

## South Lakeland LDF - Submission Core Strategy (CS)

### Soundness Self Assessment Accompanying Submission of the Core Strategy, November 2009

Key question	Possible evidence	Evidence provided
		<p>The main submission documents referred to below are available to view and download from the LDF Core Strategy page of the SLDC website:  <a href="http://www.southlakeland.gov.uk/Default.aspx?page=1973">http://www.southlakeland.gov.uk/Default.aspx?page=1973</a>                      Evidence base studies and other relevant studies are available at  <a href="http://www.southlakeland.gov.uk/Default.aspx?page=2033">http://www.southlakeland.gov.uk/Default.aspx?page=2033</a></p>
<b>Justified</b>		
<b>Participation</b>		
1. Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement	<p>Yes – see Consultation Statement (August 2009).                      The effectiveness of the consultation process is assessed on pages 9/10.</p>
<b>Research/ fact finding</b>		
2. Is the content of the development plan document justified by the evidence? 3. What is the source of the evidence? 4. How up to date and convincing is it?	i. Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals ii. Sections of the pre-submission proposals documents iii. Sections of the preferred strategy report iv. Sections of the sustainability appraisal report which set out its	<p>Appendix C of the Core Strategy lists the evidence base documents which have been taken into account in justifying Core Strategy policy, and indicates who prepared them and when.</p> <p>All of the documents are considered to provide firm evidence and to be sufficiently up to date. Updates pending at present include:</p> <ul style="list-style-type: none"> <li>• South Lakeland Strategic Housing Market Assessment (SHMA) Consultation Draft issued July 2009;</li> <li>• South Lakeland SFRA 2007– update underway as at August 2009</li> <li>• South Lakeland Employment Land Review, Stage 3 - underway at</li> </ul>

Key question	Possible evidence	Evidence provided
	<p>main conclusions in relation to the policies in the development plan document</p> <p>v. Sections of the consultation statement OR</p> <p>A very brief statement of how the main findings of consultation support the policies, with reference to:</p> <ul style="list-style-type: none"> <li>o reports to the council on the issues raised during participation, covering both the front-loading and formulation phases</li> <li>o any other information on community views and preferences</li> </ul> <p>vi. The studies, reports and technical papers that provide the evidence for the policies set out in the development plan document. The date of preparation and who they were produced by should be signposted OR</p> <p>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the development plan document)</p>	<p>present.</p> <p>The sections of the following documents which show how policy is justified by evidence are listed below -</p> <p><b>Core Strategy:</b></p> <p>Text boxes listing key evidence base sources accompany the development and area strategy sections:</p> <ul style="list-style-type: none"> <li>• <u>Development Strategy</u> – paragraphs 2.8 – 2.25</li> <li>• <u>Area Strategies</u> – Kendal (paragraphs 3.31 – 3.54); Ulverston (paragraphs 4.26 – 4.52); Cartmel Peninsula (paragraphs 5.28 – 5.39); East (paragraphs 6.25 – 6.33)</li> <li>• <u>Housing Policies</u> - CS6.1 (paras 7.1-7.6); CS6.2 – CS6.4 (paras 7.7-7.19)</li> <li>• <u>Jobs, Skills and Regeneration</u> – CS7.1 (paras 8.1 – 8.11); CS7.2 (paras 8.12-8.13); CS7.6 (paras 8.26-8.29);</li> <li>• <u>Quality Environment</u>: CS8.3a/b (paras 9.6-9.99); CS8.4 (para 9.10); CS8.6 (paras 9.13-9.21); CS8.7 (paras 9.22-9.27); CS8.8 (policy and paras 9.28 – 9.30); CS8.9 (paras 9.31-9.34)</li> </ul> <p><b>Core Strategy Preferred Options Report</b></p> <p>Appendix C and D lists evidence base studies taken into account in the Preferred Options</p> <ul style="list-style-type: none"> <li>• <u>Spatial Development Strategies</u> – PO1 to PO10; refers to evidence on pages 39-41 (PO1); 47-48 (PO2); 57-58 (PO3); 71-73(PO4); 76–77 &amp; 86-89 (PO5); 92–94 (PO6); 101-102 (PO7); 104/5 and 107/110 (PO8); 113 (PO9) and 115 (PO10).</li> <li>• <u>Area Strategies</u> – PO11-PO17: pages 129-132 (PO10); 146-147 (PO11); 158/159 (PO12); 167-168 (PO13); 174 (PO15); 186 -189 (PO16); 196 (PO17);</li> <li>• <u>Core Policies</u> – PO18-PO24; pages 201-203 (PO18); 207/8 and 210 (PO19); 212 (PO21); 215 (PO22); 216 and 218 (PO23); 223(PO24);</li> </ul> <p><b>Sustainability Appraisal</b></p> <ul style="list-style-type: none"> <li>• The SA Report of April 2008 sets out its main conclusions in regard to Issues and Options, Objectives, and Preferred Options in sections 5 to 8 (pages 39 to 58).</li> <li>• The SA Addendum Report of June 2009 sets out its main conclusions in</li> </ul>

Key question	Possible evidence	Evidence provided
		<p>regard to strategic objectives and final Core Strategy policies in section 4 (pages 1 to 30).</p> <p><b>Consultation Report</b></p> <ul style="list-style-type: none"> <li>The Consultation Statement (August 2009) summarises the main issues raised in consultation on the Core Strategy Preferred Options in sections 3.5 to 3.7 (pages 9 to 25) and at Issues and Options Stage in Appendix IV (Interim Consultation Statement Preferred Options April 2008) on pages 59 – 65).</li> </ul> <p><b>Infrastructure Report</b> (August 2009) provides a summary of main findings in section 4 (pages 19/20).</p>
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<ol style="list-style-type: none"> <li>Sections of the development plan documents setting out the assumptions</li> <li>Sections of the sustainability appraisal report setting out the assumptions</li> <li>A very brief statement for each assumption as to how the evidence led to the assumption</li> <li>Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions</li> </ol>	<p>The sections of the Core Strategy and Sustainability Appraisal reports, which relate to assumptions, are set out below.</p> <p>The relevant sections indicate how assumptions are based on evidence. For the SA, this includes baseline data, which helped identify key issues, and which was consulted on with the main national environmental organisations.</p> <p><b>Core Strategy</b></p> <p>The assumptions in the Core Strategy form an integral part of the following sections of the Introduction:</p> <ul style="list-style-type: none"> <li>Spatial Portrait</li> <li>Key Issues</li> <li>Strategic Objectives</li> <li>These heading are repeated for the 4 Area Strategies</li> <li>Appendix B – Contextual Influences</li> </ul> <p><b>Sustainability Appraisal</b></p> <ul style="list-style-type: none"> <li>The SA Scoping Report (April 2008) identifies SA objectives and (with reference to baseline data) sets out (in section 3) a baseline assessment and identifies key sustainability issues.</li> <li>The SA Report on the Core Strategy Issues and Options and Preferred Options reports (April 2008) sets out key assumptions as part of its summary (pages 17 to 58) of: <ul style="list-style-type: none"> <li>the purpose of SA</li> <li>the methodology for appraisal, and baseline data</li> </ul> </li> </ul>

Key question	Possible evidence	Evidence provided
		<ul style="list-style-type: none"> <li>○ the appraisal of options and strategic objectives</li> <li>○ identifying key sustainability (social, environmental, natural resource and economic) issues for South Lakeland</li> <li>○ the appraisal of alternatives and preferred options</li> <li>• The SA Addendum Report (June 2009) on the Publication Core Strategy sets out key assumptions as part of its <ul style="list-style-type: none"> <li>○ Appraisal of strategic objectives</li> <li>○ Appraisal of policies</li> </ul> </li> </ul>
<b>Alternatives</b>		
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options</p> <p>ii. Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered</p> <p>iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised</p> <p>iv. Sections of the preferred strategy report explaining:</p> <ul style="list-style-type: none"> <li>• how alternatives were developed and evaluated, and</li> <li>• why alternatives were rejected in favour of the preferred strategy</li> </ul> <p>v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed</p>	<p><b>i) Consultation Statement (August 2009):</b> shows how the community and stakeholders comments on preferred options were taken into account in the Proposed Submission Core Strategy (sections 3.5 to 3.7, pages 9 to 25) and how comments at Issues and Options Stage were taken into account in the Preferred Options Core Strategy (Appendix IV Interim Consultation Statement Preferred Options April 2008) on pages 59 – 65).</p> <p><b>ii) Core Strategy Issues and Options (November 2005):</b> set out issues for comment and invited the community and stakeholders to suggest other issues they considered needed to be addressed in the LDF (page12)</p> <p><b>Core Strategy Preferred Options Report (April 2009):</b> set out options, preferred options and also allowed the community and stakeholders to suggest options not already under consideration.</p> <p>iii) The Cabinet Report of 12 March 2008 sought approval to consult on Preferred Options and noted that the <b>Interim Consultation Report (April 2008)</b> set out the issues and options raised at the Issues and Options consultation stage.</p> <p>iv) The <b>Core Strategy Preferred Options Report (April 2008)</b> sets out 24 sets of policy options and a justification for the preferred options (PO1 to PO24). It also sets out a thorough appraisal of the likely positive and negative impacts of each alternative option within the document. The page numbers of the sections justifying each preferred option are listed on page 3 above in response to key questions 2 to 4</p> <p>v) Section 7 of the <b>Core Strategy Preferred Options SA Report (April 2008)</b> sets out the main findings of the sustainability appraisal of alternatives and preferred options. Section 3 of the report (Methodology) explains how a</p>

Key question	Possible evidence	Evidence provided
	<ul style="list-style-type: none"> <li>vi. Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document</li> <li>vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions</li> <li>viii. Sections of the representations statement</li> </ul> <p>OR</p> <p>A brief statement of the influence upon decisions of:</p> <ul style="list-style-type: none"> <li>the issues raised during stakeholder and community engagement, and how they have been addressed</li> <li>ix. Any other documentation showing how alternatives were developed and evaluated</li> <li>x. A very brief statement and any other supporting documentation of the way decisions have been taken</li> </ul>	<p>panel of external professionals assessed the options, with expertise drawn from the fields of sustainability, social, environmental and economic considerations</p> <ul style="list-style-type: none"> <li>vi) No</li> <li>vii) Sections 3.5 to 3.7 of the <b>Consultation Statement (August 2009)</b> explain how the main issues raised in consultation were addressed in selecting the policies in the Proposed Submission Core Strategy</li> <li>viii) The Representations Statement (November 2009) summarises the main issues raised in representations relating to legal compliance and soundness. While some comments relate to alternatives (eg para 4.7), none are considered sufficient to require a review of the preferred approach contained in the Proposed Submission Core Strategy.</li> <li>ix/x) the <b>Appropriate Assessment</b> screening stage report, produced alongside the Core Strategy Preferred options report, assessed the likely significant impacts of the preferred options on European Sites.</li> </ul>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the</p>	<ul style="list-style-type: none"> <li>i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy</li> <li>ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of</li> </ul>	<ul style="list-style-type: none"> <li>i) The <b>Core Strategy</b> has a text box section for the development strategy and Area Strategies, setting out the main findings of the Sustainability Appraisal.</li> <li>ii) Both the <b>SA Report on Preferred Options (April 2008)</b> (sections 7, 8 and 9 and appendices 3 and 9) and <b>SA Addendum Report (July 2009)</b> (pages 1-30) explain how the SA has influenced the development of the preferred strategy and how policies have been amended in the light of SA findings.</li> <li>iii) The Cabinet Report of 12 March 2008 and Cabinet/Council report of 8/16July 2009 explain that the results of sustainability appraisal were taken into account in both the Core Strategy Preferred Options report and</li> </ul>

Key question	Possible evidence	Evidence provided
<p>development plan document from the start?</p>	<p>sustainability appraisal findings</p> <p>iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies</p>	<p>Proposed Submission Core Strategy. These are available on Cabinet and Council agenda links below:</p> <p><a href="http://www.southlakeland.gov.uk/default.aspx?page=797&amp;f=d&amp;m=2218">http://www.southlakeland.gov.uk/default.aspx?page=797&amp;f=d&amp;m=2218</a></p> <p><a href="http://www.southlakeland.gov.uk/default.aspx?page=797&amp;f=d&amp;m=2495">http://www.southlakeland.gov.uk/default.aspx?page=797&amp;f=d&amp;m=2495</a></p>
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons</p> <p>ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy</p> <p>iii. Representations received from the regional development agency/regional planning body</p> <p>iv. Representations from the Government Office</p> <p>v. Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>i) The Core Strategy does not repeat regional policy but elaborates upon it. Particular examples include:</p> <ul style="list-style-type: none"> <li>• Development Strategy – (CS1.2) and pages 15 to 17</li> <li>• Meeting the Housing Requirement (CS6.1) and pages 66 and 67</li> </ul> <p>The Core strategy includes ‘primary regional policy context boxes’ for most policy sections.</p> <p>ii) 4NW’s letter of 4 October 2009 (R23.1), confirming that the Proposed Submission Core Strategy is in conformity with the North West Regional Spatial Strategy sets out matters, which (while not affecting conformity with RSS) are proposed in order to improve its consistency with the RSS.</p> <p>iii) A summary of representations to the Proposed Submission Core Strategy by 4NW is set out in the Representations Statement (see para 4.2 and elsewhere). See also ii above.</p> <p>iv) Regular on going dialogue with GONW did not raise concerns regarding regional policy. (<i>For GONW comments regarding national policy see comments under questions 42 and 43</i>) Likewise in its representations on the Proposed Submission Core Strategy, GONW did not raise issues relating to regional policy. A summary of representations to the Proposed Submission Core Strategy by GONW is set out in the Representations Statement (para 4.2 and elsewhere).</p> <p>v) The representations from 4NW (NWRA and NWDA) and GONW and the Councils response at Issues and Options Stage is set out in the Core Strategy Preferred Options Interim Consultation Statement (which forms appendix IV of the Consultation Statement – see responses 39 and 62) and at Preferred Options Stage in the Consultation Statement August 2009 (Appendix II check – see Organisations Dal – Gra and Lak - Nor). The Consultation Statement August 2009 states in para. 3.6 how the Proposed</p>

Key question	Possible evidence	Evidence provided
		Submission Core Strategy is considered by the Council to be in accordance with National Planning Policy Statements and the adopted North West Regional Spatial Strategy. The Representations Statement (November 2009) set out at para 4.2 and elsewhere a summary of issues raised by GONW and 4NW.

Effective		
Deliverable		
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there</li> <li>ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy</li> <li>iii. A core strategy vision which is framed to set out the outcomes which are sought for the future</li> <li>iv. Sections of the development plan document which identify the main issues addressed</li> <li>v. Sections of the development plan document which indicate the priority outcomes</li> </ul>	<ul style="list-style-type: none"> <li>i) The Core Strategy's Spatial Portrait informs the identification of key issues, which the Strategy also relates to the issues and priorities of the South Lakeland Sustainable Community Strategy (see pages 1 to 8). Appendix B includes a detailed table explaining how the Core Strategy has regard to the different commitments/key issues in the Community Strategy</li> <li>ii) The Consultation Statement (August 2009) in section 3.7 sets out the main issues raised in consultation at preferred options stage and indicates how these issues were addressed in the proposed submission Core Strategy report and how comments at Issues and Options Stage were taken into account in the Preferred Options Core Strategy (Appendix IV Interim Consultation Statement Preferred Options April 2008, in Section 2.12). The Representations Statement (November 2009) sets out the main issues raised on the Proposed Submission Core Strategy relating to legal compliance and soundness. Those relating to overall priorities (Vision and Objectives etc) are summarised in para 4.5.</li> <li>iii) The section of the Core Strategy titled 'South Lakeland Tomorrow', sets out a vision for the district in 2025, which includes setting out outcomes for the future. This is based around the key issues identified in the spatial portrait, these being housing to need local need, jobs skills regeneration, accessing services, quality environment and health and wellbeing</li> <li>iv) See i) above in relation to key issues. The 4 Area Strategies also set out a Spatial Portrait and key issues for each area, within the framework of the priorities of the Community Strategy;</li> <li>v) See iii) above. The 4 Area Strategies also set out a Vision and priority</li> </ul>

		<p>outcomes for each area, within the framework of the priorities of the Community Strategy. Overall, the priority outcomes are incorporated within the policies of the Core Strategy.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<ul style="list-style-type: none"> <li>i. Sections of the regional spatial strategy, which identify cross-boundary issues.</li> <li>ii. Sections of the development plan document setting out cross-boundary issues and the response to them</li> <li>iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations</li> <li>iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance</li> </ul>	<ul style="list-style-type: none"> <li>i) Policies CNL1 and CNL2 set the sub regional policy framework for Cumbria. They identify relevant sub regional issues including <ul style="list-style-type: none"> <li>o The priority for regeneration in Barrow and the Furness Peninsula;</li> <li>o meeting the need for local and affordable need housing in South and East Cumbria</li> <li>o restructuring of the housing market in Barrow.</li> </ul> </li> <li>ii) Cross boundary issues and how they are addressed are set out in the Core Strategy at - <ul style="list-style-type: none"> <li>• Appendix B – Contextual Influences, including in regard to cross boundary issues with Lancaster City and Barrow Borough;</li> <li>• Spatial Strategy and Objectives – Economy (Barrow, pages 3 and 11); role of Carnforth in Lancaster District (page 5 and 12); service provision in adjoining districts (page 6 and 12);</li> <li>• CS1.2 – Broughton in Furness (in Lake District National Park, included as Local Service Centre;</li> <li>• See also Area Strategies <ul style="list-style-type: none"> <li>o Kendal –wider economic role beyond district</li> <li>o Ulverston and Furness - relationship to Barrow</li> <li>o East Area – relationships to Lancaster District</li> </ul> </li> </ul> </li> <li>iii) Lake District Futures Report (NWDA) and Knowledge Based Industry Report (NWDA). Issues raised are addressed in the Jobs, Skills and Regeneration section: <ul style="list-style-type: none"> <li>o meeting some of the Lake District’s employment (land) needs in the South Lakeland LDF area</li> <li>o providing for wider business/science need and opportunities in Kendal</li> </ul> </li> </ul> <p>Other Cumbria wide studies, which the Core Strategy seeks to address include:</p> <ul style="list-style-type: none"> <li>o the consultation draft SHMA (July 2009), which sets out evidence of local needs housing, which is taken into account in Core Strategy policy CS6.3;</li> <li>o the Cumbria Gypsies and Travellers Assessment (May 2008)</li> </ul>

		<p>which is taken into account in Core Strategy policy CS6.5</p> <ul style="list-style-type: none"> <li>○ the Cumbria Biodiversity Evidence Base and Report (June 2008) which is taken into account Core Strategy policy CS8.4</li> </ul> <p>iv) The Development Plans Manager attends regular meetings with Development Plans managers from other Cumbria authorities, which provides an opportunity for cross boundary issues to be raised and considered.</p> <p>Cross boundary issues were also raised and considered in the following ways in preparing the Core Strategy:</p> <ul style="list-style-type: none"> <li>○ Question 7 of the Core Strategy Issues and Options report invited comments on cross boundary issues. The Council's response to comments made are set out in the Consultation Statement (Appendix IV). Likewise the preferred options consultation responses of neighbouring planning authorities are set out in Appendix II of the Consultation Statement and summarised in pages 13 to 24. Cross boundary issues are considered in summary on page14, noting that neighbouring authorities raised no significant concerns.</li> <li>○ a meeting was held with the Lake District National Park Authority in February 2009. The issues raised in this meeting have been addressed in the Core Strategy, as described above.</li> </ul> <p>The Representations Statement (November 2010) summarises issues raised relating to cross boundary matters including in paras 4.4, 4.5, 4.9 and 4.10.</p>
<p>16. Does the development plan document contain clear objectives?</p>	<ul style="list-style-type: none"> <li>i. A spatial portrait which identifies the key issues facing the area</li> <li>ii. A core strategy vision which is framed to set out the outcomes which are sought for the future</li> <li>iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision</li> </ul>	<ul style="list-style-type: none"> <li>i) The Core Strategy sets out a spatial portrait for the district and 4 subareas, and identifies key issues for each.</li> <li>ii) The Core Strategy sets out a vision ('South Lakeland Tomorrow') for the district and 4 subareas, which spells out outcomes in each area by 2025;</li> <li>iii) The Core Strategy sets out strategic objectives for the district and 4 subareas clearly derived from the spatial portrait and vision. There is an objective (broken down into sub headings/individual actions) for each of the key issues identified in the portrait and vision - these being housing to need local need, jobs skills regeneration, accessing services, quality environment and health and wellbeing.</li> </ul> <p>The Representations Statement (November 2009) sets out the main issues raised on the Proposed Submission Core Strategy relating to legal compliance and soundness. Those relating to objectives are summarised in para 4.5.</p>

<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<p>i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it</p> <p>ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place</p>	<p>i) The Core Strategy's Spatial Portrait and key issues form the basis of the objectives – and are set out both at a district wide level and then in more localised detail for 4 sub areas – Kendal, Ulverston, Cartmel Peninsula and East Area.</p> <p>ii) The Consultation Statement summarises the main issues raised in relation to objectives in the Preferred Options Report, and explains how these have been taken into account in the Proposed Submission Core Strategy. The Representations Statement (November 2009) indicates that the objectives are very largely supported, with one or two comments – see para 4.5. The South Lakeland LSP welcomed the strong links between the South Lakeland Community Strategy and Proposed Submission Core Strategy.</p>
<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<p>i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them</p> <p>ii. Relevant sections of the sustainable community strategy which identify its objectives</p> <p>iii. Confirmation from the local strategic partnership and partner organisations that they believe the policies will achieve the agreed objectives</p> <p>iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed</p> <p>v. Sections of the development plan document, reports or other documents, which discuss the matters, which should be addressed in the development plan document.</p>	<p>i) The Core Strategy sets out clear objectives and policies both for the district as a whole and for the Area Strategies. The area policies are broken down into the <u>5 key issues</u> derived from the Community Strategy which run throughout the whole strategy and originate from the district wide objectives – those being housing to need local need, jobs skills regeneration, accessing services, quality environment and health and wellbeing, thus making the relationship very clear. Likewise, there is a group of core policies for each of these key issues.</p> <p>ii) The 5 main topic issues/objectives of the South Lakeland Sustainable Community Strategy (economy, housing, environment, accessibility, and health and well-being) are used as a framework to structure Core Strategy document, and in particular its objectives and grouping of consequential policies.</p> <p>iii) The Consultation Statement sets out the main issues raised by key stakeholders and others and how these are addressed in the Proposed Submission Core Strategy. Consultation at Preferred Options included a series of presentations to the main sub groups of the South Lakeland Local Strategic Partnership on topics relevant to the Core Strategy.</p> <p>iv) Studies which address the means to meet objectives and help show that policies are appropriate and should succeed include:</p> <ul style="list-style-type: none"> <li>• Sustainability Appraisal Reports</li> <li>• Infrastructure Report</li> <li>• Appropriate Assessment Report</li> <li>• Strategic Housing Land Availability Assessment (SHLAA) and Employment and Housing Land Search Study</li> </ul>

		<ul style="list-style-type: none"> <li>• Viability Impact Study (March 2009) and Update Report (August 2009)</li> </ul> <p>v) The matters to be addressed in the Core Strategy are based on the key issues (pages 7/8 - and in the Area Strategy sections), as identified and modified through community consultation and sustainability appraisal (see response to questions 13 and 14 above).</p>
21. Are there realistic timescales related to the objectives?	<p>i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives</p> <p>ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery</p>	<p>i) The Core Strategy's Monitoring and Implementation Framework (Appendix D) sets out the implementation mechanisms, responsible agencies and outlines a timescale in relation to key matters, particularly the supply of housing land. The monitoring framework also sets out indicators and targets for meeting objectives, with timescales. The Infrastructure report also sets out an indication of timescale for delivering associated infrastructure based on current information.</p> <p>ii) In preparing the Infrastructure report, the Council contacted relevant partners responsible for providing physical, community and green infrastructure, beginning with those on the South Lakeland LSP. Through correspondence and workshops all partners have had opportunity to contribute to and comment on the Infrastructure report, and no comments of concern were raised on their role in delivery and timescales when in relation to the final draft document. Representations from the LSP and partner organisations summarised in the Representations Statement do not object to timescales, but with some related comments referred to in paras 4.9, 4.14, 4.38 and 4.42.</p>
22. Are the policies internally consistent?	<p>i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent</p> <p>ii. A very brief statement explaining how the council considers its objectives are consistent</p>	<p>i) The objectives and policies in the Core Strategy have been assessed in terms of social, economic and environmental sustainability objectives, which have helped ensure they are consistent - see Sustainability Appraisal reports. The Preferred Options SA Report (April 2008) also assesses the Community Strategy priority themes (key issues/objectives) on which the Core Strategy policies are based. The Council has also taken account of any issues raised in consultation relating to the consistency of policy, as set out in the Consultation Statements. No concerns were raised regarding the consistency of policies.</p> <p>ii) As a result of subjecting objectives and policies to consultation with key stakeholders/communities and also to sustainability appraisal, the Council considers that the policies and objectives are internally consistent.</p>
23. Does the development plan document contain	<p>i. Information in the local development scheme, or provided separately, about the scope and content (actual and</p>	<p>i) The 2008 South Lakeland Local Development Scheme sets out the scope of the Core Strategy and other proposed DPDs, which will combine to form a coherent policy structure. The Core Strategy sets the overarching policy</p>

<p>material which:</p> <ul style="list-style-type: none"> <li>• is already in another plan</li> <li>• should be logically be in a different plan</li> <li>• should not be in a plan at all?</li> </ul>	<p>intended) of each development plan document. This should show how they combine to provide a coherent policy structure</p> <ul style="list-style-type: none"> <li>ii. Representations from the Government Office</li> <li>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</li> </ul>	<p>framework for the other DPDs - the Kendal Canal Head AAP and Allocations of Land DPD. The Core Strategy appendices also specify which Local Plan policies will be replaced by the Core Strategy. The Core Strategy's implementation framework also explains some of the key linkages between documents as set out in Appendix D (section 3).</p> <p>ii) at Preferred Options consultation stage, Government Office North West (GONW) considered that the Core Strategy document's proposals for 'directions of growth' were too site specific and hence more appropriate for the Allocations of Land DPD. The proposed submission Core Strategy has been modified accordingly. GONW did not comment on this matter in its representations on the Proposed Submission Core Strategy.</p> <p>iii) The Government Office's formal comments at each stage in plan preparation and the Council's response is set out in the consultation statements and consultation schedule.</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that identify the key objectives and how they will be delivered upon</li> <li>ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery</li> <li>iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document</li> </ul>	<p>i) Appendix D of the Core Strategy sets out an implementation plan, which, for each policy, identifies relevant implementation mechanisms and agencies responsible for their delivery. The Core Strategy is also accompanied by an Infrastructure Report, which sets out agencies' proposals for physical, community and green infrastructure.</p> <p>ii) In preparing the Infrastructure report, the Council contacted relevant partners responsible for providing physical, community and green infrastructure. Through correspondence and workshops all partners have had opportunity to contribute to and comment on the Infrastructure report, and no comments of concern were raised on their role in delivery and timescales when consulted in relation to the final draft document. The Representations Statement indicates support (or no objecting representations) from the Environment Agency and United Utilities. No representations have been received from Natural England.</p> <p>iii) A summary of the Local Area Agreement for Cumbria is set out in Appendix B. It contains number of commitments, which will support the delivery of the Core Strategy.</p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that show how the development management policies: <ul style="list-style-type: none"> <li>• will help to deliver the strategy</li> <li>• derive from, and elaborate on, the objectives and policies of the plan</li> </ul> </li> </ul>	<p>The Core Strategy's core development management policies are grouped within the 5 key issues, which run throughout the whole strategy, which originate from the district wide objectives/key issues in the Community Strategy. These 5 key issues are housing to meet local need; jobs, skills and regeneration; accessing services; quality environment; and health and well-being.</p>

<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<ul style="list-style-type: none"> <li>i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward</li> <li>ii. Representations in respect of infrastructure</li> <li>iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with</li> </ul>	<ul style="list-style-type: none"> <li>i) The Core Strategy's Monitoring and Implementation Framework (Appendix D) sets out the implementation mechanisms, responsible agencies and outlines a timescale in relation to some key matters, particularly the supply of housing land. The Infrastructure report accompanying the Core Strategy also sets out how the Council has commenced a process of ongoing engagement with providers of physical, community and green infrastructure to identify infrastructure requirements arising from the strategy and how these may be met and over what timescales. In addition the Council commissioned Atkins to provide a Kendal Transport Study, which assesses the road infrastructure requirements of the development strategy in Kendal and sets out mitigation measures, which are addressed in the Kendal Area Strategy.</li> <li>ii) In preparing the Infrastructure report, the Council contacted relevant partners responsible for providing physical, community and green infrastructure, beginning with those represented on the South Lakeland LSP. Through correspondence and workshops all partners have had opportunity to contribute to and comment on the Infrastructure report.</li> <li>iii) Representations relating to infrastructure made at issues and options and preferred options stages are set out in the consultation statements, also indicating how the Council took them into account. In relation to the Infrastructure report, the Council has a copy of all representations on file, and has incorporated them in Infrastructure report. Representations on the Proposed Submission Core Strategy relating to infrastructure are set out in paras 4.7, 4.14, 4.38 and 4.39 of the Representations Report (November 2009)</li> </ul>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out delivery mechanisms and timescale</li> <li>ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered</li> <li>iii. Research or studies that address matters of delivery and the realistic timescales</li> <li>iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms</li> </ul>	<ul style="list-style-type: none"> <li>i) The Core Strategy's Monitoring and Implementation Framework (Appendix D) sets out the implementation mechanisms, responsible agencies and outlines a timescale in relation to some key matters, particularly the supply of housing land.</li> <li>ii) The Kendal Canal Head AAP and Allocations of Land DPDs are in preparation to develop the policies of the Core Strategy.</li> <li>iii) The Infrastructure report accompanying the Core Strategy also sets out how the Council has commenced a process of ongoing engagement with providers of physical, community and green infrastructure to identify infrastructure requirements arising from the strategy and how these may be met and over what timescales. In addition the Council commissioned Atkins to provide a Kendal Transport Study, which assesses the road infrastructure requirements of the development strategy in Kendal and sets out mitigation measures, which are included in the Kendal Area Strategy.</li> </ul>

	<ul style="list-style-type: none"> <li>v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder</li> <li>vi. Correspondence from stakeholders on delivery mechanisms and timescale</li> <li>vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</li> </ul>	<ul style="list-style-type: none"> <li>iv) None in addition to those referred to above.</li> <li>v) As noted above, in preparing the Infrastructure Report the Council contacted relevant partners responsible for providing physical, community and green infrastructure, beginning with those represented on the South Lakeland LSP. Through correspondence and workshops all partners have had opportunity to contribute to and comment on the Infrastructure report. The Council has a copy of all representations on file, and has incorporated them in Infrastructure report.</li> <li>vi) see v) above</li> <li>vii) Representations relating to infrastructure made at issues and options and preferred options stages are set out in the consultation statements, also indicating how the Council took them into account. In relation to the Infrastructure report, the Council has a copy of all representations on file, and has incorporated them in Infrastructure report. The infrastructure report was considered by Council alongside the proposed submission documentation. Representations on the Proposed Submission Core Strategy relating to infrastructure are set out in paras 4.7, 4.14, 4.38 and 4.39 of the Representations Report (November 2009)</li> </ul>
<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<ul style="list-style-type: none"> <li>i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery</li> <li>ii. Representations in respect of infrastructure</li> <li>iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with</li> </ul>	<ul style="list-style-type: none"> <li>i), ii) and iii)</li> <li>As noted above, in preparing the Infrastructure Report the Council contacted relevant partners responsible for providing physical, community and green infrastructure, beginning with those represented on the South Lakeland LSP. Through correspondence and workshops all partners have had opportunity to contribute to and comment on the Infrastructure report. The Council has a copy of all representations on file, and has incorporated them in Infrastructure report.</li> <li>Representations relating to infrastructure made at issues and options and preferred options stages are set out in the consultation statements, also indicating how the Council took them into account. In relation to the Infrastructure report, the Council has a copy of all representations on file, and has incorporated them in Infrastructure Requirements report. Representations on the Proposed Submission Core Strategy relating to infrastructure are set out in paras 4.7, 4.14, 4.38 and 4.39 of the Representations Report (November 2009)</li> </ul>
<p>29. Is it clear who is intended to implement each part of the strategy/</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out responsibilities for delivery</li> <li>ii. Correspondence showing how other</li> </ul>	<ul style="list-style-type: none"> <li>i) The Core Strategy's Monitoring and Implementation Framework (Appendix D) sets out an implementation plan, indicating implementation mechanisms, responsible agencies and outlines a timescale in relation to some key matters, particularly the supply of housing land.</li> </ul>

<p>development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<p>stakeholders intend to support the delivery of the policies</p> <p>iii. Reports by the council or the relevant stakeholder</p> <p>iv. Representations from stakeholders on implementation</p> <p>v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</p>	<p>ii) Correspondence relates to the Infrastructure report only. The Council contacted relevant partners responsible for providing physical, community and green infrastructure, beginning with those represented on the South Lakeland LSP. Through correspondence and workshops all partners have had opportunity to contribute to and comment on the Infrastructure report. The Council has a copy of all representations on file, and has incorporated them in Infrastructure report.</p> <p>iii) Infrastructure Report:</p> <p>iv) and v) - See above in relation to Infrastructure Report. Representations relating to implementation made at issues and options and preferred options stages are set out in the consultation statements, also indicating how the Council took them into account. Representations on the Proposed Submission Core Strategy relating to infrastructure are set out in paras 4.7, 4.14, 4.38 and 4.39 of the Representations Report (November 2009)</p>
<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<p>i. Sections of the development plan document that reflect the plans or strategies of other bodies</p> <p>ii. Expressions of support from bodies responsible for other strategies affecting the area</p> <p>iii. Representations in respect of services provided by other agencies</p> <p>iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation</p>	<p>Yes</p> <p>i) The Core Strategy's key issues are set within the context of the issues and priorities of the South Lakeland Sustainable Community Strategy, which reflects the priorities of a range of partner organisations. Appendix B of the Core Strategy describes in some detail how the document has had regard to the 9 main commitments of the Community Strategy. It then goes on to describe the various other plans which influence the strategy and have been taken into account. These include the Cumbria Local Transport Plan and Local Area Agreement.</p> <p>ii), iii) and iv) Bodies responsible for other strategies had opportunity to comment on the emerging strategy at issues and options and preferred options stages. The main issues raised in consultation are set out in the Consultation Statement, and how the Council took them into account in the Proposed Submission Core Strategy. See the Consultation Statement's summary of main issues - and in particular those listed on pages 13 and 14 regarding the Introduction to the Preferred Options report.)</p> <p>In addition, the comments of agencies with policies and programmes relating to infrastructure are taken into account in the Infrastructure report.</p>
<p>33. Does the development plan document take into account</p>	<p>i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can</p>	<p>i) The Core Strategy's Monitoring and Implementation Framework (Appendix D) sets out the indicators and targets by which it will monitor the effectiveness of policy management scenarios indicating how the Council will monitor and respond to the under or over supply of housing.</p>

<p>matters, which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<p>accommodate them</p> <p>ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</p>	<p>Core Strategy policy, through its implementation framework, will seek to ensure a 5 year supply of deliverable housing sites</p> <p>In addition the Core Strategy sets out the following 'triggers' for review of parts of the Strategy:</p> <ul style="list-style-type: none"> <li>• Policy CS1.2 refers to the possible need to adjust the apportionment of development between settlements within the settlement hierarchy, in order to adapt to changed circumstances – noting that these changes in apportionment would be clearly evidenced and monitored through the Annual Monitoring Report.</li> <li>• Paragraph 2.13 sets out a commitment to review the designated local service centres every 5 years to take account of any changes in service provision;</li> <li>• Policy CS7.1 sets out a commitment to keep the development of employment sites under review in order to maintain a rolling provision of 5 year's worth of high quality unconstrained land for each employment land sector;</li> <li>• Policy CS8.7 in relation to sustainable construction energy efficiency and renewable energy, standards will rise in level with changes in national targets, through building regulations. This policy also notes (last paragraph) that new targets for energy from renewable energy sources will be incorporated in a review of the Core Strategy or subsequent DPD, following a forthcoming study on renewable energy potential and viability.</li> </ul> <p>ii) Matters likely to be imposed by (the then forthcoming) Regional Spatial Strategy were referred to in the Preferred Options Report.</p>
<p><b>Flexible</b></p>		
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed</p> <p>ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:</p> <ul style="list-style-type: none"> <li>• the effectiveness of policies and what evidence is being collected to</li> </ul>	<p>i) The Core Strategy's Monitoring and Implementation Framework (Appendix D) sets out the indicators and targets by which the Council will monitor the effectiveness of policy. In particular it sets out management scenarios, indicating how it Council will monitor and respond to the under or over supply of housing to ensure a 5 year supply of deliverable housing sites in accordance with policy CS6.1. The Council will also monitor the supply of employment land to ensure a 5-year rolling programme of employment sites, in accordance with policy CS7.1. Additional cases where there is flexibility in policy to take account of changed circumstances are set out in response to question 33 (i) above:</p> <p>ii) The 2008 Annual Monitoring Report (see appendices and sections 2 and 4) sets out national and local performance indicators - including contextual</p>

	<p>undertake this</p> <ul style="list-style-type: none"> <li>• changes affecting the baseline information and any information on trends on which the development plan document is based</li> <li>iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline</li> <li>iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> </ul>	<p>indicators and sustainability indicators, by which the Council monitors the effectiveness of current policy. Future AMR reports will be adjusted to incorporate any additional indicators and targets (including any SA indicators) set out in Appendix D of the Core Strategy. The AMR provides the framework for assessing the effectiveness of policy, wider changing circumstances and triggering response measures to adjust performance, or if required, to trigger a review of policy.</p> <p>iii) A wide range of information is already obtained from organisations (often directly from websites) to inform the AMR. The response of organisations to earlier consultations as set out in the Consultation Statement, does not raise significant issues in regard to providing information for monitoring. Likewise the response of organisations to providing information in relation to infrastructure report has been positive.</p> <p>iv) This issue was considered overall in an advisory visit from the Planning Inspectorate, resulting in strengthened management arrangements for the supply of housing land for policy CS6.1 (see Appendix D, sections 4 to 6). The report to Cabinet and Council of 8 and 16 July 2009, referred to under question 10 above, includes an overall assessment of risk, as part of the consideration of the Proposed Submission Core Strategy.</p>
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional spatial strategy?</p>	<ul style="list-style-type: none"> <li>i. Sections within the development plan document dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</li> <li>ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> </ul>	<p>i) The Core Strategy's Monitoring and Implementation Framework (Appendix D) sets out the indicators and targets by which the Council will monitor the effectiveness of policy. In particular it sets out management scenarios, indicating how it Council will monitor and respond to the under or over supply of housing to ensure a 5 year supply of deliverable housing sites in accordance with policy CS6.1. The Council will also monitor the supply of employment land to ensure a 5-year rolling programme of employment sites, in accordance with policy CS7.1.</p> <p>ii) This issue was considered overall in an advisory visit from the Planning Inspectorate, resulting in strengthened management arrangements for the supply of housing land for policy CS6.1 (see Appendix D, sections 4 to 6).</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies</p>	<ul style="list-style-type: none"> <li>i. A section of the development plan document which expressly addresses flexibility</li> <li>ii. Sections of the development plan document identifying the key indicators of success of the</li> </ul>	<p>i) and ii) See responses to questions, 33, 34 and 35 above.</p>

are failing?	strategy, and the remedial actions which will be taken if they are failing	
<b>Monitoring</b>		
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>iii. Reference to any other reports or technical documents which contain information on the delivery of policies</li> </ul>	<ul style="list-style-type: none"> <li>i) The Core Strategy’s Monitoring and Implementation Framework (Appendix D) sets out the indicators and targets by which the Council will monitor the effectiveness of policy. Appendix L sets out the Housing Trajectory to monitor housing completions and the supply of housing land. The tables accompanying CS6.1 and CS7.1 also set out targets for the phased provision of housing and employment land.</li> <li>ii) The 2008 Annual Monitoring Report sets out national and local performance indicators - including contextual indicators and sustainability indicators, by which the Council will monitor the effectiveness of policy. Future reports will be adjusted to incorporate the additional indicators and targets set out in Appendix D of the Core Strategy. The AMR provides the framework for assessing the effectiveness of policy, wider changing circumstances and triggering response measures to adjust performance, or if required, to trigger a review of policy.</li> <li>iii) No.</li> </ul>
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal</li> <li>iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators</li> </ul>	<ul style="list-style-type: none"> <li>i) The Core Strategy’s Monitoring and Implementation Framework (Appendix D) sets out the indicators and targets by which the Council will monitor the effectiveness of policy.</li> <li>ii) The 2008 Annual Monitoring Report sets out national and local performance indicators - including contextual indicators and sustainability indicators drawn from the SA Scoping Report, by which the Council monitors (and will monitor) the effectiveness of policy. Future reports will be adjusted to incorporate the additional indicators and targets set out in Appendix D of the Core Strategy. The AMR provides the framework for assessing the effectiveness of policy, wider changing circumstances and triggering response measures to adjust performance, or if required, to trigger a review of policy.</li> <li>ii). Other reports which contain information on the collection or monitoring of indicators include the annually updated: <ul style="list-style-type: none"> <li>o Housing Land Position Report, which provides information relevant to the monitoring of housing policy and indicators;</li> <li>o Employment Land Position Report</li> </ul> </li> </ul>

		<ul style="list-style-type: none"> <li>○ Town Centre Health Checks.</li> </ul>
39. Are suitable targets and indicators present (by when, how and by whom)?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories</li> </ul>	<ul style="list-style-type: none"> <li>i) The Core Strategy's Monitoring and Implementation Framework (Appendix D) sets out the indicators and targets by which the Council will monitor the effectiveness of policy</li> <li>ii) The 2008 Annual Monitoring Report sets out national and local performance indicators - including contextual indicators and sustainability indicators, by which the Council will monitor the effectiveness of policy. Future reports will be adjusted to incorporate the additional indicators and targets set out in Appendix D of the Core Strategy. The AMR provides the framework for assessing the effectiveness of policy, wider changing circumstances and triggering response measures to adjust performance, or if required, to trigger a review of policy.</li> </ul>

<b>National policy</b>		
40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?  41. If yes, is there a local justification?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy</li> <li>ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy</li> <li>iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement</li> <li>iv. Representations from the Government Office on the preferred strategy or the submitted development plan document</li> <li>v. Reports or copies of correspondence as to how Government Office</li> </ul>	<p>The GONW has made representations on the Proposed Submission Core Strategy which in its view does not raise any significant concerns as regards regional or national planning policy, and have made representations on matters which they consider would benefit from clarification or explanation. GONW considers that while their representations (on policies CS6.3, CS7.2 and CS8.7) impinge on soundness, are amenable to responses, which can be dealt with by minor amendments.</p>

	representations have been considered and dealt with	
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons</li> <li>ii. Representations from the Government Office</li> <li>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</li> </ul>	<p>Each main policy in the Core Strategy is accompanied by a summary list of relevant national (and regional) policy to set the framework for local policy. However no Core Strategy policy simply repeats (or fails to add to) national policy.</p> <p>GONW in its representation at Preferred Options Consultation Stage as seen in the Consultation Statement August 2009 Appendix II – schedule organisations del-gra stated that some preferred options in the preferred options report may add little or nothing to national guidance.</p> <p>These representations and how they have been considered and dealt with are reflected in the summary of main issues para 3.7 of the Consultation Statement August 2009.</p> <p>See also the response to questions 40 and 41 above.</p>