

A NEW VISION FOR DEVELOPING CENTRAL WAKEFIELD

**Soundness
Self Assessment**



Central Wakefield Area Action Plan

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Self Assessment**

**Central Wakefield Area Action Plan
Development Plan Document**

Submitted to Secretary of State May 2008

Information

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دیکھو سنو

اگر آپ کو اس لیفلٹ کی کاپی آڈیو کیسٹ، بڑی
لکھائی، بریل یا کسی اور زبان میں اس کا ترجمہ
چاہیے تو ہمیں اس نمبر پر فون کریں:

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1 Introduction

Introduction

- 1.1 Under the new planning system Local Development Framework (LDF) development plan documents (DPDs) will be considered at Public Examination. The Inspector will consider whether the LDF satisfies the requirements of the Act ⁽¹⁾ and the Regulations ⁽²⁾ relating to the preparation of DPDs in terms of procedure and whether they are "sound".
- 1.2 Planning Policy Statement 12 'Creating Local Development Frameworks' (PPS 12) states that "*Local planning authorities should ensure that development plan documents are sound when submitted for examination*" (paragraph 4.15). Local planning authorities (LPAs) may find it useful to carry out an objective self assessment process having regard to the tests in PPS 12 to satisfy themselves that they have produced a sound DPD. Where they do this, their assessment can be used as part of their evidence for the Public Examination.
- 1.3 The Planning Inspectorate (PINS) has issued guidance ⁽³⁾ which sets out how the Inspector will manage the examination to assess whether the DPD is sound. In addition to soundness the examination has to consider whether the authority has complied with all the statutory requirements. While some statutory requirements are covered by the first five soundness tests, many are not. Proof that requirements have been met will therefore need to be included in the self-assessment statement.
- 1.4 This guidance has been taken forward by the Planning Advisory Service (PAS), with the support of the Department for Communities and Local Government (DCLG) and PINS through production of the 'LDF soundness self-assessment toolkit' (September 2006). The soundness toolkit provides a framework to assist LPAs to draw up an appropriate self assessment statement. It is in two parts, the first provides guidance to assist in the preparation of DPDs, and the second provides the basis for the self assessment statement.
- 1.5 The soundness toolkit has been used as the template for the City of Wakefield MDC Soundness Self Assessment Statement for the LDF Central Wakefield Area Action Plan DPD.
- 1.6 As set out above, the Local Development Framework documents are subject to a number of tests of their soundness once they are submitted to the Secretary of State. The tests are set out below:

1	It has not been prepared in accordance with the authority's Local Development Scheme (LDS).
2	It has not been prepared in compliance with the Statement of Community involvement (SCI), or where no SCI exists, it has not been prepared in accordance with the minimum requirements of the Town and Country Planning (Local Development) (England) Regulations 2004.
3	The plan and its policies have not been subject to Sustainability Appraisal.
4	It is not a spatial plan, or it has not properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas, and/or it is inconsistent with national planning policy and/or it is not in general conformity with the Regional Spatial Strategy (or spatial development strategy in London).
5	It does not have regard to the Authority's Community Strategy.
6	The strategies/policies/allocations in the plan are not coherent and consistent within and between Development Plan Documents (DPDs) prepared by the Authority and by neighbouring Authorities, where cross boundary issues are relevant.

1 *The Planning and Compulsory Purchase Act 2004*

2 *The Town and Country Planning (Local Development) (England) Regulations 2004*

3 *Development Plans Examination - A guide to the process of Assessing the Soundness of Development Plan Documents 2005*

7	The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base.
8	There are no clear mechanisms for implementation and monitoring.
9	The plan is not reasonably flexible to enable it to deal with changing circumstances.

2 Statutory Requirements

2.1 This section sets out how the Council has complied with formal procedural requirements of producing the Central Wakefield Area Action Plan DPD. It is organised by each stage of DPD production and identifies the activities that are required at each stage as set out in the Planning Advisory Service LDF Soundness Self-Assessment Toolkit.

Stage 1 - Pre-Production

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE REQUIRED
Is the DPD identified in the LPA's adopted LDS?	The Act s19(1)	Work commenced on the Central Wakefield Area Action Plan (CWAAP) DPD under the LDS 2005 ⁽⁴⁾ . It proposed the preparation of the CWAAP DPD during the period mid-2004 to the end of 2007 (Table 1 p.10, p.16).
Have you recorded the commencement of the DPD?	Not Statutory	Pre-production and early community engagement were undertaken primarily in Autumn/ Winter 2004 as the first stages of continuous engagement on the CWAAP, as set out in the LDS 2005 (p.16). This is recorded in the Initial Statement of Pre-Submission Consultation published January 2007 (p.3).
Have any details set out in the LDS such as the role, rationale or scope of the DPD been met?	The Act s19(1)	Section 3.0 of the LDS 2005 sets out the " <i>Profiles of Each Local Development Document</i> " and provides details of the role of the DPD (p.16). Section 3.0 of the LDS 2006 sets out the " <i>Priorities for the Local Development Framework</i> " and Table 3 " <i>Profiles of Each Local Development Document</i> " and provides final details on the CWAAP DPD at pre-production stage (p.28).
Is baseline information being collected and evidence being gathered to set the framework for the SA?	The Act s19(5)	The Sustainability Appraisal Scoping Report Chapter 4 (p.19-24) sets out baseline information which is summarised in Table 2 (p.19). Chapter 7 outlines the Sustainability Appraisal Framework through which the DPD will be assessed (p.35-37).
Are you collecting information on the conservation objectives of any European wildlife (Natura 2000) sites?	Conservation (Natural Habitats &c) (Amendment) (England and Wales) Regulations 2006	The Appropriate Assessment of the CWAAP DPD contains this information, however it was considered there were no sites within central Wakefield relevant to the objectives.
Have you consulted the four statutory environment consultation bodies for five weeks on the scope and level of detail of the environmental information to be included in the SA report?	Regulations 9 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 specify the consultation procedures for plans requiring SEA.	Consultation letters and copies of the Sustainability Appraisal Scoping Report were sent to the statutory bodies and some additional bodies for a five week consultation period in May and June 2005. Details are given in the Initial Statement of Pre-Submission Consultation (p.6-7).

4 A Draft LDS was approved by the Council in September 2004, and following some changes and consideration by the Secretary of State, the final version became effective from 1 July 2005

Stage 2 - Issues and Options (Regulation 25 Consultation)

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
Have the "specific consultation bodies" been consulted - or are there any of these bodies which, because of the nature of this DPD, do not need to be consulted at this stage?	Regulation 25(1)(a)	All specific consultation bodies have been consulted. These are listed in Initial Statement of Pre-Submission Consultation (Appendix A), and in The Statement of Community Involvement (Appendix 2)
Have the "general consultation bodies" been identified and consulted - and are those bodies consulted consistent with the approach set out in the adopted SCI?	Regulation 25(1)(b)	General consultation bodies have been consulted in accordance with the approach set out in the SCI. These are listed in Initial Statement of Pre-Submission Consultation (Appendix A), and in The Statement of Community Involvement (Appendix 2).
Does the consultation contribute to the development and sustainability appraisal of the options?	The Act s19(5)	Consultation on the Issues & Options Report and Issues & Options Initial Sustainability Appraisal was carried out between June - July 2005. The Initial Sustainability Appraisal set out a range of options and tested these against Sustainability Appraisal objectives. The Initial Statement of Pre-Submission Consultation (Appendix C) summarises representations made and the Council's response to these.
Are you keeping a record of the bodies being consulted, how they are being consulted, and the main issues they have raised?	Regulation 28(1)(c)	This information is contained in the Initial Statement of Pre-Submission Consultation report which sets out which bodies were consulted and how this was undertaken (p.4-7 and Appendix A & B). The issues raised and the Council's response to these are summarised in Appendices C and D. Records of all representations that have been made are kept both on paper files and electronically on an Access database.
Are you developing a framework for monitoring the effects of the DPD?	Regulation 17 of the Environmental Assessment of Plans and Programmes Regulations 2004 specifies the requirements for monitoring the significant environmental effects of implementation of plans	At Issues and Options stage, monitoring frameworks were not in place, however frameworks were being developed by Preferred Options stage and indicators updated as necessary. The CWAAP DPD describes the arrangements for monitoring. The Initial Sustainability Appraisal Chapter 5 "Baseline Information" (p.17) sets out baseline information and Chapter 7 "The Sustainability Framework" (p.27) sets out objectives and indicators for monitoring the environmental effects of the DPD. Once the monitoring framework is in place it will form part of the AMR.
Have you arranged to send to the GO copies of documents used in consultation?	Not statutory	Copies of the Issues & Options Report and all supporting documents and a letter were sent to GOYH on 13 June 2005.

Stage 3 - Preferred Options (Regulation 26 Consultation)

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
Is the DPD being prepared in accordance with the LDS?	The Act s19(1)	<p>Work commenced on the CWAAP DPD under the first LDS (which came into effect on 1 July 2005). The document was current at the time of consultation on the Issues and Options, which was carried out in January and February 2005.</p> <p>The third revised LDS became effective on 1 October 2007 after milestones for the dates of the CWAAP were missed. The Preferred Options consultation was current with this LDS and was carried out in January to February 2007.</p>
<p>Have you assessed the preferred options against</p> <ul style="list-style-type: none"> • consistency with national policy? • general conformity with the RSS? • conformity with the core strategy DPD or old policy? 	The Act s19(2), s24 and Schedule 8 Regulation 13(6)	<p>The CWAAP makes regular reference/ links to national policy throughout. Examples of this are in the Special Policy Areas section where reference is made to PPS25 and PPS6 in relation to appropriate development. The 'Context' section (paragraphs 2.0.1 to 2.0.7) also explains how the LDF has been prepared in accordance with national, regional and local documents.</p> <p>The CWAAP (The Report) is in general conformity with the RSS. Examples of this are shown in the 'Context' section (paragraphs 2.0.1-2.0.3) whereby reference is made to the draft RSS proposing high-level direction and providing the rationale for sub-area policies based around the Regional Settlement Hierarchy, of which Wakefield is classed as an Urban area and sub-regional centre within the Leeds City Region. Appendix 1 of the Report also provides evidence of how the RSS links in with the new development plan system.</p> <p>Appendix 2 of the CWAAP demonstrates how the Report is linked to Core Strategy objectives and policies which were developed alongside regional and national policy/strategies.</p> <p>The CWAAP DPD - Preferred Options Report is in conformity with the Core Strategy which in turn is in general conformity with the RSS. RBP was consulted and responded positively to the vision and proposals of the document.</p> <p>Confirmation of the approach taken was also sought through correspondence with GOYH and comments by GOYH were taken into account when finalising the Preferred Options document.</p>
Are you having regard to adjoining RSS? (if appropriate)	The Act s19(2) Regulation 15(1)(g)	Given Wakefield's position in the Yorkshire and Humber region this was not necessary as the boundary of Central Wakefield does not abut another region i.e. North West, North East and East Midlands.

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
<p>Are you having regard to</p> <ul style="list-style-type: none"> • the community strategy of the authority? • any other LDD adopted by the authority? 	<p>The Act s19(2)</p>	<p>At Preferred Options stage the Wakefield District Community Strategy was called 'Fast Forward' although at later stages this was revised and named 'Developing Knowledge Communities'. The CWAAP makes reference to how the main local policy context for the LDF is provided by the Community Strategy and how the vision will be delivered (section 2 (Context) of the CWAAP DPD, paragraphs 2.0.1 to 2.0.3, and Appendix 1 (The New Development Plan System)).</p> <p>Appendix 2 of the CWAAP DPD, 'Links to Core Strategy and Initial Sustainability Appraisal' provides evidence of how the preferred options for the CWAAP links to the five challenges in Fast Forward.</p> <p>The CWAAP DPD is in conformity with the Core Strategy DPD and so the evidence provided for this activity will relate to both documents produced. However, reference to the Community Strategy is made within the former report, (e.g in the 'Context' section, chapter 2, paragraph 2.0.3, it is stated how the city centre should be the focus of new retailing, leisure, commercial office and cultural developments in the District to support the high priority afforded to the urban renaissance of the centre in the Community Strategy).</p>
<p>Are you having regard to the other matters and strategies relating to</p> <ul style="list-style-type: none"> • resources? • the RDA's Regional Economic Strategy? • infrastructure provision in any transport plan? • utilities infrastructure? • integration of transport and land use policies? • waste strategies? • hazardous substances and accidents? • climate change? • air quality strategy? 	<p>The Act 19(2)</p> <p>Regulation 15</p> <p><i>matters referred to in Annex B of PPS 12 additional to the requirements set out in the Act and regulations</i></p>	<p>The CWAAP Preferred Options report indicates that the issues identified were taken into account in developing the document.</p> <p>Resources are made reference to within the document, for example, in the 'Context' section (paragraph 2.0.6) by the deployment of the Major Projects Team within Regeneration Services to deal with the implementation of a number of major projects within the plan area and the assistance of the Urban Centres Management and Economic Development Service and a range of external partners. The 'Context' section also refers to the input of Yorkshire Forward, the Regional Development Agency, which recognises the wider Wakefield City area (which includes that covered by the CWAAP) as the main driver of the District's economy and part of the Urban Renaissance Initiative (paragraph 2.0.4).</p> <p>Chapter 4 of the CWAAP relates to transport and to specific proposals for the creation/ completion of the Emerald Ring and the Northern Gyroty System. The integration of transport objectives and land use policies via strategies such as Regional Transport Strategy (RTS) and the present second Local Transport Plan (LTP2) are more fully regarded in Chapter 7 'Transport and Travel' of the Core Strategy DPD. Section 7.1.8.</p>

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
		<p>Aspects such as waste strategies, hazardous substances and accidents and climate changes are more specifically referred to in documents such as the Core Strategy, Development Policies and Waste DPDs. The city centre is an area of concern where congestion has led to the declaration of an Air Quality Management Area which has been developed as part of the Council's Air Quality Action Plan.</p> <p>Utilities, police health and other agencies were provided with the opportunity to comment on the Plan and responses taken into account when preparing the DPD.</p> <p>The relevant bodies have been consulted on the preferred options and issues were raised and appreciated following Issues and Options correspondence. In particular, correspondence has been received from GOYH, the Yorkshire and Humber Assembly, the West Yorkshire Passenger Transport Executive and Yorkshire Forward. A summary of the consultation process, and the comments received is given in the Initial Statement of Pre-Submission Consultation, Chapter 3 and Appendix C.</p>
<p>Have you undertaken the necessary sustainability appraisal of alternatives in arriving at the preferred options?</p>	<p>The Act s19(5)</p>	<p>Consultation on the Issues & Options Report and Issues & Options Initial Sustainability Appraisal was carried out between June and July 2005. The Initial Sustainability Appraisal assessed CWAAP DPD policy options put forward for consultation as part of the Issues and Options Report and used their appraisal to select preferred options.</p> <p>A further Sustainability Appraisal was carried out on the preferred options and rejected options to demonstrate their relative sustainability. This report was published alongside the Preferred Options Report in January 2007.</p>
<p>Have you prepared the Sustainability Report?</p>	<p>The Act s19(5)</p>	<p>The Sustainability Appraisal of the CWAAP DPD was published in January 2007 at the Preferred Options stage. The document came in three parts - a Summary version, the Full Sustainability Appraisal and the Full Sustainability Appraisal Appendix.</p>
<p>Have you screened the plan options for likely significant effects on European wildlife (Natura 2000) sites?</p>	<p>Conservation (Natural Habitats &c) (Amendment) (England and Wales) Regulations 2006</p>	<p>Appropriate Assessment of the CWAAP DPD was carried out for the Submission stage.</p>
<p>If necessary have you made an Appropriate Assessment of the plan options in Habitats terms?</p>	<p>Draft Habitats Regulations no 85B Conservation (Natural Habitats &c) (Amendment) (England and Wales) Regulations 2006</p>	<p>Refer to Appropriate Assessment Screening Report of the CWAAP document for details.</p>

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
Have you set out clear reasons for the preferred options and a precis of the alternatives and why they were rejected?	Regulation 13(1)	<p>The options in the CWAAP DPD Preferred Options Report are arranged under topic headings. Under each heading there is a discussion of the issues and the relevance to the plan area. The preferred policy option is included in a box. The rejected options are then found in a second box along with reasons for their rejection.</p> <p>Section 5.2 of the Sustainability Appraisal of the CWAAP DPD, published at Preferred Options stage, explains how options have been developed from the Issues and Options stage to Preferred Options.</p> <p>The Technical Paper shows how final options have been reached by regarding Preferred Options and Issues and Options stages and the Sustainability Appraisal.</p>
Are you ready to seek participation on the preferred options and consult on the sustainability report (including any findings on Appropriate Assessment)?	Regulation 26	Members' support for the consultation of the draft CWAAP and Sustainability Appraisal was sought on 10 November 2006 and approved by the Corporate Director Regeneration on 8 January 2007.
Have you prepared a housing trajectory (where relevant to the DPD)?	Not statutory	<p>A housing trajectory is included in the Technical Paper.</p> <p>Housing trajectories were prepared via the Annual Monitoring Report (AMR). The AMR 2005, published 31 December 2005, has a housing trajectory covering both UDP and LDF requirements found in Chapter 2.</p> <p>The AMR 2006, published 31 December 2006, has a housing trajectory covering LDF requirements found in Chapter 4 under Housing at Core Indicator 2a 'Housing Trajectory'.</p>
<p>Where sites are to be identified or areas for the application of policy defined, are you preparing sufficient illustrative material to</p> <ul style="list-style-type: none"> • enable you to amend the currently adopted proposals map? • inform the community about the location of proposals? 	Regulation 9	The CWAAP includes 5 plans illustrating proposals and other information.

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
Have you made copies of the "pre-submission proposals matters" available for inspection?	Regulation 26(a) Regulation 27 allows anyone to make representations and specifies a period of six weeks	The CWAAP DPD and statement of proposal matters were made available for inspection for the period 12 January until 22 February 2007 (6 weeks). Documents were available for inspection at deposit venues, housing offices, local libraries, council offices and community centres. Two notices were given in four local papers and these fell on either 11 and 12 January 2007.
Have you published the pre-submission proposals documents, proposals matters and a statement that the documents are available for inspection (at specified places and times) on the website?	Regulation 26(b) Regulation 24 gives definitions and Regulation facilitates representations (see above)	At Preferred Options stage the CWAAP DPD and supporting documents, proposals matters and a statement that the documents were available for inspection were placed on the Council's website www.wakefield.gov.uk (accessed via Planning and Regeneration). This showed the documents themselves and a list of places in the District where the information could be found.
Have you sent to the "DPD bodies" (ie all those you consulted at the Regulation 25 stage) <ul style="list-style-type: none"> • the proposals for the DPD? • supporting documents that are relevant to the body/ • notice of proposals matters • a statement that the documents are available for inspection (at specified places and times)? 	Regulation 26(c) Regulation 24 gives definitions and Regulation facilitates representations (see above)	Statutory consultees were sent letters on 8 January 2007 along with a notice of proposal matters, the CWAAP DPD and Sustainability Report. The other consultees were sent letters on 9 January 2007 and were provided with a letter explaining when, where and how documents would be available for inspection. The Statement of Community Involvement (Appendix 2) identifies both statutory and non-statutory consultees consulted at Preferred Options stage and the bodies are listed in the Initial Statement of Pre-submission Consultation (Appendix A).
Have you advertised in a local paper giving notice of the proposals matters when and where the pre-submission proposals documents can be inspected?	Regulation 26(d) Regulation 24 gives definitions and Regulation facilitates representations (see above)	Two notices were given in four local papers. These were published on 11 and 12 January 2007. Various press articles have also been published with reference to the consultations and responses throughout the DPD production.
Do the participation arrangements comply with the SCI?	The Act s19(3)	The Initial Statement of Pre-Submission Consultation describes the consultation undertaken at Issues and Options Stage and demonstrates that requirements were met. The Statement of Community Involvement (SCI) sets out how people and organisations are to be involved in the planning process. Chapter 2 sets out the new processes of preparing development plans and states the groups that need to be consulted and how they will be consulted, and methods of community engagements are outlined in a table on p.9. Chart 1 (p.14-16) sets out the methods of engagement at each stage and process and these have been met for the Preferred Options stage.

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
<p>Have you sent the GO and the Planning Inspectorate copies of the proposals for the DPD and supporting documents?</p>	<p>Not statutory</p>	<p>GOYH was sent a letter on 8 January 2007 regarding proposals for the DPD and supporting documents with two copies of the CWAAP Preferred Options Report, the Sustainability Report and Appendices (one copy only supplied), the CWAAP Report Proposals matters and Initial Statement of Pre-Submission Consultation.</p> <p>PINS was sent a letter on 8 January 2007 regarding proposals for the DPD and supporting document.</p>
<p>Are you keeping a record of the number of representations made and the issues raised?</p>	<p>Regulation 28(1)(d)</p>	<p>Consultation responses for the CWAAP and Sustainability Appraisal Preferred Options Report have been recorded and kept both on file and electronically on the Council's Limehouse database. The Statement of Pre-Submission Consultation contains information relating to consultation procedures and outcomes.</p>

Stage 4 - Submission

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
Have you prepared the DPD in accordance with the LDS?	The Act 19(1) and s20(5) Regulation 9	<p>Work commenced on the CWAAP DPD under the first LDS (which came into effect on 1 July 2005). The document was current at the time of consultation on the Issues and Options, which was carried out in June and July 2005.</p> <p>The revised LDS became effective on 1 October 2006 after milestones for the dates of the CWAAP were missed. The Preferred Options consultation was current with this second LDS and was carried out in January to February 2007.</p> <p>Further timetabling delays in the production of the DPDs resulted in the third revision of the LDS, the LDS 2007, being submitted to Government Office for consideration. The LDS 2007 pushed consultation on Submission of the DPD back to May to June 2008 and was approved by the Council on 12 September 2007, replacing the LDS 2006 with effect from 1 October 2007.</p>
Have you prepared the DPD in compliance with the SCI and the Regulations?	The Act s19(3) and s20(5) Regulation 28(1)	<p>The CWAAP DPD Statement of Pre-Submission Consultation describes the consultation undertaken at the stages of Regulations 25 and 26 and identifies how and who was consulted at these stages and arrangements and events held for the Submission consultation. Appendix 1 lists all consultees consulted under Regulation 25 and Appendix 6 lists all consultees consulted under Regulation 26.</p> <p>The Statement of Community Involvement (SCI), adopted in February 2006 also sets out how people and organisations are to be involved in the planning process. Chapter 2 sets out the new processes of preparing development plans and states the groups that need to be consulted and how they will be consulted, and methods of community engagements are outlined in a table on p.9. Chart 1 (p.14-16) sets out the methods of engagement at each stage and process and these have been met for the formal consultation stage. The approach followed at each stage of the Core Strategy DPD and Development Policies DPD in accordance with the intentions of the SCI.</p>
Have you undertaken sustainability appraisal and prepared a SA Report?	The Act s19(3) and s20(5) Regulation 28(1)	The Sustainability Appraisal for the Submission CWAAP DPD was carried out in February to April 2008 and a Sustainability Appraisal Report has been prepared.
Have you amended the screening (and Appropriate Assessment where needed) to take	Draft Habitats Regulations no 85B Conservation (Natural Habitats &c) (Amendment) (England)	The screening report has not been amended.

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
account of any changes since Reg 26 participation?	and Wales) Regulations 2006	
Have you considered representations made on the preferred options?	Regulation 27(3)	<p>The Technical Document shows how final options have been reached by regarding Preferred Options and Issues and Options stages and the Sustainability Appraisal.</p> <p>The CWAAP DPD Statement of Pre-Submission Consultation describes the consultation undertaken at the stage of Regulation 26 and identifies how and who was consulted at these stages. In line with Regulation 27, section 4 describes who was consulted (listed in Appendix 6) and the methods used for consultation. Numbers of responses for the CWAAP DPD Preferred Options consultation are provided in section 4, and a summary of the numbers of comments via topic representation is also provided in section 4. A detailed summary of comments is provided in Appendix 9.</p> <p>The Preferred Options consultation is also outlined in the submission CWAAP DPD 'Introduction and Explanation' chapter under 'The Submission Stage-Consultation' section.</p>
Are you likely to be in general conformity with the RSS?	The Act s24 Regulation 30	<p>Wakefield is identified as a sub-regional city in the RSS and has a key role in delivering growth in the south of the Leeds City Region, particularly within former coalfield areas. City centres are expected to continue to be the main focus for new business, shopping, leisure, cultural and educational facilities within the region.</p> <p>The RPB were consulted at the Preferred Options stage of the CWAAP document and the proposed vision and proposals were deemed positive for the central Wakefield area. Recognition of the RSS in paragraphs 2.0.1 to 2.0.3 and Appendix 1 was also welcomed.</p>
Is the DPD to be submitted consistent with national policy and in conformity with the core strategy DPD or old policy?	The Act s19(2) and Schedule 8 Regulation 13(6)	<p>The submitted CWAAP DPD makes regular reference/ links to national policy throughout and the DPD demonstrates that conformity with national policy has been sought. The 'Conformity to National, Regional and Local Policy' chapter, relates to such consistency.</p> <p>GOYH were consulted at the Preferred Options stage on the Core Strategy and Development Policies DPDs and various comments were received which have been taken into account in the Submission documents.</p>
Have you sufficient regard to all those matters required by the Act, including in respect of any	The Act s19(2) Regulation 15	The submitted CWAAP DPD and the Statement of Pre-Submission Consultation indicate that the issues identified were taken into account in developing the document. The Preferred Options document was

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
changes made since the preparation of the preferred options?		amended in light of latest government policies, draft RSS and various comments to produce the Submission document. The CWAAP Technical Document reviews how alternative options have been dealt with since the preparation of the Preferred Options.
Have you prepared a housing trajectory (where relevant to the DPD)	Not statutory	<p>Housing trajectories are prepared via the Annual Monitoring Report (AMR). The AMR 2005, published 31 December 2005, has a housing trajectory covering both UDP and LDF requirements found in Chapter 2. The AMR 2006, published 31 December 2006, has a housing trajectory covering LDF requirements found in Chapter 4 under Housing at Core Indicator 2a 'Housing Trajectory'.</p> <p>The Core Strategy DPD specifically regards the housing trajectory in the 'Meeting Local Needs in Sustainable Locations' chapter under Policy CS2, which also includes a basic interim housing strategy comparing current and past housing completions against the current and new RSS housing requirements. In the 'Delivering and Monitoring' chapter the housing trajectory is linked to objectives, sustainability appraisal and monitoring of policies.</p> <p>There is no housing target specific to the CWAAP. However, the plan does include a table showing the contribution of the housing allocations towards the requirement for Wakefield urban area.</p>
Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted proposals map? If so, have you prepared a submission proposals map?	Regulations 6, 9, 13(4) and 14	There is a Context Map and the proposals are shown on five plans.
Have you identified all policies that are to be superseded by a policy or policies in the DPD?	Regulation 13(5)	The Technical Paper identifies UDP policies that will be superseded.
Are you ready for submission? Have you a good evidence base to support your DPD, and does it contain sufficient reasoned justification?	The Act s20(5)(b) Regulation 13(1) and 13(2) Regulation 28(1)	<p>The main supporting documents are the:</p> <ul style="list-style-type: none"> • Technical Paper • Sustainability Appraisal • Appropriate Assessment Screening Report • CWAAP DPD - Statement of Pre-Submission Consultation and Soundness Toolkit • Strategic Flood Risk Assessment <p>The full list of background documents to support the evidence base are published on the website.</p>

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
Have you got all your supporting documents ready?	Regulation 28(1)(e)	A copy of the Sustainability Appraisal Report, Pre-Submission Statement of Consultation, and Technical Paper will be submitted with the CWAAP DPD.
Have you <ul style="list-style-type: none"> • summarised the issues raised in the consultation on issues and options? • prepared a statement on the consultation, the issues and how they have been addressed? 	Regulation 28(1)	The CWAAP DPD - Statement of Pre-Submission Consultation covers consultation under Regulation 25 in chapter 3 'Issues and Options'. Appendix 3 covers a summary of comments received and the Council's response and Appendix 4 covers a summary of workshops held. The Technical Paper sets out how alternative options have been dealt with.
Have you <ul style="list-style-type: none"> • summarised the issues raised in representations on participation on the preferred options? • prepared a statement on the representations and how the issues have been addressed? 	Regulation 28(1)	The CWAAP DPD - Statement of Pre-Submission Consultation covers consultation under Regulation 26 in chapter 4 'Preferred Options'. Appendix 9 covers a summary of comments received and the Council's response. The Technical Paper sets out how alternative options have been dealt with.
Have you considered how the plan will be implemented and set out how it is to be monitored?	The Act s20(5)(b) and s35 Regulation 48	Information on the delivery and implementation of proposals in the CWAAP is set out at the end of each policy. A section on how the Council will monitor the effectiveness of policies to ensure the CWAAP delivers its objectives is set out in the 'Delivery and Implementation' chapter. The CWAAP Preferred Options and the Sustainability Appraisal contents are being used to inform and steer the submission document and to select indicators, which will be used to monitor the CWAAP. The AMR 2007 explains this process (p.36-p.37. Subsequent AMRs will report on these indicators alongside national core output indicators. Where monitoring suggests that policies are not working as intended, the opportunity will be taken to consider whether the policy should be revised or deleted. The Sustainability Appraisal Report also includes information on implementation and monitoring of proposals.
Do you have evidence that the DPD can deal with changing circumstances?	The Act s 20(5)(b)	The CWAAP DPD has been designed to provide a flexible policy framework and this is discussed in more detail in relation to each policy. The policies are all associated with targets and monitoring indicators so that the success in delivering the spatial vision and

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
		objectives can be assessed and kept under review in case of changing circumstances via the AMR.
Has your authority approved the DPD for submission?	Regulation 2 of the Local Authorities Functions Regulations	On 16 April 2008 Wakefield Metropolitan District Council gave approval to submit the CWAAP DPD to the Secretary of State.
Have you sent the Secretary of State copies of <ul style="list-style-type: none"> • the DPD? • the submission proposals map 	The Act s20(1) Regulation 13(4)	These are to be sent in May 2008 prior to consultation for Submission stage.
Have you sent the Secretary of State copies of <ul style="list-style-type: none"> • SA Report (as amended after consultation/ participation)? • SCI? • statement of regulation 25 consultation? • statement on representations made under Regulation 27 at the Regulation 26 participation? 	The Act s20(3) Regulation 28(1) and (2)	These are to be sent in May 2008 prior to consultation for Submission stage.
Have you sent the Secretary of State copies of the supporting documents?	The Act s20(3) Regulation 28(1) and (2)	These are to be sent in May 2008 prior to consultation for Submission stage.
Have you made copies of the following available for inspection <ul style="list-style-type: none"> • The DPD? • the SA Report? • the statement on Regulation 25 consultation? • supporting documents? • a statement of the "DPD matters" 	Regulation 28(3)	These are to be made available for inspection at Council offices and main libraries in May 2008 prior to consultation for Submission stage. Copies were also published on the Council's website (www.wakefield.gov.uk/ldf) as set out in the matters and press notices.
Have you published on your website <ul style="list-style-type: none"> • the DPD documents? • the DPD matters? • details of where and when documents can be inspected? 	Regulation 28(3)	These are to be made available on the website (www.wakefield.gov.uk/ldf) in May 2008 prior to consultation for Submission stage.

ACTIVITY	STATUTORY REQUIREMENT	EVIDENCE PROVIDED
<p>Have you sent the bodies consulted under Regulation 25</p> <ul style="list-style-type: none"> • the DPD? • the SA Report? • the statement on Regulation 25 consultation? • supporting documents relevant to the body? • notice of the "DPD matters" • details of where and when documents can be inspected? 	Regulation 28(3)	These are to be sent in May 2008 prior to consultation for Submission stage.
<p>Have you advertised in a local paper covering the whole of your area</p> <ul style="list-style-type: none"> • the DPD matters? • details of where and when the documents can be inspected? 	Regulation 28(3)	<p>Two notices are to be given in four local papers for the Submission stage consultation on the CWAAP DPD and the DPD's Proposals Matters.</p> <p>Various press articles have also been published with reference to the consultations and responses throughout the DPD production.</p>
<p>Have you informed those who asked at Regulation 26 to be notified of the submission of the DPD?</p>	Regulation 28(3)	Letters are to be sent in May 2008 prior to consultation for Submission stage.
<p>Have you requested the opinion of the RPB on the general conformity of the DPD with the RSS?</p>	The Act s24 Regulation 30	<p>The RPB (YHA) were asked for their opinion at the Preferred Options consultation stage. The vision and proposals of the CWAAP were welcomed and the content of the Area Action Plan was thought to support the implementation of both current and draft RSS. Further opportunity to comment is to be made at the Submission stage consultation for which the letter will go out in May 2008.</p>

Stage 5 - Post-Submission

- 2.2 This stage covers the period between the submission of the documents to the Secretary of State and the opening of the first hearing session of the examination. Essentially it is concerned with receiving and considering representations, and preparing for the hearing part of the examination.
- 2.3 The Council will provide a further update using the soundness self-assessment toolkit at the end of that stage to demonstrate how it has met these procedural requirements.

3 Soundness

- 3.1 This section sets out the view of the Council that the Central Wakefield Area Action Plan DPD is sound in terms of the statutory provisions and guidance. PPS 12 indicates that soundness should be judged through 9 tests. This section addresses each of the soundness tests in turn and sets out the Council's evidence.

Test 1

Soundness Test 1	
KEY QUESTION	EVIDENCE PROVIDED
Is the DPD identified in the authority's LDS?	<p>Work commenced on the CWAAP DPD document under the first LDS, which came into effect on 1 July 2005 and was current at the time of consultation on the Issues and Options consultation.</p> <p>The revised LDS became effective on 1 October 2006 and the Preferred Options consultation was current with this second LDS.</p> <p>The third revision of the LDS, the LDS 2007, came into effect from 1 October 2007 and is current for the Submission stage.</p>
Have the details set out in the LDS such as the role, rationale or scope of the DPD been met?	The LDS 2007 sets out the profiles of the DPDs in table 3. It is stated that the role of the CWAAP is to provide the framework for urban renaissance and guidance on key development opportunities which is conveyed within the CWAAP DPD.

Test 2

Soundness Test 2	
KEY QUESTION	EVIDENCE PROVIDED
Having regard to the nature of the DPD, were all the relevant consultation/ participation procedures set out in the SCI carried out?	Consultation and community engagement were carried out in accordance with the SCI, which was adopted on 8th February 2006.

Test 3

Soundness Test 3	
KEY QUESTION	EVIDENCE PROVIDED
Was a Sustainability Appraisal (SA) carried out in relation to the particular DPD in question?	Each stage of the preparation of the CWAAP DPD has been subject to SA which was undertaken by independent consultants Waterman Environmental. The Issues and Options Initial Sustainability Report was published in June 2005. At Preferred Options the SA was published in January 2007. A final SA Report has been prepared and has been submitted to the Secretary of State alongside the CWAAP.

Test 4

Soundness Test 4(a)	
KEY QUESTION	EVIDENCE PROVIDED
Does the DPD reflect the guidance on spatial planning which is set out in national planning policy?	The CWAAP is a spatial plan which sets out the broad visions, themes objectives, and spatial development strategy to be achieved via the strategic policies. The DPD makes regular reference to national policy guidance, and there is a 'Conformity to National, Regional and Local Policy' chapter.
Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans and strategy and any requirements for land and premises, which should be prepared in parallel?	Consultation took place with a wide range of service providers and comments received were taken into account when preparing the DPD. Details of consultation are set out in the Statement of Pre-Submission Consultation.
Is it clear how the DPD relates to other plans and strategies such as local transport plans which will influence the delivery of policies and proposals within the plan?	The CWAAP DPD has been prepared having taken into account other plans and strategies. Plans, policies, strategies and programmes which form the context for the CWAAP DPD and links between the Core Strategy and objectives to Regional Spatial Strategy themes and the Government's sustainable development aims can be found in the Technical Paper.
Does the DPD integrate effectively with plans prepared by the County Council?	Wakefield MDC is a unitary authority.

Soundness Test 4(b)	
KEY QUESTION	EVIDENCE PROVIDED
Does the DPD contain any policies or proposals which are not consistent with national planning policy and, if so, is there a local justification?	The CWAAP DPD is considered to be consistent with national planning policy. A number of policies at Preferred Options stage have been amended and reviewed to take latest Government policy and guidance and recommendations made by GOYH into account.

Soundness Test 4(c)	
KEY QUESTION	EVIDENCE PROVIDED
Does the DPD contain any policies and proposals which are not in general conformity with the RSS? If so, is there a local justification?	The CWAAP DPD is considered to be consistent with RSS. Chapter 2 deals with 'Conformity to National, Regional and Local Policy'.

Test 5

Soundness Test 5	
KEY QUESTION	EVIDENCE PROVIDED
Does the DPD have regard to the Wakefield Community Strategy, by setting out policies and proposals which deliver key components of that strategy so that they are consistent with or in general conformity with higher level planning policy and relate to the use and development of land?	<p>The CWAAP has been prepared in accordance with the Community Strategy. 'Fast Forward' was the Community Strategy of Wakefield MDC from 2003 up until March 2007 when it was replaced by 'Developing Knowledge Communities'. Aspects of the Vision for the Community Strategy have a spatial dimension which the CWAAP can help to deliver. The CWAAP makes references to the Community Strategy.</p> <p>The Technical Paper demonstrates how the CWAAP contributes to the key challenges identified in the Community Strategy.</p>

Test 6

Soundness Test 6	
KEY QUESTION	EVIDENCE PROVIDED
Do the policies clearly relate to the objectives in the submitted DPD?	The policies relate to the objectives and a table is included in the Technical Paper that demonstrates the relationship.
Are the policy objectives within the DPD themselves consistent?	The CWAAP DPD objectives were also appraised against Sustainability Appraisal objectives and this also identified that there were no instances where these spatial objectives were incompatible with the CWAAP's Sustainability Appraisal objectives. The objectives are derived from the vision for central Wakefield and from the work associated with the urban renaissance programme.
Is it clear how the DPD relates to other plans in the authority's LDF and to other relevant plans prepared by neighbouring authorities?	Figure 1 in The CWAAP DPD 'Introduction and Explanation' chapter contains a diagram showing the relationship of the CWAAP to other LDDs. The LDS 2007 also demonstrates that there are good joint working practices with neighbouring authorities, in section 4.11, via for example, collaboration with Kirklees and Calderdale Councils is shown in the production of a joint Strategic Flood Risk Assessment.
Where there are overlaps, are these consistent/complementary?	The Core Strategy is at the heart of the LDF document process and the basis of the strategy is to ensure a consistent approach with other LDDs. The Core Strategy DPD identifies where there is a particular link with another strategy or programme to ensure that each takes account of and is consistent with the other. The CWAAP DPD is considered to be consistent with the Core Strategy and makes reference to other plans and strategies where appropriate.
Are there any obvious gaps in the coverage of the DPD having regard to its purpose and the relevant requirements set out in national planning policy statements?	It is not considered that there are any gaps within the coverage of the CWAAP DPD.
Is it clear how cross boundary issues are addressed?	Cross-boundary issues are generally set out in the RSS which covers the whole of Yorkshire and the Humber. Neighbouring authorities have been consulted throughout the preparation of the DPD.

Test 7

Soundness Test 7	
KEY QUESTION	EVIDENCE PROVIDED
Is it clear that the LPA considered all reasonable options and alternatives in preparing the DPD?	The Technical Paper includes an assessment of options which shows how the Council has considered the relevant alternatives. At each stage of the CWAAP DPD process consultations and a Sustainability Appraisal were carried out to assess options and alternatives. At Preferred Options stage of the CWAAP a set of preferred and rejected options were set out in the DPD with justifications for each. For the submitted CWAAP DPD justification is given for each policy in the supporting text.
Are the assumptions in the DPD set out clearly and are they supported by evidence?	The overall vision, objectives and strategy for development draw upon the evidence base and the national, regional and local policy context.
Does the evidence clearly support the policies in the DPD?	Policies are supported by evidence from the background studies and Technical Paper.
Is the evidence robust and credible - ie has it been prepared in accordance with national policy and good practice guidance?	The Sustainability Appraisal Report sets out the methodology followed and how this conforms with the SA guidance. The other supporting documents and evidence bases were all carried out according to Government Guidance and other relevant guidance and in consultation with various bodies/ organisations where appropriate.
Where a balance has been struck in taking decisions between competing alternatives - is it clear how these decisions have been taken?	The Technical Paper sets out which options were preferred and explains how alternatives were considered. The Statement of Pre-Submission Consultation also provides a summary of comments received at the Issues and Options and Preferred Options consultation stages for the DPD and the Sustainability Appraisal stages in the Appendices and gives a summary of the 'Council's Response' for each, which demonstrates how decisions have been taken.

Test 8

Soundness Test 8	
KEY QUESTION	EVIDENCE PROVIDED
Does the DPD contain targets and milestones which relate to the delivery of the policies?	The mechanisms for implementation and monitoring are set out in the 'Delivery and Implementation' chapter of the CWAAP DPD. The Annual Monitoring Report (AMR) also includes national core output indicators, targets and the housing trajectory. The Sustainability Appraisal also contains a monitoring proposal framework for identified significant effects for the CWAAP DPD.
Is it clear how these are to be measured and are these linked to the production of the Annual Monitoring Report?	The 'Delivery and Implementation' sections at the end of each policy and the 'Delivery and Implementation' chapter make reference to how policy delivery is linked to the AMR. It is made clear in section 2.2 of the AMR 2006 that the AMR is to be the main means of assessing which policies and related targets in LDDs are achieving their intended purposes and where policies may need to be revised. The AMR 2007 includes a schedule of indicators proposed to monitor the effectiveness of the policies in the CWAAP DPD and suggests potential sources of data. Subsequent AMRs will report on these indicators alongside national core output indicators.

Soundness Test 8	
KEY QUESTION	EVIDENCE PROVIDED
Are the delivery mechanisms and timescale for implementation for the policies clearly identified?	Targets and indicators for the policies are clearly identified in the 'Delivery and Implementation' chapter of the CWAAP DPD.
Is it clear who is intended to implement each policy? Where the actions required to implement the policy are outside the direct control of the LPA is there evidence that there is the necessary commitment from the relevant organisation to implementation of the policies?	The 'Delivery and Implementation' section at the end of each policy sets out mechanisms for delivery of policies, including utilising Council decisions on planning applications and outside agencies and strategies assistance. Where outside commitment is necessary, this has been demonstrated by inclusion of key partners throughout the preparation process of the DPDs.
Do the processes for measuring the success of the DPD accord with national guidelines?	The 'Delivery and Implementation' chapter of the CWAAP notes how the indicators have been developed in accordance with the national guidance on monitoring and that in accordance with the Planning and Compulsory Purchase Act 2004, the Council has produced an AMR. The AMR 2006 goes on to state further guidance utilised to prepare and monitor the LDF in the Policy Background, section 2.4. The national core output indicators are set out and reported on in the AMR in accordance with advice in 'Local Development Framework Monitoring: A Good Practice Guide', and Update 1/2005 (ODPM 2005). New indicators and targets have been devised in accordance with advice in the same document. In all cases regard has been had to advice that sources should be consistent and reliable.
Does the DPD explain how its key policy objectives will be achieved?	Delivery and implementation methods are explained at the end of each policy. There is also a 'Delivery and Implementation' chapter in the DPD.

Test 9

Soundness Test 9	
KEY QUESTION	EVIDENCE PROVIDED
Is the DPD flexible enough to respond to a variety of, or unexpected changes in circumstances?	<p>The CWAAP DPD has been designed to provide a flexible policy framework and this is discussed in more detail in relation to each policy. The CWAAP gives a local area-based dimension to reflect the needs of the central Wakefield and each policy and proposal has been developed to allow for flexibility and to ensure its endurance.</p> <p>The AMR provides mechanisms to monitor the delivery of the DPD and will assess whether reviews are necessary in case of changes or circumstances.</p>
Are Development Control Policies written in a generic form to enable them to provide a robust and consistent framework for considering planning applications?	The CWAAP DPD does not contain Development Control Policies, although many of the policies will be used in the determination of planning applications within central Wakefield. These policies are written in a form that gives specific guidance to central Wakefield.

