



The Carlisle District Local Plan 2015-2030

PAS Local Plan Soundness Self Assessment Toolkit June 2015



Images courtesy of Andrew Paterson, D&H Photographers and Jason Friend

Note: This soundness compliance self assessment checklist was produced by the Planning Advisory Service (PAS) in March 2014. Carlisle City Council has used this checklist to demonstrate that the Carlisle District Local Plan 2015-2030 meet the tests of soundness as set out in the relevant legislation.

This note was prepared by AMEC and URS on behalf of the Planning Advisory Service. It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework.

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
<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<p>The issues that the Local Plan is seeking to address have been well established throughout the evolution of the Plan. There is a clear and locally distinctive spatial vision within the Plan (pgs 16 & 17) which makes clear how Carlisle should look and function in the future. The Plan also contains explicit strategic objectives (pgs 18 – 20) grouped around the key policy themes. The vision and objectives have drew firm support throughout the various iterations of the Plan which support that these respond to the required key issues highlighted earlier in the plan making process.</p> <p>Policies are grouped around key themes on a chapter by chapter basis. At the beginning of each chapter the objective is reiterated and context provided as a means of identifying the specific issues which the policy framework seeks to address in order to achieve the intended objective(s).</p> <p>Reasonable alternatives to the quantum of development and overall spatial strategy have been considered through previous stages of consultation on the Local Plan and importantly within the Sustainability Appraisal Report under Task B3 – Evaluating the likely effects of the Local Plan and alternatives (pgs 32-94). Here a number of alternative strategic options were assessed for the spatial distribution for growth; the level of new housing provision to be planned for; the distribution of housing growth within the District; and the preferred location for accommodating the required level of new retail floorspace within the City.</p> <p>Policies are internally consistent, compatible and complementary, as evidenced by Figure 1 of the Sustainability Appraisal Report (pg 45) which demonstrates that against the sustainability appraisal objectives the cumulative impact of policies can be seen to be positive.</p> <p>The Local Plan contains a Monitoring and Implementation chapter (pgs 209-211) and associated appendices (Appendix 2 pgs 239-257) in order to measure the effectiveness of policies and sites and as a means of understanding progress towards meeting the Plan’s strategic objectives and ultimately its vision. For each policy this monitoring framework makes clear the detailed objective, indicators, triggers for intervention and what form these interventions may take, as well as which Sustainability Appraisal objectives the policy supports. The council prepares a Monitoring Report on an annual basis to report on the results of this monitoring.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Plans and decisions need to take local circumstances into account, so that they</p>	<p>The Local Plan 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 establishes the development needs of the area and was used to inform the Plans spatial strategy and other detailed policy</p>

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<p>respond to the different opportunities for achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> —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. 	<p>options.</p> <p>The process of the Sustainability Appraisal has been used alongside the evidence base and consultation to inform and therefore support the preferred strategic and policy options within the Plan including the quantum and spatial distribution of development. The SA Report and previous Preferred Options drafts of the Plan details why alternative options were discounted and conversely (alongside the supporting policy text within the Plan) why the preferred options were taken forward.</p> <p>The Plan contains the Planning Inspectorate advocated model policy on the presumption in favour of sustainable development at its outset (Policy SP1 pgs 32-33).</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<p>The Plan contains the Planning Inspectorate advocated model policy on the presumption in favour of sustainable development at its outset (Policy SP1 pgs 32-33).</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<p>The Local Plan 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 establishes the development needs of the area and was used to inform the Plans spatial strategy and other detailed policy options.</p> <p>A list of evidence base documents used to inform the development of the Plan, including the Sustainability Appraisal and Habitats Regulations Assessment is available on the Local Plan Evidence Base page of Carlisle City Council’s website. Those which relate to quantifying objectively assessed needs include the Strategic Housing Market Assessment and preceding Housing Need and Demand Study, PopGROUP modelling and the Carlisle</p>

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	<p>Retail Study.</p> <p>The Housing Site Selection Process is available on the Council’s website and helps to establish, using the evidence base, the justification for the level and location of housing development identified.</p> <p>A statement of Compliance with the Duty to Co-operate (February 2015) has been prepared which sets out the Council’s engagement with neighbouring authorities, prescribed bodies and key stakeholders with a statutory responsibility in the preparation of the Local Plan and its evidence base.</p>
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),	<p>The Plan’s spatial vision recognises the importance of Carlisle for economic development and economic growth. From the outset it recognises the City as the economic engine for a large functional economic area which extends beyond the District boundaries and highlights that land has been made available to support the delivery of new business premises and jobs.</p> <p>Chapter 4 – Economy (p69), sets out the Objective and Context for the proceeding policies within the chapter. The Objective outlines the clear commitment to foster the right conditions to stimulate inward investment and to create opportunities for economic growth.</p> <p>The Context to the chapter provides a clear strategy for addressing the shortcomings with regards to the lack of quality and choice of employment locations for companies to invest in by improving the attractiveness of existing sites and complementing this offer by providing new sites within locations recognised by Cumbria Local Enterprise Partnership as priorities.</p> <p>The Council commissioned an Employment Sites Study in 2010, this identified that whilst there was sufficient land to support employment growth opportunities in Carlisle, there were qualitative issues with the sites which were available to fulfil this need. A key element therefore of the Local Plan’s strategy is to support investment in existing sites to facilitate their modernisation and reconfiguration, as well as ensuring the potential of residual capacity within these sites is realised.</p>

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	<p>Whilst the Employment Sites study is now on face value dated, its key findings are considered to remain relevant as supported through more recent economic assessments including the Carlisle Economic Review (2013) and Carlisle Economic Review Update (2015).</p>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<p>The Context to the employment chapter (p69) provides a clear strategy for addressing the shortcomings with regards to the lack of quality and choice of employment locations for companies to invest in by improving the attractiveness of existing sites and complementing this offer by providing new sites within locations recognised by Cumbria Local Enterprise Partnership as priorities.</p> <p>In order to support economic growth and increase the level of high value jobs within the local economy, the Local Plan has identified 45ha of employment land allocations (Policy EC 1 – Employment Land Allocations pgs 70-72).</p> <p>The Council commissioned an Employment Sites Study in 2010 which identified that whilst there was sufficient land to support employment growth opportunities in Carlisle, there were qualitative issues with the sites which were available to fulfil this need. A key element therefore of the Local Plan’s strategy is to support investment in existing sites to facilitate their modernisation and reconfiguration, as well as ensuring the potential of residual capacity within these sites is realised.</p> <p>Whilst the Employment Sites study is now on face value dated, its key findings are considered to remain relevant as supported through more recent economic assessments including the Carlisle Economic Review (2013) and Carlisle Economic Review Update (2015).</p> <p>Whilst the Carlisle Employment Sites Study (2010) identified that in employment land terms there is a perceived spatial imbalance with the majority of land and premises to the north of the City away from concentrations of population to the southern areas of the City, this imbalance is not however considered to currently manifest as a key issue which needs to be immediately addressed given the ease of connectivity between south and north Carlisle (aided by delivery of the Carlisle Northern Development Route). In the longer term provisions are in place through Policy SP3 (pgs 43-45) within the Plan to address this perceived imbalance through the delivery of additional employment land within the South of the City, through the planned urban extension of Carlisle South.</p> <p>The Council has also prepared an Infrastructure Delivery Plan (March 2015) which sets out the approach for</p>

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	<p>providing and delivering the infrastructure required to implement the spatial strategy, objectives and proposals of the Plan. No 'show stoppers' have been identified as constituting a barrier to growth although the process of the IDP has highlighted the need for further investment in strategic transport infrastructure and education provision.</p>
<p>2. Ensuring the vitality of town centres (paras 23-37)</p>	
<p>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)</p>	<p>The Spatial Vision for the Plan (PGS 16-17) seeks to ensure that policies and proposals are successful in strengthening and diversifying the City Centre offer, ensuring that its expanded retail and leisure focus is underpinned by a strong cultural offer which can be enjoyed by all.</p> <p>The Strategic Objective for Economy (P18) seeks 'to focus new retail and leisure floorspace within the City Centre, and take opportunities to strengthen and diversify its offer, in order to enhance its role as a sub-regional service centre and leisure and cultural destination'.</p> <p>Policy PS2 – Strategic Growth and Distribution (PGS 34-42) states that to ensure that objectively assessed development needs are met, a number of principles will govern development, this includes that 'The City Centre will maintain and enhance its status by being the primary focus for further comparison retail development across the Plan period: specifically, sufficient land will be identified within the City Centre to accommodate an additional 18,700m² net comparison retail floorspace until 2030.</p> <p>Policy SP2 also establishes a clear retail hierarchy in terms of the City centre, District Centres and Local Centres with these defined on the Policies Map.</p> <p>Policy SP4 – Carlisle City Centre and Caldew Riverside (pgs 46-50) provides strategic direction for growth and development within the City Centre over the plan period, to ensure that its vitality and viability are supported and to allow the City Centre to remain competitive. It identifies land for the potential future expansion of the Primary Shopping Area and other key locations within the City Centre where opportunities exist to reuse and redevelop buildings and land for a mix of uses which could act as a catalyst for further future improvements.</p> <p>The Local Plan through Policy EC 3 (pgs 76-77) defines and seeks to protect Primary Shopping Areas & Frontages as the continued focus for comparison retailing provision across the Plan period.</p>

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<p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)</p>	<p>The Carlisle Retail Study (2012) identified the requirement for the Primary Shopping Area to accommodate up to an additional 18,700m² net Class A1 comparison (non-food) retail floorspace over the period to 2030.</p> <p>To understand whether this quantum could be accommodated within the City Centre, the Council commissioned consultants to prepare the City Centre Development Framework (CCDF) the intention of which was to also guide the consideration of future development proposals in the City to 2030. In this regard the CCDF constitutes a key piece of the Local Plan evidence base. The Local Plan has sought to take forward the key principles and recommendations from the CCDF through Policy SP4 (pgs 46-50).</p> <p>Strategic Policy SP4 – Carlisle City Centre and Caldew Riverside – identifies land to accommodate a future expansion of the Primary Shopping Area for retail led development. Additionally, other opportunities and locations to accommodate mixed use growth proposals within or in close proximity to the City Centre are identified.</p>
<p>3. Supporting a prosperous rural economy (para 28)</p>	
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<p>Reference is made within the Plan’s Spatial Vision to supporting thriving rural communities and explicit reference is made to ‘continued innovation and development within agriculture’ to ensure farming as an important rural economic sector remains ‘economically vibrant’.</p> <p>Within Policy SP2 (pgs 34-42) within the Plan, which establishes the strategic principles regarding growth and the distribution of new development, it is explicitly stated that ‘Within the District’s rural settlements, development opportunities of an appropriate scale and nature, which are commensurate with their setting, will be harnessed to positively contribute to increasing the prosperity of the rural economy and to enable rural communities to thrive’ (p35).</p> <p>In addition, Policy EC 9 – Arts, Culture, Tourism and Leisure Development (pgs 86-87), EC10 – Caravan, Camping and Chalet Sites (pg 88), EC11 – Rural Diversification (pgs 98-90), EC12 – Agricultural Buildings (pgs 91-92) and EC13 – Equestrian Development (pgs 93-94) serve to demonstrate that an appropriate policy framework is in place to promote the sustainable growth of rural businesses, promote the development and diversification of agricultural businesses and support sustainable rural tourism and leisure developments.</p>

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<p>4. Promoting sustainable transport (paras 29-41)</p>	
<p>Eg Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised</p>	<p>Strategic Policy SP5 – Strategic Connectivity (pgs 51-53), provides a clear strategic steer at the outset of the Plan and promotes sustainable modes of travel through making clear that opportunities will be taken to: increase the provision for walking and cycling, including improved connectivity across the District; retain and enhance existing public transport services and to improve and modernise key public transport infrastructure; and to secure a modal shift in the transport of freight away from road to rail. The Policy also seeks to protect the routes of disused railway lines which have the potential for future use as green corridors for walking and cycling, or to facilitate the reinstatement of public transport services.</p> <p>Strategic Policy SP 9 – Healthy and Thriving Communities (pgs 62-29), seeks that development contributes to enhanced health and wellbeing outcomes through creating high-quality and inclusive environments that support people in making healthy choices, and that make these choices easier by encouraging development proposals to maximise the opportunity for walking and cycling, social interaction, sport and physical activity, whilst providing accessible local services, facilities and jobs, a diverse and useable integrated network of green infrastructure assets and convenient public transport facilities.</p> <p>The Infrastructure Objective (pg129) seeks to ensure the provision of integrated infrastructure networks, and their timely delivery, including sustainable transport, where needed to support new and existing development, facilitate economic growth and deliver the Plan strategy.</p> <p>Policy IP2 – Transport and Development (pgs 132-134) is clear that new development will be required to prioritise safe and convenient access for cyclists and pedestrians, and to take opportunities to contribute to the creation and enhancement of an integrated and continuous sustainable transport network.</p> <p>Policy IP 3 – Parking Provision (pgs 135-136) encourages the use of sustainable transport modes and states that ‘Provision for convenient and secure bicycle parking will also be expected to be provided in line with standards’.</p> <p>Transport providers have been engaged through the development of the Plan and the Infrastructure Delivery Plan in order to ensure sustainable transport options are or can be made available to serve new developments. The Infrastructure Delivery Plan, as informed by the Carlisle Transport Improvement Study, identifies a suite of sustainable transport improvements which it will be necessary to deliver across the lifetime of the Plan in order</p>

Soundness Test and Key Requirements	Evidence Provided
<p>(34) Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>	<p>to support growth.</p>
<p>5. Supporting high quality communications infrastructure (paras 42-46)</p>	
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4</p>	<p>Policy IP4 – Broadband Access (p137-138) within the Local Plan seeks to support the expansion of high speed broadband throughout the District. No further policies with respect to communication infrastructure were included within the Plan as these are predominately addressed through the process of Development Management by way of reference to existing national guidance and statutory instruments.</p>

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<p>directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	
<p>6. Delivering a wide choice of high quality housing (paras 47-55)</p>	
<p>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)</p>	<p>The Local Plan is considered to allocate an adequate supply of land for housing to ensure that the District will, in also taking into account committed developments, have a five year housing land supply as required by national policy. A Five Year Housing Land Supply Position Statement is published alongside the Plan which details the specific sites relied upon to contribute to this supply including making clear the role of the Local Plan allocations. This statement also provides the required evidence to justify a continued reliance on windfall sites moving forward.</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<p>The Local Plan is considered to allocate an adequate supply of land for years 6-10 and 11-15, including, with regards to the latter, a broad location through the concept of an urban extension at Carlisle South (Policy SP3, pgs 43-45).</p>
<p>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)</p>	<p>A trajectory is included within the Local Plan in the supporting text to Policy SP2 (pg. 38). Forecasting information which sits behind the trajectory enables the sites which contribute to the respective years to be identified and analysed. Paragraphs 3.15 and 3.16 of this same supporting text detail the Council's proposed approach to implementation.</p> <p>Housing completions and permissions are both monitored and included within the Council's Annual Monitoring report.</p>
<p>Set out the authority's approach to housing density to reflect local circumstances (47).</p>	<p>The Local Plan deliberately does not prescribe specific densities for housing development but Strategic Policy SP6 'Securing Good Design' (pgs. 54-55) does require that development proposals "<i>respond to the local context and the form of surrounding buildings in relation to density, height, scale, massing and established street patterns and by making use of appropriate materials and detailing</i>". Such an approach will see density</p>

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	<p>considered on a site by site basis which is considered a flexible and entirely appropriate approach within the District.</p>
<p>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)</p>	<p>The housing target has been informed by and is therefore supported by up to date and robust evidence in the form of the SHMA and PopGROUP modelling.</p> <p>Policy HO1 (pgs. 96-101) within the Plan requires, amongst other matters, that in bringing forward allocations <i>“developers will need to demonstrate that they have provided a mix of dwelling types, sizes and tenures which help meet identified local housing need and contribute to the development of mixed and sustainable communities”</i>.</p> <p>Policy HO4 (pgs. 107-110) seeks to secure a percentage of qualifying open market developments as affordable with clear thresholds, percentage requirements and required tenure mix. The provisions of this policy draw on robust evidence in the form of the SHMA and importantly the Affordable Housing Viability Assessment.</p> <p>Policy HO10 (pgs. 122-123) within the Plan ‘Housing to Meet Specific Needs’ provides a positive presumption for specialist housing including that which caters for an ageing population.</p> <p>Finally of relevance is Strategic Policy SP9 (pgs. 62-66) which seeks to secure healthy and thriving communities through measures including <i>“encouraging the development of decent homes that are adaptable for the life course of the occupiers, meeting Lifetimes Homes Standards where possible”</i>, in response to evidenced needs of an ageing population and those with restricted mobility.</p>
<p>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).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<p>Reference is made within the Plan’s Spatial Vision to supporting thriving rural communities. Within Policy SP2 (pgs. 34-42) within the Plan, which establishes the strategic principles regarding growth and the distribution of new development, it is explicitly stated that ‘Within the District’s rural settlements, development opportunities of an appropriate scale and nature, which are commensurate with their setting, will be harnessed to positively contribute to increasing the prosperity of the rural economy and to enable rural communities to thrive’.</p> <p>The Local Plan reverses a trend of restricted housing supply in rural areas and positively allocates land in those settlements where it is deemed sustainable to do so and which have land available to accommodate growth.</p>

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	Policy HO5 (pgs. 111-112) provides guidance to illustrate when rural exception sites will be deemed appropriate and Policy HO6 (pgs. 113-116) likewise with regards to the other circumstances in which housing will be permitted in the open countryside.
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 Local Plan contains a comprehensive Policy (SP6, pgs. 54-55) the objective of which is to secure high quality design. Policy SP6 is at the outset of the Plan and in this regards constitutes a key element of the Plan's overarching strategy.
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).	<p>Policy SP6 'Securing Good Design' at the outset of the Plan, as a core element of the Plan's overarching strategy, is explicit in requiring that proposals should, amongst other matters, <i>"ensure all components of the proposal, such as buildings, car parking and new connections, open space and landscaping are accessible and inclusive to everyone, safe and well related to one another to ensure a scheme which is attractive and well integrated with its surroundings"</i>.</p> <p>Policy SP 9 – Healthy and Thriving Communities (pgs. 62-66) seeks to ensure that all new developments contribute towards 'creating high-quality and inclusive environments that support people in making healthy choices, and that make these choices easier by encouraging development proposals to maximise the opportunity for walking and cycling, social interaction, sport and physical activity, whilst providing accessible local services, facilities and jobs'.</p> <p>The Plan also contains a specific development management focussed policy on 'Planning Out Crime' (Policy CM4, pgs. 173-174).</p>
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	Policy CM3 – Sustaining Community Facilities and Services (pgs. 171-172) is concerned with sustaining community facilities and services. This Policy seeks to protect and safeguard against the unnecessary loss of valued community facilities and services. This Policy will help to ensure the sustainability of communities into

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	<p>the future, particularly in the more rural parts of the District.</p> <p>In terms of future residential development on non allocated sites, Policy HO2 (pgs. 102-104) makes clear that these will only be appropriate in those settlements that have a good range of services or where there is good access to services in one or more other nearby village.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<p>Policy GI 4 (pgs. 202-204) provides protection for open space and sports and recreational buildings and land from development. It allows for exceptions in certain cases, with a list of criteria to consider when assessing whether the loss of open space to development would be justified.</p> <p>The Council’s Playing Pitch Strategy considers the provision of sports facilities within the district, assessing their quality and accessibility, and identifying those areas suffering from a lack of sports provision – whilst not quite a full needs and demand study, the strategy is again useful in assessing planning proposals that may impact upon sports provision. The Plan recognises the need to conduct a full Open Space Needs and Demand Study and Policy GI 4 makes it clear such evidence will be used within the planning process – in some cases developers themselves may be expected to provide a localised needs and demand study to help support their proposals. A local standard was set in the 2008 Local Plan, based on existing provision – which is already significantly higher than the old 6-Acre national standard. This standard has been carried forward into the emerging Plan.</p> <p>Policy GI 5 (pg. 205) provides policy coverage for the protection and enhancement of rights of way and access – although as the management of public rights of way falls largely within the remit of the County Council this policy mainly addresses the impact that development could have on a right of way, ensuring that the development does not block the route or damage the quality of a public right of way.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<p>No ‘Local Green Space’ designations are included in the Local Plan with none considered currently necessary or to have been appropriately justified.</p>
<p>9. Protecting Green Belt land (paras 79-92)</p>	
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to</p>	<p>There are no designated areas of Green Belt within or adjoining Carlisle District.</p>

Soundness Test and Key Requirements	Evidence Provided
<p>provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	
<p>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>	
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<p>The Climate Change and Flood Risk Chapter contains a suite of policies which aim to reduce emissions of greenhouse gases, including through securing energy from renewable sources, and avoiding inappropriate development in areas at risk of flooding in order to ensure that the District is more resilient and less vulnerable to the effects of climate change and can adapt to its effects.</p> <p>Policy CC3 – Energy Conservation, Efficiency and Resilience (pgs. 157-158) seeks to ensure that new development makes the fullest contribution to creating environments which enable carbon reduction and are resilient to the effects of climate change. This includes encouraging the use of energy efficient materials and design techniques to contribute towards achieving zero carbon standards.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon</p>	<p>The context to the Climate Change and Flood Risk chapter outlines the Plan’s strategy for renewable and low carbon energy and will be implemented via both Policy CC1 – Renewable Energy (pgs. 148-151) and Policy CC2 – Energy from Wind (pgs. 152-156). These Policies will help to increase the use and supply of renewable energy</p>

Soundness Test and Key Requirements	Evidence Provided
energy, and identification of key energy sources. (97)	<p>within the most appropriate locations. Policy CC1 in particular recognises the potential for the development of a range of renewable energy sources such as energy from wind, biomass, waste, hydropower, solar, heat pumps, wood fuel and others as technologies develop.</p> <p>The evidence base supporting this chapter of the Plan is extremely helpful in identifying suitable areas for renewable and low carbon energy development, including the Cumbria Renewable Energy Capacity and Deployment Study which assessed the capacity of the County to accommodate various renewable energy technologies such as the identification of where development can draw its energy supply from decentralised sources. Policy CC2 – Energy from Wind (pgs. 152-156) has been particularly informed by the Cumbria Wind Energy SPD and the Cumulative Impact of Vertical Infrastructure study which help to guide this type of renewable energy technology into the most appropriate locations where there will be a reduction in the adverse impact on the landscape.</p>
Minimise vulnerability to climate change and manage the risk of flooding (99)	Policy CC4 – Flood Risk and Development (pgs. 159-162) seeks to ensure that new development does not result in unacceptable flood risk or drainage problems. It is a criteria based policy which seeks to locate development away from flood risk areas as informed by the Strategic Flood Risk Assessment (SFRA)(2010), and to ensure that suitable adaptation methods are employed to reduce the impacts of climate change. The SFRA has also informed the allocation of development sites and as such there are no proposed allocations within areas at risk of flooding.
Take account of marine planning (105)	There are not considered to be any marine planning issues of significance which the Local Plan needs to respond to. This view has been consistently reaffirmed by the Marine Management Organisation who have been engaged throughout the process of the Plan’s evolution.
Manage risk from coastal change (106)	There is not considered to be any significant risk of coastal erosion facing the District to an extent which necessitates a Local Plan response.
11. Conserving and enhancing the natural environment (paras 109-125)	
Protect valued landscapes (109)	Policy SP8 – Green and Blue Infrastructure (pgs. 59-61) at the outset of the Plan ensures that the importance of developing a holistic approach to the protection and stewardship of the District’s green and blue infrastructure is embedded in the Plan’s overarching strategy. Policy GI1 – Landscapes (pgs 194-195) of the specific green infrastructure chapter of the Plan seeks to protect and enhance landscapes with Policy GI2 providing an

Soundness Test and Key Requirements	Evidence Provided
	appropriate framework to guide development proposals within the District’s landscapes which are designated as Areas of Outstanding Natural Beauty.
Prevent unacceptable risks from pollution and land instability (109)	Policy CM 5 – Environmental and Amenity Protection (pgs 175-178) – seeks to ensure that only development which would not lead to an adverse impact on the environment or amenity of future or existing occupiers is permitted within the District.
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<p>Policy GI 3 – Biodiversity and Geodiversity (pgs. 198-201) sets out key principles to be applied when considering planning applications that may have an impact upon biodiversity and geodiversity. It clearly states that the protection and enhancement of such assets is of primary importance and that development which would cause harm that cannot be mitigated against will not be approved.</p> <p>The policy has a wide ranging scope setting out a clear hierarchy of protection for sites from major international conservation status right down to more locally important and designated wildlife sites. Reference is made to the need to consider bio and geodiversity at a landscape scale, with the supporting text recognising that such assets do not simply stop at the district boundary, highlighting the need for a coordinated, cross-boundary approach to conservation and enhancement.</p> <p>Biodiversity and Geodiversity assets are mapped on the Policies Map. Further evidence is provided by the Cumbria Biodiversity Data Centre who map sightings of protected species across the County and areas of priority habitat which may have the potential to be home to such species.</p>
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)	The Plan contains a strategic policy at the outset (Policy SP7 – Valuing our Heritage and Cultural Identity (pgs. 56-58) ensuring that a positive strategy for the conservation and enjoyment of the historic environment is at the heart of the Plan’s overarching strategy. This specific policy has been developed through effective engagement with Historic England who have welcomed and support the approach taken and its focus. In addition a more detailed suite of development management focussed policies are contained within the Plan as a means through which heritage and cultural assets can be protected and enhanced through development proposals.

Soundness Test and Key Requirements	Evidence Provided
13. Facilitating the sustainable use of minerals (paras 142-149)	
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Cumbria County Council as opposed to Carlisle City Council are the Minerals Planning Authority for Carlisle District. Cumbria County Council are progressing a Cumbria Minerals and Waste Local Plan (MWLP) which the Carlisle District Local Plan will operate alongside. Accordingly no policies relating to mineral matters are contained within the Carlisle District Local Plan, although it is acknowledged within (Para. 1.6) that once the MWLP is adopted that it may be necessary to update the Local Plan Policies Map to illustrate Mineral Safeguarding Areas and other relevant designations and/or allocations.</p>
<p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 	
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The submitted Consultation statement is considered to provide the required assurances as to how consultation on the Local Plan has been frontloaded; undertaken in accordance with the Council's adopted Statement of Community Involvement; and in compliance with the relevant governing Regulations. The Council considers that efforts have succeeded in securing a strong degree of public and stakeholder participation in the plan making process, evident by the volume, nature and range of interests who have responded at key consultation stages.</p>
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing</p>	<p>The Plan is supported by a comprehensive, robust and what is considered to be a proportionate evidence base. Key aspects which have directly informed policies are referenced within the supporting text and submitted as relevant supporting documentation. The evidence base has been made publically available throughout the evolution of the Plan. Various aspects have been updated where required to reflect changes in circumstances</p>

Soundness Test and Key Requirements	Evidence Provided
<p>is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<p>either locally or for example following the introduction of the Planning Practice Guidance.</p> <p>The process of the Sustainability Appraisal has also involved fact finding, evidence gathering and analysis with the overall process informing the Plan.</p> <p>Consultation on the Plan has also been frontloaded which has proven invaluable in ensuring that consultees and the general public can genuinely see how their comments have helped to shape the Plan.</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<p>Reasonable alternatives to the quantum of development and overall spatial strategy have been considered through previous stages of consultation on the Local Plan and importantly within the Sustainability Appraisal Report under Task B3 – Evaluating the likely effects of the Local Plan and alternatives (pgs. 32-94). Here a number of alternative strategic options were assessed for the spatial distribution for growth; the level of new housing provision to be planned for; the distribution of housing growth within the District; and the preferred location for accommodating the required level of new retail floorspace within the City.</p> <p>Previous drafts of the Plan and specifically those at Preferred Options stage provide detailed rationale for the choices made earlier in the process and these can equally be seen (by way of reference to earlier drafts of the SA Report) to have been supported at the time by an appropriate degree of sustainability appraisal.</p>
<p><i>Effective: the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it 	

Soundness Test and Key Requirements	Evidence Provided
<ul style="list-style-type: none"> • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 	
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan’s vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<p>The issues that the Local Plan is seeking to address have been well established throughout the evolution of the Plan. There is a clear and locally distinctive spatial vision within the Plan (pgs 16 & 17) which makes clear how Carlisle should look and function in the future. The plan also contains explicit strategic objectives (pgs 18 – 20) grouped around the key policy themes. The vision and objectives have drew firm support throughout the various iterations of the Plan which support that these respond to the required key issues highlighted earlier in the plan making process.</p> <p>Policies are grouped around key themes on a chapter by chapter basis. At the beginning of each chapter the objective is reiterated and context provided as a means of identifying the specific issues which the policy framework seeks to address in order to achieve the intended objective(s).</p> <p>Policies are internally consistent, compatible and complementary, as evidenced by Figure 1 of the Sustainability Appraisal Report which demonstrates that against the sustainability appraisal objectives the cumulative impact of policies can be seen to be positive.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<p>The Plan is accompanied by an Infrastructure Delivery Plan the process of which has succeeded in securing the buy-in of key infrastructure providers as a means of identifying likely pressures as a consequence of planned growth. No ‘show stoppers’ have been identified as constituting a barrier to growth although the process of the IDP has highlighted the need for further investment in strategic transport infrastructure and education provision. With regards to the former the Carlisle Transport Improvement Study has identified specific interventions and quantified the costs of these.</p> <p>The Plan has been informed by a plan wide viability assessment which supports that development is viable and able to contribute to infrastructure provision moving forward, with a good track record of developments doing so in the District over recent years. In acknowledging that the IDP is a living document engagement with providers is continuing and the plan will therefore continue to be updated as and when further information to do so becomes available.</p>

Soundness Test and Key Requirements	Evidence Provided
<p><i>Co-ordinated Planning</i></p> <p>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 use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<p>The strategic policies which collectively constitute the Plan’s overarching strategy can be seen to be truly spatial in nature with the strategic connectivity (Policy SP5), strategic health and wellbeing (Policy SP10) and strategic heritage and culture policies (Policy SP7) good examples of this. Such policies have been worked up in concert with the appropriate agencies / partners with a strong degree of support for such policies subsequently forthcoming from these parties and on record.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<p>Where possible and appropriate the Plan adopts a less prescriptive and more pragmatic approach in comparison to previous regimes. The absence of settlement boundaries is a good example testament to this.</p> <p>The Local Plan contains a Monitoring and Implementation chapter (pgs. 209-211) and associated appendices (pgs. 239-258) which highlights that in addition to making clear the objective for each individual policy within the Local Plan, and where relevant any targets related to this, the framework makes clear what indicators are to be employed for monitoring purposes relevant to each policy. For each, consideration is also afforded to what circumstances may trigger a review of performance and what remedial actions may be pursued as a consequence. The monitoring framework also identifies which Sustainability Appraisal objectives individual policies support.</p>
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> • 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? 	<p>A supporting statement which details how the Council has fulfilled the duty to cooperate has been prepared, consulted upon and submitted. Ultimately this demonstrates that the Plan has evolved within the context of appropriate and effective cooperation, albeit that it has not had to contend with many significant cross boundary strategic issues.</p> <p>Where there are cross boundary issues policies within the Plan and their supporting text refer to where arrangements are in place for example by way of reference to Hadrian’s Wall World Heritage Site and Areas of Outstanding Natural Beauty Management Plans.</p>

Soundness Test and Key Requirements	Evidence Provided
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<p>The Local Plan contains a Monitoring and Implementation chapter (pgs. 209-211) and associated appendices (pgs. 239-258) which highlights that in addition to making clear the objective for each individual policy within the Local Plan, and where relevant any targets related to this, the framework makes clear what indicators are to be employed for monitoring purposes relevant to each policy. For each, consideration is also afforded to what circumstances may trigger a review of performance and what remedial actions may be pursued as a consequence. The monitoring framework also identifies which Sustainability Appraisal objectives individual policies support.</p> <p>The results of monitoring will be reported annually within the Council’s Annual Monitoring Report (AMR), through which the need to review any policy or proposal within the Local Plan will be raised. The AMR will also be the process through which any significant effects on the SA objectives are reported.</p>
<p><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>	
<ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<p>The Plan is not considered to contain any policies or proposals which constitute a departure from relevant national policy.</p> <p>The policies contained within the Plan are considered justified in that they add to or aid the implementation of national policies of relevance in local circumstances.</p>

Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

Policy Expectations	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)	
Early and effective community engagement with both settled and traveller communities.	The Gypsy and Traveller Accommodation Assessment (GTAA) has been produced in partnership with adjoining districts on a Cumbria County basis. It is considered to have succeeded in effectively engaging with travelling communities in understanding accommodation needs. Of note is that the GTAA has been used to support policies in neighbouring authorities' Plans which have been found sound.
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	The Gypsy and Traveller Accommodation Assessment (GTAA) has been produced in partnership with adjoining districts on a Cumbria County basis. It is considered to have succeeded in effectively engaging with travelling communities in understanding accommodation needs. Of note is that the GTAA has been used to support policies in neighbouring authorities' Plans which have been found sound.
Policy B: Planning for traveller sites (paras 7-11)	
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs. Set criteria to guide land supply allocations where there is identified need.	Policy HO11 – Gypsy, Traveller and Travelling Showpeople Provision (pgs. 124-126) identifies targets with regards to accommodation for Travelling communities and allocates land in response to meeting future needs. The Policy also contains a presumption in favour of additional provision and provides a criteria based approach to aid the determination of proposals and/or to aid any further allocations which may be necessary over the life of the Plan.

Policy Expectations	Evidence Provided
Ensure that traveller sites are sustainable economically, socially and environmentally.	
Policy C: Sites in rural areas and the countryside (para 12)	
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.	The allocation in the Plan has had regard to this provision which being clearly set out in National Policy was not considered necessary to reference in Policy H011– Gypsy, Traveller and Travelling Showpeople Provision (pgs. 124-126).
Policy D: Rural exception sites (para 13)	
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers’ sites.	It has not been deemed necessary to allocate rural exception sites in order to respond or meet identified needs.
Policy E: Traveller sites in Green Belt (paras 14-15)	
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through</p>	There are no designated areas of Green Belt within or adjoining Carlisle District.

Policy Expectations	Evidence Provided
the plan-making process.	
Policy F: Mixed planning use traveller sites (paras 16-18)	
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	Policy HO11– Gypsy, Traveller and Travelling Showpeople Provision (pgs. 124-126) does not preclude mixed residential and business traveller sites but does require, with respect to proposals, that ‘satisfactory living conditions can be achieved on the site and there would be no unacceptable impact on the amenity of adjacent land uses including residential uses’.
Policy G: Major development projects (para 19)	
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	There are no current nor is it likely over the life of the Plan that the delivery of a major development project will necessitate the relocation of Traveller accommodation.

Soundness Self-Assessment Checklist

Integration of marine and terrestrial planning

As the UK marine area and marine plan area boundaries extend up to the level of mean high water spring tides while terrestrial planning boundaries generally extend to mean low water spring tides (including estuaries), the marine plan area will physically overlap with that of some terrestrial plan. Local authorities with any tidal frontage, even if far inland and not conventionally regarded as coastal, must therefore take full account of the MMO, the MPS and marine plans under S.58 of the Marine and Coastal Access Act and the Duty to Co-operate in Section 110 of the Localism Act 2011. A full list of the local planning authorities whose areas overlap with the UK marine area appears in Appendix One.

Furthermore, the Duty to Co-Operate requires all local planning authorities, even if landlocked, to take account, where relevant, of the MMO's plans and activities when preparing their Local Plans. Finally, the NPPF requires LPAs to take the MPS into account under the tests of soundness (specifically, to test if an emerging DPD is consistent with national policy, which includes the MPS).

The Marine and Coastal Access Act 2009 (the Act) provided for the introduction of a marine planning system for England's inshore and offshore marine area, establishing the Secretary of State as the Marine Planning Authority for these areas. The Act also provided for the establishment of the Marine Management Organisation (MMO) and for the Secretary of State to delegate various planning functions. The planning functions including preparation and review were delegated to the MMO in 2010. The Act also provided for the adoption of the UK Marine Policy Statement (MPS). The MPS was adopted on 18 March 2011 and provides the policy framework for marine planning and for all decisions likely to affect the marine area.

There are eleven plan areas in English waters, for each of which a Marine Plan will be prepared by the MMO and adopted by the Secretary of State for the Environment, Food and Rural Affairs.

In practical terms, all activities undertaken in the marine area require land based infrastructure, without which our ability to benefit economically and socially from activities in the marine area would be extremely limited.

The UK Government's vision for the marine environment, as articulated in the MPS, is:

'clean, healthy, safe, productive and biologically diverse oceans and seas'.

In the absence of a marine plan prepared by the MMO and adopted by the Secretary of State the MPS is the relevant marine policy document. Where a marine plan has been adopted both the MPS and the Marine Plan are relevant marine policy documents for the marine plan area.

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all¹ public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions²

In addition, the MPS seeks integration of marine planning and the terrestrial planning system through:

- Consistency between marine and terrestrial policy documents and guidance
- Liaison between respective responsible authorities for terrestrial and marine planning, including in plan development, implementation and review stages
- Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions

These aims are further supported by footnote 36 in the NPPF.

¹ Like the Duty to Co-Operate, no distinction is made by the Marine and Coastal Access Act between public authorities with a tidal frontage and those without. Emphasis is placed on the likelihood of the decision being made affecting the marine area.

² For example, decisions about what representations they should make as a consultee or about what action they should carry out themselves.

Policy Expectations	Evidence Provided
Key requirements under the Duty to Co-Operate	
Consistency between marine and terrestrial policy documents and guidance	There is agreement between the Council and the MMO that there are no marine issues which necessitate a Local Plan response nor does the Plan itself give rise to any issues. Notwithstanding this, the Council in its wider remit are an active member of the Solway Firth Partnership which is the principal focus through which marine related issues are explored and addressed with regards to the Solway Firth marine environment.
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	See above
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	See above
Sections 2.1 -2.2: The UK vision for the marine environment	
The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas') Achieving the vision through marine planning	See above
Section 2.4: Considering benefits and adverse effects in marine planning	

Policy Expectations	Evidence Provided
Consider benefits and adverse effects of plan policies	See above
Section 2.5: Economic, social and environmental considerations	
Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water Framework Directive)	See above
3.1 Marine Protected Areas	
<p>Incorporate identified areas and features of importance for nature conservation</p> <p>Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts</p>	See above
3.4 Ports and shipping	
<p>Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety</p> <p>Protect the efficiency and resilience of continuing port operations</p>	See above. There are no ports within the District or shipping related activities which in any way impact on the District and its waters.
3.8 Fisheries	
Consider potential economic, social and	See above

Policy Expectations	Evidence Provided
environmental impacts of other developments on fishing activity	
3.9 Aquaculture	
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	See above
3.10 Surface water management and waste water treatment and disposal	
Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment	See above
3.11 Tourism and recreation	
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and local communities	See above