



# **Local Plans and the National Planning Policy Framework**

## **Compatibility Self Assessment Checklist**

**(April 2012)**

## Introduction

We have produced a checklist to help you assess the content of your local plan<sup>1</sup> against requirements in the National Planning Policy Framework (NPPF) that are new or significantly different from national policy previously set out in PPGs and PPSs.

***These elements are highlighted in red and in italics.***

Although not part of the NPPF it also includes the 'Planning policy for traveller sites' published on 23 March 2012.

### How will it help?

We want to help local authorities to get up-to-date plans in place. This tool will help you to:

- assess your local plan against national policy
- identify gaps
- understand risks
- start to plan how to manage those risks.

This will help you to:

- respond proactively and speedily to the NPPF
- prepare for an examination
- make robust planning decisions
- implement your policies.

PAS will continue to work with authorities through the NPPF transition period.

### Why does it matter?

It matters because to have a plan-led system we need to have sound plans in place. The transition arrangements give authorities with an adopted plan a year to get their policies 'up to date' (in conformity with the NPPF). After that, the policies will be judged by their degree of conformity and the presumption in favour of sustainable development will apply. If you haven't got a plan in place, you need to do so as soon as possible; the further along the process you are, and the closer the conformity of your policies, the more weight they will have (for full details see Annex 1 'Implementation' paragraphs 208-219).

For PAS's interpretation of what you need to know about transition, see '[Things we think you should know about the NPPF](#)'.

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<sup>1</sup> We use the term "local plan" throughout this document. However, adopted plans may comprise a number of development plan documents prepared under the Planning and Compulsory Purchase Act 2004, in which case it may be all of those documents that a local planning authority may wish to consider in the context of the NPPF using this document.

## **Who should use it?**

The checklist was written with adopted plans in mind, but it should also be useful as a check for emerging local plans. It is for all planning authorities in England, including counties and National Parks.

## **What it doesn't do**

It is not an interpretation of national planning policy or a prescribed solution. It excludes the implications of the Localism Act. It doesn't deal with the process of plan-making or aspects of the NPPF which relate specifically to decision making. Nor does it list the things that you *don't* have to do any more as requirements have been dropped.

## **What else are PAS doing?**

There are more parts to this document to follow, including

- a comprehensive checklist of all requirements, new and retained,
- An understanding of what the 'gaps' or discrepancies might mean for you (your risks)
- Some actions you could take to address these risks

## **How should you use it?**

We have structured the checklist in the order of the NPPF, but you might want to prioritise the areas that you think are most important to your area and your overall strategy, and concentrate on the policy areas where you have the most development pressure.

The checklist has used, wherever possible, the same wording as that set out in the NPPF. However, our focus has been to capture the main 'prompts' that you need to consider while keeping the checklist to a reasonable length. However you should cross-refer to the NPPF itself whilst going through the checklist. We have provided paragraph references to help you do this.

Note, however, that this document highlights the new/significantly different bits of the NPPF compared to PPGs and PPSs. You'll need to think about whether, if you've quite an old adopted plan, it was fully compliant with more recent bits of government guidance (eg PPS3 revised June 2011).

The checklist concentrates on identifying where the gaps (or incompatibilities) are; you might want to also keep your own audit trail of the evidence you have identified to demonstrate compatibility, or otherwise, with the NPPF.

## **How we made it**

- We looked at the NPPF and the Impact Assessment published alongside the draft NPPF.
- We identified the main things that it asks or requires local plans to include, and highlighted those that are significantly different from previous national policy and guidance as set out in PPGs and PPSs.
- We turned this into a checklist, and set out some ideas about how local planning authorities could identify parts of their local plan that may be most at odds with this, what may happen as a result, and things they could do to manage this (*to follow*).
- We developed these ideas in consultation with a selection of local planning authorities.

We've worked with the Planning Inspectorate on this and it builds on pilot work done by the Inspectorate. The checklist is intended to provide a constructive starting point for any assessment of how the Framework impacts on plan preparation and is an important element of the support service referred to in paragraph 217 of Annex 1 to the National Planning Policy Framework

## **What will happen to this document in the future?**

It will be reviewed in the light of feedback from local planning authorities that have used it and other stakeholders and updated again as necessary later in 2012.

If you have any feedback please send it to PAS at:

Email: [alice.lester@local.gov.uk](mailto:alice.lester@local.gov.uk)

## **Disclaimer**

This is a PAS document and has not been endorsed by the Department for Communities and Local Government. We are positive that if you go through this exercise you will be able to make a judgment, with confidence, about how your plan relates to the requirements of the NPPF. It will also give you some indication of the sort of actions you may wish to pursue if you need to move towards alignment with the NPPF in any of the policy areas.

## 1A: Achieving sustainable development

The presumption in favour of sustainable development and core planning principles (para 6-17)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><i>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</i></p>	<p><i>Does the plan positively seek opportunities to meet the development needs of the area?</i></p> <p><i>Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)?</i></p> <p><i>Do you have a policy or policies which reflect the principles of the presumption in favour of sustainable development? A <a href="#">model policy</a> is provided on the Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive).</i></p>	<p>The Inspectors' Report (IR) for the Black Country Core Strategy (BCCS, described in the IR as the JCS) identified as the first of its 'Main Matters' that:</p> <p><i>"... the spatial vision that the JCS seeks to deliver by 2026 takes a ... positive and proactive approach through an economic, social and environmental regeneration of the area. Acknowledging the major challenges faced, which have increased due to the recent economic recession, the JCS seeks to tackle out-migration to surrounding counties through growth in sustainable locations to help attract private investment and enterprise to improve the local economy."</i> (paragraph 2)</p> <p>As described in the following</p>	<p>There are no differences. It is clear that the vision, principles and policies within the BCCS are consistent with the approach in the NPPF in that the Strategy plans positively for sustainable growth.</p>

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		<p>sections the strategy was supported by a set of assessments that, among other matters, considered the needs for new housing, for economic development and employment land and for investment in town centres. The Inspectors who examined the plan were able to conclude that:  <i>" the overall strategy ... is capable of delivering the new development needed to meet the housing, employment and other targets identified by 2026 in a satisfactory and sustainable way."</i>          (IR paragraph 10)</p> <p>The Inspectors' Report identified that the BCCS includes, or would as modified include, appropriate flexibility in terms of:</p> <ul style="list-style-type: none"> <li>• Infrastructure (paragraph 8)</li> <li>• Employment land (27-31)</li> <li>• Offices (41)</li> <li>• Housing land supply (51-61)</li> <li>• Housing policies (62-74)</li> <li>• Transport (108)</li> <li>• Town centre uses (155-156, 171-172, 192-194)</li> <li>• Regeneration corridors (224)</li> <li>• Delivery and generally (230-245 and especially 233-236).</li> </ul>	<p>In the context of an approach that seeks regeneration through sustainable growth whilst allowing for adverse impacts to be avoided or prevented and important assets to be safeguarded, it is considered the approach taken is consistent with the NPPF.</p> <p>The implications of this are that the provisions within the BCCS make clear that the presumption in favour of sustainable development is supported.</p>
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		<p>The BCCS is an integrated economic and spatial plan, with a vision that consists of three major directions of change, sustainable communities, environmental transformation and economic prosperity. These mirror and support the three dimensions to achieving sustainable development as set out in the NPPF.</p> <p>We are confident that it helps to direct the location and form of development in the Black Country- as demonstrated by the Inspectors Report (Paragraph 15):</p> <p><i>"Regarding the preferred strategy, we acknowledge that in a very largely built up area such as the BC the realistic alternatives for accommodating the growth aspirations are necessarily limited. Nevertheless, the two options consulted upon at the Issues and Options stage, whilst not necessarily mutually exclusive as the selected strategy demonstrates, did at least provide a clear choice for comment and assessment of the implications in sustainability terms. Thus, we are satisfied</i></p>	
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		<p><i>that they were locally appropriate."</i></p> <p>Policy CSP1 the Growth Network sets out the focus of activity for all the spatial objectives to bring about the scale of change necessary to achieve growth in the most sustainable manner.</p> <p>The appendices to the Core Strategy provide very clear guidance and spatial representation which will ensure that development proposals that accord with the plan are able to be approved without delay.</p>	
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<p>The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)</p>	<p>NPPF Core Planning Principles:</p> <ul style="list-style-type: none"> <li>a) Empowering local people to set a vision for the future.</li> <li>b) Promoting creative ways to enhance and improve places</li> <li>c) Proactively drive and support economic growth</li> <li>d) Secure High Quality Design</li> <li>e) Take account of different roles and character areas</li> <li>f) Support the transition to a low carbon future</li> <li>g) Conserve and enhance the natural environment</li> <li>h) Encourage effective of land by reusing brownfield land</li> <li>i) Promote mixed use development and encourage multiple benefits from the use of land</li> <li>j) Conserve heritage assets</li> <li>k) Actively manage patterns of growth to make fullest use of sustainable transport</li> <li>l) Support local strategies to improve health, social and cultural wellbeing.</li> </ul>	<p>The BCCS promotes these principles as set out below:</p> <ul style="list-style-type: none"> <li>a) Paragraphs 1.7 and 1.8 of the BCCS set out the comprehensive and inclusive approach to public and stakeholder engagement. In supporting the spatial vision for the Black Country the examination Inspectors referred to "<i>widespread public support</i>" (IR paragraph 3).</li> <li>b) The BCCS responds to the issues within the Black Country on the basis of a 'Growth Network' of Strategic Centres and Regeneration Corridors, and these are the subject of indicative proposals set out in Appendix 2 to the plan. At the same time, appropriate development is to be enabled outside of this network to meet local needs and circumstances. Within this framework Policy CSP 4 sets out the approach to Place Making and environmental transformation – it states all development will be required to demonstrate a clear understanding of the historic character and local</li> </ul>	<p>It is therefore considered the approach of the BCCS is highly consistent with the principles of the NPPF.</p>
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		<p>distinctiveness of the area and show how proposals make a positive contribution to place-making and environmental improvement.</p> <p>c) The regeneration of the Black Country is based on a Growth Network and the pursuit of housing growth, supported by commensurate levels of retailing and consumer services, an expanded office sector and an improved portfolio of employment land. In particular, Policies CSP1 -2, DEL 2, EMP1-6 and CEN1-7 set out our approach to ensuring that we have the right land, available in the right location and will make produce the right plans and make the right decisions, to drive and support the economic growth of the Black Country.</p> <p>d) High quality design is an important theme in the BCCS Vision, Spatial Objectives and Spatial Strategy, which refer to the vital role of environmental transformation, the importance of quality and the role of design in both tying</p>	
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		<p>areas together and respecting local character. The BCCS also includes a specific policy, ENV3 –Design Quality.</p> <p>e) The identification of the Strategic Centres and the Regeneration Corridors, the different areas outside of the this 'Growth Network' and the protection of environmental and other assets all take account of the roles and characters of different areas. Besides Policy CSP4 on Place Making, the BCCS also includes Policy ENV 2 Historic Character and Local Distinctiveness.</p> <p>f) The identification of the Growth Network, based on Strategic centres and major transport corridors and the approach towards meeting needs for consumer services and office employment in centres should help the management of transport emissions. The BCCS also includes specific policies for developments: Policies ENV7 – Renewable Energy and ENV8 Air Quality.</p> <p>g) Conserving and enhancing the natural environment is a</p>	
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		<p>major part of the Vision for Environmental Transformation and the Spatial Objective of a high quality environment. The identification of the Growth Network and other locations for development or for conservation has been undertaken in the light of consideration of the importance of the natural environment (including through SEA and HRA) location of the Growth. The natural environment is a fundamental the Core Strategic Policies, in CSP 3 Environmental Infrastructure, and Nature Conservation is the subject of Policy ENV1.</p> <p>h) The use of previously developed land is one of the Sustainability Principles informing the BCCS (Principle 4) and reflected in the Spatial Objectives of the plan and in Policies CSP1 and CSP2. The Inspectors' Report (paragraphs 2 and 5) supported the approach that the vast majority of development should be on previously-developed sites as reflecting the distinctive local</p>	
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		<p>characteristics of the Black Country.</p> <p>i) The Black Country is characterised by its centres, and the BCSS recognises that these can provide opportunities for mixed uses: Policies CSP1 (and Appendix 2), CEN1 and CEN3. It also recognises that there might be opportunities to combine different community uses / facilities (Policy HOU5) and that environmental infrastructure might play a mix of roles, such as green space and nature conservation or flood mitigation (Policy CSP3).</p> <p>j) The BCCS includes a policy, ENV 2, on Historic Character and Local Distinctiveness, as well as policies, ENV4 and EMP6, on the some of the Black Country's most distinctive assets, notably canals. The BCCS also recognises the importance of the Black Country's history and urban structure in shaping its objectives and the development strategy (see Objective 5 and Policies CSP3 and CSP4) as well as recognizing the (relationship</p>	
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		<p>between built heritage and mineral resources (Policy MIN4).</p> <p>k) The first element of the BCCS Vision is for sustainable communities based on integrated transport networks. Sustainable development is an important Principle guiding the plan and this is translated into the Spatial Objectives and Spatial Strategy. As described above, the BCCS strategy is based upon a growth network of Strategic Centres and Regeneration Corridors which seek to focus growth including to make the best use of existing infrastructure, support and facilitate public transport and maximise accessibility. This strategy (Policy CSP1) is supported by the policies for housing (HOU2, which is supported by Table 8, setting out accessibility standards) and centres (CEN1-CEN8), as well as the transport strategy and policies (CSP5 and TRAN1-TRAN5). The sustainability of the BCCS strategy in locational and</p>	
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		<p>transport terms was given considerable recognition by Inspectors who examined the plan (IR paragraphs 2, 5, 25, 32, 43, 52, 71, 73, 98, 100, 146 and 166). Among other things the Inspectors stated:</p> <ul style="list-style-type: none"> <li>• <i>"the overall SCs and RCs approach has been tested .... and is ... more sustainable"</i> (IR paragraph 98); and</li> <li>• <i>"... we are content that the JCS transport policies and priorities give the necessary and appropriate prominence to public transport improvements ... in meeting increased demand and influencing travel patterns across the BC"</i> (IR paragraph 100).</li> </ul> <p>l) The BCCS acknowledges the health and deprivation issues facing many people in the Black Country as well as the historic cultural identities of its local communities. It also links to the four boroughs' Sustainable Community Strategies. The plan's Spatial Objectives support both strategic centres and a network of smaller centres to</p>	
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		<p>best provide access to a range of services and opportunities, and they also include:</p> <p><i>"A sustainable network of community services, particularly high quality lifelong learning, health care and sport and recreation facilities, which are easily accessible to all residents at a neighbourhood level, resulting in an increase in levels of qualifications, skills, health and well-being, a decrease in deprivation indicators and improved perception of residential neighbourhoods across the Black Country."</i></p> <p>(Objective 8).</p> <p>The importance of these issues is reflected in the strategy for both the Growth Network and places outside it (Policies CSP1 and CSP2) and in the recognition of the importance of place-making (Policy CSP4) and in the important role given to the Black Country's centres (Policies CEN1-CEN7), as well as in specific policies for:</p> <ul style="list-style-type: none"> <li>• Education and Health Facilities (HOU5);</li> </ul>	
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		<ul style="list-style-type: none"><li>• Cultural Facilities (EMP6);</li><li>• Historic Character and Local Distinctiveness (ENV2); and</li><li>• Open Space, Sport and Recreation (ENV6).</li></ul>	
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## 1B: Delivering sustainable development

1. Building a strong, competitive economy (paras 18-22)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Set out a clear economic vision for the area which positively and proactively encourages sustainable economic growth (21).	<i>Is there an up to date assessment of the deliverability of allocated employment sites, to meet local needs, to justify their long-term protection (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)?</i>	<p><u>Setting out a clear economic vision and strategy</u> Economic Prosperity is at the heart of the Core Strategy. It is one of the three elements of the Core Strategy Vision and is reflected in the spatial objectives that provide the context for the individual policies in the Plan. More specifically, Policy EMP1 and paras 4.3-4.6 provides a clear economic vision and strategy by establishing employment and land targets, priority market sectors and how these targets will be delivered on the ground.</p> <p><u>Setting criteria, or identify strategic sites</u> The Core Strategy provides criteria for the preferred locations for economic development, predominantly in Policies EMP2 and EMP3. While the Core Strategy does not</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p> <p>It is considered that basing the BCCS on an economic strategy is highly consistent with the approach advocated by the NPPF.</p>

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		<p>identify strategic sites, Appendix 2 sets out in a diagrammatic way, more detailed proposals for the key regeneration Corridors and Centres, including areas of employment development and investment. This will form the starting point for the production of Area Action Plans and Site Allocations Document that will allocate individual sites.</p> <p><u>Supporting existing sectors and plan for new ones</u></p> <p>Para 4.3 of the Core Strategy identifies the role of existing manufacturing and logistics sectors, and also gives examples of priority market sectors for development. This will be further refined through Local Economic Impact Assessments. The locational criteria for different types of economic development are set out in Policies EMP2 and EMP3.</p> <p><u>Planning for clusters of knowledge driven and high technology businesses</u></p> <p>The attraction of high technology knowledge based investment is promoted by Policy EMP2. This Policy identifies the preferred locations for such development and the infrastructure needs of</p>	
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		<p>businesses in such locations.</p> <p><u>Identify priority areas for economic regeneration</u></p> <p>The Core Strategy provides a strong spatial strategy for the Black Country based on a series of Regeneration Corridors and Strategic Centres. Policies EMP2 and EMP3 identify the preferred locations for employment development including existing industrial areas in need of major investment. More detailed guidance is provided in Appendix 2 of the Core Strategy.</p> <p><u>Facilitate flexible working practices</u></p> <p>Policy CSP4 of the Core Strategy promotes the development of buildings that provide for a range of functions, facilities and services that support local communities.</p> <p><u>Avoiding the long term protection of sites</u></p> <p>The Core Strategy has been informed by extensive technical evidence, including three Employment Studies (2005, 2008 and 2009). These studies considered the development potential of all employment areas in the Black Country so as to ensure that the areas identified for retention,</p>	
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		<p>investment and development in Policies EMP2 and EMP3 are likely to remain as viable employment locations to 2026. The Inspectors who examined the plan recognised <i>"the overriding importance for the strategy of retaining sufficient suitable employment land and buildings for smaller businesses, as well as larger ones on more prestigious sites, across the BC"</i> (IR paragraph 30). Recent appeal decisions in Walsall and Dudley have shown that the protection of employment land and premises can be well-justified where it is needed to support the economy of the area.</p> <p>For specific locations, employment sites which are no longer viable and required for other employment generating uses can be brought forward for redevelopment for other uses by Policy DEL2.</p> <p>As set out in the following section, the BCCS also recognises and promotes the importance of strategic and other centres for the future of the Black Country economy (see</p>	
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		for example Policies CSP1 and CEN1).	
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<b>2. Ensuring the vitality of town centres (paras 23-27)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>

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<p>Set out policies for the management and growth of centres over the plan period (23).</p>	<p><i>Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses?</i> <i>Have you identified primary and secondary shopping frontages?</i></p>	<p>The Black Country is characterised by the number and range of its centres, and the strategic and other centres have an important role in the BCCS strategy for growth and regeneration (see especially Policies CSP1 and CEN1).</p> <p>The approach followed work on the Black Country Study, which was translated into the Phase 1 Revision of the, then, Regional Spatial Strategy (RSS) for the West Midlands (<a href="http://www.wmra.gov.uk/documents/RSS%20Full%20Doc%20Jan%2008.pdf">http://www.wmra.gov.uk/documents/RSS%20Full%20Doc%20Jan%2008.pdf</a>). The policies for the Black Country's centres were based on a 'Study of the Black Country Centres' (GVA Grimley and Roger Tym &amp; Partners, 2005). This work was co-ordinated with efforts towards a region-wide RSS Phase 2 Revision, supported by a West Midlands Regional Centres Study (Roger Tym &amp; Partners, 2007 &amp; 2009), which can be found at <a href="http://www.wmra.gov.uk/Planning_and_Regional_Spatial_Strategy/Technical_Work.aspx">http://www.wmra.gov.uk/Planning_and_Regional_Spatial_Strategy/Technical_Work.aspx</a></p> <p>The previous studies were carried forward, detailed and</p>	<p>It is considered that the BCCS is highly consistent with the NPPF in terms of its approach towards the needs for town centre uses and the roles for the area's centres.</p>
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		<p>updated through a Black Country Centres Study (GVA Grimley, 2009): downloadable from <a href="http://blackcountrycorestrategy.dudley.gov.uk/evidencesa/">http://blackcountrycorestrategy.dudley.gov.uk/evidencesa/</a>. This assessed the needs for growth in retailing and other town centre uses and the roles for the area's centres in accommodating this growth.</p> <p>The BCCS strategy places great emphasis on centres. It sets out policies for the area's centres overall and for each of the levels in the defined hierarchy of strategic, town, district and local centres, as well as to meet local needs and to respond to out-of-centre proposals (Policies CSP1, CSP2, CEN1-CEN5, CEN6-7, EMP6, HOU5.)</p> <p>The BCCS policies include, where necessary and appropriate, locally-set thresholds for the application of policy tests, to reflect local circumstances and ensure that adverse impacts, including cumulative impacts, can be assessed.</p> <p>The BCCS refers to the potential for the local authorities to define primary shopping areas /</p>	<p>The BCCS does not itself define primary or secondary frontages within centres, but it provides a</p>
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		<p>frontages in the centres in their areas. However, as a strategic document covering many centres across a wide area it does not define such frontages itself. This has been done in previous UDP policies (which have been saved if still up to date and relevant) and can be done through Area Action Plans (AAPs) in future, where necessary. Not all of the authorities consider that policies to manage frontages are necessary, at least not in all centres. However, primary shopping areas are defined (usually on the basis of frontages) in strategic and town centres to enable the application of policies to concentrate investment in centres and to apply the sequential approach. Such definitions are, again contained in saved UDP policies (and the AAP for Brierley Hill) and they will be kept up to date through AAPs where necessary. The Inspectors who examined the BCCS supported the authorities' approach:  <i>"The JCS sets the broad strategy for the management of the BC's centres. We do not think it appropriate that matters such as</i></p>	<p>framework for this to be done through other local plans. It is not considered this is a significant issue in terms of the relationship with the NPPF or the strategy of the BCCS.</p>
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		<p><i>primary and secondary frontages be addressed in this document. This is pertinent for Brierley Hill too, even though its AAP is at an advanced stage of preparation. Rather, we accept this should be handled in AAPs and other DPDs” (IR paragraph 158).</i></p>	<p>It is considered that the BCCS is highly consistent with the NPPF in terms of its approach towards the needs for town centre uses and the roles for the area’s centres.</p>
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<b>3. Supporting a prosperous rural economy (para 28)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p>Policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development (28).</p>	<p><i>Do your policies align with the objectives of para 28?</i></p>	<p>The Black Country does include some rural areas, notably on the eastern side of Walsall and to the west of Dudley. However, these areas are entirely subject to Green Belt designation.</p> <p>The BCCS is seeking to develop our urban areas in such a way that they can increasingly meet their own economic and social needs in order to counter the unsustainable movement of people and jobs. We are seeking to counteract development that would undermine the regeneration strategy and would lead to greater reliance on the car and longer journey times.</p>	<p>There are no differences because of the application of Green Belt policy.</p>

<b>4. Promoting sustainable transport (paras 29-41)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p>Policies that facilitate sustainable development but also contribute to wider sustainability and health objectives (29).</p> <p>Different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas (29).</p>	<p><i>If local (car parking) standards have been prepared, are they justified and necessary? (39) (The cancellation of PPG13 removes the maximum standards for major non-residential development set out in Annex D. PPS4 allowed for non-residential standards to be set locally with Annex D being the default position. There is no longer a requirement to set non-residential parking standards as a maximum but that does not preclude lpas from doing so if justified by local circumstances).</i></p> <p><i>Has it taken into account how this relates to other policies set out elsewhere in the Framework, particularly in rural areas? (34).</i></p> <p><i>Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</i></p>	<p>The BCCS sets out the framework for car parking standards which is finessed by greater levels of detail for each individual Authority, for example in Dudley this is in the form of Supplementary Planning Guidance based on local car ownership levels and in the case of Walsall the car parking standards remain an element of the saved UDP policies however are consistent with the approach in the NPPF.</p> <p>For non-residential development the approach is similarly tailored to local circumstances with some applying maximum PPG13 standards until a further Supplementary Planning Document can be prepared taking account the following</p> <ul style="list-style-type: none"> <li>• the accessibility of the development;</li> <li>• the type, mix and use of development;</li> <li>• the availability of and</li> </ul>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS. Councils were already well advanced with this work prior to the NPPF</p> <p>No changes are required to the BCCS at this stage.</p>

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		<p>opportunities for public transport;</p> <ul style="list-style-type: none"> <li>● local car ownership levels; and</li> <li>● an overall need to reduce the use of high-emission vehicles.</li> </ul> <p>Others already working to a locally derived framework.</p> <p>The Black Country Joint Core Strategy, now adopted, is supported by a associated transport strategy and policies. (See Section 1A answer 'k' above)</p> <p>The Inspectors report into the BCCS reported being "impressed by the continuing comprehensive level and extent of the cooperation evident in the BCCS...with many other interested parties concerned with the implementation of the strategy" and recognizing that "numerous delivery agencies have all endorsed the BCCS as generally consistent with PPG13 and the LTP" (IR paragraphs 97 and 231).</p>	<p>No changes as already adopted following successful Examination In Public.</p>
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**5.Supporting high quality communications infrastructure (paras 42-46)**

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<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>The issue of supporting high quality communications infrastructure is not dealt with specifically within the Black Country Core Strategy as it is a policy area that falls within the remit of more detailed DPDs and SPDs.</p>	<p>The overall Strategy is not affected as the Core Strategy does not contain specific policies on supporting high quality communications infrastructure. There is therefore no conflict of interest with the NPPF as a result. If individual local planning authorities adopt specific policies on communications infrastructure, they will then need to follow the guidelines set out in the NPPF on this subject.</p>
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<b>6. Delivering a wide choice of high quality homes (paras 47-55)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<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 <i>5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47).</i></p>	<p><i>What is your record of housing delivery?</i></p> <p><i>Have you identified:</i></p> <p>a) five years or more supply of specific deliverable sites;  <i>b) an additional buffer of 5% (moved forward from later in the plan period), or</i>  <i>c) If there has been a record of persistent under delivery have you identified a buffer of 20% (moved forward from later in the plan period)? [Para 47].</i></p> <p><i>Does this element of housing supply include windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?</i></p>	<p>The Core Strategy aims to provide more housing than is required to meet locally generated need, in accordance with the urban renaissance strategy set out in the adopted West Midlands Regional Spatial Strategy.</p> <p><u>% Buffer above 5 Year Supply</u>  It is for each local authority to maintain a 5 year supply of deliverable sites against housing targets set out in their local plan and in accordance with the policies and allocations of the local plan. This is demonstrated through the SHLAA / AMR, which is updated each year. The role of the Core Strategy is limited to setting the housing targets for each 5 year period for each authority, and determining what housing supply will be available from various sources to meet these targets, setting the level of discount appropriate for each source to ensure that there is</p>	<p>It is considered that there are no significant differences and will not affect the overall strategy within the BCCS.</p>

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		<p>sufficient supply available over the 15 year period.</p> <p>The Core Strategy allows for a 10% discount on commitments, which make up 83% of housing supply for the period 2009-16. It also allows for a 15% discount on housing supply on surplus employment land, which forms the bulk of housing capacity for the period 2016-26. The Black Country SHLAA's as of April 2011 provide a five year supply of deliverable sites plus a buffer of more than 20%.</p> <p><u>Windfalls in 5 year supply</u> The SHLAA report prepared for each authority as evidence to underpin the Core Strategy did not include a windfall allowance within the 5 year supply, as this was not permitted under current guidance (PPS 3 para 59). The inclusion of windfall sites within the 5 year supply is not an issue specifically addressed in the Core Strategy and is more appropriately covered in each individual authority AMR / SHLAA. The Core Strategy, by it's very nature, does not allocate sites and therefore allows for supply coming forward</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p>
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		<p>on unallocated sites. These include sites which will, in the future, be identified in SHLAAs and form part of the 5 year deliverable supply, at which point they will no longer be defined as windfalls.</p> <p>The BCCS Inspector’s Report (xi) states that “The future housing supply for the area does not rely on windfalls to any significant extent...” and paragraph 54 states: “...we are comfortable with the Councils’ assessment of less than 6%, or about 418 dwellings per year, being provided on small “windfall” sites across the BC. This compares to a recent yearly average of around 640 new dwellings and thus still provides a generous discount against the trend, even taking into account a 2% reduction arising from the changed definition for residential gardens in PPS 3. In a largely built up area, such as the BC, we accept that such an allowance is appropriate and locally justified in relation to guidance in PPS 3, notably paragraph 59. We therefore conclude on this issue that the necessary supply of developable</p>	
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		<p>new housing land has been demonstrated by the evidence for each of the relevant five year periods in accord with PPS 3, without any reliance on “windfalls”.</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>	<p><i>To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?</i></p>	<p>There is no impact as the strategy employed in the BCCS is Brownfield driven for sound planning reasons. The BCCS provides for some 60,000 units over the plan period, of which all can be identified with a sustainable amount being on Brownfield land in the regeneration corridors.</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p>

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<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50), and caters for housing demand and the scale of housing supply to meet this demand (para 159)</p>	<p><i>Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum threshold? Is your evidence for housing provision based on up to date, objectively assessed needs</i></p>	<p>Yes. (Policy HOU3)  No.  Yes – it was up to date at the time, and the Core Strategy was adopted recently (February 2011).</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</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><i>Have you considered whether your plan needs a policy which allows some market housing to facilitate the provision of significant additional affordable housing to meet local needs?</i></p>	<p>The Black Country’s rural areas are entirely within the Green Belt and subject Green Belt policies.</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p>
	<p><i>Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)</i></p>	<p>Garden land currently accounts for only approx. 2% of housing development in the Black Country, and therefore it was not appropriate or necessary for the Core Strategy to consider and address the case for setting out such policies.</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p> <p>A consideration of policies resisting inappropriate development of residential gardens will take place as and when other Local Plan documents and Neighbourhood Plans are prepared. Any such policies are unlikely to affect the overall strategy, as garden land only accounts for 2% of housing development in the Black</p>

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			Country, and the Core Strategy housing supply includes a generous discount against the trend for windfall sites.
In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	<i>Examples of special circumstances to allow new isolated homes listed at para 55 (note, previous requirement about requiring economic use first has gone).</i>	The Black Country's rural areas are entirely within the Green Belt and are subject to Green Belt policies.	It is considered that there are no significant differences and will not affect overall strategy within the BCCS.
<b>7. Requiring good design (paras 56-68)</b>			
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.			

<b>8. Promoting healthy communities (paras 69-78)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<i>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</i>	<i>Does the plan include a policy or policies addressing community facilities and local services? To what extent do policies plan positively 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?</i>	Yes, the spatial strategy as a whole is highly sustainable, concentrating growth in the most accessible locations, within Strategic Centres and along public transport corridors, with this strategy supported by a network of smaller centres and facilities to meet local needs (policies CSP1, CSP2, CEN1-6). The vast majority of new housing will be built on brownfield land, concentrated close to existing public transport nodes and services. Spatial objective 8 seeks "a sustainable network of community services, particularly high quality lifelong learning, health care and sport and recreation facilities, which are easily accessible to all residents at a neighbourhood level, resulting in an increase in levels of qualifications, skills, health and well-being, a decrease in deprivation indicators and improved	The Black Country Core Strategy plans positively for the provision and use of shared space, community facilities and other local services and is entirely consistent with the NPPF in this regard.

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		<p><i>perception of residential neighbourhoods across the Black Country."</i></p> <p>Accessibility Planning work, using Accession software, has underpinned the density and locational standards supporting Policy HOU2, Housing Density and Type and complements Housing Market Assessments. The work brings together the aims of transport and land use planning strategy in order to promote social inclusion, health, the economy and environment. It does so by seeking to ensure that basic facilities are accessible by means other than the private car to all sectors of the population. In line with Government guidance and the West Midlands Local Transport Plan, it examines access by walking and public transport to four main service areas. These are education (primary and secondary schools), health (doctors' surgeries), fresh food (shopping centres and large supermarkets) and employment (strategic centres and main employment areas). It then identifies the most suitable</p>	
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		<p>areas for different types and densities of housing based on their accessibility by walking and public transport to all of these basic services.</p> <p>Policy HOU5 addresses Education and Health Care Facilities, seeking where possible to incorporate a mix of compatible community service uses on a single site.</p> <p>Policy EMP6 addresses Cultural Facilities and the Visitor Economy, and there is a suite of 'Centres' policies to ensure a hierarchy of centres to meet strategic and local needs. Policy CEN6 further addresses Meeting Local Needs for Shopping and Services, protecting shops that provide an important service to a local area. Policy ENV6 addresses Open Space, Sport and Recreation.</p>	
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<p><i>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).</i></p>	<p><i>Do you have a policy which would enable the protection of Local Green Spaces and manage any development within it in a manner consistent with policy for Green Belts? (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77).</i></p>	<p>The Core Strategy does include Policy ENV1 which safeguards the Black Country's designated Nature Conservation Areas and Policy ENV6 which affords protection to open space land as well as sites used for sport and recreation.</p> <p>However the Local Green Space designations referred to in the NPPF relate more to the protection of local sites and would therefore not be relevant within the strategic approach taken in the Core Strategy which does not allocate site specific uses.</p>	<p>This issue will be more appropriately addressed in each Black Country Local Authority's forthcoming site allocations DPD's and not within the more Strategic framework of the Core Strategy.</p>
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<b>9. Protecting Green Belt land (paras 79-92)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p>The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy (83).</p> <p>Boundaries should be set using <b>'physical features likely to be permanent'</b> amongst other things (85)</p>	<p>If you are including Green Belt policies in your plan, do they accurately reflect the NPPF policy?</p> <p>For example:</p> <p>Lpas should plan positively to enhance the beneficial use of the Green Belt. <i>Beneficial uses are listed in para 81.</i> PPG2 set out that 'Green Belts have a positive role to play in fulfilling objectives. Para 1.6 of PPG2 set out the objectives – some of these have been rephrased/ amended and 'to retain land in agricultural, forestry and related uses' has been omitted.</p> <p>Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (85).</p>	<p>Yes – Policy CSP2, with Green Belt boundaries precisely defined in individual authorities saved policies.</p> <p>Positive Green Belt uses are identified for protection and enhancement; these include nature conservation and agricultural land.</p> <p>The policy states Green Belt boundaries will be maintained and protected from inappropriate development. Whilst the NPPF has changed some of the exceptions to inappropriate development, the Core Strategy policy remains consistent. MDS sites are not mentioned in the Core Strategy.</p> <p>The policy approach meets the requirements for sustainable development as the Core Strategy identifies how we can meet the development needs of the area without incursions into</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p>

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	<p>Does it allow for the extension or alteration of a <i>building</i>, provided that it does not result in disproportionate additions over and above the size of the original building? (89). <i>PPG2 previously referred to dwelling. Original building is defined in the Glossary.</i></p> <p>Does it allow for the replacement of a <i>building</i>, <i>provided the new building is in the same use and not materially larger than the one it replaces?</i> (89) <i>PPG2 did not have a separate bullet point – replacement related to dwellings rather than buildings.</i></p> <p><i>Does it allow for limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development?</i> (89) (PPG2 referred to 'major existing developed sites')</p>	<p>the Green Belt</p>	
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	<p>Change from 'Park and Ride' in PPG2 to <i>local transport infrastructure</i> and the inclusion of '<i>development brought forward under a Community Right to Build Order</i>' in relation to other forms of development that are not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. (90).</p>		
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<b>10. Meeting the challenge of climate change flooding and coastal change (paras 93-108)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p><i>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).</i></p>	<p><i>Have you planned new development in locations and ways which reduce greenhouse gas emissions?</i></p> <p><i>Does your plan actively support energy efficiency improvements to existing buildings?</i></p> <p><i>When setting any local requirement for a building's sustainability, have you done so in a way that is consistent with the Government's zero carbon buildings policy and adopt nationally described standards? (95)</i></p>	<p>Yes – Facing up to Climate Change and Sustainable Development are both Sustainability Principles of the Core Strategy which underpin the whole strategy. These are supported by a number of policies on various topics which will help achieve this, including ENV5 (Flood Risk, Sustainable Drainage and Urban Heat Island), ENV7 (Renewable Energy), and WM5 (Resource Management)</p> <p>The plan is silent on energy efficiency improvements to existing buildings, although where these require planning permission, they will be assessed against policy ENV3 which supports Government initiatives and design advice which would support them. The Sustainability Principles would also support these measures.</p> <p>National requirements / standards for new development</p>	<p>Whilst the plan does not mention energy efficiency improvements to existing buildings or zero carbon homes, the strategy as a whole does provide positive policy approaches to such issues.</p>

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		<p>for sustainable buildings are addressed in policy ENV3, mainly through CfSH and BREEAM standards, although the words Zero Carbon buildings are not explicitly referred to.</p>	
<p>Help increase the use and supply of renewable and low carbon energy (97).</p>	<p><i>Do you have a positive strategy to promote energy from renewable and low carbon sources?</i></p> <p><i>Have you considered identifying 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)</i></p>	<p>Yes – forms a key part of policy ENV7 requiring new developments to provide renewable and low carbon energy as a key part of proposal.</p> <p>Criteria based policy was considered appropriate to cover this issue, although locations / areas were identified where guidance was considered necessary – through the waste policies and the links this has to renewable / low carbon energy generation.</p>	<p>No significant differences.</p>

<b>11. Conserving and enhancing the natural environment (paras 109-125)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (para 117).</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).</p>	<p><i>If you have identified Nature Improvement Areas, have you considered specifying the types of development that may be appropriate in these areas (para 117)?</i></p>	<p>Yes – directly though ENV1 on nature conservation (and supported through other related policies). This approach seeks to minimise impacts and protect key parts of the ecological network (including SSSI's and Nature Reserves). All appropriate developments are encouraged to positively contribute to the natural environment of the area through the policy. A landscape scale approach was built into the evidence base which informed the policy and the Environmental Infrastructure Guidance approach of policy CSP3 – having a joint strategy helped in this regard.</p> <p>In relation to NIAs, the Core Strategy policy was in place before NIA status was given. However, as the NIA covers the whole Black Country, including the built up areas, precluding</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p>

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		certain types of development would not be considered appropriate and policy ENV1 provides the most appropriate way to assess such proposals.	
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<b>12. Conserving and enhancing the historic environment (paras 126 – 141)</b>			
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.		The Core Strategy seeks to protect and enhance heritage assets and local character and distinctiveness.	It is considered that there are no significant differences and will not affect overall strategy within the BCCS.

<b>13. Facilitating the sustainable use of minerals (paras 142-149)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>

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<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><i>Does the plan have policies for the selection of sites for future peat extraction? (143) (NPPF removes the requirement to have a criteria based policy as peat extraction is not supported nationally over the longer term).</i></p>	<p>BCCS Spatial Objective 10 is consistent with NPPF objectives for minerals. It seeks to safeguard and make most sustainable use of the Black Country’s mineral resources, and to continue to provide a steady supply of minerals to support the local economy and provide the raw materials needed to support the regeneration of the area. This accords with NPPF paragraph 142.</p> <p>The specific requirements of “Local Plans” set out in paragraphs 143, 145, 146, 147 and 163 of the NPPF are also fully covered in BCCS Policies MIN1 – MIN5, with waste minimization, use of alternative materials, and transportation of minerals by rail also addressed through Policies TRAN3 and WM5.</p> <p>NPPF Paragraph 143: The BCCS identifies a mineral safeguarding area (MSA) containing mineral resources of potential national and local importance and key mineral infrastructure sites (including recycling operations and existing/ potential rail-linked</p>	<p>No significant differences identified. BCCS Policies MIN1 – MIN5 and WM5 are considered to be in conformity with the NPPF.</p> <p>However, it should be recognised that the BCCS is a high-level strategic plan and that it also reflects local circumstances, particularly with regard to mineral safeguarding, as the MSA covers nearly the whole of the Black Country, including the locations where most development is expected to take place. Where further detail is still required this will be progressed through separate ‘Local Plans’.</p>
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		<p>sites) that will also be safeguarded, and has a policy governing non-mineral development within the MSA (Minerals Key Diagram, Policy TRAN3 and Policy MIN1).* It encourages minimization of mining and quarry waste, supports the production and use of substitute (secondary and recycled) materials and takes into account the potential contribution from these sources (Policies MIN2, MIN3, WM5 and MIN5). It identifies "areas of search" suitable for the extraction of the main minerals of economic value present in the Black Country, i.e. sand and gravel and brick and plans for adequate supplies of these minerals in line with national and local requirements (Minerals Key Diagram and Policies MIN2 – MIN3). It also provides guidance on the potential exploitation of other minerals occurring locally i.e. coal, coal bed methane and natural building stone (Policy MIN4). It includes environmental criteria to be taken into consideration when determining planning applications for mineral development, and general</p>	
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		<p>guidance on mineral working, other mineral operations, and restoration and aftercare of mineral extraction sites (Policy MIN5).</p> <p>NPPF Paragraph 145:                  BCCS Policy MIN2 plans for a steady and adequate supply of aggregates, taking into account the extent and distribution of primary resources present within the area (land-won sands and gravels only, with the only viable resources identified in Walsall Borough) and the potential contribution from recycled and secondary sources. It sets a modest annual production target for sand and gravel in Walsall, taking into account recent production rates and likely future trends. However, sufficient resources are identified within the "areas of search" to enable the Black Country to contribute appropriately towards the landbank requirements for the West Midlands County sub-region, consistent with the annual supply requirements identified in technical work carried out by the West Midlands AWP and former WMRA during</p>	
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		<p>2009/10, revised in accordance with the National and Regional Guidelines for Aggregates Provision in England 2005 – 2020 (2009). It also provides locally specific guidance on sand and gravel extraction proposals within the areas identified, and in other locations, including the potential need for “borrow pits.” The policy was developed in co-operation with the West Midlands AWP and neighbouring mineral planning authorities.</p> <p>NPPF Paragraph 146: BCCS Policy MIN3 plans for a steady and adequate supply of industrial minerals, taking into account the extent and distribution of the resources present within the area (brick clays only, comprising Etruria Marl resources identified in Dudley and Walsall and fireclay resources identified in Walsall), and the potential contribution that recycled and secondary sources, imports and stockpiles are likely to make towards future supplies to operational and mothballed brick manufacturing plants. Sufficient Etruria Marl and fireclay resources are identified within</p>	
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		<p>the “areas of search” to enable the Black Country to maintain an adequate supply of clays to brick manufacturing plants and other clay users in the Black Country, to at least the end of the plan period (2025/26). The additional resources were identified in consultation with the brick manufacturing industry, and with other relevant stakeholders, and took into account the likely continued availability of supplies from outside the Black Country, based on information provided by manufacturers and the relevant mineral planning authorities. The policy also includes guidance on importation of materials and requirements relating to stockpiling.</p> <p>NPPF Paragraph 147: BCCS Policy MIN4 provides guidance on the exploitation of other mineral resources that occur locally or may have potential to be exploited within the Black Country, specifically, coal, coal bed methane and natural building stone. The policy includes guidance on where these resources may be found, the circumstances where</p>	
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		<p>working of these resources will be supported, and the requirements that proposals will be expected to address. The policy relating to coal and coal bed methane was developed in co-operation with the Coal Authority and neighbouring mineral planning authorities and the policy relating to natural building stone was developed in co-operation with English Heritage and the authorities' conservation officers.</p> <p>NPPF Paragraph 163: The BCCS minerals policies were developed having regard to the best and most up-to-date information available on the extent of mineral resources and future mineral requirements. The evidence used included technical reports published by BGS and CLG, mineral resource maps published by the Coal Authority and BGS, and technical work carried out by and on behalf of the Black Country Authorities (see Black Country Core Strategy website for details of evidence). The policies were also shaped by continuous working and engagement with other relevant</p>	
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		organisations such as the West Midlands AWP, the Coal Authority, brick manufacturers, other local clay users, the aggregates industry and adjoining mineral planning authorities.	
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## Planning policy for traveller sites

The CLG '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 travellers 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 which respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

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<b>Policy A: Using evidence to plan positively and manage development (para 6)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
Early and effective community engagement with both settled and traveller communities.	Has your evidence been developed having undertaken early and effective engagement including discussing travellers accommodation needs with travellers themselves, their representative bodies and local support groups?	Yes: the site numbers proposed in the Core Strategy are based on the needs identified in the Gypsy and Traveler Accommodation Assessment that was produced using surveys of the communities. The Core Strategy policies were found sound at examination following discussions with community representatives.	It is considered that there are no significant differences and will not affect overall strategy within the BCCS.
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.	Can you demonstrate that you have a clear understanding of the needs of the traveller community over the lifespan of your development plan?  <b>Have you worked collaboratively with neighbouring local planning authorities?</b>  Have you used a robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions?	Yes – the Core Strategy covers four local authority areas and the targets were developed in parallel with the RSS revision process, involving collaboration with neighbouring authorities.  A robust and up-to-date evidence base was used – the Black Country Gypsy and Traveller Accommodation Assessment. (Fordham Research, July 2008), downloadable from:	It is considered that there are no significant differences and will not affect overall strategy within the BCCS.

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		<a href="http://blackcountrycorestrategy.dudley.gov.uk/evidencesa/">http://blackcountrycorestrategy.dudley.gov.uk/evidencesa/.</a>	
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<b>Policy B: Planning for traveller sites (paras 7-11)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>

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<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 (8)</p>	<p>Have you identified, and do you update annually, a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set targets? Have you identified a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. (9)</p>	<p>The role of the Core Strategy is to set targets, but not to allocate sites. Local Plan documents will allocate sites and SHLAAs / AMRs for each local authority will monitor supply against targets.</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p>
<p>Consider the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites.</p>	<p>Have you identified constraints within your local area which prevent you from allocating sufficient sites to meet likely future need? If so have you prepared a joint development plan or do you intend to do so? Is the reason for this clearly explained?</p>	<p>The Core Strategy is Black Country wide. No particular constraints have been identified which would prevent allocation of sufficient sites to meet likely future need.</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p>
<p>Relate the number of pitches and plots to the circumstances of the specific size and location of the site and the surrounding population size and density.</p>		<p>The site selection criteria in policy HOU4 of the Core Strategy comply with these criteria</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p>
<p>Protect local amenity and environment.</p>		<p>The site selection criteria in policy HOU4 of the Core Strategy comply with these</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within</p>

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		criteria	the BCCS.
Set criteria to guide land supply allocations where there is identified need.	<p>Has an up-to-date assessment of the need for traveller sites been carried out? If an unmet need has been demonstrated has a supply of specific, deliverable sites been identified based on the criteria you have set?</p> <p>Where there is no identified need, have criteria been included in case applications nevertheless come forward?</p>	<p>A robust and up-to-date assessment of the need for traveller sites was carried out to support the Core Strategy – the Black Country Gypsy and Traveller Accommodation Assessment.</p> <p>The role of the Core Strategy is to set targets, but not to allocate sites. Local Plan documents will allocate sites and SHLAAs / AMRs for each local authority will monitor supply against targets.</p> <p>A criteria based policy has been included in the Core Strategy (Policy HOU4: Accommodation for Gypsies and Travellers and Travelling Showpeople), which can be applied to the allocation of sites, and to determine applications where there is a need not met through allocated sites.</p>	It is considered that there are no significant differences and will not affect overall strategy within the BCCS.
Ensure that traveller sites are sustainable economically, socially and environmentally.	Have your policies been developed taking into account criteria a-h of para 11 of the policy	The criteria based policy (Policy HOU4) in the Core Strategy, and Policy ENV5 regarding flood risk and Policy HOU2 regarding accessibility to services, address the criteria set out in para 11 of	It is considered that there are no significant differences and will not affect overall strategy within the BCCS.

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		the policy, where these are relevant in terms of the scale of pitch provision required and the circumstances of the Black Country.	
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<b>Policy C: Sites in rural areas and the countryside (para 12)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
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?		All the rural areas in the Black Country are in the Green Belt so traveller sites would be inappropriate development under policy E of the CLG Statement.	It is considered that there are no significant differences and will not affect overall strategy within the BCCS.

<b>Policy D: Rural exception sites (para 13)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p>If there is a lack of affordable land to meet local traveller needs, lpas in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers sites.</p>	<p>If you have a lack of affordable land to meet local traveller needs in your rural area have you used a rural exception site policy, and if so, does it make it clear that such sites shall be used for affordable traveller sites <b>in perpetuity?</b></p>	<p>The Black Country's rural fringe is covered by Green Belt and thus the policy for Green Belt would apply.</p> <p>There are no rural exception sites in the BCCS.</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p>

<b>Policy E: Traveller sites in Green Belt (paras 14-15)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.	Have you made an exceptional limited alteration to the defined Green Belt boundary to meet a specific, identified need for a traveller site? Has this alteration been done through the plan-making process and is it specifically allocated in the development plan as a traveller site only	If it proved necessary to alter the Green Belt boundary, this would be carried out through a Site Allocation Document.	It is considered that there are no significant differences and will not affect overall strategy within the BCCS.

<b>Policy F: Mixed planning use traveller sites (paras 16-18)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
	<p>Have you considered including travellers sites suitable for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents)?</p> <p>If mixed sites are not practicable have you considered the scope for identifying separate sites for residential and for business purposes in close proximity to one another?</p> <p>Have you had regard to the need that travelling showpeople have for mixed-use yards to allow residential accommodation and space for storage of equipment?</p> <p><b>NB Mixed use should not be permitted on rural exception sites</b></p>	<p>The role of the Core Strategy is to set targets, but not to allocate sites. Local Plan documents will allocate sites and SHLAAs / AMRs for each local authority will monitor supply against targets.</p> <p>Policy HOU4 of the Core Strategy takes account of the need for travelling showpeople to have sufficient space for storage and maintenance of equipment.</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p>

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<b>Policy G: Major development projects (para 19)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
	Do you have a major development proposal which requires the permanent or temporary relocation of a traveller site? If so has a site or sites suitable for the relocation of the community been identified (if the original site is authorised)?	Not applicable.	It is considered that there are no significant differences and will not affect overall strategy within the BCCS.

## Plan-making

Local Plans (paras 150-157)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Each local planning authority should produce a Local Plan for its area. Any additional DPDs should only be used where clearly justified. SPDs should be used where they help applicants make successful applications/aid infrastructure delivery/not be used to add unnecessarily to financial burdens on development (153)	<i>Are you able to clearly justify the use of additional DPDs if this is the approach that you are pursuing?</i>	The BCCS is a strategic plan for a large and complex area and it is the Core Strategy that covers the largest population of any so far. It sets out a spatial strategy, based on centres and corridors, and it illustrates how this will be applied, including with reference to important locations in the area. Appendix 2 to the plan does set out "Detailed Proposals for Regeneration Corridors and Strategic Centres", but this begins with a statement that includes "The delineation of boundaries within the diagrams and the figures provided are illustrative to give a broad indication of the scale of change. Detailed boundaries and exact figures will be defined in lower tier Development Plan Documents such as Site	It is considered that there are no significant differences and will not affect overall strategy within the BCCS.

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		<p><i>Allocation Documents and Area Action Plans.</i>" The BCCS states (in paragraph 1.6) that, as well as the Core Strategy there will be "a series of area action plans (AAPs), site allocations documents (SADs) and other local development documents (LDDs) prepared by individual local authorities, containing site allocations, detailed policies and local implementation mechanisms for specific areas."</p> <p>It recognises that the BCCS provides the context for the preparation of Site Allocation and other plans and that these will be needed to deal with:</p> <ul style="list-style-type: none"> <li>• specific development proposals (see for example paragraphs 2.9 and 2.54);</li> <li>• the allocation of housing sites and the densities and housing mixes to be promoted (paragraph 3.3, Policies HOU1 and HOU2), and the allocation of sites to meet identified needs to gypsies and travellers (Policy HOU4);</li> <li>• the securing of necessary provision for education and health (Policy HOU5);</li> <li>• the allocation, phasing and protection of employment</li> </ul>	
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		<p>sites (Policy DEL2, paragraph 4.21);</p> <ul style="list-style-type: none"> <li>• detailed proposals for strategic and other centres (Policies CEN1-CEN8);</li> <li>• detailed proposals for and the safeguarding of land for transport schemes, and the allocation of sites in accessible locations (Policies TRAN1 and TRAN3);</li> <li>• detailed proposals to support historic character and local distinctiveness (Policy ENV2);</li> <li>• detailed arrangements to secure and promote environmental infrastructure (paragraph 2.31);</li> <li>• detailed Flood Risk Assessments where necessary (paragraph 6.23);</li> <li>• ensuring that waste management capacity is provided and safeguarded, and promoting the sustainable management of resources (Policies WM1-WM5);</li> <li>• detailing the extent of mineral commodities and bringing forward appropriate mineral-related proposals (paragraphs 8.8, 8.73).</li> </ul>	
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		<p>The Inspectors' Report recognised that each of the individual districts would be preparing its own more detailed plans, and that that these would allocate sites, and provide more detail on the implementation of policies (see for example IR paragraphs 36, 39, 69, 99, 103 and 142), and that such an approach need not mean any wait for delivery (IR paragraphs 57- 58). They recognised also the importance of individual plans for centres, especially the strategic centres. For example, in respect of Wolverhampton the Inspectors considered the location of additional convenience retailing "<i>is best reserved for consideration in the Wolverhampton City Centre AAP</i>", whilst "<i>it is appropriate that the forthcoming Wolverhampton City Centre AAP should address the detailed allocation of sites and the programme for delivering these development targets</i>" and more generally "<i>... detail about boundaries should be handled in "next stage" DPDs</i>" (IR paragraphs 191, 193 and 195). In respect of the Regeneration Corridors (RCs) the Inspectors</p>	
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		<p>noted that "... the boundaries and specific land use designations of the RCs are illustrative only and they said "we do not consider it appropriate that the JCS set out in detail how individual RCs will be developed as these are matters to be determined in "next stage" DPDs" (IR paragraph 219). The Inspectors went on (IR paragraph 226) to state</p> <p><i>"... we support the broadbrush approach to area designation and the indicative residential and employment land yields for individual RCs.... we are satisfied that this is not necessary in a JCS and that the level of information is sufficient to guide the preparation of subsequent AAPs etc, where more detailed decisions will need to be taken."</i></p> <p>The BCCS was supported by a Delivery &amp; Implementation Plan which drew upon key evidence in the Black Country Infrastructure Study and the Black Country Viability Study. See <a href="http://blackcountrycorestrategy.dudley.gov.uk/evidencesa/">http://blackcountrycorestrategy.dudley.gov.uk/evidencesa/</a>.</p>	
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		<p>The Core Strategy expects Policy DEL1: Infrastructure Provision to be delivered through DPDs and SPDs for various types of infrastructure and planning obligations, and Policy HOU5 enables a similar approach in respect of Education and Health Care Facilities. The BCCS also provides for Policy ENV2: Historic Character and Local Distinctiveness and Policy ENV3: Design Quality to be delivered through DPDs and SPDs. The text provides scope for DPDs to set any planning obligation requirements and for SPDs to be used only to assist applicants by providing further detail. In the same way, Policy TRAN2: Managing Transport Impacts of New Development provides for the preparation of advice as to how the policy will be applied.</p> <p>The BCCS also provides for the preparation of SPDs to set out or explain the standards to be used by the local authorities in respect of various kinds of provision where this proves necessary:</p> <ul style="list-style-type: none"> <li>• Housing density and housing types (Policy HOU2);</li> <li>• Car Parking in centres (Policy</li> </ul>	
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		<p>CEN8);</p> <ul style="list-style-type: none"> <li>• Cycle parking (Policy TRAN4);</li> <li>• Car parking generally (Policy TRAN5); and</li> <li>• Open space, sport and recreation (paragraph 6.28).</li> </ul> <p>These standards will not in themselves place financial burdens on development, but will provide evidence against which applications should be judged.</p>	
<p><b>Local Plans should:</b></p> <ul style="list-style-type: none"> <li>• Plan positively (para 157)</li> </ul>	<p><i>Have you objectively assessed development needs and planned for them? If you can't meet them in your area, have you co-operated with others on meeting them elsewhere? (para 182)</i></p>	<p>The scale of development proposed in the Core Strategy is based on extensive technical work, in particular the Employment Land review (2008), Employment Sites Study (2009), Black Country Centres study (2009) and Strategic Housing Land Availability Assessments (2009). (see <a href="http://blackcountrycorestrategy.dudley.gov.uk/evidencesa/">http://blackcountrycorestrategy.dudley.gov.uk/evidencesa/</a>). This work provides a sound understanding of the development needs of the area. In terms of employment land, Policies EMP1 and EMP2 provide sufficient land to meet identified employment needs, including a safety margin to cover risk. This supply includes an allowance for</p>	<p>It is considered that there are no significant differences and will not affect overall strategy within the BCCS.</p>

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		committed / proposed employment land within southern Staffordshire which due to its close proximity is considered to contribute towards meeting Black Country employment needs. The Councils continue to work with southern Staffordshire Councils to bring forward these sites through joint studies and engagement with the relevant LEPs.	
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<b>Using a proportionate evidence base (paras 158-177)</b>			
<b>What NPPF identifies in relation to the development of local plans</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)</b>	<b>Does your local plan meet the NPPF's expectations? How significant are any differences?</b>
<b>Defence, national security, counter-terrorism and resilience</b>	See para 164	There is nothing in the Core Strategy that specifically addresses this issue. The Ministry of Defence has not previously been a statutory consultee in the planning process. However their Strategic Planning Team did not raise any issues or make any representations during the consultation and adoption process for the Core Strategy. The requirements of the NPPF now mean that the Ministry of Defence will be actively consulted on all future DPDs including site allocation documents produced by individual Authorities within the Black Country.	The Core Strategy did not directly meet the NPPF expectations set out in Para 164. However, it will not have resulted in any differences of significance within the Core Strategy and no specific issues were raised directly by the Ministry of Defence during the consultation and adoption process.
<b>Ensuring viability and deliverability</b>  The sites and scale of development identified in the plan should not be subject to	<i>To what extent has your plan been assessed to ensure viability, taking into account the costs of any requirements likely to be applied to development, such as requirements for</i>	The Core Strategy Delivery & Implementation Plan was submitted alongside the Core Strategy for inspection. The plan addresses in detail, viability and the short term delivery	It is considered that there are no significant differences and will not affect overall strategy within the BCCS.

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<p>such a scale of obligations and policy burdens that their ability to be developed viably is threatened (173)</p>	<p><i>affordable housing, standards, infrastructure contributions or other requirements?</i></p> <p><i>In so doing to what extent has it taken into account the normal cost of development and on-site mitigation and provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable (173)?</i></p>	<p>programme and draws upon key evidence in the Black Country Infrastructure Study and the Black Country Viability Study.</p> <p>The Viability Study in particular, looked in detail at the costs of mitigation and development and demonstrated the viability and deliverability of our sites and thus supports the policies in the Core Strategy.</p>	
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	<p><i>To what extent have the likely cumulative impacts on development in your area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards been assessed to ensure that the cumulative impact of these standards and policies do not put implementation of the development plan at serious risk, and facilitate development throughout the economic cycle (174)?</i></p>	<p>The strategy takes a long term view, and is designed to be flexible enough to accommodate a range of economic circumstances. Since the plan has been adopted, the Black Country has been able to consider the cumulative impact of our standards and our policies, and to measure delivery against stated priorities.</p> <p>The Black Country is seeing significant investment and development, despite the economic downturn, with development in our centres, key investment in strategic employment sites, and housing developments all underway. Through the monitoring group, we operate continuous review of the development targets in the core Strategy, and through our work with developers, continue our dialogue to ensure that the implementation of our plan continues.</p>	
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<b>Examining Local Plans (para 182)</b>			
<b>What NPPF identifies in relation to the development of local plans</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)</b>	<b>Does your local plan meet the NPPF's expectations? How significant are any differences?</b>
<p>Authorities should submit a plan for examination which it considers is sound, including being ....</p>	<p><i>Positively prepared</i></p>	<p>As stated at the start of this assessment, the Inspectors who examined the BCCS reported that:  <i>"... the spatial vision that the JCS seeks to deliver by 2026 takes a ... positive and proactive approach through an economic, social and environmental regeneration of the area. Acknowledging the major challenges faced, which have increased due to the recent economic recession, the JCS seeks to tackle out-migration to surrounding counties through growth in sustainable locations to help attract private investment and enterprise to improve the local economy."</i>                      (IR paragraph 2)</p> <p>The 'regeneration through growth' strategy started in the aspirational 'Black Country</p>	<p>The BCCS is a positive plan for regeneration through growth. It is aspirational but is justified through evidence and has helped to mobilise substantial support. Following the endorsement it received through the examination process there should be no doubt that it meets the expectations of the NPPF.</p>

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		<p>Study', "the urban renaissance strategy" for the area (<a href="http://www.the-blackcountry.com/default.asp?PageID=224&amp;n=Black+Country+Study1">http://www.the-blackcountry.com/default.asp?PageID=224&amp;n=Black+Country+Study1</a>), which informed the Phase 1 Revision of the RSS for the West Midlands (<a href="http://www.wmra.gov.uk/documents/RSS%20Full%20Doc%20Jan%2008.pdf">http://www.wmra.gov.uk/documents/RSS%20Full%20Doc%20Jan%2008.pdf</a>). Given the need to regenerate the area this set the following objectives.</p> <p>"a) to reverse out-migration</p> <ul style="list-style-type: none"> <li>• accommodating within the Black Country all of the generated household growth from 2011</li> <li>• meeting at least the levels of housing provision identified in Policy CF3 table 1;</li> </ul> <p>b) to raise income levels</p> <ul style="list-style-type: none"> <li>• raising demand and household incomes (average earnings, GDP per head and reducing unemployment) to the UK average by 2033;</li> </ul> <p>c) to create an inclusive and cohesive society within the Black Country</p> <ul style="list-style-type: none"> <li>• removing barriers to opportunity</li> <li>• changing the socio economic mix by increasing</li> </ul>	
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		<p><i>the proportion of social grades A and B to match the national profile by 2033 or earlier;</i></p> <p><i>d) to transform the Black Country Environment</i></p> <ul style="list-style-type: none"> <li><i>• protecting and enhancing the sub-region's environmental and heritage assets and biodiversity</i></li> <li><i>• implementing the Black Country as Urban Park concept."</i></li> </ul> <p>The BCCS sought to respond to these challenges through a growth strategy that included 63,000 net additional dwellings 2006-2026 (Policy HOU1). This would represent a 13% increase in housing stock and exceeded the ONS household growth projections for the same period of 50,000 (2008-based) to 58,000 (2006-based).</p> <p>The studies that supported the BCCS, such as those into the economy, employment land and centres (see <a href="http://blackcountrycorestrategy.dudley.gov.uk/evidencesa/">http://blackcountrycorestrategy.dudley.gov.uk/evidencesa/</a>) reflected the proposed housing growth and the other objectives, including improving economic</p>	
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		<p>performance, and helped to shape a comprehensive strategy based upon the Growth Network as put forward in the plan.</p> <p>The Inspectors who examined the BCCS were able to endorse the evidence on which the plan was based, the capability of meeting the targets set by the growth strategy and the support the BCCS had mobilised. See, for example IR paragraphs 3, 10, 16, 231 and 245.</p> <p><i>"The JCS also benefits from an extensive and robust evidence base that has been developed over a number of years and with considerable input independent of the four Councils acting together. Moreover, it is clear to us that there is not only widespread public support across the area for the strategy, but also strong evidence of co-operation across authority boundaries, including those under differing local political control. All of the above factors, reinforced by the effective absence of strategic level representations from the development industry, service providers and/or national bodies</i></p>	
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		<p><i>to the contrary, lead us to conclude that the spatial vision put forward for the BC is appropriate in principle."</i></p> <p><i>"... we are able to conclude that ... the overall strategy, with its important focus on SCs and RCs ... is capable of delivering the new development needed to meet the housing, employment and other targets identified by 2026 in a satisfactory and sustainable way."</i></p> <p><i>"Deriving as it does directly from the Black Country Study (BCS) (2006), that itself arose from the original RSS (adopted 2004), it is clear that the preferred strategy has emerged from a process of gradual refinement influenced by consultation responses (and sustainability appraisal) at various stages. The submitted strategy therefore benefits from considerable public support. It also has positive endorsement from most, if not all, organisations responsible for service delivery in the BC. Moreover, there is a noticeable absence of significant strategic objections from the development industry as a whole, as distinct</i></p>	
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		<p><i>from specific detailed criticisms of certain aspects and policies. Taken together, these all point to a sound overall strategy that has emerged from a comprehensive consultation process and we conclude accordingly."</i></p> <p><i>"We have been impressed by the continuing and comprehensive level and extent of co-operation evident in the JCS and its supporting documents, both between the four Councils and with the many other interested parties concerned with the implementation of the strategy. This is reflected in the effective overall consensus on the list of priority schemes sought by 2026."</i></p> <p><i>".... It is common ground that a joint will to achieve regeneration of the BC continues to exist ...."</i></p>	
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