople sets out criteria for the assessment of sites through links with BDP1.</p>
<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</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 Plan includes a policy on Rural Exception Sites (BDP9). This does not explicitly reference accommodation for</p>

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Policy Expectations	Possible Evidence	Evidence Provided
travellers sites.		gypsies and travellers although this does preclude the use of the policy for this purpose if a need is identified.
<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 accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<ul style="list-style-type: none"> <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>	BDP 4 Green Belt sets out criteria for GB Review. The Review will identify appropriate sites for gypsies and travellers if a need has been identified.
<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>	<p>BDP 1 Sets out criteria for Sustainable Development Principles</p> <p>BDP19 sets parameters for High Quality Design</p> <p>BDP 11 Accommodation for Gypsies, Travellers and Showpeople sets criteria for</p>

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Policy Expectations	Possible Evidence	Evidence Provided
		development.
<b>Policy G: Major development projects (para 19)</b>		
<p>Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.</p>	<ul style="list-style-type: none"> <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>	<p>Housing Strategy 2011-2015</p> <p><a href="http://www.worcester.gov.uk/fileadmin/assets/pdf/Housing/New_Files/Strategies/Worcestershire_Housing_Strategy.final.pdf">http://www.worcester.gov.uk/fileadmin/assets/pdf/Housing/New_Files/Strategies/Worcestershire_Housing_Strategy.final.pdf</a></p> <p>BDP 1 Sets out criteria for Sustainable Development Principles</p> <p>BDP19 sets parameters for High Quality Design</p> <p>BDP 11 Accommodation for Gypsies, Travellers and Showpeople sets criteria for development.</p>

End

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