Peak District National Park Authority Local Plan Part 2
Development Management Policies

PAS Local Plan Soundness Self-Assessment Toolkit

February 2018

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, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

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

Soundness Test and Key Requirements	Evidence Provided
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.	

Soundness Test and Key Requirements	Evidence Provided
Vision and Objectives 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? 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?	The Development Management Policies (DMP) form part 2 of the Local Plan for the National Park. As such the issues are closely aligned to the adopted Core Strategy and actively seek to assist the delivery of the Spatial Strategy and Core Policies set out in the Core Strategy. The DMP seek to deliver the Vision and Spatial Objectives of the Core Strategy which also aligns to the National Park Management Plan.
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?	Policies align to chapters of the Core Strategy and each section of the DMP starts by setting out the strategic context from the Core Strategy.
Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?	The DMP do not seek to review the Spatial Strategy or matters of development quantum.
Are the policies internally consistent?	The only chapter of the Core Strategy not to have a dedicated DMP equivalent relates to Climate Change. The key reasons are: • the Core Strategy contains a relatively detailed suite of policies covering this topic; and A supplementary planning document was produced covering several matters of extra detail regarding the delivery of core policies such as energy efficiency and renewable energy provision.
Are there realistic timescales related to the objectives?	The plan objectives cover the period 2006 – 2026 which is a realistic time period to monitor whether plan objectives are being met.
Does the DPD explain how its key policy objectives will be achieved?	The DPD explains that the policies supplement the Core Strategy and in combination enable plan objectives to be met
The presumption in favour of sustainable development (NPPF paras 6-17) Plans and decisions need to take local circumstances into account, so that they	National Parks work within a context of statutory protection, reflected in paragraph 14 of the NPPF and specifically in paragraphs 115 and 116.

respond to the different opportunities for achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —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 —specific policies in this Framework indicate development should be restricted.	National Parks are not expected to plan for unrestricted housing growth and as such do not present housing targets in the normal way. Instead estimates of local needs are presented in the Core Strategy. It is the role of the DMP to facilitate the delivery of this need. The DPD is considered to have been founded upon a robust and proportionate evidence base which has been published and made available throughout the entirety of the Plan's evolution, being updated and added to when considered necessary in response to changes in circumstances. The evidence base for the DMP is used to refine and go further than the strategic evidence based prepared for the Core Strategy. However opportunities have also been taken to keep strategic aspects of the evidence base up to date by working proactively with constituent district and county councils. The process of Sustainability Appraisal (SA) has been used alongside new evidence and consultation responses to inform and support the preferred policy options within the Plan. The SA Report and previous Preferred Options drafts of the Plan detail why alternative options were discounted and, conversely (alongside the supporting policy text within the Plan), why the preferred options were taken forward. The Plan contains a variant of the Planning Inspectorate advocated model policy on the presumption in favour of sustainable development at its outset (Policy DM1).
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.	The Plan contains a variant of the Planning Inspectorate advocated model policy on the presumption in favour of sustainable development at its outset (Policy DM1). This differs by placing delivery in the context of the National Park's statutory purposes, to: • Conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and • Promote the understanding and enjoyment of the area's special qualities by the public In pursuing these purposes National Parks have an associated duty to have regard to the social and economic well-being of local communities.

Objectively assessed needs 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. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	Footnotes to paragraph 14 reflect the statutory protections given to certain areas of land (including National Parks). The DEFRA Vision and Circular for National Parks (2010) provides guidance on this approach to housing policy in National Parks making it clear that National Parks are not expected to deliver housing to meet general needs. In light of this clear government guidance it is reasonable to conclude that whilst the National Park Authority needs to understand the housing need of the planning area, it is not reasonable to adopt a target to meet OAN and therefore unnecessary to identify a 5 year supply of housing sites to meet any such target. National Parks are however encouraged to take a proactive approach to addressing local affordable housing needs. The DMP also sets out positive means by which other (market) housing can be achieved through the active conservation and enhancement of brownfield land and redundant buildings (particularly heritage assets) The extensive and positive approach to the Duty to Cooperate has highlighted the way the housing achieved within the National Park contributes to the housing targets of constituent authorities.
NPPF Principles: Delivering sustainable development	
1. Building a strong, competitive economy (paras 18-22)	
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	The vision and spatial strategy for the National Park economy are set out in the National Park Management Plan and Core Strategy. The DMP seeks to aid delivery of these strategies. New DMP policies seek to safeguard the most sustainable employment sites throughout the National Park and enable new business opportunities on sites in sustainable locations.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	The Core Strategy evidence raised no areas of concern in terms of infrastructure requirements or barriers to investment. Subsequent evidence for this DMP document similarly raise no concerns. The policy approach is considered therefore to be as positive as is reasonable when viewed alongside core national park purposes to conserve and enhance the area.
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)	The National Park only contains 1 town, Bakewell.

Options were explored for the detailed policy coverage of Bakewell. As most of the regeneration schemes have now been implemented support was expressed for a new approach which manages Bakewell under policies adopted for the whole Park but supports and encourages the preparation of a Neighbourhood Plan to give those generic policies local expression.

At the time of writing the Bakewell Neighbourhood Plan is undergoing Regulation 14 consultation. The Authority is confident that the neighbourhood plan will deliver sustainable policies that are in general conformity with the Core Strategy. The plan deals with key aspects such as employment sites and the role of the town centre. |
| 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) | The scope and principles for development are laid out in the Core Strategy. No allocations are made, with a general principle across the strategy that development in the National Park is essentially to meet local needs.

However, in accordance with policy E1 of the Core Strategy policy DME3 seeks to safeguard a range of high quality, sustainable business sites which positively contributes towards an evidenced need for employment space across the Derbyshire Dales Recent evidence on the ongoing need for safeguarded sites in Bakewell highlighted the extent to which National Park sites are valuable to the wider economy of the area. |
| **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) | Core Strategy policies E1 and E2 provide opportunities for business development in both settlements and appropriate, limited opportunities in the countryside (such as those linked to tourism or farm diversification). In settlements DME 3 (Safeguarded employment sites) and DME4 (change of use of non-safeguarded sites) provide additional clarity, whereas in the countryside DME 2 (Farm diversification) and DME5 (Class B1 employment uses in the countryside) develop the strategy in more sensitive areas.

Recreation and tourism policy also provides further scope through caravan and camping sites |

	with additional provision for camping pods and shepherd huts in where these can be carefully located (DMR1)
4. Promoting sustainable transport (paras 29-41)	
Eg Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)

Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst 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)

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)

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)

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)

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)

Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)

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)

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 | DM policies develop the strategic transport approach set out in the Core Strategy, with policies that seek to manage the impacts of cross park traffic and the private car, whilst facilitating and encouraging more sustainable means of travel.

The Core Strategy safeguards routes for future rail use but considers the relationship between this and the potential future benefits of former railway lines as multi-user trails.

The statutory purposes of the National Park relate strongly to access and enjoyment of the National Park's special qualities and as such moving to sustainable modes of travel which bring about a lighter touch to the environment are encouraged as well as promoting means which allow people to enjoy the National Park on foot, bicycle, or by horseback.

DM policies therefore set out detail for managing impacts such as DMT1 (Cross park infrastructure), DMT 3 (Railway construction) and DMT4 (Development impacting on public rights of way) as well as setting out the design requirements for access and parking through DMT2 (Access and design criteria) and 3 policies relating to parking standards (DMT5 – Business parking, DMT6 – Visitor parking and DMT7 – Residential off-street parking) |

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)

The setting of car parking standards including provision for town centres. (39-40)

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) | |
| **5. Supporting high quality communications infrastructure (paras 42-46)** | |
| Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)

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) | Utilities policies such as DMU4 (Telecommunications infrastructure) provide guidance on achieving a continued roll out of telecommunications masts in ways which recognise the sensitives of an area with the highest level of protection in terms of landscape and scenic beauty. |
| **6. Delivering a wide choice of high quality housing (paras 47-55)** | |
| 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)

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of local communities. For example where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as:
• Essential need for a rural workers to live permanently at or near their place or work in the countryside; or
• Where such development would represent the optimal viable use of a | No housing target is provided and no allocations are brought forward on this basis.

However an understanding of capacity to delivery via the exception site route is achieved through ongoing work with planners, housing enablers, communities and housing associations to identify areas where development may be acceptable.

Core Strategy policies DS1 and HC1 provide the strategic framework for housing delivery in the National Park, essentially setting the exceptional circumstances whereby housing will be permitted.

This includes locally needed affordable housing (DMH1, 2, 3), essential rural workers dwellings (DMH4) plus other market housing where this specifically drives the conservation and enhancement of the National Park (e.g. through conversions (DMC10) and brownfield land (DMH6)). |

heritage asset or would be appropriate enabling development to secure the future of heritage assets; or
• Where the development would re-use redundant or disused buildings and lead to an enhancement of the immediate setting; or
• The exceptional quality or innovative nature of the design of the dwelling. Such a design should:
    o Be truly outstanding or innovative, helping to raise standards of design more generally in rural areas;
    o Reflect the highest standards in architecture;
    o Significantly enhance its immediate setting; and
    o Be sensitive to the defining characteristics of the local area (55)
	Housing policies link closely to conservation polices and are closely link the spatial strategy in DS1 of the Core Strategy.
	
	The context of the highest level of protection in terms of landscape and the great weight afforded to wildlife and cultural heritage means that in the National Park the approach to more isolated development must be strongly justified and assessed rigorously.
	
	In terms of the re-use of buildings DM policies pay close attention to the merits of designated and non-designated heritage assets with particular emphasis on the setting of such buildings within their protected landscape context (DMC5 and DMC10)

Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	In the context of National Park purposes and in absence of a housing target the need to set out a supply of developable sites is not appropriate.
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)	The Core Strategy sets out a strategic estimate of delivery against evidenced needs. It breaks this down by landscape as opposed to settlement hierarchy in order to reflect the landscape designation of the National Park. Delivery is then monitored through the Annual Monitoring Report. DM policies bring a more positive approach to the application of HC1 in response to community needs, such as through DMH 5 (Ancillary dwellings), DMH 9 (Replacement dwellings) and DMH10 Subdivision of dwellings)
Set out the authority's approach to housing density to reflect local circumstances (47).	Density is a factor of the particular characteristics of each settlement in order to achieve the conservation and enhancement of the National Park.
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)	The commitment to address local affordable housing needs ensures that exception sites are justified on the basis of housing needs surveys. These set out the required mix of houses needed at a local scale. DMH 1 (New affordable housing) provides the basis for demonstrating a proven need.
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).	This is the focus of the policy framework set out above.

In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	
7. Requiring good design (paras 56-68)	
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	The theme of the development plan is one of being responsive to the character and appearance of the area in order to achieve National Park purposes.
8. Promoting healthy communities (paras 69-77)	
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).	Despite being a deep rural area, essentially dealing with rural exceptions and local needs the spatial strategy identifies a wide list of 63 named settlements as the key focus for new development (Core Strategy policy DS1 applies). This is to recognise and support the role that Bakewell and the villages play in the sustainability of the area. By directing the majority of new housing to these settlements the plan encourages a greater degree of social interaction and supports community networks. Neighbourhood Plans and community development are also a corporate priority for the National Park Authority in promoting wider aspects of sustainability.
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	Core Policy HC4 supports the provision and retention of community services and facilities and this is given greater definition through DMS2 (Change of use of shops, community services and facilities), DMS6 (Safeguarding of sites for community facilities), and DMS7 (Retention of recreation sites or sports facilities).
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).	While no specific targets are set for local open space or sports/recreation provision, evidence from the Derbyshire Dales Built Sports Facilities, Playing Pitch and Open Space Strategy indicates a good level of provision across Derbyshire Dales which covers a large part of the National Park's settled White Peak landscape. Evidence also recognises the role that village halls and schools can provide in offering leisure opportunities to the wider community in rural areas.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	A suite of proposed conservation policies sets out the context for open space protection through DMC3 (Siting, design, layout and landscaping), DMC4 (Settlement Limits) and DMC8 (Conservation Areas). Proposed modifications (e.g. to paragraph 3.25) to the plan seek to further clarify the role that neighbourhood plans can play in identifying

	"Local Green Space"
9. Protecting Green Belt land (paras 79-92)	
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) Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83) When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84) Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)	There are no designated areas of Green Belt within the Peak District National Park, however there are significant tracts all around the perimeter of the National Park boundary in adjoining districts and boroughs.
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)	
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)	Core policy CC5 and the Supplementary Planning Document for Climate Change and Sustainable Building deal with this matter. Modifications to DMH9 (Replacement dwellings) seek to reinforce adopted policy in CC1 of the Core Strategy regarding the need to deliver high energy efficiency standards.
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)	Core policy CC2 seeks to encourage renewables and low carbon developments where they integrate well with the valued character of the area. Supplementary Planning Document on Climate Change adds significant guidance on how this can be achieved across a range of technologies.
Minimise vulnerability to climate change and manage the risk of flooding (99)	Core policy CC5 along with updated constraints mapping address this matter.
11. Conserving and enhancing the natural environment (paras 109-125)	
Protect valued landscapes (109) National Parks having the highest level of protection in relation to landscape and scenic beauty (115) Planning permission should be refused for major development in these designated areas except in exceptional circumstances (116)	The adopted Core Strategy as supplemented by the proposed DMP is focussed on the achievement of statutory National Park purposes for the Peak District National Park as a protected landscape.

Prevent unacceptable risks from pollution and land instability (109)	DMC14 (Pollution and disturbance) and DMC15 (Contaminated and unstable land) give focus to these matters.
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	Core Policies L1 and L2 provide a strategic framework for the protection of landscape and biodiversity. These are supplemented by DM policies as follows: DMC 1 (Conservation and enhancement of nationally significant landscapes) DMC 11 (Safeguarding, recording and enhancing nature conservation interests) DMC 12 (Sites, features or species of wildlife, geological or geomorphological importance) DMC13 (Protecting trees, woodlands, or other landscape features put at risk by development)
12. Conserving and enhancing the historic environment (paras 126-141)	
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	Core Policy L3 provides a strategic framework for conservation and enhancement of the historic environment. A suite of heritage policies, commencing with DMC5 (Assessing the impact of development on heritage assets and their settings) are then proposed by DMP to ensure that a robust approach to heritage management and protection is taken in the National Park.
13. Facilitating the sustainable use of minerals (paras 142-149)	
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) Authorities should put in place policies to ensure worked land is reclaimed at the earliest opportunity and that high quality restoration and aftercare of mineral sites takes place, including for agriculture, geodiversity, biodiversity, native woodland, the historic environment and recreation (143) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	In the context of Core policies MIN1 to MIN4, DM policies seek to ensure that the appropriate justification for minerals development is made (DMMW1), as it represents major development in the context of the protected landscape. A range of DM policies set out the various impacts that must be adequately addressed in order to justify mineral extraction, as well as setting out high quality restoration requirements (DMMW5) that respond to the landscape and biodiversity objectives of the National Park. Policies also expand on the guidance for safeguarding (DMMW7). The proposed Policies Map defines these areas in detail.
Justified: The plan should be the most appropriate strategy, when considered against the	

reasonable alternatives, based on proportionate evidence.
To be 'justified' a DPD needs to be:
• 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.

Participation Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement provides a comprehensive overview of the key stages in preparing and consulting on the DM policies document.
Research / fact finding 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?	A key starting point for the DMP is the adopted Core Strategy. The approach to evidence gathering for the DPD has therefore been one of **proportionality**, i.e. only bringing forward new evidence which takes the plan further, and **relevance**, i.e. evidence which ensures the Development Plan as a whole remains up to date and which assists in monitoring the strategic objectives.
What assumptions were made in preparing the DPD? Were they reasonable and justified?	A starting assumption in preparing the DM policies was that the existing saved Local Plan from 2001 still provided a sound basis for addressing the development management issues faced. As such an early Issues and Options document (September 2012) tested the assumption that saved policies provided a reasonable starting point as a preferred approach for new policy subject to updating and checking for consistency with the Core Strategy and national policy (NPPF). While a protracted period of debate was necessary to reach full Publication stage the basic scope of issues reflect the saved Local Plan and allow a steady continuation of long term policy and strategy for the National Park.
Alternatives 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? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the	Despite the narrow parameters available to the DM policies, i.e. it wasn't reassessing the spatial strategy, a set of options for policy were tested at the Issues and options stage. This was tested using an interim Sustainability Appraisal and Habitat Regulations Assessment.

content of the DPD from the start?	
Effective: the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. To be 'effective' a DPD needs to: • 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	
Deliverable and Coherent • 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?	The DM Policies document is structured in a consistent way to highlight the strategic context for each detailed policy. In this way there is a clear policy framework for DM policies in addressing spatial objectives of the Core Strategy. Consultation responses on the Publication stage document gave confidence that the plan is coherent, however a modification stage has been undertaken in an attempt to address any issues with clarity.
Infrastructure Delivery • 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?	The Core Strategy process assessed the infrastructure implications of the anticipated delivery levels. Feedback and evidence from infrastructure bodies indicated that the anticipated level of growth would not place a strain on local capacity. In that context it remains the case that DM policies will not place an additional strain on infrastructure levels. Nevertheless, additional evidence was undertaken in 2013 as part of cross boundary discussions on the potential for Community Infrastructure Levy (CIL). This found that the anticipated levels of growth would not lead to a funding gap in terms of the need for new infrastructure and thus CIL would not be required. Community benefits are sought on site wherever possible through the use of S106 agreements.
Co-ordinated Planning Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and	The National Park Authority commits substantial resources to strategy development of partner organisations and shares in evidence collection in order to

| | understand the needs of other partners/agencies/organisations operating in the area.

The National Park Management Plan is produced as a partnership plan for the place and focusses heavily on close engagement towards shared goals for the landscape, economy and communities. |
|---|---|
| **Flexibility**
• 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? | The DM Policies assists the need for flexibility by providing further guidance and covering more "policy ground", thus avoiding doubt and confusion.

It is also the intention of the National Park Authority as laid out in its Local Development Scheme to move towards full review of the Core Strategy and create a single Local Plan, thus any strategic policy principles that are still debated by partners and communities at this stage are open for early review in an atmosphere of continuous dialogue. |
| **Co-operation**
• Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?
• 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? | A separate statement has been produced explaining how the Authority has demonstrated its Duty to Cooperate in plan making. |
| **Monitoring**
• 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? | The Annual Monitoring Report measures delivery against strategic policies in the Core Strategy. As such the DMP does not alter the basic approach to monitoring. This will be reviewed as part of the review of the Core Strategy. |

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies
in the Framework.
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	
• 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 anything to existing national guidance? If so, why have these been included?	The DPD is consistent with national policy when taken in the statutory context of National Park purposes and the high level statements in the Framework which reflect the highest level of protection for landscape and scenic beauty, and great weight that should be afforded to wildlife and cultural heritage interests. Paragraphs 14 (including footnote), 115 (including footnote) and 116 are the relevant paragraphs.