
Preferred Strategy Site Assessment Methodology Background Paper

**Pembrokeshire Coast National Park
Replacement Local Development Plan**

April 2017

Pembrokeshire Coast National Park Authority

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Introduction

- 1 This document sets out the methodology and assessment process for the consideration of land for development in the Pembrokeshire Coast National Park Replacement Local Development Plan. The document will be used as part of the evidence base to support the Authority's approach towards the inclusion or omission of sites for development in the Plan.
- 2 The submission of sites should not be interpreted as a commitment that they will be included in the Plan as they will need to meet a criteria-based assessment as set out in this methodology paper.
- 3 In broad terms the Candidate Sites Assessment Methodology will include criteria to filter out sites that are, for example, incompatible with the National Park and its Special Qualities, or below a certain size, clearly contrary to national planning policy or unsuitable due to the presence of constraints. This will also include a lack of commitment from landowners or developers to bringing sites forward for development.
- 4 The location of sites is obviously a critical issue - for example, a site which proposes a new dwelling or residential development which is remote from existing Centres and supporting services is unlikely to be considered acceptable. Small sites at the edge of Centres will be considered as part of a review of existing Centre boundaries.
- 5 The sites will also need to be considered against the Local Development Plan Strategic Environment Assessment/Sustainability Appraisal (SEA/SA) which will assist in measuring the extent to which the Plan will achieve its objectives for sustainable development. Any sites which are likely to have a significant effect on a European Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar Site and their supporting habitat must also be subject to an appropriate assessment under the Habitats Regulations (HRA)¹. However, all sites will be appraised regarding their biodiversity value.
- 6 In the interests of producing a sound development plan and to meet Government guidance the assessment process is essentially designed to examine Sites for their:

¹ <http://www.pembrokeshirecoast.org.uk/default.asp?PID=755>

- Suitability;
 - Availability; and
 - Probability that they can be developed within the lifetime of the Plan.
- 7 Site deliverability (i.e. when, in the Plan period, development is likely to come forward) is a key issue for both the Authority and the Welsh Government². In order for the Plan to be adopted it must be determined 'sound' by the Examination Inspector. This includes ensuring that the Plan will deliver its proposals and allocations. For more information on the soundness tests see [Appendix A](#).
- 8 Each Site will be subject to an assessment process in order to determine its suitability for inclusion in the replacement Local Development Plan. In each instance the type of use being proposed needs to be made clear.
- 9 The Authority is proposing a 4-stage assessment of sites as follows:
- Stage 1 – Initial filtering of sites by size and location
 - Stage 2 – Detailed appraisal of filtered sites
 - Stage 3 – Appraisal against other parallel assessments
 - Stage 4 – Appraisal against the draft Preferred Strategy of the Local Development Plan
- 10 [Appendix D](#) of this document sets out how sites will be appraised, using a traffic-light scoring system.

² Local Development Manual 2 (August 2015) section 5.3.4 provides more detail on the expectations of Welsh Government.
<http://gov.wales/topics/planning/policy/policy-and-guidance-on-development-plans/ldpmanual/?lang=en>

Stage 1 – Initial Filtering

11 The first stage of the assessment will be to determine whether a site is:

A. Site Size for allocation

12 Large enough to be potentially allocated in the Plan. Such sites are considered to be:

- i. **Residential** - those capable of accommodating 5 or more houses and are capable of accommodating 2 or more affordable dwellings (which equates to a site size of about 0.15 hectares or greater based on a density of 30 units per hectare).
- ii. **Employment** - minimum 0.15 hectares. Large-scale proposals (more than 2 hectares) are generally not considered compatible with the National Park designation*. Preference will be given to sites within Centre boundaries before consideration of land adjacent to but outside Centre boundaries. Sites which are more remote from Centres will be considered if there are particular locational requirements which are supported by robust evidence or if they are existing buildings which may be suitable for change of use or conversion to an employment use.
- iii. **Retail** – minimum 0.15 hectares. Large-scale proposals* (more than 2 hectares) are generally not considered compatible with the National Park designation.
- iv. **Commercial** - minimum 0.15 hectares. Large-scale proposals* (more than 2 hectares) are generally not considered compatible with the National Park designation.
- v. **Recreation/leisure** - minimum 0.15 hectares. Large-scale proposals* (more than 2 hectares) are generally not considered compatible with the National Park designation.
- vi. **Gypsy and Traveller Accommodation** – minimum 0.5ha (to accommodate 3 – 5 pitches).
- vii. **Mixed use proposals** - minimum 0.15 hectares. Large-scale proposals* (more than 2 hectares) are generally not considered compatible with the National Park designation.

*If your site is larger than 2 hectares it will however still be considered.

B. Acceptable in terms of location

13 Development in the countryside is strictly controlled. Residential development, in particular where it is remote from Centres and services is unlikely to be carried forward. A list of Centres from the draft Preferred Strategy is set out in Appendix B.

C. Centre Boundary Revision (Small Sites)

14 Small housing sites (less than 0.15ha) (including those submitted as rural exception sites) adjacent or in very close proximity to the existing Centre boundaries will be considered as part of a Centre boundary revision.

15 Centre boundaries fulfil strategic functions in accordance with the Preferred Strategy of the Plan which are:

- Definition of an area within which development would normally be permitted subject to meeting other planning requirements (such as access, size, design, compatibility with neighbouring uses etc.);
- Direction of development to the most sustainable locations;
- Preventing inappropriate development in the countryside and avoiding ribbon development or fragmented development patterns.

16 To establish the suitability of land for inclusion within or exclusion from the Centre boundaries, the following criteria will be used when assessing **small sites**:

- a) Compatibility with the draft replacement Preferred Strategy– i.e. how much development is needed and where it should take place.
- b) Inclusion of the site should represent a natural and logical extension to a Centre using firm and defensible boundaries such as walls, hedgerows or roads;
- c) Constraints such as impact on the National Park landscape or nature, Conservation Areas, Listed Buildings, lack of suitable access, flooding etc.;
- d) Development of the site would not represent an unacceptable intrusion into the countryside, ribbon development or a fragmented development pattern;
- e) The site is not used for an important community function such as playing fields, play grounds or amenity land which cannot be mitigated.

17 Exception sites are housing sites permitted in locations where market housing would not gain planning permission. Ideally they should be located next to Centre

boundaries and form a logical extension to the built area. As an exception site the value of the land is lower than it would be for full market housing. The landowner must be willing to offer the land for 100% affordable housing. Support from the town or community council should be sought.

- 18 Exception sites should be next to a Centre and form a logical extension to an existing town or village. It is also important for sites to comply with other considerations, such as land drainage and highways and landscape impact, even if they are well-related to a Centre.
- 19 Rural exception sites should be small in scale, although the number and size of houses will vary according to the level of local need, nature of sites identified and the size of the existing Centre. In some instances where larger need is identified, it may be more suitable to identify two or more smaller sites around the Centre in preference to one large site.
- 20 In order for sites to be considered as exceptions sites a need for affordable housing must be shown and there must be a mechanism for making sure the properties remain affordable for all time. In the case of Low Cost Home Ownership, no mortgage lender will lend without a mortgagee in possession clause being included within a Section 106 legal agreement³ under the Town & Country Planning Act. As such a clause enables the re-sale of the property without restriction (in circumstances where the property is re-possessed), this does not guarantee that it will remain affordable in perpetuity. The Authority is keen to ensure that exception sites do not become market sites over time as a result of such clauses. Given this situation, exception sites will only be permitted for affordable rented properties.
- 21 The site value will reflect that exception sites are not sites to provide open market housing but only 100% affordable housing. Proposals for such sites can be considered under existing Local Development Plan policies.

Stage 2 – Detailed Appraisal

- 22 For sites which have been successfully filtered through Stage 1 this next stage will involve a detailed assessment based initially on the information submitted on
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³ Section 106 (S106) Agreements are legal agreements between local planning authorities and developers; these are linked to planning permissions and can also be known as planning obligations.

the Site Submission Form together with desk-based evidence and inspection of sites.

- 23 All sites of 0.15 hectares or more and for which a **residential use** is being proposed will be assessed against the following criteria:

A. Planning Assessment

- 24 The planning assessment will consider if the site complies with the search sequence approach advocated in Planning Policy Wales (Edition 9; November 2016) (para 9.2.9) which is set out in Appendix C of this document.
- 25 In addition environmental considerations will be taken into account, namely the impact on the National Park landscape, the special qualities of the National Park (see policy 8 of the adopted Local Development Plan) flooding issues, geodiversity and biodiversity, the protection and loss of the best quality agricultural land, national minerals protection policies and historic environment designations. Where relevant the planning history of the site will be taken into account.
- 26 It is recognised that many sites are likely to have some level of constraint on them that can impact on their suitability for development or may reduce the developable area of a Submission Site. In Centres where there are more sites available than are required to meet the housing requirements and the Plan's Preferred Strategy, the decision as to which sites will be taken forward will depend on the nature of the constraints and the degree of confidence the Authority is given by landowners/developers that the land will be brought forward for development during the Plan period.
- 27 Alongside consideration of constraints, the Authority will also assess whether the site has particular development opportunities, for example:
- Will the proposal involve the re-use of suitable previously developed land/buildings?
 - Will the proposal remove an eyesore/untidy site/un-neighbourly use?
 - Does the proposal align with any forthcoming public sector or other service-provider improvements to services and facilities?

B. Infrastructure

- 28 New development can place additional pressures on existing infrastructure such as highways, water supply, drainage and sewerage capacities as well as local facilities such as schools, medical and recreational facilities. The Authority is engaging with Natural Resources Wales, Dwr Cymru and Pembrokeshire County Council to establish whether such pressures on local infrastructure exist in order to inform the assessment process and highlight those locations for which new development would not be viable or realistic within the timescale of the Plan. The

development of sites is often likely to be subject to legal agreements (called Section 106 Agreements) to ensure that local services and infrastructure have adequate capacity to meet the additional demands arising from the development.

C. Accessibility

- 29 Consideration will be given to the suitability of vehicular access to and from the site. This will focus on the potential impact upon the highway network and the level of constraint in achieving an acceptable access into the site, including the extent of loss of trees, hedgerows and historic or characteristic features.
- 30 National planning policy highlights the importance for new development to have access to a range of services, facilities and employment opportunities which can be accessed by existing communities. Consequently the relative distances to existing facilities, public transport stops and frequency of service will be considered. For housing proposals therefore the assessment will examine the site in terms of whether it is located within, adjacent to or outside a Centre.
- 31 In the case of retailing and leisure proposals or other uses best located in town centres, these will be assessed according to whether they should be located within existing Centres (i.e. the sequential approach advocated by Planning Policy Wales).

D. Economic Viability

- 32 Delivering the Plan's Preferred Strategy is a critical function of the Local Development Plan and the Authority needs to be confident that any allocated site has a realistic prospect of being developed for its intended use within the Plan period – up to 2031.
- 33 Several factors can affect the viability and deliverability of a site. These can include inappropriate adjoining uses, ransom strips, land contamination issues, a lack of infrastructure or distance to public infrastructure facilities (roads, sewers etc.). Another important issue to consider is whether there is a genuine identified need for the type of development at its proposed location. Residential proposals will also need to consider the local level of need for affordable housing. For residential proposals the Authority may contact you to submit a financial viability proforma.
- 34 It will also be necessary to assess if the site is genuinely available for development. Full details of the proposed assessment criteria are shown in Appendix D of this document.

E. Additional Criteria for Proposals for Non-Residential Types of Development

- 35 **Employment proposals** – Proposals for new employment or mixed use sites containing employment will take account of the Joint Local Employment Land Review undertaken with Pembrokeshire County Council. Evidence of need and deliverability of such sites will be particularly relevant. Sites within or adjacent to Centres will be given priority, although sites in countryside locations may be considered where they are for specific reasons linked to their location.
- 36 **Retail proposals** – The site selection process for retail sites will have regard to any relevant retail studies⁴ and the sequential assessment of sites in relation to retail centres as outlined in Planning Policy Wales.
- 37 **Gypsy and Traveller Sites** - Evidence of need for new sites will be required and sites will need to be located to serve needs of Gypsies and Travellers, including access to the local services and facilities and to public roads.
- 38 **Mixed use proposals** - Over and above the considerations set out above for individual uses, compatibility of uses within mixed-use sites and with neighbouring uses will be important factors.

Stage 3 – Compliance with other related assessments

- 39 Sites will also be considered through related assessments that are triggered by preparing a plan of the nature and scope of the Local Development Plan where required. These are:
- Strategic Environmental Assessment/Sustainability Appraisal (SEA/SA)
 - Habitats Regulations Assessment (HRA)
 - Equalities Impact Assessment (EqIA)
 - Welsh Language Impact Assessment

Stage 4 – Compliance with the Preferred Strategy

- 40 To deliver the Preferred Strategy it should be acknowledged that some but not all of the Centres in the National Park will be required to accommodate growth and continue to be the focus of future planning development. The type and scale of
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⁴ Retail Study [Pembrokeshire Coast National Park - Papers M-R](#)

new development will have regard to particular needs, existing infrastructure and/or constraints – thereby directing future development to the most appropriate and sustainable locations. The draft Preferred Strategy sets out where new growth will be directed.

- 41 The Authority will use the Preferred Strategy to assess, those sites which have successfully passed through stages 1 to 3 of the assessment.
- 42 The potential acceptability and contribution of small sites which are located outside but adjacent to the Centre boundaries identified in Appendix B of this document can also be assessed.

What Happens Next⁵?

- 43 A schedule of suggestions for new site allocations will be published by the Authority in due course.
- 44 The Authority will assess the sites submitted in accordance with the methodology and the Preferred Strategy. The schedule of suggestions for new sites will also be published alongside the replacement Deposit Local Development Plan (Spring 2018 when published for formal consultation).
- 45 The Local Development Plan Manual Edition 2 August 2015 Chapters 7 and 8 and the Authority's Delivery Agreement Section 2 (Timetable) provides information on the stages following Pre-Deposit Consultation.

Further Information

- 46 For further assistance on the Preferred Strategy Sites Assessment Methodology process or the Local Development Plan process in general please see our website [Pembrokeshire Coast National Park - Local Development Plan 2](#) or email devplans@pembrokeshirecoast.org.uk or contact the Park Direction Service at the National Park Authority's Office on 01646 624800.

⁵ See Appendix E for Stages of Plan Preparation

Appendix A: Soundness Tests and Checks

Test 1: Does the plan fit? (i.e. is it clear that the Local Development Plan is consistent with other plans?)

Questions:

- Does it have regard to national policy and the Wales Spatial Plan?
- Does it have regard to Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Is it consistent with regional plans, strategies and utility programmes?
- Is it compatible with the plans for neighbouring authorities?
- Does it reflect the Single Integrated Plan and the National Park Management Plan?

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Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)

Questions:

- Is it locally specific?
- Does it address the key issues?
- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind plan policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- It is logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

Test 3: Will the plan deliver? (i.e. is it likely to be effective?)

Questions:

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

For further information on the soundness tests please see Chapter 2 of Planning Policy Wales - <http://gov.wales/topics/planning/policy/ppw/?lang=en>
And/or Chapter 8 of the Local Development Plan Manual – Edition 2 - <http://gov.wales/topics/planning/policy/policy-and-guidance-on-development-plans/ldpmanual/?lang=en>

Appendix B – List of Local Development Plan Centres (Draft Preferred Strategy)

Centre	Current Strategy Category
Amroth	Tier 4 – Rural Centre
Angle	Tier 4 – Rural Centre
Bosherston	Tier 4 – Rural Centre
Broad Haven	Tier 4 – Rural Centre
Cosheston	Tier 4 – Rural Centre (partly in National Park)
Crymych	Tier 3 – Local Centre
Dale	Tier 4 – Rural Centre
Dinas Cross	Tier 4 – Rural Centre
Felindre Farchog	Tier 4 – Rural Centre
Herbrandston	Tier 4 – Rural Centre
Hook	Tier 4 – Rural Centre (partly in National Park)
Houghton	Tier 4 – Rural Centre (partly in National Park)
Jameston	Tier 4 – Rural Centre
Lawrenny	Tier 4 – Rural Centre
Little Haven	Tier 4 – Rural Centre
Llangwm	Tier 4 – Rural Centre (partly in National Park)
Lydstep	Tier 4 – Rural Centre
Manorbier	Tier 4 – Rural Centre
Manorbier Station	Tier 4 – Rural Centre
Marloes	Tier 4 – Rural Centre
Milton	Tier 4 – Rural Centre (partly in National Park)
Nevern	Tier 4 – Rural Centre
New Hedges	Tier 4 – Rural Centre (partly in National Park)
Newgale	Tier 4 – Rural Centre
Newport	Tier 3 – Local Centre
Pleasant Valley	Tier 4 – Rural Centre (partly in National Park)
Pontfaen	Tier 4 – Rural Centre
Roch	Tier 4 – Rural Centre (partly in National Park)
Rosebush	Tier 4 – Rural Centre
Saundersfoot	Tier 3 – Local Centre

Centre	Current Strategy Category
Solva	Tier 4 – Rural Centre
Square and Compass	Tier 4 – Rural Centre (partly in National Park)
St Davids	Tier 3 – Local Centre
St Ishmaels	Tier 4 – Rural Centre
Stackpole	Tier 4 – Rural Centre
Summerhill	Tier 4 – Rural Centre (partly in National Park)
Tenby	Tier 2 – Local Service and Tourism Centre
Trefin	Tier 4 – Rural Centre

Appendix C – Extract from Planning Policy Wales (Edition 9)

Paragraph 9.2.9

Local planning authorities should consider the following **criteria in deciding which sites to allocate for housing** in their development plans:

- the availability of previously developed sites and empty or underused buildings and their suitability for housing use;
- the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility;
- the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure;
- the scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language (see 4.13), and to provide sufficient demand to sustain appropriate local services and facilities;
- the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change (and see Chapter 13), and the location of fragile habitats and species, archaeological and historic sites and landscapes (Chapters 5 and 6);
- the compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; and
- the potential to reduce carbon emissions through co-location with other uses.

Appendix D –Site Assessment

Section 1 – Key Questions

	Criterion	Commentary	Assessment Criteria
A	Is the site compatible with the National Park Purposes and Duty?		Yes
			Yes with mitigation
			No
B	Is there evidence to question the viability or deliverability of the site?		No
			Possibly
			Yes
C	Does the site have a planning history?		Yes – supports this proposal
			No history
			Yes – conflicts with this proposal
D	Does the site compatible with the Preferred Strategy of the Replacement Local Development Plan?		Yes
			No

Section 2 – Detailed Site Appraisal

	Criterion	Commentary	Assessment Criteria
	Is the site within or adjoining an existing Centre?		Within a Centre
			Adjoining edge of Centre
			Countryside
	Is the site located on previously developed (brownfield) land, as defined by Planning Policy Wales (figure 4.4)		Brownfield
			Part Brownfield/part Greenfield
			Greenfield
	Would the development of the site result in the loss of the best and most versatile agricultural land?		No loss
			Grade 3a and above
			Grade 1 or 2
	Is the site accessible from a public highway?		Yes
			Yes – with improvements

Criterion	Commentary	Assessment Criteria
		No
Is the nearby highway network capable of accommodating the resulting traffic movements?		Yes
		Yes – with improvements
		No
Is public transport available?		Yes – more than 5 buses/trains per day
		Yes – less than 5 buses/trains per day
		No
Would the development of the site result in the loss of publicly accessible open space?		Would not result in a loss
		Would affect public access but could be mitigated
		Would result in a loss
Is the site within 100m of existing water, sewerage, electrical, gas and telecommunications systems?		Yes
		No
Is there a possible infrastructure capacity issue that could act as a constraint to development?		No
		Yes – but can be addressed through investigation/mitigation
		Yes
If the site is proposed for residential development, how does it relate to any employment uses adjacent to the site?		Close to 'good neighbour' employment uses
		Not close to employment uses
		Close to 'bad neighbour' employment uses
If the site is proposed for 'bad neighbour'		Yes

Criterion	Commentary	Assessment Criteria
development – ie employment are there any residential properties within 400m of the site?		No
Does the site include or is it close to any areas designated for biodiversity importance at an international level?		No
		Adjacent/close
		Within
Does the site include or is it close to any areas designated for biodiversity importance at a national level?		No
		Adjacent/close
		Within
Does the site include or is it close to any areas designated for biodiversity importance at a local level?		No
		Adjacent/close
		Within
Is the site within or adjacent to a Regionally Important Geodiversity Site?		No
		Adjacent/close
		Yes
What is the outcome of the biodiversity assessment (if applicable ⁶)?		Positive
		Neutral
		Negative
Is there are threat to		No

⁶ This appraisal will be undertaken for sites which are considered suitable for inclusion in the Plan only.

Criterion	Commentary	Assessment Criteria
mature trees or hedgerows within or adjacent to the site?		Adjoining
		Within
Is the development of the site likely to affect the habitat, breeding site or resting place of a protected species?		No
		Potentially
		Yes
Is the site located within or close to a designated open space?		No
		Adjacent/close
		Within
Is the site located within or close to an area designated for cultural heritage importance?		No
		Adjacent/close
		Within
Is the site within or adjacent to a Conservation Area?		No
		Adjacent/close
		Within
Are there any Listed Buildings within or adjacent to the site?		No
		Adjacent/close
		Within
Are there any Scheduled Ancient Monuments within or adjacent to the site?		No
		Adjacent/close
		Within
Is the site located within or adjacent to an area prone to flood risk?		No
		Adjacent/close

Criterion	Commentary	Assessment Criteria
		Within
If the site is within or adjacent to an area prone to flooding is the risk acceptable, having regards to vulnerability of the development proposed.		Yes
		Yes, with mitigation measures
		No
Do the topographical characteristics of the site present an obstacle to development?		No
		Yes but can be mitigated
		Yes significant to prevent development
Would development of the site have a detrimental impact on the character of the Centre or locality?		No
		Yes but can be mitigated
		Yes significant enough to prevent development
Is there evidence that the site could consist of potentially contaminated land?		No
		Yes, but capable of remediation
		Yes and unlikely to be capable of remediation
Is the site within a minerals safeguarding zone?		No
		Yes but can be mitigated
		Yes
Is the land likely to be adversely affected by stability issues?		No
		Yes but capable of mitigation
		Yes

Overall Assessment

Recommendation

Appendix E: Plan Stages

We are here →

Stage	Main purpose
Review Report	<ul style="list-style-type: none"> Identifies the parts of the Local Development Plan that need to be revised. Publish background papers (evidence base) in support.
Delivery Agreement	<ul style="list-style-type: none"> Timetable for producing the replacement Local Development Plan. Community Involvement Scheme outlining the principles of community engagement.
Candidate Sites	<ul style="list-style-type: none"> Publish criteria for site selection. Invite site submissions.
Preferred Strategy	<ul style="list-style-type: none"> Set out the key strategic policies for the Local Development Plan Identify sites which fit with the Strategy
Deposit Plan	<ul style="list-style-type: none"> Prepare and publish the detailed policies and proposals map.
Submission	<ul style="list-style-type: none"> Submit the Plan and supporting evidence to the Planning Inspectorate.
Examination	<ul style="list-style-type: none"> An independent Inspector assesses the soundness of the Plan.
Adoption	<ul style="list-style-type: none"> The Authority adopts the Plan and uses it in making planning decisions.