

Hastings Borough Council

**Proposed Submission Planning Strategy**

**Soundness Self-Assessment**

October 2012

## **Introduction**

This 'Soundness' Self-Assessment has been undertaken by Hastings Borough Council to check, and confirm, that its Planning Strategy is positively prepared, justified, effective and consistent with national policy in order for it to be judged "sound". As such, it supports the submission of the Council's 'Proposed Submission Planning Strategy in October 2012.

It should be read in conjunction with the Council's parallel 'Legal Compliance' Self-Assessment.

Key Question	Possible Evidence	Evidence Provided
<b>Justified</b>		
<b>Participation</b>		
1. Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement	The <a href="#">Consultation Statement</a> details the range of methods employed at each stage and the stakeholders engaged to ensure effective participation in the plan making process.
<b>Research/ fact finding</b>		
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?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals</li> <li>ii. Sections of the pre-submission proposals documents</li> <li>iii. Sections of the preferred strategy report</li> <li>iv. Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document</li> <li>v. Sections of the consultation statement</li> </ul>	<p>Yes. The supporting text preceding the policies within the document references key evidence.</p> <p>The key evidence supporting the Planning Strategy is located on the Council's Local Plan web pages under <a href="#">Evidence Base</a></p> <p>Studies have been updated where necessary, notably in relation to housing, employment and retail.</p> <p>Strategic Objectives and Policies have been tested through the Sustainability Appraisal (SA) process. The final <a href="#">Sustainability Appraisal</a> report evidences the sustainability merits of the Submission version of the Planning Strategy.</p>
5. What assumptions had to be made in preparing the development plan	<ul style="list-style-type: none"> <li>i. Sections of the development plan documents setting out the assumptions</li> </ul>	The Planning Strategy has been prepared in the context of the South East Plan and has assumed that this remains extant whilst also having regard to the NPPF and

Key Question	Possible Evidence	Evidence Provided
<p>document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<ul style="list-style-type: none"> <li>ii. Sections of the sustainability appraisal report setting out the assumptions</li> <li>iii. A very brief statement for each assumption as to how the evidence led to the assumption</li> <li>iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions</li> </ul>	<p>reviewing the assumptions underpinning the South East Plan in developing the Planning Strategy.</p> <p>A key assumption has been the construction of the Bexhill to Hastings Link Road having a high expectation of delivery within the plan period.</p> <p>East Sussex County Council (ESCC) has supplied population, household and workforce projections. The County Council uses the POPGROUP Model, developed by the Local Government Association (LGA), to produce demographic projections</p> <p>Key assumptions underpinning particular topics are explained in relevant <a href="#">Evidence Base</a> papers, such as retail growth and affordable housing viability.</p>
<b>Alternatives</b>		
<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>	<ul style="list-style-type: none"> <li>i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options</li> <li>ii. Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered</li> <li>iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues</li> </ul>	<p>The Sustainability Appraisal (SA) process has considered options and alternatives at the respective stages of consultation. This is evidenced in the <a href="#">Sustainability Appraisal of the Core Strategy Issues &amp; Options and Preferred Approaches</a> document. This SA informed the preferred approaches set out in the <a href="#">Core Strategy Preferred Approaches</a> 2008 document.</p> <p>In 2011, partly in response to Government changes to the planning system, a further round of <a href="#">informal consultation</a> was undertaken on the Planning Strategy. An SA of the housing growth scenarios set out in this consultation document, also included an SA to determine the likely</p>

Key Question	Possible Evidence	Evidence Provided
<p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>and options raised</p> <p>iv. Sections of the preferred strategy report explaining:</p> <ul style="list-style-type: none"> <li>• how alternatives were developed and evaluated, and</li> <li>• why alternatives were rejected in favour of the preferred strategy</li> </ul> <p>v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed</p> <p>vi. Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document</p> <p>vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions</p> <p>viii. Sections of the representations statement</p> <p>OR</p> <p>A brief statement of the influence upon decisions of: the issues raised during stakeholder and community engagement, and how they have been addressed</p>	<p>effects of each scenario. This stage of SA work has been incorporated into the May 2012 <a href="#">Sustainability Appraisal Report</a> which accompanies the Planning Strategy</p> <p>The <a href="#">Consultation Statement</a> describes the contribution of the respective engagements, and how these have been considered at each successive stage of the Planning Strategy.</p> <p>The <a href="#">Evidence Base</a> documents for the Planning Strategy include consideration of options, for example in relation to retail requirements and renewable energy generation. The <a href="#">Explanation of Housing Evidence</a> summarises the housing evidence which supports the Planning Strategy, this paper documents the evidence surrounding the decision not to include a strategic housing allocation following the 2008 Preferred Approaches consultation document.</p>

Key Question	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>ix. Any other documentation showing how alternatives were developed and evaluated</li> <li>x. A very brief statement and any other supporting documentation of the way decisions have been taken</li> </ul>	
<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>	<ul style="list-style-type: none"> <li>i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy</li> <li>ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings</li> <li>iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies</li> </ul>	<p>Chapter 7 of the <a href="#">Final Sustainability Appraisal Report</a> sets out the reasonable alternatives that were considered in developing the Planning Strategy in relation to the Policy areas of Housing Growth; Housing Distribution; Employment Growth; Retail Provision; Sustainable Design and Renewable Energy</p> <p>Tables 9-1 to 9-22 in the Final SA Report detail the policies assessed against the SA objectives, giving the appraisals findings and any recommendations made. It can be readily seen that options favoured by the SA process have been carried forward into the Planning Strategy document. Thus ensuring that sustainability considerations are at the heart of the Plan document.</p>
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons</li> <li>ii. The regional development agency/regional planning body letter</li> </ul>	<p><i>While PAS guidance says that questions 11 and 12 can be disregarded, they are addressed below as the South East Plan is still extant. In addition, the following also addresses the question of compliance with the National Planning Policy Framework (NPPF).</i></p>

Key Question	Possible Evidence	Evidence Provided
<p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>confirming that the development plan document is in general conformity with the regional special strategy</p> <ul style="list-style-type: none"> <li>iii. Representations received from the regional development agency/regional planning body</li> <li>iv. Representations from the Government Office</li> <li>v. Reports or copies of correspondence as to how the representations have been considered and dealt with</li> </ul>	<p>The Planning Strategy has been prepared to be in general conformity with the South East Plan.</p> <p>The Council however, has undertaken further work with regard to a locally determined housing target, and whilst the evidence underpinning the preparation of the South East Plan provides the foundations, the Council has supplemented this through further examination of more recent information in order to determine the most appropriate level of housing growth. This is documented in 2 housing background papers - <a href="#">Explanation of Housing Evidence</a> and the joint <a href="#">Assessment of Housing Need in Hastings and Rother</a></p> <p>The Council has assessed the submission version of the Planning Strategy in terms of its compliance with the NPPF. This is set out in the <a href="#">Local Plans and the National Planning Policy Framework - Compatibility Self Assessment Checklist</a></p>
<b>Effective</b>		
<b>Deliverable</b>		
<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</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there</li> <li>ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out</li> </ul>	<p><a href="#">Chapter 2</a> of the submission version of the Planning Strategy provides a portrait of the Borough and details the challenges and main issues facing the town. <a href="#">Chapter 4</a> sets out the overall development strategy for Hastings, whilst <a href="#">chapter 5</a> sets out the strategies for the 3 broad spatial areas.</p> <p>Strategic objectives are set in <a href="#">Chapter 3</a> and clearly show what the Planning Strategy is seeking to achieve.</p>

Key Question	Possible Evidence	Evidence Provided
is seeking to achieve?	<p>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</p> <p>iii. A core strategy vision which is framed to set out the outcomes which are sought for the future</p> <p>iv. Sections of the development plan document which identify the main issues addressed</p> <p>v. Sections of the development plan document which indicate the priority outcomes</p>	<p>Further consideration of the key sustainability issues that needed to be taken account of in preparing the Planning Strategy are included in the <a href="#">Sustainability Appraisal Scoping Report</a></p>
15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?	<p>i. Sections of the regional special strategy which identify cross-boundary issues.</p> <p>ii. Sections of the development plan document setting out cross-boundary issues and the response to them</p> <p>iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations</p> <p>iv. Records of meetings with adjoining authorities or relevant agencies</p>	<p>The Hastings Travel to Work Area includes all of Hastings Borough and most of Rother District. Whilst Hastings and Rother also constitutes a sub regional housing market area. There are close economic links between the two local authority areas, particularly between Hastings and Bexhill, as recognised by the former SEEDA led Task Force.</p> <p>As well as preparing joint evidence papers in relation to <a href="#">housing</a> and <a href="#">employment</a>, Hastings and Rother Councils have also agreed a joint vision for Hastings and Bexhill which is set out in <a href="#">Chapter 2</a> of the submission version of the Planning Strategy.</p>

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	<p>which confirm that there are no cross-boundary issues of significance</p>	<p>The full extent of cross boundary working in the preparation of the Submission Planning Strategy is set out in the Council's published <a href="#">Statement of Compliance: Duty to Co-operate</a></p>
<p>16. Does the development plan document contain clear objectives?</p>	<ul style="list-style-type: none"> <li>i. A spatial portrait which identifies the key issues facing the area</li> <li>ii. A core strategy vision which is framed to set out the outcomes which are sought for the future</li> <li>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</li> </ul>	<p>See <a href="#">Chapter 3</a> of the submission version of the Planning Strategy which sets out the strategic objectives of the Plan.</p> <p>See also <a href="#">Chapter 5</a> which sets out the strategic policy for each of the broad Spatial Areas within the Plan.</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"> <li>i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it</li> <li>ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place</li> </ul>	<p>The strategic objectives have been developed from the identification of Borough-wide local issues and the consideration of local priorities. A strategic policy specific to each of the broad Spatial Areas have also been developed.</p> <p>The Vision was discussed with Hastings Local Strategic Partnership (LSP).</p> <p>The link between issues and the development of objectives is reflected the <a href="#">Consultation Statement</a> in the <a href="#">Final Sustainability Appraisal Report</a></p>

Key Question	Possible Evidence	Evidence Provided
<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<ul style="list-style-type: none"> <li>i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them</li> <li>ii. Relevant sections of the sustainable community strategy which identify its objectives</li> <li>iii. Confirmation from the local strategic partnership and partner organisations that they believe the polices will achieve the agreed objectives</li> </ul> <p>Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed</p> <p>Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document</p>	<p><a href="#">Part 6</a> of the submission version of the Planning Strategy - Monitoring and Implementation - relates the strategic objectives to individual policies.</p>
<p>21. Are there realistic timescales related to the objectives?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives</li> </ul>	<p>The plan period is 17 years which will allow 15 years from the anticipated date of adoption. Unless otherwise stated the strategic objectives relate to this plan period.</p>

Key Question	Possible Evidence	Evidence Provided
	ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery	<p>Where relevant, the policies themselves provide further detail on the timescales relating to the delivery of development.</p> <p>The <a href="#">Infrastructure Delivery Plan</a> (IDP) provides timescales for the delivery of infrastructure to meet the objectives in the Infrastructure Delivery Schedule (IDS)</p>
22. Are the policies internally consistent?	i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent ii. A very brief statement explaining how the council considers its objectives are consistent	<p>Yes. This has been achieved both through the Sustainability Appraisal process, which tests the Planning Strategy objectives for their consistency with other plans and strategies of the Council and broader sustainability objectives, and through the Hastings LSP and corporate involvement in the development of the Plan.</p>
23. Does the development plan document contain material which: <ul style="list-style-type: none"> <li>• is already in another plan</li> <li>• should logically be in a different plan</li> <li>• should not be in a plan at all?</li> </ul>	i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with	<p>The preparation of the Planning Strategy has been undertaken with advice from GOSE, and 3 advisory visits from PINS officers, it contains no unnecessary repetition of Planning Guidance or erroneous policies.</p> <p>The <a href="#">Local Development Scheme</a> explains the scope and content of the respective Local Plan documents and how they relate to each other.</p> <p>The Planning Strategy sets out the overall strategy for Hastings, setting how much development is needed, where it will take place and by when. The themed based policies, also included in the Planning Strategy, reflect strategic borough-wide issues. The document does not allocate specific sites. This will be addressed through the</p>

Key Question	Possible Evidence	Evidence Provided
		forthcoming Development Management Plan which will also provide more detailed development management policies in relation to areas such as design, access and amenity.
24. Does the development plan document explain how its key policy objectives will be achieved?	i. Sections of the development plan document that identify the key objectives and how they will be delivered upon ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document	<a href="#">Part 6</a> of the submission version of the Planning Strategy - Monitoring and Implementation section, relate the strategic objectives to individual policies.
25. If there are development management policies, are they supportive of the strategy and objectives?	i. Sections of the development plan document that show how the development management policies: <ul style="list-style-type: none"> <li>• will help to deliver the strategy</li> <li>• derive from, and elaborate on, the objectives and policies of the plan</li> </ul>	The themed based polices of the submission version of the <a href="#">Planning Strategy</a> , are reflective of strategic borough-wide objectives.
26. Have the infrastructure implications of the	i. A section or sections of the development plan document where	The <a href="#">Infrastructure Delivery Plan</a> and Infrastructure Delivery Schedule elaborate on the infrastructure

Key Question	Possible Evidence	Evidence Provided
<p>strategy/policies clearly been identified?</p>	<p>infrastructure needs are identified and the proposed solutions put forward</p> <p>ii. Representations in respect of infrastructure</p> <p>iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with</p>	<p>proposals that support delivery of development and the timescales for their delivery</p> <p>Specific attention is paid to the Bexhill to Hastings Link Road development at Policy T1 of the Planning Strategy and within the supporting text which precedes this policy.</p>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<p>i. Sections of the development plan document setting out delivery mechanisms and timescale</p> <p>ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered</p> <p>iii. Research or studies that address matters of delivery and the realistic timescales</p> <p>iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms</p> <p>v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or</p>	<p>The Planning Strategy will be implemented over the plan period. An indication of the timescale for housing delivery is included in the Housing Trajectory at <a href="#">Appendix 2</a>. Other policies provide detail on the timescales relating to the delivery of development.</p>

Key Question	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>vi. reports by the authority or the relevant stakeholder</li> <li>vi. Correspondence from stakeholders on delivery mechanisms and timescale</li> <li>vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</li> </ul>	
<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"> <li>i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery</li> <li>ii. Representations in respect of infrastructure</li> <li>iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with</li> </ul>	<p>The <a href="#">Infrastructure Delivery Plan</a> and Planning Strategy have been produced in tandem.</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</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out responsibilities for delivery</li> <li>ii. Correspondence showing how other stakeholders intend to support the delivery of the policies</li> </ul>	<p>The majority of policies will be implemented by the Council through its development management function.</p> <p>Where other organisations are required to deliver policies, this is set out in the <a href="#">Infrastructure Delivery Plan</a></p>

Key Question	Possible Evidence	Evidence Provided
<p>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"> <li>iii. Reports by the council or the relevant stakeholder</li> <li>iv. Representations from stakeholders on implementation</li> <li>v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</li> </ul>	<p>Both statutory agencies and other delivery bodies, including developers and business organisations, have been involved in the development of the policies. This is set out in the <a href="#">Consultation Statement</a></p>
<p>31. Does the development plan document reflect the concept of spatial planning? 32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that reflect the plans or strategies of other bodies</li> <li>ii. Expressions of support from bodies responsible for other strategies affecting the area</li> <li>iii. Representations in respect of services provided by other agencies</li> <li>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</li> </ul>	<p>The Planning Strategy reflects the concept of spatial planning. It addresses planning issues identified at the sub-regional, borough-wide and at the local (Spatial Area) levels. This is evidenced in the cross boundary working, notably with Rother District Council, and the identification of spatial areas within the Borough, as well as the strong corporate dimension to the vision and objectives of the Plan as a whole.</p> <p>The full extent of cross-boundary working on strategic matters is contained in the <a href="#">Statement of Compliance: Duty to Co-operate</a>. The Planning Strategy joins up planning and land-use issues with other plans and proposals as set out in the <a href="#">Hastings &amp; St Leonards Sustainable Community Strategy</a>.</p>
<p>33. Does the development plan document take into account matters which may be</p>	<ul style="list-style-type: none"> <li>i. Explicit recognition within the development plan document that this may happen, and clear</li> </ul>	<p>The Planning Strategy has had regard to national and local economic conditions, the need to maintain flexibility the availability of infrastructure. The Planning Strategy</p>

Key Question	Possible Evidence	Evidence Provided
imposed by circumstance, notwithstanding the council's views about the matter?	information about how the plan strategy can accommodate them ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy	sets out an achievable but challenging strategy which is supported by background evidence studies. Further explanation of the Planning Strategy's flexibility is set out in the following section.
<b>Flexible</b>		
34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> <li>• the effectiveness of policies and what evidence is being collected to undertake this</li> <li>• changes affecting the baseline information and any information on trends on which the development plan document is based</li> </ul> iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline	Yes. Policies seek to strike a balance between providing certainty for all interested parties and providing flexibility to respond to changes in circumstances. Where appropriate, the wording of the policies provides flexibility; for example, affordable housing requirements are qualified by reference to viability, whilst quantitative requirements are either expressed as a range, as for housing, or as 'circa' amounts of employment and retail floorspace.  <a href="#">Part 6</a> – monitoring and implementation - of the Planning Strategy, sets out how the implementation of the Plan will be monitored. This will be reported in the Council's Annual Monitoring Report (AMR) and where it is evident that policies are not performing as intended, the AMR will indicate what actions will be taken to address such issues.

Key Question	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> </ul>	
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional spatial strategy?</p>	<ul style="list-style-type: none"> <li>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</li> <li>ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> </ul>	<p>Although the South East Plan is due to be abolished, the Planning Strategy has been prepared to be in general conformity with the Regional Spatial Strategy. The Council however, has undertaken further work with regard to a locally determined housing target, and whilst the evidence underpinning the preparation of the South East Plan provides the foundations, the Council has supplemented this through further examination of more recent information in order to determine the most appropriate level of housing growth. See the <a href="#">Explanation of Housing Evidence</a> background paper, and the joint <a href="#">Assessment of Housing Need in Hastings and Rother</a> paper.</p> <p>Policy DS1 in <a href="#">chapter 4</a> of the submission version of the Planning Strategy includes a housing implementation strategy.</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<ul style="list-style-type: none"> <li>i. A section of the development plan document which expressly addresses flexibility</li> <li>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</li> </ul>	<p>As 34 above</p>

Key Question	Possible Evidence	Evidence Provided
<b>Monitoring</b>		
<p>37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>iii. Reference to any other reports or technical documents which contain information on the delivery of policies</li> </ul>	<p><a href="#">Chapter 4</a> of the submission version of the Planning Strategy sets target for the delivery of housing, employment and retail space.</p> <p>This will be reviewed annually through the Annual Monitoring Report (AMR).</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"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>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</li> <li>iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators</li> </ul>	<p><a href="#">Part 6</a> of the submission version of the Planning Strategy sets out a monitoring framework. This will be a major component of the AMR.</p>
<p>39. Are suitable targets and</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan</li> </ul>	<p><a href="#">Part 6</a> of the submission version of the Planning Strategy</p>

Key Question	Possible Evidence	Evidence Provided
indicators present (by when, how and by whom)?	<ul style="list-style-type: none"> <li>document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories</li> </ul>	sets out a monitoring framework, this includes targets and indicators.
<b>National Policy</b>		
<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"> <li>i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy</li> <li>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</li> <li>iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement</li> <li>iv. Representations from the Government Office on the preferred strategy or the submitted development plan document</li> <li>v. Reports or copies of</li> </ul>	The assessment of compliance set out in the <a href="#">Local Plans and the National Planning Policy Framework - Compatibility Self Assessment Checklist</a> indicates that the Planning Strategy is in conformity with national planning guidance.

Key Question	Possible Evidence	Evidence Provided
	correspondence as to how Government Office representations have been considered and dealt with	
<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"> <li>i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons</li> <li>ii. Representations from the Government Office</li> <li>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</li> </ul>	No