

Soundness Self-Assessment Checklist (January 2019)

Allerdale Borough Council

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

In summary – the key requirements of plan preparation are:

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

The Tests of Soundness at Examination

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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<p>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</p>		
<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<p>The Spatial portrait pages 7-11 of the adopted Local Plan (part 1) sets out the issues facing Allerdale</p> <p>The Borough wide Vision and more specific town visions reflect both strategic and more local aspirations are set out on pages 12-13 of the adopted Local Plan (part 1)</p> <p>Strategic Objectives P14-17 and table below each policy links back to the objectives in adopted local Plan (part 1)</p> <p>The quantum of development and spatial strategy is established in adopted Local Plan (part 1)</p> <p>Infrastructure Delivery Plan sets out the infrastructure required to deliver the site allocations.</p> <p>The housing trajectory sets out timescales for housing delivery appendix 3 (p156) of the pre-submission draft of the Local Plan (part 2)</p>	<p>Local Plan (part 1)</p> <p>Infrastructure Delivery Plan</p> <p>Housing Trajectory</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p>	<p>The objectively assessed need and Spatial Strategy was adopted in the Local Plan (part 1)</p>	<p>Local Plan (part 1)</p>

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<p>—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</p> <p>—specific policies in this Framework indicate development should be restricted.</p>		
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<p>Policy S1- p18 in the Local plan (part 1). In addition policy S2 provides more detail on sustainable development principles p 19-21</p>	<p>Local Plan (part 1)</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<p>The Objectively assessed needs was adopted in the Local Plan (part 1).</p>	<p>Local Plan (part 1)</p>
<p>NPPF Principles: Delivering sustainable development</p>		
<p>1. Building a strong, competitive economy (paras 18-22)</p>		
<p>Set out a clear economic vision and strategy for the area which positively and proactively</p>	<p>Both the Borough wide and town Visions promote economic growth and diversity. This is reflected in the strategic objectives. (p 14-17)of</p>	<p>Local Plan (part 1)</p>

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encourages sustainable economic growth (21),	the Local Plan (part 1) and Policy S2 p19. The spatial strategy (policy S3 p22-28) sets out how much and where development should take place to support economic growth. Policies S12-15 inclusive p73-83 set out to proactively support economic growth in terms of existing business, emerging sectors, rural businesses and skills. There is a dedicated policy (S13 p76) to support the implementation of the West Cumbria Economic blueprint.	
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<p>Policy S12 p73 of local plan (part 1) sets out a pro active approach to support meeting identified needs and emerging sectors. Policy S13 promotes the objectives of Britain's Energy Coast. Policy S16 p85-88 actively promotes town centres and culture to support economic objectives.</p> <p>Policy S23 p109-111 supports and safeguards strategic and local infrastructure. Infrastructure Delivery Plan September 2019 identifies the infrastructure required to deliver the Local Plan and the delivery mechanisms. Green infrastructure is promoted in policy S24 p111-114. Policy SA52 (p131) in Local Plan (part 2) adds further policy to deliver green infrastructure as well as defined on the Policies Map. Policy S7 p60-62 promotes delivering of balanced housing market to support economic objectives</p> <p>Polices S4 p19-31, DM10 p166, DM 14 p173-176 all promote good quality design and public realm to ensure the quality of the built environment is of a high standard to attract investment.</p>	<p>Infrastructure Delivery Plan 2018</p> <p>Allerdale Workspace and Employment Land Study 2016</p>
2. Ensuring the vitality of town centres (paras 23-37)		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	Policy S16 p85-88 in Local Plan (part 1) sets out a definition of hierarchy, also considers edge of centre and out of town proposals. Policies DM7 and DM8 p160-166 set out sequential and impact tests and outlines greater policy detail to support S16. Town centre boundaries have been reviewed and amendments have been made to the policies map as appropriate. The Local Plan (part 2) has identified site allocations for retail and town centre uses in town centre locations to support the existing town and centre and provide future	<p>Retail Study 2015</p> <p>Retail Topic paper</p>

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	capacity.	
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	<p>Policy DM9 sets out the policy framework for Primary and Secondary frontages. Existing Primary and secondary frontages have been updated and changes are proposed on the policies map. Policy S16 supports residential uses in vacant first floors above retail units.</p> <p>The Local Plan (part 2) has identified site allocations for retail and town centre uses in town centre locations to support the existing town and centre and provide future capacity.</p>	
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	<p>Policy S2 p19 pro actively supports the rural economy</p> <p>The Vision has a clear rural dimension and this is picked up in objectives SO3a, SO3e and SO3f.</p> <p>Policy S14 p80-83 is a dedicated policy to support new and existing rural businesses and farm development</p> <p>Policy S17 supports and promotes tourism, coastal and countryside recreation P88-93</p> <p>Policies DM5 and DM6 p154-158 cover farm diversification and equestrian and agricultural buildings.</p>	Local Plan (part 1)
4. Promoting sustainable transport (paras 29-41)		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst</p>	<p>Policy S2 p19 promotes all strands of sustainable development and is an overarching policy running through the plan.</p> <p>Policy S3 p22 The spatial strategy is based on locating development in the most sustainable places close to services and alternative forms of transport.</p> <p>Policy S4 p29 and DM14 p173 promotes design that aims to ensure</p>	<p>Local Plan (part 1)</p> <p>Site Assessment Methodology</p> <p>Sustainability Appraisal</p>

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<p>recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p>	<p>the built environment contributes to a healthier lifestyle, access to services by walking, cycling, open space and green infrastructure.</p> <p>Policy S22- p106 promotes sustainable transport principles, guides development where all transport options are available. Links to the LTP priorities. Policy S23 p109 supports and safeguards all forms of infrastructure</p> <p>Policy S24 p111 promotes and safeguards green infrastructure</p> <p>Site Assessment Methodology and Sustainability Appraisal indicators assess access to services and public transport to ensure site selection maximises use of sustainable transport and reduce the need to travel by private car.</p> <p>Joint work with the County Council has been undertaken to assess existing connectivity and opportunities to establish cycling and pedestrian links as part of the site selection process.</p> <p>Green infrastructure has been mapped in the Principal and Key Service Centres and linkages from allocated sites are identified specifically in site polices and generally by policies S24, and SA52.</p>	

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<p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		
<p>5. Supporting high quality communications infrastructure (paras 42-46)</p>		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<p>Objective SO3f supports improvements to electronic infrastructure</p> <p>Policy S2 p19 supports improvements to communications including electronic</p> <p>Policy S23 p109 supports and safeguards all infrastructure including telecommunications.</p> <p>Policy DM13 p171 provides policy detail on individual telecommunications proposals</p>	<p>Local Plan (part 1)</p>
<p>6. Delivering a wide choice of high quality housing (paras 47-55)</p>		

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Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	It was acknowledged in Local plan (part 1) that a 20% land supply buffer was required due to persistent under delivery. It has been built in to the supply of housing land identified in the local plan (part 2)	Housing trajectory Housing Topic paper Five year land supply document
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	The housing allocations has identified a land supply sufficient to deliver the housing requirement identified in the local plan (part 1) including 20% land supply buffer.	Local plan (part 2) policies SA8-29
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	Housing trajectory is set out in Appendix 3 of the Local Plan (part 2) A five year land supply position statement is reviewed annually. The site allocations have factored in a 20% buffer of land supply to deliver enhance choice and flexibility to the land supply. A lapse rate of 20% on existing consents has also been factored in. Housing topic paper outlines the approach taken.	Appendix 3 Local Plan (part 1)
Set out the authority's approach to housing density to reflect local circumstances (47).	Policy DM14, p173 of local plan (part 1)	Local Plan (part 1)
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	Policy S7 p60 promotes a mixed and balanced housing market catering for all needs Policy S10 p68 promotes elderly needs housing Policy SA3 sets out the policy framework to deliver affordable houses (quantum and tenure) The site selection and allocations provides a mix of size across the settlement hierarchy which range from town centre locations to smaller villages.	Local Plan (part 1) Local Plan (part 2)- policies SA8-29 Settlement Boundary review
In rural areas be responsive to local circumstances and plan housing development	Policy S3 p22 sets out the criteria for allowing isolated homes as an exception. In addition the settlement hierarchy extends to include	Local Plan (part 1)

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<p>to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<p>rural villages. Policy S5 provides the policy context to allow small scale development in infilling and rounding off villages and the settlement boundaries for Limited Growth Villages have be reviewed and amended to allow for future growth.</p> <p>Policy S9 p66 sets the policy framework for rural exception sites including criteria for the incorporation of an element of open market to secure delivery where appropriate.</p>	<p>Settlement Boundary review document</p>
<p>7. Requiring good design (paras 56-68)</p>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<p>Objective SO5a- promotes high standards of design</p> <p>Policy S4 p29 sets out key design principles</p> <p>Policy DM12 p169 sets out sustainable design criteria</p> <p>Policy DM 14 p173 provides more detailed design policy</p> <p>Individual site allocation policies also pick up individual sign design consideration where necessary.</p>	<p>Local Plan (part 1)</p> <p>Local Plan (part 2) policies SA8-29</p>
<p>8. Promoting healthy communities (paras 69-77)</p>		
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).</p>	<p>Policy S4 p29 promotes well designed, safe and inclusive spaces</p> <p>Policy S7 p60- promotes mixed housing provision</p> <p>Policy S22 p106- promotes safe accessible environments</p> <p>Policy S24 p114 promotes green infrastructure</p> <p>Policy DM10 p166- Promotes high quality public realm</p> <p>Policy DM12 p169 promotes sustainable design criteria</p> <p>Policy DM 14 p173 provides more detailed design policy</p>	<p>Local Plan (part 1)</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities</p>	<p>Policy S3 p22 The spatial strategy is based on the premise of locating the majority of development close to services. Proximity of services</p>	<p>Local Plan (part 1)</p>

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and other local services (70).	<p>including community services was included in the Sustainability Appraisal for site assessment methodology.</p> <p>Policy S26- p117 protects existing local services, promotes replacement, extension or new facilities where appropriate as well as multi uses.</p>	
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	<p>Policy S25 p114 protects existing provision and is linked to the evidence base (Open space, sports and recreation study and Playing Pitch Strategy) This is supplemented by policy SA51 that re enforces the protection of open space now identified on the policies map.</p> <p>Protection of sports fields and facilities and important areas of open space formed part of the assessment of the site allocations</p> <p>Para 198- supports improvements to rights of way and protection (both the route and quality)</p> <p>The Developer Contributions SPD adopted in 2017 applies the evidence and identifies local standards including formula to ensure that there is a open space deficit this is addressed as part of development schemes.</p>	<p>Developer Contributions SPD</p> <p>Open Space Study (2014)</p>
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).	<p>Important areas of open space have been identified on the policies map and supported by policy SA51. An open space assessment has been carried (Open Space Review Document) which formed the basis for those areas identified on the policies map.</p>	<p>Open Space Review Document</p>
9. Protecting Green Belt land (paras 79-92)		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in</p>	<p>Not applicable</p>	<p>N/A</p>

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<p>their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)</p>		
<p>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<p>Policy S2 p19 promotes sustainable development as an overarching principle of the local plan</p> <p>Policy S3 p22 promotes a spatial strategy that reduces the need to travel</p> <p>Policies S4 p29, and DM12 p169- promotes sustainable construction methods</p> <p>Policy S29 p124 addresses flood risk</p> <p>Policy S37 p144 addresses coastal change including a revised coastal change management area as an amendment to the Proposals Map</p> <p>Site allocations have taken into account flood risk, coastal change and water supply and demand as part of the assessment of sites.</p>	<p>Local Plan (part 1)</p> <p>Local plan (part 2)- individual site allocation policies</p> <p>SFRA 2018</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<p>Strategic objective SO1f- promotes renewable energy production</p> <p>Policy S2 p19 encourages the development of renewable or low carbon energy resources</p> <p>Policy S19 p97 promotes all forms of renewable energy</p> <p>Policy SA50 defines an area suitable for wind energy development.</p>	<p>Policy S19 Local Plan (part 1)</p> <p>SA50 Local Plan (part 2)</p>

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Minimise vulnerability to climate change and manage the risk of flooding (99)	<p>Policy S2 p19 promotes reducing carbon footprint, resilience and mitigation measures.</p> <p>Policy S29 p124- addresses flood risk and surface water flooding</p> <p>Policy DM12 p169 promotes sustainable construction</p> <p>Flood risk assessment was an integral part of the site selection methodology.</p>	<p>Local Plan (part 1)</p> <p>Local plan (part 2)- individual site allocation policies</p> <p>SFRA 2018</p>
Manage risk from coastal change (106)	Policy S37 p144 addresses coastal change and the development allowed in the Coastal Change Management Area. (CCMA). The CCMA was defined on the Policies Map as part of the local plan (part 1)	Local Plan (part 1)
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	<p>Strategic objectives SO6a-e</p> <p>Policy S2- p19- promotes the protection and enhancement of biodiversity and landscape and agricultural land</p> <p>Policy S24 p111 seeks to protect and enhance green infrastructure</p> <p>Policy S33 p135 promotes, enhancement and protects landscape</p> <p>Policy S34 p137 seeks to enhance and protect AONB</p> <p>Policy S35 p139 protects and enhances biodiversity and geo diversity</p>	Local Plan (part 1)
Prevent unacceptable risks from pollution and land instability (109)	<p>Policy S32 p132- safeguards amenity in terms of pollution</p> <p>Para 298 p128 addresses land stability</p> <p>Policy S36 p142 Protection and enhancement of air, soil and water quality.</p> <p>Factors such as potential sources of pollution that could impact on allocated sites and the potential for the site allocations to be a source</p>	<p>Local Plan (part 1)</p> <p>Site selection methodology</p>

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	of pollution has been considered in the site assessments. Past history of coal mining was also included as part of the site screening process.	
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<p>Policy S2 p19 protects maintains and enhances species, habitats and ecological networks.</p> <p>Policy S35 p134-139 protects and enhances biodiversity and geodiversity</p> <p>Site assessments included ecological as part of site visits and the Habitats Regulation Assessment. Individual site allocation policies include detail on habitat and species protection and enhancement.</p> <p>Biodiversity also formed part of the sustainability appraisal assessment.</p> <p>Green infrastructure networks are identified on the policies map and form important biodiversity networks. Policy SA 52 seeks to enhance the green infrastructure network including its biodiversity value.</p>	<p>Local Plan (part 1)</p> <p>Habitat Regulations Assessment</p> <p>Sustainability Appraisal</p> <p>Local Plan (part 2) individual site policies</p> <p>Green Infrastructure Network on the Policies Map.</p>
12. Conserving and enhancing the historic environment (paras 126-141)		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<p>Policy S2 p19 seeks to protect and enhance historic environment and assets</p> <p>Policy S27 p119 covers all heritage assets, both protection and enhancement.</p> <p>Heritage assessments formed part of the site selection process and the sustainability appraisal. Safeguarding heritage assets, design considerations in sensitive historic environments and potential for undiscovered archaeological remains have been highlighted and incorporated in to individual site policies.</p>	<p>Local Plan (part 1)</p> <p>Local Plan (part 2) individual site policies</p> <p>Heritage Topic Paper</p>
13. Facilitating the sustainable use of minerals (paras 142-149)		

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<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Policy S2 p22 seeks to safeguard mineral resources</p> <p>Mineral Safeguarding Areas will be included on the interactive Policies Map.</p>	
<p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement sets out when, who and the methods used at all stages of the local plan (part 2 preparation. The consultation methods and list of consultees are contained in the SCI and a live consultee database is kept.</p>	
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<p>The evidence base can be found at www.allerdale.gov.uk/siteallocations</p> <p>Sustainability Appraisal reports at Preferred Options and publication</p> <p>Consultation statement- indicates how comments were taken on board and consultation methods used</p> <p>Justification of policy in the local plan sets out link to evidence base</p> <p>Preferred options document sets out reasoning for selection of preferred options and reasons for discarded sites.</p> <p>Topic papers on housing, broadband, housing standards, employment,</p>	

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	viability and wind energy.	
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<p>Issues and Options in 2006 was the basis for developing the preferred options in 2012. The preferred options document sets out alternatives considered and reasons for choosing the preferred policy and sites. It also included reasonable alternatives.</p> <p>Topic papers set out the reasoning behind policy decisions and discarded sites, open space review and settlement boundary review documents set out reasons why sites were not taken forward.</p> <p>The Sustainability Appraisal (SA) informed the development of the preferred options and reasonable alternatives. The SA report assesses all sites options that were not screened out in stage 1.</p>	
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		
<p><i>Deliverable and Coherent</i></p>	<p>The policies are internally consistent. The Core Strategy takes its thematic structure from the strategic objectives. The Housing and</p>	

Soundness Self-Assessment Checklist (January 2019)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan’s vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<p>Economy policies reflect the spatial strategy set out in policy S3. The policies in the Sustainable Communities and Infrastructure, Built and Historic Environment and Natural Environment chapters apply across the board. The Development Management policies under pin and add detail to the strategic policies and mirror the structure of the Core Strategy. Local Plan (part 2) takes forward the strategy and strategic policies set out in the Local Plan (part 1) in particular it identifies the land supply to deliver the level of growth identified in part 1 consistent with the spatial strategy. The local plan (part 2) is structured to reflect the first part of the Plan and linkages are made between the two parts of the plan.</p> <p>Appendix 7 of the Local Plan (part 1) and appendix 2 of the Local Plan (part 2) - Monitoring and Implementation provides the framework against which the performance of the Local Plan is judged. Appendix 3 of the local plan (part 2) contains the housing trajectory and the Infrastructure Delivery Plan outlines the infrastructure requirement.</p> <p>Linkages are made between the Core Strategy policies and the NPPF, Local Plan Strategic objectives, Sustainable Community Strategy and Evidence Base in a matrix below each policy</p>	
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<p>The Infrastructure Delivery Plan sets out infrastructure implications for delivering the site allocations.</p> <p>The Infrastructure Delivery plan (IDP) has been developed in partnership with the key infrastructure providers.</p> <p>Funding sources and programmes have been identified in the IDP.</p>	
<p><i>Co-ordinated Planning</i></p>	<p>The Local Plan reflects the approach taken in the Sub-Regional Spatial Strategy, which is the spatial expression of the Cumbria Sustainable</p>	

Soundness Self-Assessment Checklist (January 2019)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for development and the use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?	<p>Community Strategy agreed by the main stakeholders.</p> <p>The integration of all aspects of spatial planning is contained and expressed in the Infrastructure Delivery Plan.</p> <p>A matrix appears below each policy showing the linkages to other strategies.</p> <p>Policy S4 –encourages social wellbeing through inclusive places</p> <p>Policy S15 supports skills and education</p> <p>Policy S21- developer contributions covers physical, social and green infrastructure</p> <p>Policy S10 Elderly Needs Housing supports the strategy of adult social care. These are some examples of policies in the Local plan which reflects a spatial planning approach.</p>	
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<p>Appendix 7 in local plan (part 1) and appendix 2 in local plan (part 2) sets out the monitoring framework for the local plan strategy and policies and site delivery combined with the Sustainability Appraisal indicators will form the basis for annual reporting in the Annual Monitoring Report.</p> <p>Annual monitoring will allow the performance of policies and site delivery to be assessed and action taken, which will include a review should the policy/strategy not be achieving the desired outcome.</p> <p>The Local Plan has a number of policies that have flexibility built in to them (e.g. S3 –rate of housing and employment delivery or SA3 affordable housing that recognise changes to market conditions and viability)</p> <p>Monitoring of land supply to ensure a deliverable housing land supply is achieved in the first five years, including a 20% buffer to allow flexibility in supply.</p>	
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> • Is there sufficient evidence to demonstrate 	The adopted Local Plan (part 1) complied with the Duty to Cooperate where strategic cross boundary issues were examined. Duty to	

Soundness Self-Assessment Checklist (January 2019)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>that the Duty to Co-operate has been undertaken appropriately for the plan being examined?</p> <ul style="list-style-type: none"> • Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? 	<p>Cooperate activity has continued during the production of Local Plan (part 2) which includes, evidence base and joint working through county wide groups.</p> <p>The Council has worked closely with statutory consultees and infrastructure and utility providers to ensure the site allocations are deliverable and developable.</p>	
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<p>Appendix 7 of the local plan (part 1) sets out the indicators and monitoring framework for the local plan strategy and strategic and development management policies.</p> <p>Appendix 2 in the local plan (part 2) supplements the monitoring framework in the first part of the local plan to monitor site delivery in particular.</p> <p>Appendix 3 in the Local Plan (part 2) sets out a detailed housing trajectory and Appendix</p> <p>The AMR will report using the monitoring framework in both parts of the local plan.</p> <p>The sustainability appraisal also has a monitoring framework which will be included in the Annual Monitoring report</p>	
<p><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add 	<p>We do not consider any policy is contrary to national policy. The local plan has been developed in a positive manner supporting the principle of delivering the presumption in favour of sustainable development.</p> <p>The Local Plan reflects Allerdale’s issues and priorities. Policy detail is</p>	

Soundness Self-Assessment Checklist (January 2019)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
anything to existing national guidance? If so, why have these been included?	included to support the delivery of development that reflects specific local issues. The sites allocated for development are consistent with the adopted spatial strategy.	

Soundness Self-Assessment Checklist (January 2019)

Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

Soundness Self-Assessment Checklist (January 2019)

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement with both settled and traveller communities.	<p>Cumbria Gypsy and Traveller Accommodation Needs Assessment 2013 included interviews and consultation with both settled and traveller communities.</p> <p>Engagement with travellers on the site allocation was carried out.</p> <p>The Travelling Showpeople accommodation need assessment was updated in 2019 and this included interviewing the travelling showpeople community on the Showmen Yards and the Showmen Guild.</p>	<p>GTAA 2013</p> <p>Travelling Showpersons accommodation Needs (2018)</p> <p>Gypsy, Traveller and Travelling Showpeople Topic Paper.</p>
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	<p>Cumbria Gypsy and Traveller Accommodation Needs Assessment 2013 included interviews and consultation with both settled and traveller communities.</p> <p>Engagement with travellers on the site allocation was carried out.</p> <p>The Travelling Showpeople accommodation need assessment was updated in 2019 and this included interviewing the travelling showpeople community on the Showmen Yards and the Showmen Guild.</p>	
Policy B: Planning for traveller sites (paras 7-11)		
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site	The Local Plan (part 1) set pitch targets for gypsy and travellers and plot targets for travelling show people. The plot targets have been revised in the Local Plan (part 2) based on an updated assessment of need for the	

Soundness Self-Assessment Checklist (January 2019)

Policy Expectations	Possible Evidence	Evidence Provided
<p>accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<p>travelling show people community.</p> <p>Policy S11 p70-72 sets out criteria for both site allocations and planning applications</p> <p>The proposed allocation and site options have been assessed against the criteria in policy S11, sustainability appraisal and site assessments.</p>	
<p>Policy C: Sites in rural areas and the countryside (para 12)</p>		
<p>When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.</p>	<p>Policy S11 p70-72 includes criteria on scale and local context. It was used to assess site options. The assessment of site options is set out in the Gypsy and Traveller topic paper and Sustainability Appraisal.</p>	
<p>Policy D: Rural exception sites (para 13)</p>		
<p>If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers sites.</p>	<p>Policy S9 of Local Plan (part 1) p66 This addresses rural exceptions. It does not directly address rural exceptions for travellers sites</p>	
<p>Policy E: Traveller sites in Green Belt (paras 14-15)</p>		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate</p>	<p>Not applicable</p>	

Soundness Self-Assessment Checklist (January 2019)

Policy Expectations	Possible Evidence	Evidence Provided
<p>development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>		
<p>Policy F: Mixed planning use traveller sites (paras 16-18)</p>		
<p>Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.</p>	<p>Policy S11 p70 of Local Plan (part 1) does recognise mixed use sites in respect to travelling shows (storage and accommodation needs)</p>	
<p>Policy G: Major development projects (para 19)</p>		
<p>Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.</p>	<p>Not applicable</p>	

[Type text]

Soundness Self-Assessment Checklist (January 2019)

End