PEAK DISTRICT NATIONAL PARK AUTHORITY: LOCAL DEVELOPMENT FRAMEWORK

CORE STRATEGY
SOUNDNESS SELF ASSESSMENT

January 2011

Soundness Self Assessment – Peak District National Park Core Strategy DPD

Key question	Possible evidence	Evidence provided
Justified		
Participation		
1. Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement	The Statement of Consultation describes the methods used in all stages of preparation. A number of techniques have been employed to engage interested parties and hard-to-reach groups. The list of people consulted has been refined at each stage (see Appendices 3 & 6). http://www.peakdistrict.gov.uk/ldf-a005_statement_of_consultation.pdf
Research/ fact finding		
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 main conclusions in relation to the policies in the development plan document v. Sections of the consultation statement OR vi. A very brief statement of how the main findings of consultation support the policies, with reference to: • reports to the council on the issues raised during participation, covering both the front-loading and formulation phases • any other information on community views and preferences	The Evidence Library lists and gives links to evidence base documents which have been taken into account in preparing the Core Strategy. A number of evidence studies were specifically commissioned in 2007/8/9 to provide up-to-date sub-area baseline information and evidence for the LDF (see Evidence Library section E). http://www.peakdistrict.gov.uk/ldf-final-evidence-library.xls Paragraphs within chapters 5 -15 in the Core Strategy show how evidence justifies the selected strategy and policies. http://www.peakdistrict.gov.uk/ldf-a001-submissioncorestrategy.pdf The Preferred Approaches document includes paragraphs describing 'what our other evidence and analysis tells us' for each Issue. 'Help Shape the Future', Issues and Options and Refined Options documents also referred to background evidence. http://www.peakdistrict.gov.uk/core-strategy-preferred-approach.pdf The Sustainability Appraisal (SA) Report sets out the main conclusions with reference to SA objectives. http://www.peakdistrict.gov.uk/ldf-a003-

Key question	Possible evidence	Evidence provided
	• 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 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	sustainabilityappraisal.pdf Statement of Consultation Appendices 5, 7 and 8 summarise key issues raised in consultation responses at each stage, and how these were used in drafting subsequent documents. All the evidence is considered to be convincing and sufficiently up-to-date.
5. What assumptions had to be made in preparing the development plan document? 6. Are the assumptions reasonable and justified?	i. Sections of the development plan documents setting out the assumptions ii. Sections of the sustainability appraisal report setting out the assumptions iii. A very brief statement for each assumption as to how the evidence led to the assumption iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions	The Core Strategy sets out assumptions, mainly in chapter 3 including the context of NP purposes at paragraph 3.5, and under Vision and Context paragraphs 3.7 – 3.10; and chapter 5 Spatial Outcomes at paragraphs 5.3 & 5.4. The Sustainability Appraisal Report sets out key assumptions and factors taken into account in paragraphs 2.18 – 2.23 and 3.3 – 3.7. National Park purposes and Section 62 duty are established in the Environment Act 1995 (see Core Strategy paragraphs 3.18 – 3.19).
Alternatives		
7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives? 8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at? 9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and	i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options ii. Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised iv. Sections of the preferred strategy report explaining: • how alternatives were developed and	The Statement of Consultation describes how stakeholders and communities were encouraged to get involved throughout the LDF process, from early identification of issues and options through to commenting on preferred approaches. The 'Help Shape the Future' and Issues and Options documents invited consultees to identify the issues that concerned them and put forward options for how they could be addressed. http://www.peakdistrict.gov.uk/issues.pdf http://www.peakdistrict.gov.uk/ppconsultation1.pdf The Refined Options document set out all the issues and options, including new options raised in consultation. http://www.peakdistrict.gov.uk/ldf-

Key question	Possible evidence	Evidence provided
why these decisions were made?	evaluated, and • why alternatives were rejected in favour of the preferred strategy v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed 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 vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions viii. Sections of the representations statement OR A brief statement of the influence upon decisions of: • the issues raised during stakeholder and community engagement, and how they have been addressed ix. Any other documentation showing how alternatives were developed and evaluated x. A very brief statement and any other supporting documentation of the way decisions have been taken	refinedoptionsconsultation.pdf The Preferred Approaches document included a section for each issue setting out the level of support and objection for each issue/option, and explaining why options had been chosen or discarded. The Sustainability Appraisal Report paragraphs 2.25 – 2.37 explain how options/refined options and preferred approaches were assessed. Statement of Consultation Appendices 5, 7 & 8 summarise key points from consultations and how these were used to address subsequent stages of document preparation. The Representations Statement highlights the main issues raised in pre-submission consultation. http://www.peakdistrict.gov.uk/ldf-corestrategy-statementofrepresentations.pdf
10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?	i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy 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 sustainability appraisal findings iii. Reports made as part of plan-making which	The Core Strategy paragraph 3.24 explains the requirement and process for Sustainability Appraisal. Findings of the SA have directly influenced content of the Core Strategy but are not repeated in it. The Sustainability Appraisal Report paragraphs 2.25 – 2.29 and 3.11 – 3.15 and Appendices D & E show how SA has influenced development of strategy and policies. Issues & Options, Refined Options and Preferred Approaches documents explain for each issue how SA has influenced thinking and choices.

Key question	Possible evidence	Evidence provided
	indicate how sustainability appraisal has influenced the choice of strategy and the content of policies	
11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it? 12. Does the strategy take forward the regional context reflecting the local issues and objectives?	i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy iii. Representations received from the regional development agency/regional planning body iv. Representations from the Government Office v. Reports or copies of correspondence as to how the representations have been considered and dealt with	The Core Strategy does not repeat regional policy but elaborates upon it for the National Park context. Throughout its preparation, the Core Strategy has taken account of regional policy in the East Midlands Regional Plan (RSS). It contains policies that are not only consistent with national policy, but were widely supported by the evidence and public examination (and its conclusions) for the East Midlands Regional Plan (2009). When the Regional Plan was revoked by the Secretary of State for Communities and Local Government in July 2010, references to conformity with regional policies were removed from the Core Strategy. Where relevant, Core Strategy sections for each issue explain the background of regional evidence which was taken into account during its preparation. In submitting the Core Strategy the Authority has acted in a manner that is compatible with the Secretary of State's decision at the time of publication (pre-submission consultation), removing reliance on (and most references to) the East Midlands Regional Plan. Following legal challenge, the continued relevance of the adopted Regional Plan has now been confirmed by the court. Conformity with the Regional Plan was requested from East Midlands Council by email on 10 December 2010. East Midlands Development Agency comments at Preferred Approaches stage sought more flexibility to respond to community needs and allow appropriate levels of growth. Their response to pre-Submission consultation noted that improvements have been made since Preferred Approaches, but suggested that the Core Strategy should offer more opportunity for sustainable development. Representations were made by EM Regional Assembly / East Midlands Councils to Issues & Options and Refined Options documents. Their comments were generally supportive, that the Vision and objectives were resonant with the Regional Plan. GOEM was consulted at each stage of plan preparation, but

Key question	Possible evidence	Evidence provided
		made no representations at Refined Options or Preferred Approaches consultation. See Appendix to this document. Neither EMC nor GOEM made representations to pre-Submission consultation.

Effective		
Deliverable		
13. Has the council clearly identified what the issues are that the development plan document is seeking to address? 14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?	i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there 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 iii. A core strategy vision which is framed to set out the outcomes which are sought for the future iv. Sections of the development plan document which identify the main issues addressed v. Sections of the development plan document which indicate the priority outcomes	The Peak District National Park Authority is not itself required to produce a SCS, but GOEM have accepted the National Park Management Plan (NPMP) as proxy for SCS for the National Park. http://www.peakdistrict.gov.uk/npmp.pdf The vision and outcomes from the NPMP are outlined in Core Strategy paragraphs 3.7 – 3.9 and these are related to spatial strategy for the LDF. Key points raised in consultations on 'Help Shape the Future' and Issues and Options consultations are included within the Statement of Consultation Appendices 2 & 5. The spatial portrait at chapter 4 of the Core Strategy analyses the values and sets out the challenges facing the National Park which the Core Strategy seeks to address. The Core Strategy sets out Spatial Outcomes at paragraphs 5.3 – 5.4. Spatial Objectives shown in figures 3 - 6 then outline how they will be achieved for different parts of the National Park. Paragraphs within chapters 9 -15 describe how policies will contribute to spatial outcomes within the 3 spatial areas.
15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?	i. Sections of the regional special strategy which identify cross-boundary issues. ii. Sections of the development plan document setting out cross-boundary issues and the response to them iii. Reports on relevant studies which cover wider	Throughout its preparation the Core Strategy has responded to cross-boundary and Peak sub-Area issues identified in the East Midlands Regional Plan,. The need for cross-boundary working is raised within Spatial Portrait chapter 4, eg road traffic paragraph 4.11 and wind turbines paragraph 4.12. The Development Strategy in chapter 5 discusses further the

	areas than the local authority and how the development plan document addresses their findings or recommendations iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance	interplay between the National Park and surrounding service centres. The important relationships with areas adjoining the National Park are recorded within several chapters including housing, employment and transport. Sub-regional evidence studies which have included the areas of High Peak and Derbyshire Dales are listed. Regard has been taken to any cross-boundary issues identified in all of these in preparing the Core Strategy. Meetings with adjoining authorities on housing, transport etc have considered how to address cross-boundary issues and formulate complimentary proposals and delivery. Responses from adjoining authorities have displayed support for the overarching spatial strategy.
16. Does the development plan document contain clear objectives?	i. A spatial portrait which identifies the key issues facing the area ii. A core strategy vision which is framed to set out the outcomes which are sought for the future 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	The Core Strategy includes a Spatial Portrait at chapter 4 which identifies key issues for different parts of the National Park. The Core Strategy Vision and NPMP outcomes are set out at paragraphs 3.7 and 3.8. Para 5.3 of the Core Strategy sets out spatial outcomes for the National Park to 2026 followed by area-based objectives for its distinctive parts, derived from these and the spatial portrait.
17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere? 18. Is there a direct relationship between the identified issues and the objectives?	i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place	The Core Strategy includes a spatial portrait and issues in chapter 4 from which outcomes and spatial objectives for the National Park and its distinctive parts are derived. The three broad spatial areas have been informed by the Peak District Landscape Strategy and Action Plan, and by common characteristics such as the extent to which an area is settled and developed. Only Macclesfield LSP specifically responded (at Issues & Options stage), and were generally supportive of the Vision and spatial objectives. Email responses received between the Preferred Approaches stage and Pre-Submission highlighted broad support for the way that the spatial strategy supported LSP priorities. Detailed dialogue took place between NPA officers and the Dales and High Peak LSP in order to satisfy all parties that conformity had been achieved. The results of this process are set out in the Delivery Plan.

		Representations to the pre-Submission Core Strategy have not questioned the objectives.
19. Is it clear how the policies will meet the objectives? 20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?	i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them ii. Relevant sections of the sustainable community strategy which identify its objectives iii. Confirmation from the local strategic partnership and partner organisations that they believe the polices will achieve the agreed objectives iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.	The Core Strategy includes paragraphs for each issue within chapters 8-15 which relate policies to the spatial outcomes. GOEM has agreed that the NPMP takes the place of SCS in the National Park (see 13 above). Spatial objectives in the Core Strategy are derived from NPMP objectives. The Statement of Consultation describes the main issues raised by partner organisations and stakeholders throughout preparation of the Core Strategy. The Sustainability Appraisal Report and evidence studies indicate that policies are appropriate and should succeed. The Core Strategy sets out at paragraph 3.7 the Vision for the National Park and describes within chapters 5-15 how this will be delivered. This and previous documents have all been developed based on matters identified as important by a wide range of stakeholders.
21. Are there realistic timescales related to the objectives?	i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery	The Delivery Plan addresses by whom and how delivery can be achieved. http://www.peakdistrict.gov.uk/ldf-a002-deliveryplan.pdf Discussions have taken place since Preferred Approaches stage with key organisations who can contribute to delivery. The Authority is continuing involvement with partner authorities and organisations to ensure delivery. Local Strategic Partnerships have not made representations to pre-Submission consultation on issues of timescales or delivery.
22. Are the policies internally consistent?	i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent ii. A very brief statement explaining how the council considers its objectives are consistent	The Sustainability Appraisal has assessed policies from several perspectives including environmental, social and economic. The Authority is satisfied that policies in the Core Strategy are internally consistent. There has been a long process of developing, refining and testing policies internally and through consultation.

23. Does the development plan document contain material which: • is already in another plan • should be logically be in a different plan • should not be in a plan at all?	i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with	The Local Development Scheme explains how documents in the LDF will fit together. http://www.peakdistrict.gov.uk/localdevelopmentschemev5.pdf A key relationship is that between the Core Strategy and Development Management Policies DPDs. Several references are made in the Core Strategy to the way in which DM policies will add further detail to principles established. Core Strategy Appendix 1 shows saved and replaced Local Plan policies. Early correspondence from GOEM referred to concerns about the scope of the DPD - see Appendix 1 to this document. Appendices in the Statement of Consultation describe the main points raised in consultations.
24. Does the development plan document explain how its key policy objectives will be achieved?	i. Sections of the development plan document that identify the key objectives and how they will be delivered upon ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery 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	Core Strategy paragraph 3.7 sets out the Vision for the National Park; paragraphs 5.2 – 5.4 and figures 3 - 6 describe how policies will contribute to the achievement of beneficial spatial outcomes and help deliver this Vision. This linkage is then maintained throughout the Core Policies by cross-referring back to these diagrams, reminding the reader of the intent of policy. Discussions have taken place since Preferred Approaches stage with key organisations who can contribute to delivery. The Statement of Consultation describes the main issues raised by partner organisations and stakeholders throughout preparation of the Core Strategy.
25. If there are development management policies, are they supportive of the strategy and objectives?	i. Sections of the development plan document that show how the development management policies: • will help to deliver the strategy • derive from, and elaborate on, the objectives and policies of the plan	The Core Strategy sets out strategic level policy principles that will be supplemented by detailed policies/criteria in a subsequent Development Management Policies document. Core Strategy policies aim to facilitate delivery of spatial outcomes and enable appropriate development in the context of National Park purposes. Paragraph 7.6 explains hierarchy of policy including the relationship with future DMP document and SPD.
26. Have the infrastructure implications of the strategy/policies clearly been identified?	i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward ii. Representations in respect of infrastructure iii. Reports or copies of correspondence as to	The Delivery Plan aims to identify infrastructure needs for developments such as housing or business within sections 7 to 13. However there are likely to be limited infrastructure requirements bearing in mind National Park purposes and the low expected level of development. Representations have not raised concerns about

		how representations in relation to infrastructure have been considered and dealt with	infrastructure provision.
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	i.	Sections of the development plan document setting out delivery mechanisms and timescale	The Delivery Plan sections 6-13 and Appendix E (housing delivery) set out delivery mechanisms and timescales.
	ii.	Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered	The Local Development Scheme Third Revision indicates that the Development Management Policies document will be prepared immediately following the Core Strategy. This will help interpret the intention of policy and give clear guidance to decision makers and applicants. Climate Change and Sustainable Building SPD and Design Guide Technical Supplements SPDs are in preparation.
	iii.	Research or studies that address matters of delivery and the realistic timescales	The Core Strategy has been prepared closely with other Authority strategies and Action Plans including those for Recreation, Landscape and Cultural Heritage, Climate Change, Minerals and Transport, which include action plans for delivery.
	iv.	Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms	
	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	Service partners and providers have been engaged throughout the process. Notes of Delivery Plan meetings at Preferred Approaches stage can be made available to the Inspector on request.
	vi.	Correspondence from stakeholders on delivery mechanisms and timescale	The Delivery Plan section 3 explains how the National Park Authority will work in partnership with local authorities and a range of other partners to deliver the strategy.
	vii.	Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with	Infrastructure issues have not been raised in consultations during preparation of the Core Strategy.
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?	i.	Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery	As described in 26 above, there are likely to be limited infrastructure requirements bearing in mind National Park purposes and the low expected level of development.
	ii.	Representations in respect of infrastructure	Representations to pre-Submission consultation have not raised concerns about infrastructure provision.
	iii.	Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with	
29. Is it clear who is intended to implement each part of the strategy/ development plan document?	i.	Sections of the development plan document setting out responsibilities for delivery	The Delivery Plan sections 3 and 6 - 13 set out who is intended to deliver the Core Strategy policies.
	ii.	Correspondence showing how other stakeholders intend to support the delivery of	Service partners and providers have been engaged throughout the process. The Delivery Plan section 3 explains

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?	the policies iii. Reports by the council or the relevant stakeholder iv. Representations from stakeholders on implementation v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with	how the National Park Authority will work in partnership with local authorities and a range of other partners to deliver the strategy. Notes of Delivery Plan meetings at Preferred Approaches stage can be made available to the Inspector on request. Appendices 2, 5, 7 & 8 to the Statement of Consultation summarise the key issues in representations made at all stages of LDF preparation. The Statement of Representations summarises two representations referring to the Delivery Plan at the pre-Submission consultation.
31. Does the development plan document reflect the concept of spatial planning? 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?	i. Sections of the development plan document that reflect the plans or strategies of other bodies ii. Expressions of support from bodies responsible for other strategies affecting the area iii. Representations in respect of services provided by other agencies 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	Paragraph 2.5 in the Core Strategy explains how spatial policy can influence the actions, investment and programmes of other statutory bodies. References are made within chapters 9 – 15 in cases where other bodies' strategies are relevant or helpful. Delivery Plan section 3 describes the partnerships and responsibilities of other authorities and agencies for delivery within the National Park. The concept of spatial planning in the National Park is a linkage between the LDF and National Park Management Plan which deals with partnership working to achieve shared priorities for the area. The Authority has chosen not to duplicate all these matters into the LDF but describe how it is an integrated process in the National Park, unlike other parts of the country where the LDF has a closer relationship to LSP priorities and the Core Strategy is the place to deal with the broader "spatial" issues. Government Office for the East Midlands have accepted the role of the NPMP for the purposes of spatial planning, and following early concerns have not expressed concern at the Preferred Approaches or Pre-Submission stages. Constituent authorities, partners, service providers and stakeholders have all had opportunities to influence the Core Strategy. The Statement of Consultation describes the main issues raised in consultation and how these have been addressed. Comments made at the pre-submission stage (Regulation 28 consultation) are summarised in the Representations Statement.
33. Does the development plan	i. Explicit recognition within the development	The Core Strategy and Delivery Plan are intended to be

document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?	plan document that this may happen, and clear information about how the plan strategy can accommodate them ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy	flexible and can respond to change, but within the context of statutory protection as a National Park eg housing delivery uncertainties. Monitoring of targets and indicators will show where problems arise. Evaluation of options was informed by SA etc which allowed these potential matters to be taken into account.
Flexible		
34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	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 ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: • the effectiveness of policies and what evidence is being collected to undertake this • changes affecting the baseline information and any information on trends on which the development plan document is based 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 iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances	The overall development expectation is low. Some aspects of the strategy eg affordable housing delivery are reliant on public subsidy, and there is no target either from the RSS or self imposed, reflecting the fact that the key driver is National Park purposes. Therefore changes in resources would not lead to a failure of the plan, just a slow-down in desired delivery times. Monitoring and implementation are covered in the Delivery Plan section 4 and Appendix F. Monitoring and review will ensure that changes in needs, opportunities and delivery are monitored. Future AMRs will incorporate revised and additional indicators and targets. Significant issues will be reported in Annual Monitoring Reports, which will lead to review of policies and/or trigger contingencies where necessary. All policies are written to be reasonably flexible within the constraints of National Park purposes. A wide range of data is currently collected to inform AMRs and this will continue for new Core Strategy policies. No problems have been raised in consultations. The Core Strategy and Delivery Plan are intended to be flexible and can respond to changing circumstances, but within the context of statutory protection as a National Park.
35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?	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 ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan	Whilst maintaining a strong level of control over landscape protection, policies in the Core Strategy offer flexibility to accommodate the likely factors and scale of change affecting the National Park. The Delivery Plan section 10 considers this particularly in relation to housing delivery. No housing figures were imposed on the National Park in RSS. The Localism Bill highlights the strong intent of Government to abolish RSS and revert target-setting to local planning

	could cope with changing circumstances	authorities. This should allow the Authority to reasonably adjust to circumstances through continued joint work with partners.
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	i. A section of the development plan document which expressly addresses flexibility ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing	Core Strategy paragraph 5.17 (supported by preceding paragraphs) explains the flexible nature of the development strategy focus on named settlements. The Delivery Plan sections 5 - 13 describe the uncertainties of delivery. Indicators in the Delivery Plan Appendix F will be used to monitor effectiveness of policies both qualitatively and quantitatively. If the AMR identifies problems, a review of policies will be undertaken as required.
Monitoring		
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?	i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories iii. Reference to any other reports or technical documents which contain information on delivery of policies	Appendix F in the Delivery Plan sets out indicators and targets by which we will monitor the effectiveness of policy. AMRs include sections on indicators, targets and milestones, and comment on the effectiveness of policies. Review of policy will be triggered if necessary. Strategies and Action Plans including the Biodiversity Action Plan and the Recreation Strategy contain information on delivery of actions which are linked to policies in the National Park Management Plan and LDF. The Core Strategy does not include housing trajectories, targets or milestones; however it does include phased estimates (2010 - 14 & 2014 - 26) of anticipated housing delivery.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	i. Sections of the development plan document setting out indicators, targets and milestones 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 iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators	Delivery Plan Appendix F sets out indicators and targets for monitoring the effectiveness of the strategy. The AMR sets out national and regional performance indicators including sustainability indicators, by which we will continue to monitor delivery of policies. Future AMRs will incorporate any additional indicators and targets as set out in the Delivery Plan.
39. Are suitable targets and indicators present (by when,	i. Sections of the development plan document setting out indicators, targets and milestones	The Delivery Plan Appendix F identifies indicators and targets by which we will monitor policy effectiveness and delivery.

how and by whom)?	ii.	Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories	The AMR sets out national and regional performance indicators including sustainability indicators, by which we will continue to monitor the delivery of policies. The AMR also considers wider changing circumstances. Response measures or review of policy will be triggered if necessary.

National policy			
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?	i. ii. iii. iv. v.	Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy Sustainable community strategy, studies forming evidence for the development plan document, or other information which provide the stimulus for departing from national planning policy Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement Representations from the Government Office on the preferred strategy or the submitted development plan document Reports or copies of correspondence as to how Government Office representations have been considered and dealt with	Core Strategy paragraph 3.18 explains that the Environment Act 1995 sets out the statutory purposes and duty of National Parks. Government has confirmed that National Parks have the highest status of protection in relation to landscape and scenic beauty. The Core Strategy reflects how national planning policy statements must be considered in the context of this protection. The National Park Management Plan, which is proxy for SCS in the National Park, reiterates these purposes and duty. The Preferred Approaches document explains how evidence in SA and responses to consultations led to some options being discarded because they would be contrary to national policy. Government Office for the East Midlands (GOEM) provided advice at Issues & Options stage about the inclusion of PPS and MPS guidance in the Core Strategy (see Appendix to this document). GOEM did not make representations at Refined Options, Preferred Approaches or pre-Submission stage. Overall the Authority considers that while necessary protective safeguards are built into policy, the plan is sufficiently consistent with national planning policy in the National Park context.
42. Does the development plan document contain policies that do not add anything to existing national guidance? 43. If so, why have they been included?	i. ii. iii.	Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons Representations from the Government Office Reports or copies of correspondence as to how the representations have been considered and dealt with	No issues have been raised in representations on the basis that strategy or policies simply repeat national policy. Government Office for the East Midlands has not made representation at pre-Submission consultation. Each chapter draws out the national policy context to explain how the Core Strategy builds on it to create a locally distinctive and appropriate approach.

Appendix

Summary of correspondence from GOEM
Action taken in response to these communications from GOEM is recorded in the Pre-Submission Consultation Statement.

In their response to the 'Help Shape the Future' consultation and the accompanying work on Sustainability Appraisal, the Government Office for the East Midlands (GOEM) advised that if we continued in this approach through to later stages of DPD preparation, the document would be in danger of being considered unsound. The reasons for this related to:

- lack of clarity on what the consultation related to - a National Park Management Plan, a Core Strategy DPD, a Development Control Policy document, or both;
- the need to separate out the scoping and testing stages for SA/SEA, and to show how results and responses were taken into account in subsequent plan development;
- lack of clarity in the way that options were considered and tested before choosing the preferred approach;
- concern that while considerable local consultation had taken place, there was not sufficient evidence of engagement by specific or general consultation bodies in accordance with Regulation 25.

Further GOEM advice (by email October 2006) prompted officers to consider experiences at Stafford and Lichfield. Here, Inspectors found the plans unsound because a Core Strategy must present a proper range of spatial options. Our officers sought to gain more insight into LDF experiences at other authorities and decided to rework the material gathered during 2006 into a new set of Issues and Options for the LDF Core Strategy.

Further work was necessary to meet the requirements set out by the Government Office. In April 2007 GOEM invited the Authority to take up an offer of a diagnostic appraisal of the circumstances in working towards the preparation of our LDF. On 21 May 2007 Addison & Associates, consultants working for the Planning Advisory Service (PAS), visited the Authority. An action plan devised from the PAS report following this visit was taken to the Authority's Audit and Performance Committee on the 20 July 2007.

GOEM also confirmed in a letter on 25 April 2007 that the National Park Authority were not required to prepare a Community Strategy, and that the National Park Management Plan could be taken as a proxy for the Community Strategy in respect of soundness test v in PPS12 para 4.24.

A letter received from GOEM on 13 June 2007 explained further detailed concerns over the approach taken in the consultation on Issues and Options:

- The Core Strategy should have a spatial vision, presenting a succinct picture of how the authority sees the area developing over the next 20 years or so;
- Documentation did not represent a spatial approach;
- No spatial portrait;
- Need for a robust evidence base;
- Options need to show they have been subject to sustainability appraisal;
- Need for key issues to flow more obviously from the spatial portrait;

- Strategic Objectives should not read as high level development control policies but set out what the authority aims to achieve for spatially distinctive parts of the area;
- Need for a clearer spatial strategy setting out how the authority will deal with identified issues and how these will impact on different parts of the plan area;
- Need to more clearly express conformity with national and regional policy;
- State more clearly how the plan has had regard to other plans, strategies and programmes;
- Show how the plan has had regard to community strategies;
- Give better discussion of cross-boundary issues;
- Show how spatial options have been prepared, considered and tested;
- Set out mechanisms for implementation and monitoring;
- Show more clearly how the plan has been tested by means of a Sustainability Appraisal and Appropriate Assessment

Further concern was expressed in an email from Anthony Hamilton at GOEM 30 April 2009:

"I am concerned that the theme-based approach taken in the consultation document does not accord with "new system thinking" and might not, as such, provide a basis for the preparation of a sound core strategy. I see that many options were presented in the consultation document, but would note that, to fit in with new system thinking, options should be derived from thinking about a spatial portrait yielding a vision, which, in turn, would give rise to objectives and policies. In that sense, spatial options would, I think, be relatively broad in scope. Framing options on an "issues basis" is not, of course, the same thing. Furthermore, I am not entirely sure how it would be possible to effectively derive a sufficiently spatial strategy from a large number of issue-based options. Would it be a case of choosing the best, or even most popular, option(s) pertaining to each issue and somehow aggregating these together, and, in so doing, creating a preferred options document? If so, how would one know that the options being pulled together were compatible with each other? It seems to me that the focus should be spatial from the beginning.

In that regard, I see that you had drafted the outline of a more spatial consultation document and feel that the issues consultation should have been based around that kind of structure, though that would still have left open the question of how to create a genuinely spatial plan in a national park context, given that the structure proposed was essentially a two-part one, moving, as it did, from the spatial to the thematic, development control-type approach. The question of how to retain a spatial approach "throughout" the plan is one that I need to reflect upon and look into.

On the basis of our discussions, I think that it is, in all likelihood, unlikely that the timetable we discussed for core strategy preparation is a realistic one. In due course, it will, I think, be sensible to prepare a revised project plan. The dates to be included in that plan will, of course, be dependent on the discussions we will need to have when I have considered further how to make a national park core strategy spatial in its entirety (insofar as this is possible). Would it be possible for you to reflect further on the experiences of the other national parks and consider how a more spatial core strategy might be prepared?"