

Winchester District Local Plan Part 1 – Joint Core Strategy

(Submission Stage – June 2012)

Soundness Self Assessment Toolkit



Winchester District Local Plan Part 1 Soundness self-assessment June 2012

Please note that a separate Duty to Cooperate Statement has been completed to comply with the National Planning Policy Framework

Key question	Evidence Provided
Justified	
Participation	
1. Has the consultation process allowed for effective engagement of all interested parties?	<p>The consultation statement (and for Submission see Statement of Representations Made and Key Issues Raised) illustrates how consultation has been carried out at all stages of plan preparation and that a variety of methods have been employed to ensure the effective engagement of interested parties, alongside the formal consultation on policies. Public workshops, meetings and exhibitions have been held at various stages of the plan preparation. Meetings were held throughout the process with stakeholder groups and delivery agencies and known special interest groups and also on particular topics such as climate change, infrastructure and particular sites. Targeted engagement was undertaken with hard-to-reach and under-represented groups such as ethnic minority interests, young people and older people. Other methods employed included questionnaires, press releases, LDF newsletters and articles in various publications such as Parish Connect. In 2010, the Blueprint exercise was held across the District, which used innovative methods of engaging with people to encourage them to consider the needs and requirements of their area over the next 20 years. The Blueprint consultation received a commendation in the Planning Process category at the RPTI awards for 2011.</p>
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?	<p>The Local Plan Part 1 is fully justified by the evidence, from both technical data and community engagement throughout the Plan's preparation.</p> <p>The evidence is referred to where necessary throughout the text in the Plan and listed at Appendix C (of the Plan), all documents can be viewed online. A number of the reports have also been jointly commissioned with neighbouring LPAs or by PUSH to inform all LPAs within the sub-region.</p> <p>The evidence varies from specifically commissioned studies covering technical issues such as housing, employment, transport and retailing matters, to more locally focussed issues where the City Council has compiled and analysed data sets to provide an assessment of local circumstances, to support a policy approach, such as the Market Towns and Rural Area Development Strategy Background Paper. The Plan has also undergone a sustainability appraisal and strategic environmental assessment at key stages of its preparation.</p> <p>Where necessary these studies and reports have been updated to reflect changes in the broader economy. The evidence base is proportionate to its purpose and does not seek to cover all statistical information. The development of the Plan has also had regard to other sources of evidence not listed in the evidence base such as general Council strategies and studies and socio-demographic information and trends.</p>

Key question	Evidence Provided
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>At the commencement of Plan preparation the South East Plan presented specific matters to be addressed including the housing requirement for the District up to 2026. The Issues and Options Plan published in 2007 presented a number of ‘challenges’ for the core strategy to address. These were compiled from an analysis of the Council’s Community Strategy 2007, together with the initial findings of the sustainability appraisal scoping report and early front loading discussions.</p> <p>The ‘challenges’ and ‘key drivers for change’ highlighted matters that required a spatial planning response.</p> <p>In addition, during 2006/7 the Council commissioned specific research to examine climate change/renewable energy; affordable housing/housing market assessment; transport and economic matters – all ‘key drivers’ as identified by earlier front loading.</p> <p>The Housing Technical Paper is a key source of evidence that draws together the assumptions and the findings of studies relevant to housing delivery.</p> <p>The findings of these and other reports provided the necessary assumptions to generate a series of options and alternative strategies to seek opinion on and are considered reasonable and justified given that they were compiled from a range of sources.</p>
Alternatives	
<p>7. Can it be shown that the council’s chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why</p>	<p>The consultation statement describes how the community was involved in the evolution of issues and the consideration of issues, alternatives and options and how the preferred strategy was arrived at.</p> <p>Initially the Live for the Future engagement resulted in a number of issues being identified as reported in CAB 1472. The initial Sustainability Appraisal and Scoping Report also identified issues and key drivers for change.</p> <p>These led to the Issues and Options Plan. This was published in 2007 presented a series of options for both the spatial strategies to be applied across the District (or parts of it) and the various ‘core policies’ to be included. Each option was expressed as 2 or 3 alternatives usually including a baseline ‘do nothing’ approach; limited growth/change vs significant growth or ‘step change’, with a summary of the key features of each option to provide an overview to allow the reader to compare the proposed outcomes of each option.</p> <p>The sustainability appraisal of the 2007 Issues and Options Plan assessed each of the options and made recommendations, as to sustainability credentials of each option.</p> <p>The Issues and Options Plan generated a significant number of responses from stakeholders and the wider public, these were reported to a series of LDF Cabinet Committee meetings held on 15 July 2008, 21 October 2008, 12 November 2008, 16 December 2008, 28 January 2009, 6 March 2009. These reports thoroughly explored the</p>

Key question	Evidence Provided
these decisions were made?	<p>responses received and suggestions made as to alternative approaches, with an assessment of the advantages and disadvantages of the suggested alternatives, prior to a recommendation proposing the preferred approach for each section/issue of the Plan. The preferred approaches were then carried forward to generate the Preferred Option version of the Core Strategy.</p> <p>The Preferred Option Core Strategy was structured to include a section on ‘What You’ve told Us’, prior to setting out the preferred approach for the subject area, to include a draft policy. The preparation process continued to consider reasonable alternatives until the publication of the Plan in January 2012. Housing alternatives were considered for post SEP numbers (Housing Technical Paper, Plans for Places), The Blueprint process threw up a number of alternative options which informed the conclusions of the Housing Technical Paper and were discussed in a report to LDF Cabinet to be taken forward into Plans for Places. The Plans for Places exercise suggested a preferred approach but invited suggestions for reasonable alternatives to be proposed</p>
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?	<p>The scoping report and baseline assessment carried out in early 2007 identified key issues and drivers for change at the beginning of the plan preparation process. The sustainability appraisal of the 2007 Issues and Options Plan assessed each of the options and made recommendations. The Council also undertook detailed site assessments based on the sustainability appraisal methodology, of the proposed strategic allocations at Whiteley, West of Waterlooville and Winchester Town, this information formed a key part of the decision making process.</p> <p>A sustainability appraisal was also undertaken at preferred option and pre-submission stages to ensure that policies and proposals are expressed to deliver sustainable development. Section 2 of the pre-submission SA sets out how each stage of the SA has informed the next iteration of the Core Strategy. A final sustainability check has also been undertaken on the changes that have led to the final submission version of the Local Plan Part 1. This includes a report on the consultation on the sustainability appraisal.</p>
<p><i>PAS advice says to ignore Q11 & 12 (although there are still refs elsewhere to govt offices etc & would be relevant – partic for early stages of plan)</i></p> <p>11. Does the development plan document adequately expand upon regional guidance rather than</p>	<p>Paragraph 1.43 of the pre-submission core strategy explains that the Plan has been prepared to be in general conformity with the Regional Strategy (South East Plan), but also that the Council has developed a locally focussed strategy through Blueprint and Plans for Places, taking into account the proposed revocation of Regional Strategies. It is considered that in this way the Plan is robust in respect of either scenario. The Plan will also continue to follow the PUSH strategies as the Council is a partner in this sub-regional body, which will continue even in the absence of the South East Plan.</p> <p>The early stages of plan preparation considered the emerging policies of the South East Plan as part of the statutory background to be reflected in the draft policies (see Live for the Future/Issues and Options reports).</p> <p>GOSE, SEERA, SEEDA, PUSH and HCC were all consulted at various stages of the plan preparation, including – but</p>

Key question	Evidence Provided
<p>simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>not solely during the statutory Reg 25 (2004 Regs) and Reg 27 (2009 Regs) procedures. Where they have responded, their comments have been reported to the relevant LDF committees that considered responses at the specific stages of the Plan. The appendices to the Consultation Statement (and for Submission see Statement of Representations Made and Key Issues Raised) contain examples of the letters sent and lists of whom these were sent to at each stage.</p> <p>The Local Plan Part 1 Pre-Submission Joint Core Strategy was sent to the DCLG, but no response has been received.</p>

Effective		
Deliverable		
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<ul style="list-style-type: none"> 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 	<p>This process initiated the preparation of the Core Strategy taking forward an analysis of the Council's Community Strategy 2007, together with the initial findings of the sustainability appraisal scoping report and early front loading discussions to identify a series of 'key drivers' , which form the backbone to the evolution of the document and policy approach included.</p> <p>Section 2 of the pre-submission Core Strategy includes a profile (spatial portrait) of the District which reflects its main features. It identifies the, qualities and key challenges and opportunities across the three spatial areas.</p> <p>This leads to a spatial vision and series of spatial planning objectives pre-submission Core Strategy (para 2.31 – 2.34) which correspond to the themes of the Councils Community Strategy. Minor changes (see Submission pages) have since been made so the Submission Plan illustrates more clearly how the objectives will be delivered and by which policies.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<ul style="list-style-type: none"> 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 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 	<p>Part of Winchester District falls within the PUSH sub-region and through PUSH many cross - boundary issues have been addressed pre-submission Core Strategy (para 1.34 – 1.38) . In addition a number of evidence base documents have been jointly commissioned with neighbouring authorities.</p> <p>A series of meetings have been held with adjoining authorities (See Duty to Co-operate Statement) during the plan preparation process. These have identified any cross-boundary issues. Specific meetings have been held where there are particular issues such as the SDAs at Eastleigh, and Fareham and with Havant regarding the West of Waterlooville development. Ongoing working groups are progressing the later two developments. The Duty to-co-operate Statement contains more details of the cross-boundary working.</p> <p>The Council also attends the Hampshire Development Plans</p>

		<p>Group meetings which discuss strategic planning matters as well as more specific interest groups meetings such as the Hampshire and Isle of Wight Planning Officers Group and the Hampshire Planning Research Liaison Group.</p> <p>.</p>
16. Does the development plan document contain clear objectives?	<ul style="list-style-type: none"> 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 	<p>The Community Strategy outcomes are expressed in the spatial planning objectives for the District at para 2.34 of the pre-submission Core Strategy.</p> <p>The Submission plan has been amended to illustrate the links between the objective and the policies more clearly (see 14 above).</p>
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<ul style="list-style-type: none"> 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 (LSP) and partner organisations that they agree the objectives as being specific to the place 	<p>The objectives specifically focus on matters that relate to the District or one of the three special areas within it and reflect the themes of the Community Strategy, as outlined in 16 above. The spatial strategies for each of the three areas of the District led to a series of objectives and locally distinctive policies.</p> <p>Yes - the objectives lead from the vision and the 'key drivers' identified at the commencement of the process. As discussed in 14 above, these links have been made more explicit.</p> <p>The sections of the Consultation Statement (and for Submission see Statement of Representations Made and Key Issues Raised) that refer to the various stages of the plan preparation describe how planning officers have attended meetings of the local strategic partnership throughout the plan preparation process. For the Blueprint exercise a workshop was held at the Health and Wellbeing group of the LSP and the Economic Prosperity group held a breakfast meeting. Planning officers attended the Executive Group meeting in November 2010. Some partners of the local strategic partnership also attended the stakeholder event, housing forums and other events specific to their particular interest.</p>
19. Is it clear how the policies will meet the objectives?	<ul style="list-style-type: none"> i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet 	<p>The policies are structured to follow either the spatial split of the District or the one of the three themes as set out in the Council's Community Strategy – some policies cover more than</p>

<p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<p>them</p> <ul style="list-style-type: none"> 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 policies 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. 	<p>one objective. As discussed in 14 above, the links between the objectives and policies have been made more explicit.</p> <p>The Monitoring Framework (Appendix D) includes targets and objectives relating to the delivery of policies.</p> <p>All objectives can be linked to at least one policy, as the update for Submission makes clearer.</p>
<p>21. Are there realistic timescales related to the objectives?</p>	<ul style="list-style-type: none"> 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 	<p>The Plan period has been extended to 2031 providing sufficient time for the objectives to be fulfilled through the application of the policies and meeting government advice on plans running for 15 years from adoption. Where appropriate the objectives specifically refer to timescales i.e delivery of housing.</p> <p>The Infrastructure Delivery Plan (IDP) in general and table 2 in particular shows how infrastructure delivery will link in with the plans of delivery agencies.</p> <p>The LSP meetings referred to in the consultation statement show that there is broad agreement from these partners with the Plan. The delivery events of July 2009 and December 2010 addressed issues of timescale. (See Appendix C & D of the consultation statement).</p> <p>The results of the consultation show that there are no fundamental matters of objection raised by partner organisations. There are only some issues of detail, mainly in relation to sites. Many of these relate to the strategic allocations and are addressed in the delivery plans for these sites (see Infrastructure Delivery Plans) and background papers (see Evidence Base)</p>
<p>22. Are the policies internally consistent?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that 	<p>The Core Strategy has from the commencement of its preparation been considered by the Council as a key corporate project and a number of Council policy documents refer to it,</p>

	<p>the objectives are consistent</p> <p>ii. A very brief statement explaining how the council considers its objectives are consistent</p>	<p>for example, the Change Plans for each of the Community Strategy themes. In addition the Winchester District Strategic Partnership has been involved from the outset through numerous discussions and debates and been a key partner in its evolution to date. This is detailed further on the WDSP website</p> <p>The Sustainability Appraisal has analysed the policies of the plan and the Local Plan Part 1 as a whole against SA objectives, which identified synergy/inconsistencies</p>
<p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? 	<p>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</p> <p>ii. Representations from the Government Office</p> <p>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>The Local Development Scheme (LDS) provides detail of the scope and content of the individual components of the LDF and how they relate to each other.</p> <p>The Core Strategy is generally a strategic document. The strategic allocations are detailed as they will not be covered in other Development Plans Documents (DPDs). Some generic policies cover key issues in more detail where they are not covered in up-to-date saved local plan policies and/or government guidance. Examples are those policies relating to affordable housing and to climate change.</p> <p>An Inspector's advisory visit and report advised on the content and scope of the Plan during 2009, following the Preferred Options publication. The Plan has also been subject to a PAS peer review (2009).</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<p>i. Sections of the development plan document that identify the key objectives and how they will be delivered upon</p> <p>ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery</p> <p>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</p>	<p>Question 14 above describes how the objectives of the plan are expressed and how they relate to delivery. The Submission Plan has also been amended to clarify this.</p> <p>Appendix D sets out a detailed monitoring framework for each policy and links this to both a spatial planning objective and the themes of the community strategy as well as which SA/SEA objective it will contribute. Some amendments have been made to the Submission Plan to clarify targets in relation to timescales where possible (see Schedule of Modifications).</p> <p>Appendix E to the plan summarises the infrastructure delivery requirements and links these to specific policies. The infrastructure delivery plan provides more detail on how the necessary infrastructure will be delivered. Meetings have been held with key delivery agencies and partners (see Appendices' C & D of the consultation statement) as part of the plan preparation process and in relation to the strategic allocations. Meetings will continue as part of their implementation and for</p>

		the purposes of the Development Management and Allocations DPD.
25. If there are development management policies, are they supportive of the strategy and objectives?	<ul style="list-style-type: none"> i. Sections of the development plan document that show how the development management policies: <ul style="list-style-type: none"> • will help to deliver the strategy 37. derive from, and elaborate on, the objectives and policies of the plan 	<p>The plan only includes a small proportion of development management style policies where it was felt these relate to key strategic issues and are necessary to support the approach being taken and to provide up to date policy advice.</p> <p>Some policies have been made more detailed in light of the replacement of PPSs by the NPPF, to fully replace certain saved local plan policies and where adequate policy guidance would otherwise no longer exist.</p>
26. Have the infrastructure implications of the strategy/policies clearly been identified?	<ul style="list-style-type: none"> 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 how representations in relation to infrastructure have been considered and dealt with 	<p>A summary of infrastructure delivery is included in the document (appendix E) which sets out the infrastructure needed, where it is needed, which policies apply, delivery and phasing along with the delivery mechanism. A full infrastructure study and delivery plan are included in the evidence base, which include more detail of how the delivery plan evolved. Cabinet Reports 2063 (LDF) and 2150 (LDF) also discuss the study. Both the study and the delivery plan were prepared with the involvement of delivery agencies and were subject to consultation which took into account representations made during their development.</p> <p>Policy CP21 – Infrastructure and Community Benefit outlines the Council's policy in respect of infrastructure delivery.</p>
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	<ul style="list-style-type: none"> i. Sections of the development plan document setting out delivery mechanisms and timescale ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered iii. Research or studies that address matters of delivery and the realistic timescales 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 	<p>In general terms, as a strategic plan the time horizon of the Local Plan Part 1 complies with the NPPF which requires a core strategy to provide to clear guidance for 15 years from adoption of the development plan document. The Plan period was extended to 2031 on this basis. The strategic allocations are time relevant, however more of the core policies will extend throughout the whole of the plan period, being topic rather than site-based.</p> <p>The strategic allocations have been subject to detailed site assessments as listed in the evidence base (the Infrastructure Study and Delivery Plan include assessments of delivery mechanisms)</p> <p>The infrastructure study and delivery plan set information on</p>

	<p>the relevant stakeholder</p> <ul style="list-style-type: none"> vi. Correspondence from stakeholders on delivery mechanisms and timescale vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	<p>the timing and delivery of infrastructure. The Strategic Allocation Policies have been modified to include more information on the delivery of infrastructure (see Schedule of Modifications). The involvement of stakeholders has been addressed in questions 24 and 26 above.</p>
<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<ul style="list-style-type: none"> i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery ii. Representations in respect of infrastructure iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with 	<p>Appendix E identifies the key agencies to deliver the required infrastructure and further details are included in the infrastructure study and delivery plan. (See q 24, 26 & 27 above)</p>
<p>29. Is it clear who is intended to implement each part of the strategy/development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out responsibilities for delivery ii. Correspondence showing how other stakeholders intend to support the delivery of 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 	<p>Appendix E list those organisations identified as the implementation bodies of the Plan. The infrastructure and delivery plan provide further details of how infrastructure may be provided.</p> <p>Those agents/developers promoting the strategic allocations have been engaged throughout the process – in addition key stakeholders and representatives from the statutory agencies have been involved through numerous officer meetings, plus more formal forums and committees involving elected members and representatives from neighbouring authorities if relevant. The delivery events have already been detailed under question 24. More details on these sites together with delivery is set out in detailed background papers.</p>
<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use</p>	<ul style="list-style-type: none"> 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 	<p>The Plan integrates with many policy documents and statements produced by the Council and its partners and in this respect fully reflects the concept of spatial planning. The Community Strategy itself and the Local Plan Part 1 early frontloading, clearly identifies the Plan as one of the key delivery mechanisms for the Community Strategy. A series of Change Plans have been prepared to deliver the Community</p>

planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?	<p>by other agencies</p> <p>iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation</p>	<p>Strategy, which highlight the role played by the LDF in delivery. The Winchester District Strategic Partnership has been involved throughout the Plan's preparation and has co-hosted key events involving the delivery agencies (utility companies, regulators, statutory agencies and developers.) The stakeholder delivery events carefully considered the delivery of the Plan by outside stakeholders as well as the Council and how the Plan will contribute to the deliver of their own objectives, as already referred to under question 2.</p>
33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?	<p>i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them</p> <p>ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</p>	<p>The policies expressed within the Plan provide flexibility to enable matters imposed to be taken into account. This is explored further under the 'Flexible' section below.</p> <p>A new paragraph has been inserted after paragraph 8.3 with further details of the approach to monitoring and review (see Schedule of Modifications).</p>
Flexible		
34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	<p>i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed</p> <p>ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:</p> <ul style="list-style-type: none"> 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 <p>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</p>	<p>All policies avoid inflexible wording (such as 'must') and include provision for account to be taken of viability issues in relation to the key requirements of development. For example the requirements of Policy CP.3 (affordable housing) are qualified by reference to economic viability, CP.11 (sustainable built development) seeks measures which are 'practical and viable' and CP.21 (infrastructure) states that account should be taken of the cumulative impact of requirements on viability.</p> <p>The housing provisions (policy CP.1) refer to a requirement of 'about' 11,000 dwellings, allowing scope for additional provision within settlements and allocated sites if there is capacity and market need or, conversely, a lower level of provision if there are market or environmental problems in delivering the target. The policy for the larger market towns/villages (MTRA.2) proposes a housing target for each settlement which is expressed as a range. This allows</p>

	<p>baseline</p> <p>iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</p>	<p>flexibility for local communities to influence the scale of development to reflect the specific needs of each area and to incorporate community aspirations. The policy for smaller settlements (MTRA.3) allows for local communities to bring forward development proposals which would support a settlement's role and meet a community need or aspiration. The monitoring framework at Appendix D sets out how policies will be monitored and what evidence will be required.</p> <p>The new paragraph inserted after 8.3 (see Schedule of Modifications) illustrates how the Plan will be monitored to deal with changing circumstances.</p>
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?</p>	<p>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</p> <p>ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</p>	<p>Regional strategies are about to be abolished and the Plan's housing requirement has been locally-derived, although the Plan has been drafted so as to be in general conformity with the existing SEP (see housing background paper). The Plan has been flexible enough to achieve this but it is not expected that regional strategies will be re-introduced. Nevertheless, the Council is working with other authorities in the Partnership for Urban South Hampshire (PUSH) to update the spatial strategy for that area. The Local Plan's strategy and provisions are flexible enough to accommodate the expected outcomes of this work. Any future update of the PUSH strategy, or development of other regional / sub-regional plans, is likely to look beyond the current Plan period and would therefore require a review/roll-forward of the Local Plan in any event. This is normal and the Development Planning Regulations enable partial or whole-Plan reviews to be undertaken relatively quickly, if needed.</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<p>i. A section of the development plan document which expressly addresses flexibility</p> <p>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</p>	<p>The policies have been developed and evidenced so as to be realistic and achievable. The Plan contains a monitoring framework (Appendix D) specifying the indicator and target for monitoring each policy. As the Local Plan Part 1 is a strategic document, the detailed monitoring of these indicators and targets would be carried out through the Annual Monitoring Report and this would highlight any issues requiring remedial action.</p>
Monitoring		
<p>37. Does the</p>	<p>i. Sections of the development plan document</p>	<p>The mechanism for the delivery of policies is expanded on in</p>

<p>development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?</p>	<p>setting out indicators, targets and milestones</p> <ul style="list-style-type: none"> 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 the delivery of policies 	<p>the IDP. The Plan contains targets for housing delivery and in some other policy areas. Where targets exist, they are detailed within the policies and in the Monitoring Framework (Appendix D of the Plan). Housing trajectories are provided for the whole of the Plan period covering both RSS and Local Plan Part 1 strategies, with a further split for the PUSH area of the District. These trajectories are contained within the AMR. The AMR also provides further information on the expected delivery of housing over the period with a more detailed examination of housing land supply in the first 5 years.</p> <p>Some policies do not have targets that lend themselves to numerical monitoring. In these cases, the monitoring framework expresses the targets in the form of expected outcomes of the policy. The AMR will report back on all these policies, however there will need to be a flexible approach to monitoring dependant upon the varying nature of the policies.</p>
<p>38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?</p>	<ul style="list-style-type: none"> 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 	<p>The monitoring framework (MF) will be used in the production of the AMR, although it will not be the only component of it. The housing trajectory and 5yr supply, review of LDS progress, progress on infrastructure delivery and the duty-to-cooperate will also form part of the AMR.</p> <p>The MF sets out in general terms how the targets and milestones will be monitored. Monitoring information will be provided annually as part of the AMR, which will use the Monitoring Framework as its basis. In relation to housing supply, the delivery of housing will be updated by analysis of planning permissions and completions and this will be used to revise the trajectories and 5 yr land supply accordingly. The individual AMRs will report back on progress on policies and take a tailored approach to factors that will trigger a review of a particular policy, or the plan as a whole. Policy failings will highlight a need for further work in that policy area. Significant failings will indicate a need for a review or re-consideration of the policies and/or their implementation.</p> <p>The monitoring framework indicates how each policy relates to SA/SEA objectives, as well as to the spatial objectives of the Local Plan Part 1 and the Council's Community Strategy outcomes. The AMR will consider further how the policies perform against the SA.</p>

39. Are suitable targets and indicators present (by when, how and by whom)?	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories 	The Monitoring Framework identified targets and indicators for each policy and indicates how they will be monitored and by whom. As stated above, it is not always possible to provide numerical targets for policies and it may not be practical or efficient to monitor all aspects of all policies on an annual basis. These issues will be discussed further in the AMR as appropriate.
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National policy		
<p>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement iv. Representations from the Government Office on the preferred strategy or the submitted development plan document v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with 	<p>The Plan has been developed so as to be consistent with national planning policy. The numerous evidence studies set out, or refer to, the Government advice applying at the time. The evidence has been used to develop locally-justified approaches, for example in relation to the level of housing to be provided, affordable housing requirements, open space standards, sustainable built development, etc. The evidence work demonstrates that the Plan's requirements are generally viable and practicable. Because the various policies and requirements are locally-justified there are not considered to be any direct conflicts with Government. The analysis of the policy options (see question 11) also considered this issue.</p> <p>The locally-derived policies have been subject to extensive consultation – including with the government office – and subject to sustainability appraisal which highlighted any potential conflicts. The reports analysing representations on Issues and Options and Preferred Options (referred to under question 11) included any responses from the Government Offices</p> <p>The Community Strategy and its Change Plans provided a clear steer for the LDF in terms of tackling climate change, where addressing the District's high levels of carbon emissions has been identified as a key issue. A challenging target for reduction in CO2 emissions has been adopted by the Council in its climate change framework and action plan, and policies CP11 and CP12 in the Local Plan part 1 reflect this ambition.</p> <p>The draft NPPF was developed relatively late in the Local Plan</p>

		<p>Part 1 process and was published for consultation in July 2011. Nevertheless, the draft NPPF did not generally make any major changes to the policy directions set out in the series of PPGs and PPSs, but where there has been a change of direction or detail it was possible to incorporate this into the Pre-Submission Plan. The final version of the NPPF was published on 27th March 2012. The Council has completed a NPPF Checklist and had an advisory visit from a Planning inspector to help ensure that the changes to the Local Plan Part 1 (see Schedule of Modifications) reflect the NPPF before the submission of the Plan. It is considered that any conflicts with national guidance can be justified having regard to local circumstances and evidence.</p>
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p>All of the policies build on or add to national policy, or develop specific local strategies and policy. Parts of some policies may include similar wording or requirements to national policy but this is always amplified in order to provide locally distinct policies.</p> <p>In the 'Development Strategy' part of the Plan all of the policies are specific to the District, or a spatial part of it, and there is thus no superfluous material. The Core Policies set out particular targets, standards or expectations, which have been developed in accordance with national policies but which provide additional local detail. For example, these cover matter such as local housing requirements (CP.1), affordable housing provision (CP.3), open space standards (CP.7), sustainability requirements (CP.11), settlement gaps (CP18), etc. Some policies are criteria based but the criteria have been developed so as to relate to Winchester District, so far as possible.</p> <p>It has been noted above that most national planning policy guidance has been consolidated into the NPPF. This is a much more condensed version of national policy so it is appropriate that the Local Plan Part 1 policies contain sufficient detail to give clear policy direction. If the Plan is not sufficiently comprehensive there is a danger of policy gaps being inadvertently created by changes which are beyond the control of individual planning authorities.</p>