

East Herts District Plan 2011-2033

Soundness Self-Assessment Checklist

This checklist has been prepared for the East Herts District Plan 2011-2033 (EHDP), and the accompanying Policy Maps. Its purpose is for the Council to satisfy itself that the plan is sound for submission to the Secretary of State for Examination in Public by an independent planning inspector.

This concludes that the plan being submitted is sound.

This checklist follows the structure template prepared by AMEC and URS on behalf of the Planning Advisory Service. The checklist requirements are presented in *italic* and checklist evidence in plain.

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

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.		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Vision and Objectives</i></p> <p><i>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?</i></p> <p><i>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?</i></p> <p><i>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?</i></p> <p><i>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</i></p> <p><i>Are the policies internally consistent?</i></p> <p><i>Are there realistic timescales related to the objectives?</i></p> <p><i>Does the DPD explain how its key policy objectives will be achieved?</i></p>	<ul style="list-style-type: none"> • <i>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.</i> • <i>Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them.</i> • <i>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.</i> • <i>Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</i> • <i>Confirmation from the relevant agencies that they support the objectives and the identified means of delivery.</i> • <i>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.</i> 	<p>Section 2.3 (P.15) sets out the key issues and challenges that face the District. The EHDP proposes high levels of growth within the East Herts administrative boundary, therefore management and mitigation of the impact of this is integral to the delivery of sustainable development in the District.</p> <p>Section 2.4 (P.17) outlines the vision for East Herts in 2033. The Strategic Objectives, set out at Section 2.5 (P.18), are the stepping stones to delivering the Vision. Relevant agencies have contributed to the formulation of the Vision and Strategic Objectives, and support has been provided through the Regulation 19 Consultation. The 2014 Sustainability Appraisal (SA) (Ref: SUB/005) appraises the policies in terms of their contribution to achieving the vision and strategic objectives. The 2016 SA (Ref: SUB/004) updates and reappraises where necessary.</p> <p>The Council has also included the London Stansted Cambridge Corridor (LSCC) Vision (P.19) as the Council is fully supportive of contributing to the economic ambitions of this strategic area.</p> <p>Chapter 25 (P.302) deals with delivery and explains how infrastructure should be delivered in the District. The Council's Infrastructure Delivery Plan (IDP) (Ref: IDM/001) is referenced in this Chapter. This document was produced in consultation with relevant stakeholders and agencies. It provides information with regards to key projects, delivery mechanisms, costs and timescales. This will be a live document which will continue to be updated as new information emerges.</p>

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		<p>The SA (SUB/004) demonstrates that reasonable alternatives have been considered.</p> <p>The Council's most recent Local Development Scheme (Ref: SUB/011) defines the scope and outlines the content of the EHDP.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p><i>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.</i></p> <p><i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</i></p> <p><i>—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</i></p> <p><i>—specific policies in this Framework indicate development should be restricted.</i></p>	<ul style="list-style-type: none"> • <i>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).</i> • <i>An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</i> • <i>Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)</i> 	<p>The EHDP allocates sufficient sites to meet the housing needs identified in the Strategic Housing Market Assessment (SHMA) (Ref: HOP/001) .The overall position is set out in policies DPS1 (P.28) and the housing supply set out in DPS3 (P.32). The Council recognises that further work is required prior to the Examination Hearing sessions in order to identify an up to date OAHN figure based on 2014 Household projections. The Housing Topic Paper (Ref: TPA/004) also provides further information on the OAHN.</p> <p>The Council has adopted a flexible approach with regards to housing supply. Currently the EHDP allocates a higher number of houses than the OAN as identified in the SHMA (Ref: HOP/001). A 20% buffer has been applied to the housing supply in the first five years to ensure competition and flexibility. In addition, to this the Council has inserted policy DPS5 (P.35) which will enable the Council to undertake an early review of the Plan in order to meet the extra housing need arising from the 2014 household projections.</p> <p>The SHMA Economic Evidence report (Ref: EER/002) identifies the employment needs of the District. The Council is maximising job growth to meet the need through the allocation of new employment sites and retention of existing</p>

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		<p>employment areas. The Employment Topic Paper (Ref: TPA/005) provides further detail regarding employment provision.</p> <p>The Supporting Document (Ref: SSS/001) informed the Preferred Options District Plan, 2014 and is an important document when looking at formulation of the preferred Development Strategy. Following the Regulation 18 Consultation further work has been undertaken which has led to changes to the strategy. This work is explained within the respective Settlement Appraisals (Ref: SSS/002-SSS/010). In addition the Council has produced a Development Strategy Topic Paper (Ref: TPA/001) which summaries how the chosen Development Strategy has been reached.</p> <p>Many consultees responding to the Regulation 18 Consultation promoted alternative sites and strategies for development. The SA (Ref: SUB/004) reviewed the alternative growth options confirming the preferred option as the most suitable.</p>
<p><i>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.</i></p>	<ul style="list-style-type: none"> <i>A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk)</i> 	<p>Policy INT1 (P.11) sets out the Council's approach for achieving sustainable development.</p> <p>The policies within the EHDP are positively prepared and aim to encourage sustainable development.</p>
<p><i>Objectively assessed needs</i></p>	<ul style="list-style-type: none"> <i>Background evidence papers</i> 	<p>The SHMA (Ref: HOP/001), which is based on demographic and population forecasts, identifies</p>

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<p><i>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.</i></p> <p><i>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</i></p>	<p><i>demonstrating requirements based on population forecasts, employment projections and community needs.</i></p> <ul style="list-style-type: none"> <i>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.</i> 	<p>the OAHN for the District, taking account of 2012 Household projections. The Council recognises that further work is required prior to the Examination Hearing sessions in order to identify an up to date OAHN figure based on 2014 Household projections. The SHMA Economic Evidence report (Ref: EER/002) identifies the employment needs across the District. Housing, Employment and Retail requirements are set out in policy DPS1 (P.28).</p> <p>The Council has produced a number of Topic Papers which demonstrate how the evidence gathered has been utilised to determine the growth options and how the chosen options will meet the EHDP objectives.</p> <p>The Duty to Co-operate Compliance Statement (Ref: SOC/001) and the Regulation 22 Consultation Statement (Ref: SUB/ 009) provide details of the consultation and co-operation that has influenced the development strategy.</p>
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
<p><i>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),</i></p>	<ul style="list-style-type: none"> <i>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.</i> 	<p>The EHDP endorses and seeks to facilitate the Economic Development Vision for East Herts (Ref: EER/001), this vision is summarised in Table 15.1 (P.196). Key aspects of the LEP's Strategic Economic Plan are referenced as part of the vision.</p> <p>The Council has also included the London Stansted Cambridge Corridor Vision (LSCC) at Section 2.6 (P.19) as the Council is fully supportive of this economic vision for the wider strategic area.</p>

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<p><i>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</i></p>	<ul style="list-style-type: none"> <i>A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</i> <i>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)</i> 	<p>Section 2.3 (P.15) sets out the key issues and challenges that face the District. The EHDP seeks to address these issues.</p> <p>Policy DPS1 (P.28) commits the Council to meeting the housing, employment and retail needs across the District. The Council recognises that further work is required prior to the Examination Hearing sessions in order to identify an up to date OAHN figure based on 2014 Household projections The commitment to providing new homes and jobs will increase investment into the District.</p> <p>The Hertford Town Centre Urban Design Strategy (Ref: SSS/012) and Bishop's Stortford Town Centre Planning Framework (Ref: SSS/011) set the guidelines for future development in the District's main town centres. Policies BISH2 (P.48) and HERT7 (P.99) refer to these documents which will promote future investment into the town centres. In addition, the Gilston site allocation referred to in policy GA1 (P.141) will support the regeneration of Harlow by attracting investment to the town.</p> <p>Policy DPS4 (P.34) and the IDP (Ref: IDM/001) highlight the infrastructure components required to support the proposed development. Securing these infrastructure schemes will contribute to increasing investment into the District.</p> <p>The Council has identified new employment land and intends to retain existing employment sites. Evidence to support the employment strategy is outlined in the Employment Topic Paper (Ref: TPA/005). Site specific policies in the EHDP contain employment land requirements and</p>

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		deliverability will be confirmed through the Statements of Common Ground agreed with developers.
2. Ensuring the vitality of town centres (paras 23-37)		
<p><i>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)</i></p>	<ul style="list-style-type: none"> <i>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.</i> 	<p>The Council has produced a Hertford Town Centre Urban Design Strategy (Ref: SSS/012) and is currently preparing the Bishop's Stortford Town Centre Planning Framework (Ref: SSS/011). Both these documents will guide future development and growth in the District's main town centres. Policy BISH2 (P.48) and HERT7 (P.99) commit the Council to utilising the frameworks in determining development proposals that come forward in the town centres.</p> <p>The town centre hierarchy is established in section 16.3 (P.207) and Table 16.1(212) lists the hierarchy in terms of District Centres, Neighbourhood Centres and Local Parades.</p> <p>Policy RTC1 (P.208) outlines the Council's approach to proposals that come forward within town centre boundaries, the retail impact assessment thresholds are established through this policy. The Councils approach to proposals in Primary Shopping Areas and Primary/Secondary Shopping Frontages is set out in policies RTC2, RTC3, RTC4 (P.209-211).</p>
<p><i>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)</i></p>	<ul style="list-style-type: none"> <i>An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses.</i> <i>Primary and secondary shopping frontages identified and allocated.</i> 	<p>An assessment of the future need for additional retail floorspace in the town centres was carried out as part of the Retail and Town Centres Study (Ref: EER/009).</p> <p>The Primary and Secondary Shopping Frontages</p>

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		are highlighted in policies RTC3 and RTC4 (P.210-211) and visually identified on the Policies Maps (Ref: SUB/003).
3. Supporting a prosperous rural economy (para 28)		
<p><i>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</i></p>	<ul style="list-style-type: none"> • <i>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.</i> 	<p>Much of the District is rural in its character, therefore it is appropriate for the Council to have a policy relating to the rural economy. Policy ED2 (P.199) sets out the Council's approach to supporting sustainable economic growth in rural areas. This policy supports the development and diversification of agricultural businesses in principle.</p> <p>Policies CFLR4, CFLR5 and CFLR6 (P.243-246) refer to specific areas and types of leisure and support the enhancement of these where appropriate.</p> <p>Policies CFLR7 and CFLR8 (P.247-248) aim to retain, enhance and support local services and facilities where appropriate.</p>
4. Promoting sustainable transport (paras 29-41)		
<p><i>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</i></p> <p><i>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)</i></p> <p><i>Encourage solutions which support</i></p>	<ul style="list-style-type: none"> • <i>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.</i> • <i>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.</i> • <i>A spatial strategy and policy which</i> 	<p>The IDP (Ref: IDM/001) provides an overarching approach to transport infrastructure and details those schemes that will be provided in the plan period to facilitate the level of proposed development. The Council has had input into the spatial transport strategies produced by Hertfordshire County Council (HCC), as Highways Authority, these strategies have informed the IDP and Plan as a whole. The Council continues to work HCC, neighbouring LPAs and the Hertfordshire LEP with regards to transport infrastructure</p>

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<p><i>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)</i></p> <p><i>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)</i></p> <p><i>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)</i></p> <p><i>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)</i></p> <p><i>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</i></p> <p><i>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)</i></p> <p><i>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</i></p>	<p><i>seeks to reduce the need to travel through balancing housing and employment provision.</i></p> <ul style="list-style-type: none"> • <i>Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.</i> • <i>If local (car parking) standards have been prepared, are they justified and necessary? (39)</i> • <i>Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</i> 	<p>provision within the District. On a wider strategic scale the Council has been heavily involved in discussions with its housing market area partners, HCC, Essex County Council (ECC) and Highways England regarding improvements to the M11 corridor. The proposed transport improvements will enable growth in and around the Harlow Area.</p> <p>The Plan as whole seeks to direct development to the most sustainable locations, in terms of transport capacity. This has led to the Council directing the majority of development to the south of the District which is served by superior transport links. The north of the District, including Buntingford, is relatively isolated and is served by limited transport infrastructure, therefore further development in this area, beyond that which already has permission, would not be sustainable.</p> <p>Policy TRA1 (P.232) sets criteria for developments to meet in order to enhance sustainable modes of transport. This policy also attempts to reduce carbon emissions through promotion of sustainable transport measures.</p> <p>Site allocation policies within the Plan commit developers to providing contributions to transport infrastructure. Some allocated sites will provide new highways infrastructure to support development, whilst others will contribute to sustainable transport measures such as enhanced pedestrian and cycling links and improved passenger transport services.</p> <p>A number of the proposed allocations will also provide onsite resources such as: education</p>

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<p><i>practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</i></p> <p><i>The setting of car parking standards including provision for town centres. (39-40)</i></p> <p><i>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)</i></p>		<p>facilities, sports facilities and a neighbourhood centre. These facilities and the employment opportunities they bring will be accessible by foot and will decrease the requirement of residents to travel via car.</p>
5. Supporting high quality communications infrastructure (paras 42-46)		
<p><i>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</i></p> <p><i>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)</i></p>	<ul style="list-style-type: none"> • <i>Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.</i> 	<p>Policy ED3 (P.200) supports the provision and expansion of communications infrastructure. There is a growing trend across society in terms of flexible working and home working, it is important that the Council delivers new residential properties that are able to cater for part time and full time home workers.</p>
6. Delivering a wide choice of high quality housing (paras 47-55)		
<p><i>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%</i></p>	<ul style="list-style-type: none"> • <i>Identification of:</i> <ol style="list-style-type: none"> a) <i>five years or more supply of specific deliverable sites; plus the buffer as appropriate</i> 	<p>The Housing Topic Paper (Ref: TPA/004) demonstrates that the EHDP identifies sufficient deliverable sites to provide a five year housing supply. This includes the 20% buffer, accepting that there has been a persistent under delivery of</p>

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<p><i>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)</i></p>	<ul style="list-style-type: none"> • <i>Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)</i> • <i>A SHLAA</i> 	<p>housing since the start of the plan period.</p> <p>Policy DPS3 (P.32) shows the supply of sites. An important document which contributed to this supply is the Supporting Document (Ref: SSS/001). This study identified the most favourable parcels of land across the District for development. This work was then cross referenced with the Strategic Land Availability Assessment (SLAA) (HOP/004), to identify sites that had been promoted which were located within the favourable parcels. The Development Strategy Topic Paper (Ref: TPA/001) provides an overarching audit trail of how the preferred strategy has been arrived at.</p> <p>Development of Green Belt land is required to ensure the Council has a five year housing supply available. Without this the EHDP could not identify sufficient sites to meet its housing requirement. The Green Belt Topic Paper (Ref: TPA/003) sets out the exceptional circumstances required to amend Green Belt boundaries.</p> <p>An allowance for windfall sites has been made within the first five years, The evidence for this is explained in the Housing Topic Paper (Ref: TPA/004).</p>
<p><i>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</i></p>	<ul style="list-style-type: none"> • <i>Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</i> 	<p>Policy DPS3 (P.32) identifies a supply of sites sufficient to meet the figure of 16,390 homes by 2033 as identified within the SHMA (HOP/001). The Council recognises that further work is required prior to the Examination Hearing sessions in order to identify an up to date OAHN figure based on 2014 Household projections Sites were identified through work on the Supporting Document (Ref:</p>

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		<p>SSS/001) and the SLAA (Ref: HOP/004), which forms the basis of these site allocations. The Strategy Worksheet at Appendix B (P.308) highlights the anticipated phasing of housing delivery across the plan period.</p> <p>An allowance for windfall sites has been made over the whole plan period. The evidence for this is explained in the Housing Topic Paper (Ref: TPA/004).</p>
<p><i>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)</i></p>	<ul style="list-style-type: none"> • <i>A housing trajectory</i> • <i>Monitoring of completions and permissions (47)</i> • <i>Updated and managed SHLAA. (47)</i> 	<p>A housing trajectory is provided in the Authority Monitoring Report (Ref: IDM/006) which measures progress against housing targets, including the monitoring of completions and permissions.</p> <p>The Strategy Worksheet at Appendix B of the EHDP (P.308) shows the expected phasing of housing delivery in five year segments and highlights how the Council will maintain a five year supply.</p>
<p><i>Set out the authority's approach to housing density to reflect local circumstances (47).</i></p>	<ul style="list-style-type: none"> • <i>Policy on the density of development.</i> 	<p>Policy HOU2 (P.170) outlines the Council's approach to housing density across the District.</p>
<p><i>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)</i></p>	<ul style="list-style-type: none"> • <i>Policy on planning for a mix of housing (including self-build, and housing for older people</i> • <i>SHMA</i> • <i>Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50)</i> • <i>Evidence for housing provision based on up to date, objectively assessed</i> 	<p>The SHMA (Re: HOP/001) sets out the objectively assessed needs of the authorities making up the East Hertfordshire and West Essex Housing Market Area (HMA) and is the basis for identifying the mix of housing required within the plan period.</p> <p>Policy HOU1 (P.168) outlines the Council's overarching approach to type and mix of housing. This policy will be used in conjunction with other housing policies.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p><i>needs. (50)</i></p> <ul style="list-style-type: none"> • <i>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)</i> 	<p>Policy HOU3 (P.175) sets out the thresholds for affordable housing and tenure mix. It states the preference for provision to be on-site and highlights that off-site provision or financial contributions will only be accepted in justified exceptional circumstances.</p> <p>Policy HOU6 (P.181) sets out the specific requirements for specialist housing for older and vulnerable people. Policy HOU7 (P.181) seeks to ensure that housing delivered is accessible and adaptable to meet the changing needs of occupants.</p> <p>Self-Build Housing requirements are outlined in policy HOU8 (P.182).</p>
<p><i>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).</i></p> <p><i>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</i></p>	<ul style="list-style-type: none"> • <i>Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs.</i> • <i>Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)</i> • <i>Examples of special circumstances to allow new isolated homes listed at para 55.</i> 	<p>Large parts of the District are rural in nature, therefore it is appropriate for the Council to provide housing policies relating to the rural area. Policy VILL4 encourages Parish Councils to prepare Neighbourhood Plans in order deliver a minimum of 500 new homes across the rural area. In particular, Group 1 villages within the Rural Areas Beyond the Green Belt are required to deliver a 10% increase in housing stock by 2033. Policy HOU4 (P.177) establishes the criteria for Rural Exception Affordable Housing schemes to come forward in areas where an affordable housing need exists and policy HOU5 (P.178) outlines the approach to dwellings for rural workers.</p> <p>The Council in general is not in favour of bringing forward isolated dwellings. However, policy GBR2 (P.41) does include criteria for development that may be acceptable in the Rural Area Beyond the</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Green Belt.
7. Requiring good design (paras 56-68)		
<p><i>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</i></p>	<ul style="list-style-type: none"> <i>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</i> 	<p>The Vision for East Herts in 2033 (P.17) aims to maintain the high quality environment of the District. Policy DES3 (P.225) aims to fulfil this aspect of the vision by setting out the Council's expectations for high quality design.</p> <p>The preparation of masterplans is required for all strategic sites. These should reflect the Council's desire to provide high quality developments that deliver the necessary infrastructure. The preparation of masterplans for non-strategic sites is also encouraged prior to submission of planning applications.</p>
8. Promoting healthy communities (paras 69-77)		
<p><i>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).</i></p>	<ul style="list-style-type: none"> <i>Inclusion of a policy or policies on inclusive communities.</i> <i>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 crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high</i> 	<p>The Council seeks to create inclusive communities which will provide services, facilities and jobs in close proximity for residents. Some of the site allocation policies include requirements for developers to provide facilities and employment opportunities on site.</p> <p>Policies CFLR7 and CFLR8 (P.247-248) promote community interaction through retention of existing and provision of new community facilities across the District.</p> <p>Policy RTC5 (P.213) aims to retain and enhance the district centres, neighbourhood centres, local parades and individual shops which play an</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p><i>quality public space, which encourage the active and continual use of public areas. (69)</i></p>	<p>important role in creating community cohesion.</p> <p>Reducing the opportunity for crime will play a part in creating cohesive communities. The Council will seek to contribute to this through sensitive design as set out in policy DES4 (P.227).</p> <p>Some of the site allocations will provide high quality new pedestrian routes which will improve accessibility and promote walking as a sustainable mode of transport. Policy CFLR3 (P.242) sets out the Council's aspiration to maintain and enhance the Rights of Way Network.</p>
<p><i>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</i></p>	<ul style="list-style-type: none"> • <i>Inclusion of a policy or policies addressing community facilities and local service.</i> • <i>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.</i> 	<p>Policy CFLR7 (P.247) seeks to ensure that community facilities are provided to support the needs of residents and enhance the sustainability of new developments. Policy CFLR8 (P.248) will be used to preserve existing community facilities. Policies CFLR4 to CFLR 10 (P.243-252) aim to protect and enhance leisure, health, education and community facilities across the District. In general the policies within the plan support modernisation of existing facilities and services, and do not aim to stifle innovative design.</p> <p>Policy RTC5 (P.213) will be utilised in conjunction with CFLR7 (P.247) to ensure that existing district centres, neighbourhood centres, local parades and individual shops are maintained where possible.</p> <p>The larger site allocations (Bishop's Stortford North, Bishop's Stortford South, North and East of Ware, East of Stevenage and East of Welwyn Garden City) will be expected to provide neighbourhood centres to support the new housing proposed. In</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>addition, the Gilston Area will deliver a series of neighbourhood centres across the whole site.</p> <p>The new housing proposed in the EHDP has been suitably located so that there is good access to community facilities, key services and infrastructure.</p>
<p><i>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).</i></p>	<ul style="list-style-type: none"> • <i>Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)</i> • <i>A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74)</i> • <i>Protection and enhancement of rights of way and access. (75)</i> 	<p>The open space, sports and recreational facility requirements across the District are set out in the East Herts Playing Pitch Strategy (Ref: CFA/001 & CFA/002) and the East Herts Sports Facility Assessment (Ref: CFA/003). The Council is currently in the process of updating this work and expects to have updated information prior to examination.</p> <p>Policy CFLR1 (P.240) seeks to retain and enhance open spaces, sports and recreational buildings. This policy also aims to promote new facilities in support of proposed new housing.</p> <p>Policy CFLR3 (P.242) sets out the Council's aspiration to maintain and enhance the Rights of Way Network.</p>
<p><i>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).</i></p>	<ul style="list-style-type: none"> • <i>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</i> 	<p>The Council has designated the green fingers of Bishop's Stortford and Hertford as local green spaces, these areas will be maintained and protected through policy CFLR2 (P.242). Paragraph 19.3.1 (P.241) enables Neighbourhood Plans to designate green areas of particular importance as Local Green Space.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<i>Green Belts. (78)</i>	
9. Protecting Green Belt land (paras 79-92)		
<p><i>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)</i></p> <p><i>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)</i></p> <p><i>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</i></p> <p><i>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</i></p>	<ul style="list-style-type: none"> • <i>Where Green Belt policies are included, these should reflect the need to:</i> <ul style="list-style-type: none"> ○ <i>Enhance the beneficial use of the Green Belt. (81)</i> ○ <i>Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)</i> ○ <i>Specify that inappropriate development should not be approved except in very special circumstances. (87)</i> ○ <i>Specify the exceptions to inappropriate development (89-90)</i> ○ <i>Identify where very special circumstances might apply to renewable energy development. (91)</i> 	<p>Policy GBR1 (P.40) states that the Council will assess planning applications within Green Belt in line with the provisions of the NPPF.</p> <p>The Policies Map (Ref: SUB/003) accompanying the EHDP identifies the land designated as Green Belt in the District.</p> <p>The OAHN set out in policy DPS1 (P.28) is very challenging and this cannot be met in a sustainable way without undertaking a carefully planned review of the Green Belt. The East Herts Green Belt Review (Ref: GBE/001) assessed Green Belt parcels in terms of their Green Belt purpose to determine the most appropriate parcels to release from the Green Belt. This work has led to the redrawing of the Green Belt in order to facilitate the necessary development.</p> <p>The Green Belt Topic Paper (TPA/003) sets out further details and highlights the exceptional circumstances present.</p> <p>A large part of the District beyond the Green Belt is very rural in nature, therefore it is appropriate to have a policy relating to this area. The Council has termed this area ‘Rural Area Beyond the Green Belt’ and it is shown on the Policies Map (Ref: SUB/003). Policy GBR2 (P.40) aims to protect this area from inappropriate and unsustainable development, whilst at the same time making it clear where exceptions to the policy will be considered. These exceptions include appropriate</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		facilities for outdoor sport and recreation for example.
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
<i>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)</i>	<ul style="list-style-type: none"> • <i>Planning of new development in locations and ways which reduce greenhouse gas emissions.</i> • <i>Support for energy efficiency improvements to existing building.</i> • <i>Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy. (95)</i> 	<p>The Vision for East Herts (P.17) and the Strategic Objectives (P.18) include an aspiration to adapt to and mitigate the effects of climate change.</p> <p>The Council's approach to Climate Change is set out in Chapter 22 (P.278-282). Policies CC1 (P.279) and CC2 (P.280) promote energy efficiency in building improvements and new builds.</p> <p>Policy WAT1 (P.285) takes account of climate change and the impact on flood risk, while policy WAT4 (P.288) seeks to promote the efficient use of water resources.</p>
<i>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)</i>	<ul style="list-style-type: none"> • <i>A strategy and policies to promote and maximise energy from renewable and low carbon sources,</i> • <i>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)</i> • <i>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)</i> 	<p>The Strategic Objectives (P.18) contain an aspiration to support decentralised, low carbon and renewable energy. Policy CC3 (P.281) sets out the Council's positive approach to the use of Renewable and Low Carbon energy where appropriate.</p> <p>The Hertfordshire Renewable and Low Carbon Energy Technical Study will assist the Council to identify sources of renewable and low carbon energy.</p> <p>The Council has limited authority to enforce sustainability standards given that new development is required to meet building regulations.</p>
<i>Minimise vulnerability to climate change</i>	<ul style="list-style-type: none"> • <i>Account taken of the impacts of climate</i> 	The Council has produced a Level 1 and 2 SFRA (REF: ENV/002) which will be used to guide

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>and manage the risk of flooding (99)</i>	<p><i>change. (99)</i></p> <ul style="list-style-type: none"> <i>Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</i> <i>Policies to manage risk, from a range of impacts, through suitable adaptation measures</i> 	<p>development to the most appropriate locations and will provide more specific guidance for proposed development in areas at risk to flooding. The SFRA also assesses the impact of climate change on flood risk and a series of climate change maps have been provided as part of this study.</p> <p>Policy WAT1 (P.285) takes account of climate change and seeks to mitigate the impacts of flood risk.</p>
<i>Take account of marine planning (105)</i>	<ul style="list-style-type: none"> <i>Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas.</i> <i>Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.</i> 	<p>East Herts is not a coastal authority therefore this section is not applicable.</p>
<i>Manage risk from coastal change (106)</i>	<ul style="list-style-type: none"> <i>Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas.</i> <i>Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.</i> 	<p>East Herts is not a coastal authority therefore this section is not applicable.</p>
11. Conserving and enhancing the natural environment (paras 109-125)		
<i>Protect valued landscapes (109)</i>	<ul style="list-style-type: none"> <i>A strategy and policy or policies to create, protect, enhance and manage</i> 	<p>The Council will seek to protect existing species and habitats and enhance biodiversity networks</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p><i>networks of biodiversity and green infrastructure.</i></p> <ul style="list-style-type: none"> • <i>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.</i> 	<p>through Policies NE2 (P.258) and NE3 (P.261).</p> <p>The East Herts Green Infrastructure Plan (Ref: ENV/001) provides an overview of existing green infrastructure assets and considers opportunities for enhancement and creation of new assets. Policy NE4 (P.263) seeks to protect assets and endorses enhancements of green infrastructure networks.</p> <p>The District contains a number of Designated Environmental Assets and these will be protected through the use of policy NE1 (P.257). In line with the regulations a Habitats Regulation Assessment (Ref: SUB/012) has been produced and this study concluded that the EHDP proposals would not have a significant effect on European Sites. The Council is working with neighbouring authorities to manage the potential cumulative impacts of development on the Epping Forest Special Area of Conservation (contained within the Duty to Co-operate Compliance Statement REF)</p> <p>The Council has sought to minimise the loss of higher quality agricultural land where possible in line with the NPPF. However, due to the high growth requirement of the District and the aspiration to bring development forward in sustainable locations it has been necessary for some agricultural land to be allocated for development purposes.</p>
<p><i>Prevent unacceptable risks from pollution and land instability (109)</i></p>	<ul style="list-style-type: none"> • <i>Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or</i> 	<p>Policy EQ2, EQ3 and EQ4 (P.296-298) seek to minimise noise, light and air pollution that may arise from development. Policy EQ4 also highlights that the Council has produced an Air Quality Guidance Document which will be utilised in the assessment</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<i>general amenity.</i>	of planning applications. Policy EQ1 (P.294) sets out the Council's approach to development proposals that may be effected by contaminated land or land instability.
<p><i>Planning policies should minimise impacts on biodiversity and geodiversity (117)</i></p> <p><i>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</i></p>	<ul style="list-style-type: none"> • <i>Identification and mapping of local ecological networks and geological conservation interests.</i> • <i>Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species</i> 	<p>The Council will minimise impacts on biodiversity through policies NE2 (P.258) and NE3 (P.261). Ecological networks in the District are identified in Local Nature Partnership's Ecological Network Report.</p> <p>There are no areas in the District of regional geological interest.</p>
12. Conserving and enhancing the historic environment (paras 126-141)		
<p><i>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</i></p>	<ul style="list-style-type: none"> • <i>A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</i> • <i>A map/register of historic assets</i> • <i>A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</i> 	<p>The Vision for East Herts (P.17) contains an aspiration to protect and enhance the historic environment. Heritage Assets at risk are identified in the Historic England Buildings at Risk Register and also in the Council's Risk Register. Historic assets are shown on the Policies Map (Ref: SUB/003).</p> <p>Policies HA1, HA2 and HA3 (P.267-269) seek to protect heritage assets (designated, non-designated and assets with archaeological interest). Policies HA4, HA5 and HA6 (P.270-272) concern the 42 Conservation Areas in the District and aim to protect and enhance these historical areas. Opportunities to sustain and enhance the significance of Listed Buildings will be actively sought through the use of policy HA7 (P.273) and policy HA8 (P.275) seeks to protect the Historic Parks and Gardens in the District.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Development that will make a positive contribution to the Historic Environment will be endorsed in line with policy HA9 (P.276).
13. Facilitating the sustainable use of minerals (paras 142-149)		
<p><i>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)</i></p>	<p><i>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.</i></p>	<p>This is primarily a matter for Hertfordshire County Council (HCC) as the Minerals Planning Authority.</p> <p>The delivery of housing on the site North of Hertford (HERT4) is being phased to allow the extraction of gravel to take place. The Council is also working with the developer and HCC on the allocation to the East of Welwyn Garden City (EWEL1) as mineral deposits will need to be extracted prior to commencement of this development. It is intended that minerals extracted on these sites will be used during the construction phase.</p>
<p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<p><i>Participation</i> <i>Has the consultation process allowed for effective engagement of all interested parties?</i></p>	<p><i>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.</i></p>	<p>The Regulation 22 Consultation Statement (Ref: SUB/ 009) contains information on the consultations carried out at the Regulation 18 and 19 stages. This statement lists the specific and general consultation bodies that have been consulted and those that made representations, as</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p><i>Reference SCI</i></p>	<p>well as the individuals that have contributed. Main issues raised are summarised in this statement and there is an explanation as to how representations have been taken into account.</p> <p>The Council consulted and raised public awareness through various methods including; letters, emails, social network updates, advertisements in local media, leaflet drops, posters and the Council's Link magazine. The Council has made efforts to consult hard to reach groups, through: presentations and public meetings. A number of these groups are also on the consultation database and therefore received consultation updates.</p> <p>The adopted SCI (Ref: SUB/010) has been used to guide the public consultation on the EHDP.</p>
<p><i>Research / fact finding</i></p> <p><i>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?</i></p> <p><i>What assumptions were made in preparing the DPD? Were they reasonable and justified?</i></p>	<ul style="list-style-type: none"> • <i>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.</i> <p><i>AND</i></p> <ul style="list-style-type: none"> • <i>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.</i> <p><i>OR</i></p> <ul style="list-style-type: none"> • <i>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-</i> 	<p>The EHDP has been informed and is supported by a credible, up to date and comprehensive evidence base. This evidence base includes studies relating to: Community Facilities, Housing, Economy, Employment, Green Belt, Historic Environment, Infrastructure, Housing, Natural Environment, Population, Retail and Transport. All these documents can be viewed on the Council's website and in hard copy from the Council's Offices. Year of production and author are included in the evidence library.</p> <p>The Topic Papers pull various studies together and demonstrate how they have been used to inform the Plan. These documents, read alongside the SA (Ref: SUB/004) and the EHDP itself, provide a thorough explanation of how the options were selected and how the policies have been</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p><i>loading and formulation phases; and any other information on community views and preferences.</i></p> <p>OR</p> <ul style="list-style-type: none"> • <i>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).</i> 	<p>formulated.</p>
<p><i>Alternatives</i></p> <p><i>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?</i></p> <p><i>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</i></p>	<ul style="list-style-type: none"> • <i>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.</i> • <i>An audit trail of how the evidence base, consultation and SA have influenced the plan.</i> • <i>Sections of the SA Report showing the assessment of options and alternatives.</i> • <i>Reports on how decisions on the inclusion of policy were made.</i> • <i>Sections of the consultation document demonstrating how options were developed and appraised.</i> • <i>Any other documentation showing how alternatives were developed and</i> 	<p>The Development Strategy Topic Paper (Ref: TPA/001) summarises the way in which the strategy in the District Plan has been identified and provides a clear audit trail showing how the preferred approach was arrived at.</p> <p>The three different iterations of the Sustainability Appraisal (SA) (Ref: SUB/004-006) provide a detailed account of how reasonable alternative options have been assessed and how the most appropriate strategy was selected. The most recent SA (Ref: SUB/004) at chapters 6 and 7 identifies and evaluates the reasonable alternatives, whilst chapter 8 outlines the reasons for developing the preferred approach in-light of the alternatives appraisal. Development management and strategic policies have also been assessed through the various versions of the SA. The SA Topic Paper (Ref: TPA/002) provides further details on the progression of the SA through the plan making process.</p> <p>The Supporting Document (Ref: SSS/001) identified the most sustainable locations for development.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p><i>evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.</i></p>	<p>This document assessed land across the District and highlighted the most favourable parcels of land for development. This work was then cross referenced with the Strategic Land Availability Assessment (SLAA) (HOP/004), to identify sites that had been promoted which were located within favourable parcels.</p> <p>Settlement Appraisals were also produced by the Council which explain how the strategy for each settlement/site has been reached, as part of this, alternative sites were considered.</p> <p>A comprehensive evidence base has been produced to support and inform the EHDP. This evidence is pulled together in the Topic Papers which provide an audit trail of how the evidence has been used to inform the strategy.</p> <p>The Council undertook a Regulation 18 Consultation on the Preferred Options District Plan in 2014, and then a Regulation 19 Consultation on the Pre-Submission version in 2016. The Regulation 22 Consultation Statement (Ref: SUB/009) provides further details regarding how the Council has taken account of the comments received.</p>
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it 		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible <p>Be able to be monitored</p>		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • <i>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?</i> • <i>Are the policies internally consistent?</i> • <i>Are there realistic timescales related to the objectives?</i> • <i>Does the DPD explain how its key policy objectives will be achieved?</i> 	<ul style="list-style-type: none"> • <i>Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.</i> • <i>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).</i> • <i>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.</i> • <i>Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).</i> 	<p>The structure of the EHDP outlines a clear top down relationship between the the Vision (P.17), the Strategic Objectives (P.16) and the policies that will enable the Council's aspirations to be met. The policies seek to address the key issues and challenges (P.15) facing the District.</p> <p>The 2014 SA (Ref: SUB/005) appraises the policies in terms of their contribution to achieving the vision and strategic objectives. The 2016 SA (Ref: SUB/004) updates and reappraises where necessary.</p> <p>Chapter 25 of the EHDP (P.302) outlines the Council's approach to delivery. The timescale for proposed developments to come forward is set out in the Strategy Worksheet at Appendix B (P. 308).</p> <p>Policy DEL1 (P.302) demonstrates the Council's commitment to continued co-operation with delivery partners. A number of bodies have expressed their support through representations submitted to the consultations. It is also the intention of the Council to sign MOUs with relevant bodies to confirm their continued support.</p> <p>The Council's most recent Local Development Scheme (Ref: SUB/011) defines the scope and outlines the content of the EHDP.</p>
<p><i>Infrastructure Delivery</i></p>	<ul style="list-style-type: none"> • <i>A section or sections of the DPD where</i> 	<p>The Strategy Worksheet at Appendix B (P.308)</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • <i>Have the infrastructure implications of the policies clearly been identified?</i> • <i>Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</i> • <i>Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?</i> 	<p><i>infrastructure needs are identified and the proposed solutions put forward.</i></p> <ul style="list-style-type: none"> • <i>A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.</i> • <i>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.</i> • <i>Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</i> 	<p>identifies the proposed phasing of housing to be delivered across the plan period. Provision of necessary infrastructure is integral to the delivery of the proposed housing. Policy DPS4 (P.34) highlights the strategic infrastructure necessary to facilitate development in East Herts and the wider housing market area. In addition, the site allocation policies commit developers to working with infrastructure providers to deliver the infrastructure required to support their site.</p> <p>The IDP (Ref: IDM/001) which has been produced through co-operation with infrastructure providers and relevant stakeholders identifies the district wide infrastructure requirements. It also highlights funding arrangements, delivery mechanisms, costs, timescales and the relevant agencies/stakeholders involved in delivery. This is a live document which will continue to be updated as new information emerges through the plan period.</p> <p>A whole plan viability assessment has been produced as part of the Delivery Study (Ref: IDM/003). This study assessed the financial viability of the policies in the plan when considering a series of generic development typologies. Affordable housing requirement was also taken account of through this document. This work concluded that the policies in the plan were financially viable.</p> <p>The Strategic Sites- section of the Delivery Study (Ref: IDM/002) assessed the four strategic sites in terms of their viability and deliverability. The conclusion of this study was that the Bishop's Stortford South, North and East of Ware, and East</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>of Welwyn Garden City sites were developable. The study could not confirm at the time the deliverability of the proposed allocation at the Gilston Area. Further work in relation to infrastructure delivery on this site is ongoing, however the Council is of the view that any issues can be resolved and therefore the site is deliverable.</p>
<p><i>Co-ordinated Planning</i> <i>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?</i></p>	<ul style="list-style-type: none"> • <i>Sections of the DPD that reflect the plans or strategies of the local authority and other bodies</i> • <i>Policies which seek to pull together different policy objectives</i> • <i>Expressions of support/representations from bodies responsible for other strategies affecting the area</i> 	<p>Spatial Planning has been the basis for the production of the EHDP. The Plan includes reference to the London Stansted Cambridge Corridor Vision (P.19) which is a strategic and spatial vision for growth across a large area consisting of a number of local authorities.</p> <p>OANs have been calculated on a strategic and spatial scale. The District is part of the East Hertfordshire and West Essex Housing Market Area (HMA). The SHMA (Ref: HOP/001) looked spatially at population/demographic projections and housing requirements across the four local authorities making up the HMA. The SHMA Economic Evidence Report (Ref: EER/002) assessed employment need across the FEMA, which comprises four core local authorities and a number of fringe authorities.</p> <p>Several joint evidence studies have been produced in co-operation with agencies and other local planning authorities considering the spatial impact of the EHDP. These documents can be viewed as part of the Evidence Library. The Council has also taken account of a number of strategies/studies produced by other organisations and some of these are included within the library.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The IDP (ref: IDM/001) has been produced in conjunction with infrastructure and service providers and therefore the strategies of these bodies have been considered.</p> <p>The Duty to Co-operate Compliance Statement provides further information on the detailed discussions held with neighbouring authorities, County Councils and other organisations, throughout the plan making process. The Council intends to sign a number of MOUs/Statements of Common Ground with organisations listed in this statement.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • <i>Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</i> • <i>Does the DPD include the remedial actions that will be taken if the policies need adjustment?</i> 	<ul style="list-style-type: none"> • <i>Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.</i> • <i>Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:</i> <ul style="list-style-type: none"> a. <i>the effectiveness of policies and what evidence is being collected to undertake this</i> b. <i>changes affecting the baseline information and any information on trends on which the DPD is based</i> • <i>Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</i> • <i>Sections within the DPD dealing with possible change areas and how they</i> 	<p>Flexibility and adaptability have been built into the plan throughout the process particularly with regards to housing numbers. Currently the EHDP allocates a higher number of houses than the OAN as identified in the SHMA (Ref: HOP/001). The Council recognises that further work is required prior to the Examination Hearing sessions in order to identify an up to date OAHN figure based on 2014 Household projections A 20% buffer has been applied to the housing supply in the first five years to ensure competition and flexibility. In addition, to this the Council has inserted policy DPS5 (P.35) which will enable the Council to undertake an early review of the Plan in order to meet the extra housing need arising from the 2014 household projections.</p> <p>The Council has adopted a flexible approach to development in the villages. The villages will be expected to deliver at least 500 homes across the plan period and at least 300 homes in the first five</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p><i>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</i></p> <ul style="list-style-type: none"> • <i>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.</i> 	<p>years. Policy VILL4 (P.134) encourages Parish Councils to prepare Neighbourhood Plans to allocate land for development to meet these numbers. The Council recognises that this policy approach relies on the uptake of Neighbourhood Plans which are an optional tier of planning, therefore monitoring will be undertaken and if under delivery is identified a review will be triggered with the District Council allocating specific sites in the villages.</p> <p>The Councils has taken an adaptable approach to future provision of Employment and Retail so that individual circumstances can be considered. Policies ED1 and ED2 (P.197-199) state that the Council will support new employment uses that come forward in suitable locations, whilst also recognising that in certain cases retention of employment land may not be financially viable and change of use may be more appropriate. With regards to retail, policies RTC1-RTC4 (P.208-211) have been constructed with sufficient flexibility taking into account the changing roles of town centres.</p> <p>Appendix C- Monitoring Framework (P.312) sets out a number of indicators that will be used to monitor the effectiveness of the policies. Data is collected on an annual basis through the AMR (Ref: IDM/006). This will allow the Council to identify if the plan is not being implemented as anticipated and if a review is required or if policy adjustments are needed.</p>
Co-operation	<ul style="list-style-type: none"> • <i>A succinct Duty to Co-operate</i> 	The Duty to Co-operate Compliance Statement

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • <i>Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?</i> • <i>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?</i> 	<p><i>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.</i></p> <ul style="list-style-type: none"> • <i>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 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.</i> 	<p>(Ref: SOC/001) details the positive, pro-active and ongoing co-operation the Council has undertaken with the duty to co-operate bodies through the plan making process. The Council intends to sign a number of MOUs/Statements of Common Ground with organisations which are listed in the statement.</p> <p>A number of the proposed developments require infrastructure provision to ensure the site is sustainable. The Council has produced and IDP (Ref: IDM/001) in conjunction with infrastructure and service providers. This document highlights the infrastructure required to support the proposed growth and identifies the organisations responsible for bringing forward the infrastructure.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> • <i>Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)?</i> • <i>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?</i> • <i>Is it clear how the significant effects identified in the sustainability appraisal</i> 	<ul style="list-style-type: none"> • <i>Sections of the DPD setting out indicators, targets and milestones</i> • <i>Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</i> • <i>Reference to any other reports or technical documents which contain information on the delivery of policies</i> • <i>Sections of the current annual monitoring report and the sustainability appraisal report setting out the</i> 	<p>Appendix C- Monitoring Framework (P.312) provides targets and indicators which relate to the delivery of the policies. Monitoring is undertaken on an annual basis through the AMR (Ref: IDM/006). This report monitors housing land supply data and the housing trajectory, as well as, reporting on the effectiveness of the policies contained within the Plan. Data to inform the AMR is collected via a number of sources. The Council itself supplies data and some of the information is received from external sources.</p> <p>The SA (Ref: SUB/004) at chapter 25 lists the</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</i></p>	<p><i>framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal</i></p>	<p>sustainability topics assessed and the indicators that are of particular importance to the monitoring of these topics.</p>
<p>Consistent with national policy: <i>the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> • <i>Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification?</i> • <i>Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?</i> 	<ul style="list-style-type: none"> • <i>Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons.</i> • <i>Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy.</i> • <i>Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement.</i> • <i>Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement</i> • <i>Reports or copies of correspondence as to how representations have been considered and dealt with.</i> 	<p>Policy INT1 (P.10) provides a version of the standard NPPF policy recommended by PINS for local plans. Ensuing policies are locally distinctive to the East Herts District and do not repeat or reformulate national guidance.</p>

Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
<p><i>Early and effective community engagement with both settled and traveller communities.</i></p>	<ul style="list-style-type: none"> • <i>Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.</i> 	<p>Both the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment 2014 and its 2016 Update included the opportunity for all traveller families on each of the sites in the district to take part in face-to-face interviews and approaches were also made to representative stakeholders to take part in the studies. Likewise, the Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, 2014, involved further dialogue with travellers and representative groups and, in addition to other forms of contact, the process included a workshop event to which Gypsies and Travellers and Travelling Showpeople were invited, along with key stakeholders, as part of this process. Outside of these studies, in addition to dialogue with representatives of Gypsies and Travellers and Travelling Showpeople from sites where need has been identified, the Showmens Guild has been particularly helpful in providing information to assist in site delivery.</p>
<p><i>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.</i></p>	<ul style="list-style-type: none"> • <i>Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan.</i> • <i>Collaborative working with neighbouring local planning authorities.</i> • <i>A robust evidence base to establish accommodation needs to inform the</i> 	<p>The Council has commissioned regular Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessments and has most recently, in 2016, updated its 2014 study to take into account the August 2015 revisions to 'Planning policy for traveller sites'. The Council has included Gypsies and Travellers and Travelling Showpeople issues</p>

	<p><i>preparation of your local plan and make planning decisions.</i></p>	<p>through the Duty to Co-operate with neighbouring authorities. In this respect a joint site provision arrangement has been reached with Welwyn Hatfield Council for the development of the Birchall Garden Suburb development to the east of Welwyn Garden City (EWEL1). Aside from this allocation, no formal approach has been made from any of East Herts' neighbouring authorities and the Council plans to meet its own needs within the district.</p> <p>It is considered that the combination of the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, 2016 and the Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, 2014, comprise a robust evidence base in terms of establishing accommodation needs and seeking to meet those needs.</p>
<p>Policy B: Planning for traveller sites (paras 7-11)</p>		
<p><i>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.</i></p> <p><i>Set criteria to guide land supply allocations where there is identified need.</i></p>	<ul style="list-style-type: none"> • <i>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.</i> • <i>An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified.</i> • <i>Policy which takes into account criteria a-h</i> 	<p>Policy HOU9 provides for the timely provision of Gypsies and Travellers and Travelling Showpeople pitches and plots across the plan period and also contains longer-term contingencies that would address meeting any further need identified through updated Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessments carried out during the Plan period and/or beyond.</p> <p>Policy HOU9 contains criteria to guide land supply allocations for identified need and to guide speculative applications beyond those allocated sites.</p>

	of para 11	
Policy C: Sites in rural areas and the countryside (para 12)		
<i>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.</i>		Other than the expansion of one existing site, all provision for Gypsies and Travellers and Travelling Showpeople will involve delivery as an element of wider development provided through strategic allocations, where masterplanned development, coupled with the provisions of Policy HOU9 will ensure that the scale of such sites will not dominate the nearest settled community.
Policy D: Rural exception sites (para 13)		
<i>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.</i>	<ul style="list-style-type: none"> <i>If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.</i> 	Other than the expansion of one existing site, all provision for Gypsies and Travellers and Travelling Showpeople will involve delivery as an element of wider development provided through strategic allocations, where affordable housing provisions apply. Therefore, although all identified need is derived from private sites, scope exists for the provision of affordable pitches/plots if appropriate.
Policy E: Traveller sites in Green Belt (paras 14-15)		
<p><i>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</i></p> <p><i>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.</i></p>	<ul style="list-style-type: none"> <i>Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.</i> 	The only Green Belt boundary revisions proposed in respect of Gypsies and Travellers and Travelling Showpeoples sites involve their delivery as an element of wider development provided through strategic allocations.
Policy F: Mixed planning use traveller sites (paras 16-18)		

<p><i>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.</i></p>	<ul style="list-style-type: none"> • <i>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.</i> • <i>N.B. Mixed use should not be permitted on rural exception sites</i> 	<p>For Gypsy and Traveller sites, Policy HOU9 has flexibility in that it neither specifically requires or excludes mixed use provision. Criterion II (f) adds a caveat regarding satisfactory residential amenity, both within the site and neighbouring occupiers, which includes, <i>inter alia</i>, on-site business activities. For Travelling Showpeople's sites, Policy HOU9 III specifically requires that sites allow for mixed use yards.</p>
<p>Policy G: Major development projects (para 19)</p>		
<p><i>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.</i></p>	<ul style="list-style-type: none"> • <i>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.</i> 	<p>No relocation of any site proposed through major development projects.</p>

Integration of marine and terrestrial planning

This part of the checklist has not been completed as it does not apply to East Herts.