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. A separate checklist looks at legal compliance.

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	Possible Evidence	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.*		
Vision and Objectives Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve? Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives? 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? Have reasonable alternatives to the quantum of development and overall spatial strategy been considered? 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?	• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. • Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. • The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.	Plan **Chapter 2** (pp.10-24) establishes a picture of North Hertfordshire from a range of sources. This enables key relationships, influences, challenges and opportunities to be identified. These have helped to inform the overall spatial vision for the district and the plan's strategic objectives which are contained in **Chapter 3** (pp.27-30). The key diagram, identified in the *Schedule of Proposed Additional Modifications* (**LP3**) shows how this vision will be delivered spatially. The Strategic Policies of the plan are contained in **Chapter 4** (pp.31-72). They demonstrate how the key elements of the vision and objectives will be realised. Issues of delivery and monitoring are covered in **Chapter 14** (pp.217-225). This includes identification of key partners, the basis of a monitoring framework for the plan and a number of issues which might trigger a full or partial review of the plan. This chapter contains a year-by-year housing trajectory. Evidence There are no outstanding substantive *representations* (**LP7**) from statutory consultees or Duty to Co-operate bodies in relation to the objectives or vision of the plan. North Hertfordshire have produced a single, local plan. The *Local Development Scheme* (**OLP1**) confirms its district-wide scope.
The presumption in favour of sustainable development (NPPF paras 6-17) Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or —specific policies in this Framework indicate development should be restricted.	• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below). • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)	Evidence Details of the evidence base establishing the development needs of the plan area are contained in the *Objectively Assessed Needs* section below. The development of the strategy contained in the submitted plan is contained within or can be derived from a number of the submitted documents. The plan has been developed across a number of iterations. Three regulation 18 consultations were carried out: *Housing Options Growth Levels and Locations* (**OLP3**) (February 2013), *Housing Additional Location Options* (**OLP4**)(July 2013) and *Preferred Options* (**OLP5**) (December 2014). These set out strategic choices in terms of key housing issues. Various alternative options have been considered and assessed through the *Sustainability Appraisal* process (**LP4**). Potential sites for housing development have been assessed through a series of *Strategic Housing Land Availability Assessments* (SHLAAs). These have been completed annually with the most recent 2016 update submitted as part of the evidence base for the plan (**HOU9**). Given the scale of unmet housing need arising from Luton, the Council commissioned work to inform an appropriate scale of contribution that could be made within North Hertfordshire (**HOU8**). Following publication of the submission plan, further joint work has ratified the outcomes of this study and also considered options for meeting development requirements across the wider housing market area (**HOU7**). The *Duty to Co-operate Compliance Statement* (**SOC1**) provides additional information on these joint projects. The *Housing and Green Belt Background* Paper (**HOU1**) and *Employment*

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Background Paper (**E5**) explain how key elements of the plan strategy have been arrived at. Other policy matters, such as retail, provision of infrastructure etc. are strongly influenced by the decisions made on these two matters.
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.	• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk)	**Policy SP1** (p.31) sets out the Council's overarching approach to sustainable development. It includes (criterion c) a clear, positive expectation that permission will be granted where development accords with the broad principles of sustainability.
Objectively assessed needs The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.	Evidence The Local Plan is underpinned by a comprehensive evidence base. In terms of housing, a range of joint work has been undertaken. *Housing Market Areas in Bedfordshire and surrounding areas* (**HOU2**) establishes the geography of housing market areas. The *Strategic Housing Market Assessment (SHMA)* (**HOU4**), as updated by *Updating the Overall Housing Need* (**HOU3**) demonstrates the calculation of objectively assessed needs for the district. The joint *Luton Housing Market Area Growth Study* (**HOU7**) assesses the potential for the significant housing requirement identified in this area – including unmet needs from Luton Borough – to be accommodated. The *Housing and Green Belt Background Paper* (**HOU1**) draws together the various strands of evidence and explains how the housing strategy in the plan has been derived, including consideration of 'Paragraph 14' constraints. In terms of employment, the joint *Functional Economic Market Area Study* (**E3**) establishes the evidential basis for co-operation with Stevenage and Central Bedfordshire on employment matters. Employment requirements for North Hertfordshire have been kept under review through this document and also the *North Hertfordshire Employment Land Review* (**E4**) and *Employment Background Paper* (**E5**). This last paper also explains how the employment strategy of the plan has been derived, including consideration of unmet employment needs from Stevenage. The *Duty to Co-operate Compliance Statement* (**SOC1**) provides additional information on the joint projects completed with other authorities.
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.	Plan The Spatial Vision p.27-29 and Economic Strategic Objectives (p.29-30) set the economic vision for the District. **Policy SP3** (p.35-38) sets out the Council's approach to the economy and employment, detailing the locations of future allocated employment land and the strategy for delivery over the plan period. Evidence The *Employment Land Review* (**E4**) provides key evidence with regards to vision and strategy in the plan as does *Functional Economic Market Area Study* (**ETC3**) and the updated *Employment Background Paper* (**E5**). **Policy SP3** in the plan

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		links to the Council's *Economic Development Strategy* (**E7**) and *Action Plan* (**E8**) and the Hertfordshire and the Greater Cambridgeshire, Greater Peterborough LEPs Strategic Economic Plans for delivery as set out in the Statement of Common Ground (**MOU9**).
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)	Plan **Policy SP3** (p.35-38) sets out the Council's criteria based approach to the economy and employment, detailing the locations of future allocated employment land and the strategy for delivery. **Policy SP7** provides the mechanisms to secure infrastructure from development both in the form of on-site provision and off-site contributions (pp.44-46). **Policy ETC1** (p.75) also sets the strategy and criteria in line with paragraph 22 of the NPPF. Evidence The *Employment Land Review* (**E4**) provides key evidence with regards to policies and strategy in the plan and the assessment of existing and proposed employment areas. Evidence on the employment figures was updated with Central Bedfordshire and Stevenage Borough Council as part of the *Functional Economic Market Area Study* (**E3**) and to assess the level of provision within the wider area, accounting for Stevenage's potential shortfall of land. The district-wide figures for employment needs were updated in the *Employment Background Paper* (**E5**) following the most recent run of the East of England Forecasting Model and updating of Stevenage's evidence.
2. Ensuring the vitality of town centres (paras 23-37)		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	• The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.	Plan Policy **SP4** (p.38-40) sets out the hierarchy of centres in the District and the strategy for retail and town centres over the plan period. Town centre areas are designated on the Councils Submission Proposals Map (**LP2**). **Policy ETC3** (p.77) sets the requirements for new retail, leisure and other main town centre uses. Evidence The evidence and discussion of the hierarchy of centres is detailed in the *North Hertfordshire Retail Study Update* (**E1**). The strategy for meeting need is also set out in the *North Hertfordshire Retail Study Update* (**E1**) and the *Retail Background Paper* (**E2**).
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)	• An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages identified and allocated.	Plan The requirement for additional main town centre uses is set by Policy **SP4** (p.38-40) over the plan period. Additional retail allocations are detailed in the Communities section **(Chapter 13)** in relation to specific settlements such as in Hitchin sites HT11 and HT12 (p.165); Letchworth Garden City sites LG19, LG20 and LG21 (pp186-187); Royston site RY12. These sites are shown on the Submission Proposals Map **(LP2)** as Mixed Use Allocations. Policies **ETC4** and **ETC5** (p.79-80) identify the requirements for Primary and Secondary Frontages in the district's town centre. The extents of the frontages are detailed on the Submission Proposals Maps (**LP2**).

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<u>Evidence</u> The evidence and discussion of both the assessment of need and the extent of the town centre frontages is detailed in the *North Hertfordshire Retail Study Update* (**E1**). In addition the detailed strategy for meeting need is set out in the *Retail Background Paper* (**E2**).
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	• Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities.	<u>Plan</u> **Policy SP3** (pp.35-38) sets the strategy for the economy and employment and specifically references, in (criterion g.), support for employment outside of designated centres recognising growth of the rural area in paragraph 4.35 of the supporting text. **Policy ETC2** (p.77) sets the requirements where development outside of designated employment areas will be granted. **Policy ETC8** (82-83) sets the requirements in relation to tourism specifically requesting how the proposals will support the rural economy. <u>Evidence</u> The *Employment Land Review* (**E4**) and *Economic Development Strategy* (**E7**) provide evidence in relation to the growth within the rural area and support for the policy approach.
4. Promoting sustainable transport (paras 29-41)		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29) Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30) Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31) Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32) Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34) Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35) Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37) For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as	• Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. • Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. • A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. • If local (car parking) standards have been prepared, are they justified and necessary? (39) • Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.	<u>Plan</u> **Policy SP6** (pp.43-44) sets out the Plan's overarching approach to sustainable transport. **Policy T1** (pp.89-90) contains detailed requirements for development management purposes, including that major development must demonstrate access by a range of modes. **Policy SP7** provides the mechanisms to secure infrastructure from development both in the form of on-site provision and off-site contributions (pp.44-46). The overall housing strategy is set in **Policy SP8** (pp.47-51). The six Strategic Sites all adjoin the largest towns as identified in the plan's settlement hierarchy defined by **Policy SP2** (pp32-34). A review of the housing trajectory set out in the *Housing and Green Belt Background Paper* (**HOU1**), shows that over the plan period, approximately 5 out of every 6 homes to be built are anticipated to be within or adjoining these largest settlements. **Policy SP3** (pp.35-38) sets out the plan's approach to employment. It identifies that 'overproviding' employment against modelled needs and addressing unmet employment needs from Stevenage presents opportunities to reduce commuting that occurs across and beyond the District over the plan period. **Policy T2** (pp.90-91) established that car parking must be provided in accordance with the standards in the plan (as set out in Appendix 4, p.243). The policy states that experience in North Hertfordshire shows that insufficient parking provision in residential environments can have an adverse impact (para 7.11). All of the proposed strategic housing sites have their own policies (**Policies SP14 to SP19**, pp.61-72) incorporating a range of land uses, including education and neighbourhood retail facilities, to promote sustainable communities. Where appropriate, specific sustainable transport measures are also identified, see **Policy SP14** (criterion e.) (p.61). These are supplemented by the generic

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
primary schools and local shops should be located within walking distance of most properties. (38) The setting of car parking standards including provision for town centres. (39-40) Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)		requirements of **Policy T1** requiring, for example, the provision of demarcated cycle routes on the principal arterial roads of larger developments. Evidence North Hertfordshire has worked with both Hertfordshire County Council (HCC) and the Bedfordshire authorities to understanding transport impacts. *East of Luton Urban Extension Stage 2 Transport Modelling* (**TI7**) examines the 'in combination' effects of proposed development within Luton and North Hertfordshire. The *North Hertfordshire Local Plan Model Testing* (**TI4**) examines the impact of proposed growth on the road network along the A1(M) corridor. This is supplemented by the *Baldock Link Road Testing paper* (**TI5**) which specifically tests the implications of new road connections proposed as part of the plan's housing allocations in the town. The mitigation schemes identified by this work are included in the *Infrastructure Delivery Plan* (**TI1**) Following completion of the above work and preparation of the Proposed Submission consultation on the Local Plan, HCC consulted upon their Transport Vision 2050 (**TI8**). To address the implications of this, the District and County Council have agreed a *Direction of Travel* (**MOU3**). This will lead to the production of the *North Hertfordshire Transport Strategy* (forthcoming). The *Duty to Co-operate Compliance Statement* (**SOC1**) provides additional information on these joint projects.
5. Supporting high quality communications infrastructure (paras 42-46)		
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)	• Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.	The provisions and requirements of the NPPF and GPDO provide sufficient guidance on this matter. It is considered that a specific local policy would result in duplication of national guidance and has not been included.
6. Delivering a wide choice of high quality housing (paras 47-55)		
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	• Identification of: a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) • A SHLAA	Plan **Policy SP8 (criterion c. and d.)** (p.47) set out the overall sources of land supply and a commitment to maintain a five-year housing land supply respectively. This is achieved through a combination of the strategic Housing Allocations (**Policies SP14 to SP19**, pp.60-72), Local Housing Allocations (**Policy HS1**, p.92 & pp135-215) and other allowances identified in the plan. The monitoring framework includes indicators relating to land supply and the anticipated housing trajectory at the time of writing. This can be found in **Chapter 14** (pp.220-223).
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15	Evidence
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)	• A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47)	The detailed calculations of the plan's housing supply are in the *Housing and Green Belt Background Paper* (**HOU1**). This contains: • Detail of the housing trajectory and five-year supply (pp.33-34); and • A year-by-year / site-by-site breakdown (Appendix 3) This document also contains consideration of the 'exceptional circumstances' which are considered to exist to justify a review of Green Belt boundaries to

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		release land for employment and housing-led development. The most recent (2016) *Strategic Housing Land Availability Assessment* has been submitted as part of the evidence base (**HOU9**). This contains the justification for the inclusion of windfall allowances in the housing trajectory, including in the first five years of the plan (pp.7-9)
Set out the authority's approach to housing density to reflect local circumstances (47).	• Policy on the density of development.	<u>Plan</u> **Policy HS3 (criterion b.)** (p.95) requires housing development to provide a density of development appropriate to its location and surroundings. The supporting text to this policy (para 8.21) identifies that, given the design-led approach to development set out in the plan, district-wide density standards have not been prescribed. Further advice on design is contained in **Policy SP9** (p.52) and **Policy D1** (p.101). <u>Evidence</u> The dwelling estimates for the proposed housing allocations are informed by density assumptions as set out in the *Strategic Housing Land Availability Assessment* (**HOU9**).
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)	• Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50) • Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)	<u>Plan</u> **Policy SP8** (pp.47-51) sets out the overall approach to housing. This includes targets for development, affordable housing, house size and self-build. **Chapter 8** (pp.92-100) contains detailed policies on housing matters including supported, sheltered and older persons housing. Within this chapter, **Policy HS2** (pp92-94) addresses affordable housing and the presumption in favour of on-site provision (criterion a. ii.). Paragraph 8.11 states that the onus will be firmly upon the applicant to demonstrate that any exceptional circumstances exist to justify off-site provision contributions in lieu of affordable housing provision on-site. **Policy SP7** (pp.44-45) sets out the approach where developers consider there will be adverse impacts upon viability. (Criterion b. v.) of **Policy HS2** (pp 92- 93) links to **Policy HS3** (p.95) and aims to ensure that mixed and balanced communities are created by responding to specific housing needs across the District. **Policy HS4** (pp 95 -96) (criterion e. and f.) outlines that residential developments of 100 units or more will be required to provide an element of accommodation within Use Class C3 for older persons housing, and on Strategic Sites, provide some accommodation in Use Class C2. Self-build targets are outlined for the Strategic Housing Sites **Policies SP14 to 19** (pp.61-72). **Policies HS5** (pp.97-98) and **HS6** (p.96) sets out the requirements to meet the demand and needs of different groups . **Policy HS7** on gypsies, travellers and travelling showpeople provides a criteria-based approach to the meeting needs of this group of the community (pp.98-100). <u>Evidence</u> Volume 2 of the *SHMA* (**HOU5**) provides the assessment of future housing requirements in terms of tenure mix and unit sizes. The *Housing and Green Belt*

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Background Paper (**HOU1**) explains how these findings have been translated into policy. No uplift to the objectively assessed housing need is considered necessary to address affordable housing need but a small adjustment (200 units) is made to address housing requirements for older persons (para 5.10-5.22, pp27-28). This document also sets out how the Council has used the SHMA to inform the house size and affordable housing tenure mix requirements of the plan (Ch. 6, pp.35-36). **For Policies HS5 and HS6**: *Stevenage and North Hertfordshire SHMA Update Volume Two establishes the need for all types of housing* (**HOU5**) A *Gypsy and Traveller Accommodation Assessment* (**HOU10**) was produced in order to inform **Policy HS7** identifying the predicted levels of need over the plan period. Following updates to National Planning Guidance in *Planning for Travellers sites* and changes to definitions of what constituted a Gypsy or Traveller *the Pulmore Water Capacity Study* (**HOU11**) was produced to define in more detail who was onsite and to clarify an issue that arose in the GTAA with regards to non-travellers onsite.
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). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new isolated homes listed at para 55.	Plan **Policy CGB2** (pp84-86) sets out the Council's rural exceptions policy. This includes permitting the provision of limited market housing to cross-subsidise schemes in exceptional circumstances. More generally, **Policy SP2** (pp.32-34) explains how general development will be permitted within the defined boundaries of identified 'Category A' villages and infilling development within the built core of 'Category B' villages. The Council will generally rely on a combination of national policy and the design policies of the plan (particularly **Policies SP9, D1 & D2**) (pages 52, 101 and 103 respectively) to consider proposals for development in residential gardens and isolated locations.
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).	• Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues	Plan The Spatial Vision and the environmental strategic objectives (pp 27-29) in **Chapter 3** seek to protect and enhance the local distinctiveness and character of settlements across the District through appropriate design. **Policy SP9** (p.52) is the Council's strategic policy on design. **Policies D1 to D3** (pp.101-104) provide more detailed advice. The plan cross references other relevant material considerations including the Council's Design SPD. The Strategic Housing Sites (**SP14 to 19** (pp.61-72) and the allocations in the Communities section of the Plan (**Chapter 13** (pp.133-215) additionally outline specific design measures.
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).	• Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of	Plan **Policy SP10** (p.53) sets out the Council's strategic policy on healthy communities. (Criterion a.) of the policy states that the Council will support the retention of existing community, cultural, leisure or recreation facilities and (criterion b.) of the same policy states that the Council will require appropriate levels of new community, cultural, leisure and built sport and recreation

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)	facilities to be provided in new development. This policy together with those listed below have been included in the Local Plan in recognition of the fact that community and recreation facilities together with green spaces can play an important role in the life of local people. **Policy HS5** (p.97) outlines the requirements for residential development in relation to meeting the accessible housing needs of the District. **Policy NE5** (criterion a.) (p.114) states that development proposals should provide high quality, on-site, fully publically accessible open space having regard to the Council's open space standards. Quality will be protected in the longer term through (criterion d.) of the policy, which requires that applicants submit a long term maintenance and management plan. **Policy HC1** (p.108) seeks to retain existing community facilities as they provide opportunities for social interaction which are not easily replaced if lost. **Policy D1** (criterion v. and vii.) seek to ensure that the design and location of new development are accessible to all potential users as well as creating safe and attractive places by designing out opportunities for crime and anti-social behaviour. Evidence The *Stevenage and North Hertfordshire SHMA Update Volume Two - establishing the need for all types of housing* (**HOU5**) establishes the need for accessible and adaptable housing in the District and the thresholds used in the Local Plan are tested in the *Local Plan Viability Assessment Update - Final Report* (**TI2**) The *North Hertfordshire Open Space Review and Standards* (**OSC4**) underpins **policies NE4** and **NE5** which seek to protect existing and make provision for publically accessible open space and biodiversity. The Council's A *Green Space Management Strategy for North Hertfordshire* (**ORD2**) sets out opportunities and priorities for high quality public open space. The *Equality Impact Assessment* (**SOC5**) identifies how the emerging policies aim to deliver inclusive communities and positive interaction between different groups within the local community. The *Community Halls Strategy*, (**OSC3**) identifies existing facilities and gives an indication of where future development might result in community space deficiencies.
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	• Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.	Plan **Policy SP10** (p.53) sets out the Council's strategic policy on healthy communities, where (criterion a.) of the policy states that the Council will support the retention of existing community, cultural, leisure or recreation facilities and criterion (b.) states that the Council will require appropriate levels of new community, cultural, leisure and built sport and recreation facilities to be provided in new development. **Policy HC1** (p.108) seeks to encourage community facilities to be provided in locations that are accessible, help to reduce the need to travel and provide opportunities for people to participate in activities within their own communities. The policy lists a set of criteria against which any loss of

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		community facilities would need to be justified. **NE5** (criterion a.) (p.114) states that development proposals should provide high quality, on-site, fully publically accessible open space having regard to the Council's open space standards. Quality will be protected in the longer term through (criterion d.) of the policy, which requires that applicants submit a long term maintenance and management plan. The Strategic Housing Sites (**SP14 to 19** (pp.61-72) and the allocations in the Communities section of the Plan (**Chapter 13** (pp.133-215) additionally outline site-specific requirements for shared space, community facilities and other local services. Evidence The *Community Halls Strategy*, (**OSC3**) identifies existing facilities and gives an indication of where future development might result in community space deficiencies. The *North Hertfordshire Open Space Review and Standards* (**OSC4**) underpins **Policy NE5** and seeks to protect existing and make provision for publically accessible open space. The *Infrastructure Delivery Plan* (**TI1**) produced in consultation with a wide range of service providers identifies a range of community facilities and local services that would need to be provided arising from the implementation of the plan. This includes a schedule of projects setting out delivery responsibilities. The *Duty to Co-operate Compliance Statement* (**SOC1**) provides further detail of the Council's interactions with various bodies on the provision of community facilities.
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75)	Plan **Policy NE4** (p.113) seeks to protect publically accessible open space and sets out the approach where there is a proposed loss of open space to ensure protection of open spaces across the District. This policy includes exceptions, which are detailed in both (criterion a. and b.) of this policy. **Policy NE5** (pp. 114-115) for new and improved public open space and biodiversity will be applied in securing new open space, or financial contributions towards open space provision in exceptional circumstances. This will address deficits in provision, both in terms of quantity and quality. Public rights of way and access are protected and enhanced by **Policy SP6** Sustainable transport (criterion g.) (p.43). This policy is supported by paragraph 4.72 (p.44), which acknowledges that whilst public rights of way are protected under their own statutory regime, the Council's general expectation is that existing rights of way should be incorporated into the green infrastructure of development proposals. Further to this, existing routes and alignments should be maintained. In terms of enhancing public rights of way, **Policy SP12** on green infrastructure, biodiversity and landscape 9criterion a.) (p.56) states that the Council will protect, enhance and manage the green infrastructure network and seek opportunities to create new green infrastructure.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		The Strategic Housing Sites **Policies SP14 to 19** (pp.61-72) and the allocations in the Communities section of the Plan (**Chapter 13** (pp.133-215) additionally provide policy detail where there is a Public Right of Way (PRoW) that affects the site in question. Evidence The *North Hertfordshire Open Space Review and Standards* (**OSC4**) provides the background assessment in support of **policies NE4** and **NE5**. This document provides an up-to-date quantitative and qualitative assessment of the needs for open space, sport and recreation facilities as well as information on provision and the resulting surpluses and deficits. The standards are derived from this assessment and set out the type and quality of open space that will be required. The Council's A *Green Space Management Strategy for North Hertfordshire* (**ORD2**) identifies opportunities and priorities for open space projects and outlines work recently completed. This provides information on the current quality of current provision and where quality improvements are needed. The North Hertfordshire Playing Pitch Strategy and Indoor Sports Facilities Study Assessment Reports **(OSC1 and OSC2)** provide an assessment of the current provision and requirements for outdoor and indoor sports provision across the District.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)	Plan **Paragraph 11.31** (p.116) identifies that the plan does not designate Local Green Space but will support their designation in Neighbourhood Plans where appropriate. **Policy SP1** (pp.31-32) recognises the importance of local knowledge and the role that Neighbourhood Plans can play.
9. Protecting Green Belt land (paras 79-92)		

Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)
Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)
When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)
Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)
	• Where Green Belt policies are included, these should reflect the need to:
	  o Enhance the beneficial use of the Green Belt. (81)
	  o Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)
	  o Specify that inappropriate development should not be approved except in very special circumstances. (87)
	  o Specify the exceptions to inappropriate development (89-90)
	  o Identify where very special circumstances might apply to renewable energy development. (91)
		Plan
		
		Policy SP5 sets out the overarching approach to Green Belt (pp.41-42). The plan conducts a comprehensive review of the Green Belt to enable development that will meet the identified housing and employment needs of the District. New Green Belt is also to be provided.
		
		In most cases, revised Green Belt boundaries have been set using physical features likely to be permanent. Where this is not considered possible or appropriate, the plan contains policy provisions requiring relevant development schemes to create or reinforce appropriate boundaries. For example **Policy SP15(criterion e.)** (p.63-64), **Policy SP16(criterion f.)** (p.65-66) and **Policy SP18(criterion g.)** (pp.69-70)
		
		To avoid unnecessary duplication of national policy, the Council will rely on the provisions of the NPPF to determine if development on land within the Green

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Belt [following the proposed review] can be supported in principle. Where this is the case, the detailed policies of the plan will be used to determine whether permission should be granted. Evidence The plan is supported by a *Green Belt Review* (**CG1**) which assesses existing, and potential new, Green Belt in the District against the defined purposes in the NPPF. The *Housing and Green Belt Background Paper* (**HOU1**) contains the consideration of the 'exceptional circumstances' test set out in national policy for a plan-led review of Green Belt boundaries.
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)	• Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy . (95))	Plan Addressing climate change is a theme that permeates throughout the submitted plan (**LP1**). In particular this can been seen in the **Vision & Objectives** (pp.27-29), **Policy SP1** (pp.31-32), **Policy SP11** (pp.55-56) and the detailed policies on the natural environment contained in **Chapter 11** (pp.110-126). All of the proposed strategic housing sites have their own policies (**Policies SP14 to SP19**, pp.61-72) incorporating a range of land uses, including education and neighbourhood retail facilities, to promote sustainable communities and reduce the need to travel. **Policy D1** (pp.101-103) requires applicants to take all reasonable opportunities to reduce energy consumption and waste (criterion b, iii).
Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)	• A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)	Plan **Policy SP11** (p.55) sets out the plan's strategic approach to renewable and low carbon energy. **Policy NE12** (pp.125-126) provides the detailed framework for assessing relevant proposals. **Policy D1** (pp.101-102) places a generic responsibility on new development to seek to reduce energy consumption. Evidence The *Hertfordshire Renewable and Low Carbon Energy Technical Study* (**TI12**) identifies energy opportunity areas in the District.
Minimise vulnerability to climate change and manage the risk of flooding (99)	• Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures	Plan **Policy SP11** (p.55) sets the strategic approach to flood risk in the plan. This is set out in more detail in **Policies NE7** and **NE8** (p.119-121) in relation to both flood risk and sustainable drainage systems. Evidence The *Strategic Flood Risk Assessment (SFRA) Update* (**NHE12**) provides detailed guidance in relation to the sequential testing of the sites in the plan for both existing and future flood risk taking account of climate change. The document was produced in consultation with both the Environment Agency and the Lead Local Flood Authority. The information in the recent SFRA provides an update to much of the mapping and site level information from the original SFRA (**NHE13**) although information

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		in this document also remains relevant.
Take account of marine planning (105)	• *Not applicable to North Hertfordshire*	None
Manage risk from coastal change (106)		
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. • Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.	Plan **Policy SP1 on s**ustainable development (criterion c. iv.) (p.31) states that the Council will protect key elements of North Hertfordshire's environment including important landscapes, heritage assets and green infrastructure (including the water environment) **Policy SP12** (pp.56 -57) sets out the Council's approach to the protection and enhancement of green infrastructure, biodiversity and landscape. This policy seeks to protect, enhance and manage biodiversity networks including wetland and riverine habitats, Local Geological Sites and seek opportunities for net gains for biodiversity. **Chapter 11** contains detailed policies on Green Infrastructure **Policy NE2** and the Chilterns AONB, **Policy NE3** (pp.110 – 113)
Prevent unacceptable risks from pollution and land instability (109)	• Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.	Plan **Policy D3 (p.104)** protects living conditions, including safeguarding against the impacts of pollution, whilst **Policy D4** (pp.105-107) specifically sets out the Council's approach to dealing with air quality issues. **Policy NE11** (pp.124-125) requires the appropriate assessment and treatment of (potentially) contaminated land. Parts of North Hertfordshire lie under flight paths into and out of London Luton Airport. **Policy SP19 (criterion j.)** (p.71) requires appropriate noise mitigation measures in development to the east of Luton. Similar site-specific criteria are included in other local housing allocations as required. Evidence The policy approach to these issues has largely been guided by the responses of relevant consultees such as the Environment Agency and London Luton Airport Operations Limited as well as internal advice from the Council's Environmental Health team. A specific *Baldock Air Quality Paper* (**TI6**) addresses concerns raised by consultees in relation to the proposed growth of the town.
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	• Identification and mapping of local ecological networks and geological conservation interests. • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species	Plan **Policy SP12** (p.56) on green infrastructure, biodiversity and landscape (criterion b.) states that the Council will protect, enhance and manage biodiversity networks including wetland and riverine habitats, Local Geological Sites and seek opportunities for net gains for biodiversity. **Policy NE5 (criterion c.)** (pp. 114-115) requires that development proposals contribute to net gains for biodiversity, ecological networks and the water environment and/or restores degraded or isolated habitats. **Policy NE6** (p.117) on designated biodiversity and geological sites provides further detail, setting out a hierarchy for designated sites, requirements for an ecological survey, a mitigation hierarchy, management of construction impacts and requirements for a long term management plan including mitigation

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		measures as necessary. The policy also covers non-designated sites that include important habitats and species as well as Local Geological Sites. Priority habitats are covered by **Policy NE6** (criterion c. ii.) , and in paragraphs 11.50 and 11.51 of the plan. The Strategic Housing Sites **Policies SP14 to 19** (pp.61-72) and the allocations in the Communities section of the Plan, **Chapter 13** (pp.133-215), provide policy detail to minimise impacts, where applicable. Evidence The Hertfordshire Environmental Records Centre (HERC) updates the list of designated Wildlife Sites, LNRs, SSSIs and Local Geological Sites on a regular basis as well as sites of ecological interest. This information is then transferred onto the Council's online Interactive Mapping, which can be accessed by members of public, along with in Cadcorp in Accolaid, which is used by case officers. Sites of Special Scientific Interest are shown on the Submission Proposals Map **(LP2).** Herts and Middlesex Wildlife Trust and the Local Nature Partnership have developed the ecological networks mapping system, which will be used where off-site compensation is delivered as a last resort. This provides the basis of targeted habitat creation to maximise the benefits to biodiversity of any required ecological measures. The *Hertfordshire Local Nature Partnership (LNP)* 'Planning for biodiversity and the natural environment in Hertfordshire: guiding principles **(ORD3)** have also been used to inform the policies relating to biodiversity in the Plan.
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)	• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets • A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)	Plan **Policy SP13** (pp.57-59) sets the Council's strategy for the conservation and enjoyment of the historic environment. This is supplemented by detailed policies in **Chapter 12** (pp.127-130) relating to the historic environment. Sites allocated in the plan that have the potential to lead to less than substantial harm to a designated heritage asset and / or its setting have been weighed against the public interest test and mitigation or guidance measures are set out in the plan where necessary. See, for example, **Policy SP14 (criterion l.)** (pp.61-62) and **Policy SP16(criterion h.).** Evidence A series of *Heritage Assessments* for those settlements or allocations where particular issues were raised by Historic England and consultees have been completed for *Ashwell* (**NHE1**), *Baldock* (NHE2), *Barkway* (**NHE3**), central *Hitchin* (**NHE4**), *Ickleford* (**NHE5**), *Little Wymondley* (**NHE6**) and the land *North of Stevenage* (**NHE7**). The *Housing and Green Belt Background Paper* (**HOU1**) shows how heritage impact considerations have been weighed in arriving at the development

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		strategy in the plan.
13. Facilitating the sustainable use of minerals (paras 142-149)		
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.	Plan **Chapter 2** (p.20) acknowledged the role of Hertfordshire County Council (**HCC**) as the minerals planning authority. Following advice from HCC, the *Schedule of Proposed Additional Modifications* (**LP3**) includes additional advice on minerals matters (p.1) and proposed extra site-specific criteria for sites with potential minerals implications (p.10). Evidence The *Duty to Co-operate Compliance Statement* (**SOC1**) provides further detail of the Council's interactions with HCC on minerals planning matters. A Memorandum of Understanding is in preparation with HCC.
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. To be 'justified' a DPD needs to be: • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area; and the most appropriate strategy when considered against reasonable alternatives.		
Participation Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI	The *Reg. 18 Consultation Statement* (**LP5**) sets out the early stage consultations undertaken, the responses received and the main issues raised. The *Reg. 22 Consultation Statement* (**LP6**) identifies the main issues arising from the proposed submission consultation. The Council's *Statement of Community Involvement* (**OLP2**) was updated in 2015.
Research / fact finding Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?	• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. AND • Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. OR • A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. OR • For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).	Plan **Chapter 1** (pp.5-9) provides an overview of the framework within which the new local plan has been developed. This includes identification of consultations undertaken at the preparation stage which have also been submitted as part of the document library (**OLP3, OLP4 & OLP5**). Where relevant to the understanding of the strategy, the plan explains why alternate options have not been pursued. See, for example, the discussion new settlements in **paragraphs 4.100 to 4.103** (p.50). Policies or statements in the plan that rely upon specific evidence contain footnotes citing the relevant documents or studies. The supporting text to each of the strategic policies in **Chapter 4** (pp.31-72) contains an overview of the key findings of the Sustainability Appraisal (**LP4**) in relation to each policy area. Evidence The submission Local Plan is supported by a wide ranging evidence base. This covers a wide range of topics including housing, employment, retail, Green Belt, transport & infrastructure, landscape, heritage and open space. References to relevant studies are set out as required against the individual questions in this assessment. All of the submitted evidence is listed in full in the document library. This includes the *Sustainability Appraisal* of the plan (**LP4**).
Alternatives Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken? Does the sustainability appraisal show how the different options perform	• Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the plan.	Throughout the local plan's preparation the SA/SEA process has tested reasonable alternatives to help inform the strategy, sites and policy framework within the plan. Section 4 (p.26) of the *Sustainability Appraisal of the Proposed Submission Local Plan* (**LP4**) identifies the different options considered for both strategic and

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
and is it clear that sustainability considerations informed the content of the DPD from the start?	• Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.	non-strategic issues setting out the rational for the chosen option(s), this summarises the information contained within Appendices 3 and 4 of the main report. Iterations of the SA have informed all stages of the plan's preparation. The *Housing and Green Belt Background Paper* (**HOU1**), *Employment Background Paper* (**E5**) *North Hertfordshire Retail Study Update* (**E1**) and *Retail Background Paper* (**E2**) are key documents explaining how competing requirements and evidence have been balanced to derive the strategy set out in the plan.
Effective: the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. To be 'effective' a DPD needs to: • Be deliverable; Demonstrate sound infrastructure delivery planning; Have no regulatory or national planning barriers to its delivery; Have delivery partners who are signed up to it; Be coherent with the strategies of neighbouring authorities; Demonstrate how the Duty to Co-operate has been fulfilled; Be flexible; Be able to be monitored		
Deliverable and Coherent • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved?	• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).	Plan Issues of delivery and monitoring are covered in **Chapter 14** (pp.217-225). This includes identification of key partners, the basis of a monitoring framework for the plan and a number of issues which might trigger a full or partial review of the plan. This chapter contains a year-by-year housing trajectory (p.223). Evidence North Hertfordshire have produced a single, local plan. The *Local Development Scheme* (**OLP1**) confirms its district-wide scope. Memoranda of Understanding, or other agreements, have been completed with a range of agencies including Hertfordshire County Council as highway authority (**MOU3**), the Environment Agency (**MOU5**), Anglian and Thames Water (**MOU2 & MOU6**), Hertfordshire LEP (**MOU9**) and neighbouring local planning authorities (**MOU1, 4, 7, 8, 10 & 11**). Other agreements continue to be prepared. The *Duty to Co-operate Statement of Compliance* (**SOC1**) provides further detail of engagement with relevant bodies as the plan was prepared.
Infrastructure Delivery • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?	• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.	Plan **Policy SP7** (pp.44-46) sets out the overarching approach to infrastructure requirements and developer contributions. Site specific requirements for infrastructure including education, transport and community retail facilities are set out for sites as required in **Policies SP14 to 19** (pp.61-72) and **Chapter 13** (pp.133-215). **Policy HC1** (pp.108-109) supports the provision of new community facilities in response to identified needs. Issues of delivery and monitoring are covered in **Chapter 14** (pp.217-225). Evidence The Infrastructure Delivery Plan (**TI1**) was produced in consultation with a wide range of service providers and identifies key infrastructure requirements arising from the implementation of the plan. This includes a schedule of projects setting out delivery responsibilities. Memoranda of Understanding, or other agreements, have been completed with a range of agencies including Hertfordshire County Council as highway authority (**MOU3**), the Environment Agency (**MOU5**), Anglian and Thames Water (**MOU2 & MOU6**), Hertfordshire LEP (**MOU9**) and neighbouring local

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		planning authorities (**MOU1, 4, 7, 8, 10 & 11**). Other agreements continue to be prepared. The *Duty to Co-operate Statement of Compliance* (**SOC1**) provides further detail of engagement with relevant bodies as the plan was prepared. The cumulative policy requirements of the plan have been tested through the *Local Plan Viability Assessment* (**TI2**).
Co-ordinated Planning Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?	• Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area	Plan **Chapter 2** of the plan sets out its relationship with other relevant plans and strategies (pp.15-22) that have been taken into account in its production. The Strategic Policies, particularly **Policy SP3** (pp.35-38), **Policy SP6** (pp.43-44), **Policy SP10** (pp.53-54) and **Policy SP11** (pp.55-56) commit to positively addressing the requirements of external agencies and /or their strategies. Evidence Memoranda of Understanding, or other agreements, have been completed with a range of agencies including Hertfordshire County Council as highway authority (**MOU3**), the Environment Agency (**MOU5**), Anglian and Thames Water (**MOU2 & MOU6**), Hertfordshire LEP (**MOU9**) and neighbouring local planning authorities (**MOU1, 4, 7, 8, 10 & 11**). Other agreements continue to be prepared. The *Duty to Co-operate Statement of Compliance* (**SOC1**) provides further detail of engagement with relevant bodies as the plan was prepared.

Flexibility
• Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?
• Does the DPD include the remedial actions that will be taken if the policies need adjustment?
	• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.
	• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:
	   a. the effectiveness of policies and what evidence is being collected to undertake this
	   b. changes affecting the baseline information and any information on trends on which the DPD is based
	• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances
	• Sections within the DPD 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
	• Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.
		Plan
		
		These issues are covered in **Chapter 14** of the plan (pp.217-225). This includes identification of key delivery partners, the basis of a monitoring framework for the plan and a number of issues which might trigger a full or partial review of the plan.
		
		Evidence
		
		The latest *Annual Monitoring Report 2015/16* (**OLP6**) contains a range of monitoring indicator. It is anticipated that many of these indicators will be maintained in a full monitoring framework of the new plan which will be set out in the AMR for 2016/17.

Co-operation • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? • Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?	• A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. • The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues	Evidence A *Duty to Co-operate Compliance Statement* (**SOC1**) has been submitted alongside the plan. This sets out, by theme, details of (as applicable) joint evidence work, representations received and issues raised during the preparatory phases of the plan, the outcomes in the submitted plan and details of any relevant Memoranda of Understanding **(MOU1-11 inclusive)** or other agreements.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.	
Monitoring • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?	• Sections of the DPD setting out indicators, targets and milestones • Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal	Plan A number of key indicators and targets for monitoring the strategic policy requirements of the plan are contained in **Chapter 14** (pp.220-222). A full monitoring framework of the new plan will be set out in the AMR for 2016/17.
Consistent with national policy: *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.* The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.		
• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?	• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement • Reports or copies of correspondence as to how representations have been considered and dealt with.	The Council does not consider that the plan contains any policies and proposals that are not consistent with national policy. The Council does not consider that the plan contains any policies that do not add anything to existing national guidance.

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	Possible Evidence	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.	- Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.	Evidence The *Gypsy, Traveller and Showperson Accommodation Assessment Update* (**HOU10**) establishes need for additional accommodation in consultation with the travelling community in North Hertfordshire. The *Pulmore Water Capacity Study* (**HOU11**) provides an analysis of the site near Codicote, including further site visits, which has a complex planning history. Memoranda of Understanding with neighbouring *Welwyn Hatfield* (**MOU7**) and *Stevenage* (**MOU11**) demonstrate a common understanding of issues.
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.	- Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. - Collaborative working with neighbouring local planning authorities. - A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.	
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. Ensure that traveller sites are sustainable economically, socially and environmentally.	- Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. - An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified.	Plan **Policy SP8(c)(iv)** (p.47) identifies the pitch target for gypsies and travellers. **Policy HS7** (pp.98-100) provides the allocation which can meet these needs in full along with criteria for the determination of any further planning applications over the lifetime of the plan. Evidence The *Gypsy, Traveller and Showperson Accommodation Assessment Update*

Policy Expectations	Possible Evidence	Evidence Provided
	• Policy which takes into account criteria a-h of para 11	(**HOU10**) establishes need for additional accommodation in consultation with the travelling community. The *Pulmore Water Capacity Study* (**HOU11**) provides an analysis of the site near Codicote, including site visits, which has a complex planning history. This demonstrates that this site can meet identified needs in full.
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.		Plan As a criteria-based policy dealing with planning applications, **Policy HS7 (criterion d.(ii))** (p.99) requires that a proposed site has no significant impact on the amenity of nearby residents or adjoining landowners.
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.	• If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.	Not applicable
Policy E: Traveller sites in Green Belt (paras 14-15)		
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. 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 the plan-making process.	• Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.	Plan The site identified in **Policy HS7** (pp.98-100) is located within the Green Belt. It is not proposed to remove this area from the Green Belt as it forms part of a caravan site which it is not considered appropriate to inset as a whole. Insetting of only part of the site is not considered appropriate in planning terms.
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.	• Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. • N.B. Mixed use should not be permitted on rural exception sites	Not applicable
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.	• Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.	Not applicable

Soundness Self-Assessment Checklist

Integration of marine and terrestrial planning

Not applicable – North Hertfordshire does not overlap with the UK marine area. Section not completed.