

Epping Forest District Local Plan Soundness Self-Assessment Checklist

This checklist has been prepared for the Local Plan Submission Version of the Epping Forest District Local Plan 2011-2033 (LPSV 2017), and the accompanying Policies Map. Its purpose is for the Council to satisfy itself that the plan is sound for submission to the Secretary of State for Independent Examination by a 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* in the first two columns of the document.

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) 2012 (para 182): “The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is ‘sound’ “, namely that it is:

1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

This means that the DPD should be based on a robust and credible evidence base involving:

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

4. Consistent with national policy: enabling the delivery of sustainable development

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy www.planningportal.gov.uk). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>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.</i>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Vision and Objectives</i></p> <p>a. <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>b. <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>c. <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>d. <i>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</i></p> <p>e. <i>Are the policies internally consistent?</i></p> <p>f. <i>Are there realistic timescales related to the objectives?</i></p> <p>g. <i>Does the DPD explain how its key policy objectives will be achieved?</i></p>	<ul style="list-style-type: none"> Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. 	<p>Chapter 1 at Paragraph 1.44 (P.9-10) sets out the key issues and challenges that face the District. The LPSV proposes high levels of growth within the Epping Forest SAC, therefore management and mitigation of the impact of this is integral to the delivery of sustainable development in the District.</p> <p>Chapter 2 at Paragraph 2.27 (P.19) outlines the vision for Epping Forest District in 2033. Visions for the individual settlements are set out in Chapter 5 of the Local Plan (P.114 – 180). The Council has also included the London Stansted Cambridge Corridor (LSCC) Vision (P.16) as the Council recognises the need to reflect the aspirations and opportunities identified in the LSCC Vision. The Council has also included the Lee Valley Regional Park Vision (P.18) recognising that part of Epping Forest District lies within the Park's boundary.</p> <p>The Local Plan Objectives are set out as part of Paragraph 2.27 (P.20-21). These are the 'guiding principles' for delivering the Local Plan Vision. Relevant agencies have contributed to the formulation of the Local Plan Vision and Objectives, and support has been provided through the Regulation 19 publication.</p> <p>There is a direct relationship between the identified issues, the visions and the objectives. For example issues p 9-10 :</p> <ul style="list-style-type: none"> <i>The continued protection of the remaining Green Belt, and in particular preventing the merging of</i>

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		<p><i>settlements and checking the unrestricted sprawl of large built-up areas;</i></p> <ul style="list-style-type: none"> <i>Protecting and improving the impressive range and quality of places for enjoyment of the outdoors, sport and nature conservation in the District.</i> <p>relate directly to the Local Plan objectives p 20:</p> <p><i>A. Environment and Design</i></p> <p><i>(i) To protect the Metropolitan Green Belt within its revised boundary, and to encourage the re –use of previously developed land;</i></p> <p><i>(ii) To conserve and enhance Epping Forest and its setting, including the buffer lands:</i></p> <p><i>(iii) To protect, and encourage appropriate management of other designated wildlife sites in the District, including the Lee Valley Special Protection Area, Sites of Special Scientific Interest, Local Nature Reserves and Local Wildlife Sites;</i></p> <p><i>D. Infrastructure and Movement</i></p> <p><i>(iii) To provide access to green spaces and leisure, play and sports facilities and to make appropriate provision in new development</i></p> <p>It is clear how the policies will meet the objectives since they address those matters explicitly in many</p>

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		<p>instances. For example <i>Policy SP 2 Spatial Development Strategy, Policy SP 6 Green Belt and District Open Land and Policy DM 4 Green Belt</i> (among other policies) address Objective A (i) above. <i>Policies SP 7 The Natural Environment, Landscape Character and Green And Blue Infrastructure, Policy DM 1 Habitat Protection and Improving Biodiversity and Policy DM 2 Epping Forest SAC and the Lee Valley SPA</i> (among others), address Objective A (ii) above.</p> <p>The sustainability and equalities impact assessment (SEIA), and Habitats Regulations Assessment undertaken for the Local Plan cover the range of options considered during plan making. The reasonable alternative strategic spatial strategies were considered in the “Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire Strategic Housing Market Area” 2016 (EB203). The “Sustainability Appraisal of the Epping Forest District Draft Local Plan” 2016 (EB202) reviews that work and takes forward the SA of the Local Plan. The “Sustainability Appraisal (incorporating Equalities Impact Assessment) for the Epping Forest District Local Plan Submission Version” 2017 (EB204) completes the record of the process of consideration of reasonable alternatives considered. The “Habitats Regulations Assessment Screening of Epping Forest District Council Regulation 18 Local Plan” 2016 (EB 205) and “Habitats Regulations Assessment of Epping Forest District Council Regulation 19 Local Plan” 2017 (EB206) also test the chosen alternatives and inform mitigation measures alongside the SEIA.</p> <p>The policies are internally consistent and presented as</p>

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		<p>a complete set. This is demonstrated by the policy coverage of the plan in addition to specific wording of policy.</p> <p>The timescales related to the objectives of the plan span twenty years. This is a realistic overall time period to be able to assess impact. The monitoring provisions for policies are set out in <i>Policy D 7 Monitoring and Enforcement. Appendix 3 List of measures to monitor the effectiveness of policies in the Local Plan</i> highlights the different time scales for the monitoring of various indicators that will enable the evaluation of the effectiveness of the plan.</p> <p>Chapter 6 (P.182 onwards) deals with delivery and explains how infrastructure should be delivered in the District. The Council's "Infrastructure Delivery Plan" 2017 (EB1101A & EB 1101B) is referenced in this Chapter. This document was produced in consultation with relevant stakeholders and agencies. It provides information with regard to current and future infrastructure provision, key projects, delivery mechanisms, costs and timescales. This is a live document which will continue to be updated as new information emerges. Housing, Employment and Traveller Development Trajectories are contained in Appendix 5 of the Plan (P.242).</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for</p>	<ul style="list-style-type: none"> • An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below). • An audit trail showing how and why the quantum 	<p>The "Strategic Housing Market Assessment Establishing the OAN" 2017 (EB407) and the "Strategic Housing Market Assessment Affordable Housing Update" 2017 (EB408) are based on 2014 demographic and population projections, as well</p>

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<p>achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <p>—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</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<p>of development, preferred overall strategy and plan area distribution of development were arrived at.</p> <ul style="list-style-type: none"> Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area) 	<p>matters such as market signals, and identify the OAHN for the District, within the context of the HMA distribution. The “Essex, Southend on Sea and Thurrock Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Summary 2016 – 2033” (EB401A) and the detail in the “Epping Forest District Council: Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Need Report” November 2017 (EB402) identify these needs within the County context. The “West Essex and East Hertfordshire Assessment of Employment Needs” October 2017 (EB610) covers the functional economic market area and identifies the employment needs across the District. This has been supplemented by MoUs signed by the relevant partners agreeing the distribution of housing and employment across the SHMA/FEMA.</p> <p>The housing and employment requirements are set out in <i>Policy SP 2 Spatial Development Strategy 2011-2033</i> (P.31-33) which provides for a minimum number of homes, and their geographic distribution, travellers sites and makes employment provision.</p> <p>The Duty to Co-operate Compliance Statement (EB119) and the Regulation 22 Consultation Statement (EB115) provide details of the consultation and co-operation that has influenced the development strategy.</p> <p>In particular signed memoranda of understanding are in place for “Highways and Transport Infrastructure for the West Essex/ East Hertfordshire Housing</p>

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		<p>Market Area” February 2017 (EB1201) “Distribution of Objectively Assessed Housing Need across the West Essex/ East Hertfordshire Housing Market Area” February 2017 (EB1202) and “Managing the Impacts of growth within the West Essex/ East Hertfordshire Housing Market Area on the Epping Forest Special Area of Conservation” March 2017 (EB1200). A further MoU on the Distribution of Objectively Assessed Employment Need across the West Essex-East Hertfordshire Functional Economic Market Area May 2018 has been agreed. (EB1203).</p> <p>The audit trail demonstrating the process of formulation of the preferred strategy through the Regulation 18 consultation and leading to the conclusions on the spatial development strategy in the LPSV is documented through the sustainability appraisal and equalities impact reports (EB203-EB204). The audit trail for site selection is included within this documentation and detailed in the Site Selection Reports and Appendices 2016, 2017 and 2018.(EB 801A-AC, EB802b & EB804) and 2018 (EB805A-AK).</p> <p>The LPSV allocates sufficient sites to meet the housing needs identified for the District in the “Strategic Housing Market Assessment Establishing the OAN” 2017 (EB 407) and the “Strategic Housing Market Assessment Affordable Housing Update” 2017 (EB408). The LPSV also allocates sufficient sites to meet all of the calculated need identified in the Essex, Southend on Sea and Thurrock Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Summary 2016 – 2033 (EB401A) and the detail in the</p>

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		<p>Epping Forest District Council: Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Need Report November 2017 (EB402). The Council's update to the GTAA is included in the plan (P.29) and the sites are identified in the Places Chapter 5 (P.114 onward).</p> <p>The Council has adopted a flexible approach with regards to housing supply. LPSV allocates a higher number of houses than the OAN as identified in the SHMA 2017 update (EB407) to ensure that the Plan includes sufficient flexibility to respond to unanticipated changes in circumstances including the unforeseen failure of site(s) to deliver as planned, and, recognising that recent household projections have identified a further upward trend in housing need. The identification of additional sites demonstrates the Council's commitment to positive planning. In addition, a 5% buffer has been applied to the housing supply in the first five years to ensure competition and flexibility.</p> <p>The Council's approach to supporting the economy has been to plan for a marginally higher amount of employment land than that identified for the District in the "West Essex and East Hertfordshire Assessment of Employment Needs" October 2017 (EB610) to provide sufficient flexibility to respond to unforeseen demands and to provide for a range and choice of sites in terms of typology, location, mix and phasing. The spatial distribution has also sought to reflect the employment needs identified across the district and recognising that significant employment opportunities</p>

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		<p>already exist at Harlow.</p> <p>Many consultees responding to the Regulation 18 Consultation promoted alternative sites and strategies for development. The “Sustainability Appraisal (incorporating Equalities Impact Assessment) for the Epping Forest District Local Plan” 2017 (EB204) reviewed the alternative growth options confirming the preferred option as the most suitable.</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk) 	<p><i>Policy SP 1 Presumption in favour of sustainable development</i> (P.23) sets out the Council’s approach for achieving sustainable development. The policies within the LPSV are positively prepared, drafted in positive language and aim to encourage sustainable development.</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate. 	<p>Please refer to <i>the response to “The presumption in favour of sustainable development (NPPF paras 6-17)” above</i>.</p> <p>Background papers demonstrating the use of evidence in respect of the needs include <i>Housing Background Paper</i> (EB1600) and <i>Background Paper: The Economy and Town Centres</i> (EB1605).</p> <p>The promotion of efficient use of land and mixed use development is evidenced in policy including <i>Policy SP 3 Place Shaping</i> and the proposals for the Harlow and Gilston Garden Communities Policies SP 4 and SP 5.</p>

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NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	<ul style="list-style-type: none"> • 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. 	The Council has included the London Stansted Cambridge Corridor Vision (LSCC) in Chapter 2 (P.16) as the Council has recognised, and taken into account, the wider context within which the District is located, and therefore the need to reflect the aspirations and opportunities identified in the LSCC Vision. The Vision for the District (P. 19) supports a sustainable local economy which is complementary to the LSCC Vision.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> • A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22) 	<p>Chapter 1 Paragraph 1.44 (P.9) sets out the key issues and challenges that face the District. The LPSV seeks to address these issues.</p> <p><i>Policy SP 2 Spatial Development Strategy 2011-2033</i> (P.31-32) provides for the housing, employment and retail needs across the District. The commitment to providing new homes and the land for the provision of jobs will support investment in the District.</p> <p><i>Policy E 2 Centre Hierarchy/ Retail Policy</i> (P. 66-67) provides the framework for securing future investment into the town centres and smaller district centres. In addition, the Garden Town Communities site allocations as set out in <i>Policies SP 4 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town</i> and <i>SP 5 Garden Town</i></p>

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		<p><i>Communities</i> (P.40 and 42) will support the regeneration of Harlow by attracting investment to the town.</p> <p><i>Policy D 1 Delivery of Infrastructure</i> (P.183) sets out the mechanisms for securing the delivery of infrastructure and services to support new development. <i>Policy SP 5</i> (P.42-44), <i>Chapter 5 Places</i> (P.114-180) and Parts A & B of the Infrastructure Delivery Plan 2017 (EB1101A & EB 1101B) identify the infrastructure and services necessary to support proposed development. Securing this infrastructure will contribute to increasing investment in the District.</p> <p>The Council has identified new employment land together with the appropriate protection of existing employment sites in Policies SP 2, SP 5 and Chapter 5. Evidence to support the approach to employment is outlined in the suite of Employment Land Supply Assessments 2017 (EB602A-F). Site specific policies in Chapter 5 and Appendix 6 contain employment land requirements and current deliverability will be confirmed through the Statements of Common Ground agreed with developers.</p>
2. Ensuring the vitality of town centres (paras 23-37)		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> 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 	<p>The town centre and small district centre hierarchy is established in <i>Policy E 2 Centre Hierarchy/ Retail Policy</i> (P.66-67). This introduces a simplified town centre hierarchy which accords with the latest evidence as set out in the “Town Centres Review” 2016 (EB1008).</p>

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	not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.	<i>Policy E 2</i> (P.66-67) also outlines the Council's approach to proposals that come forward within town centre and small district centre boundaries, and the approach to Out of Centre development. The Council's approach to proposals in Primary and Secondary Shopping Frontages, and for corner shops, shops in small local parades and village shops is also set out in this policy.
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)	<ul style="list-style-type: none"> • An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages identified and allocated. 	<p>An assessment of the future need for additional retail floorspace in the town centres was carried out as part of the "Town Centres Review" 2016 (EB1008). This suggests that increasing the market share of retail expenditure is considered to be an unrealistic prospect for the District given the established and more significant nearby retail offer. Consequently retaining a constant market share is more realistic. Some 'pipeline' development already exists and consideration has also been given to the provision of floorspace in Harlow, recognising the contribution it makes to serving the needs of the District. The Council will keep under review how to meet future floorspace requirements over the Plan period, including the needs for out of centre sites.</p> <p>The locally specific approach to be taken with regard to Primary and Secondary Shopping Frontages is also set out in Chapter 5 Policies P 1 to P 5 inclusive (P. 115 -141) and identified in the associated maps.</p>
3. Supporting a prosperous rural economy (para 28)		

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<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<ul style="list-style-type: none"> 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. 	<p>The rural parts of the District are almost entirely washed over by Green Belt. However, within national policy there is strong support in the LPSV to maintain a vital economy within rural areas.</p> <p>Identified issues for the plan to address include at p.9-10:</p> <ul style="list-style-type: none"> <i>Protecting local services in the District's rural areas and facilities in villages</i> <i>Providing for future rural retail and commercial development, rural employment and supporting agriculture and horticulture whilst ensuring that unused horticultural and other agricultural buildings are re used.</i> <p>The Local Plan Objectives include at p.20:</p> <p><i>C. Economic Development</i></p> <p><i>(iii) to encourage the growth of local businesses and start ups, through supporting home working, provision of a range of flexible and affordable business facilities and the provision of high speed broadband across the District</i></p> <p><i>(iv) to support the diversification of the agricultural economy, including the expansion of the glasshouse industry, subject to appropriate environmental considerations</i></p>

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		<p><i>(v) to support tourism in the District through the promotion of , and improved access to , a wide range of existing attractions.... and through the provision of new visitor accommodation.</i></p> <p><i>Policy SP 2 Spatial Development Strategy (P. 31) seeks to enable small scale sites in smaller rural communities to come forward where there is a clear local need which supports the social and economic well being of that community at (viii).</i></p> <p>Other policies seek to permit new homes (that can in turn support commercial activity) within defined settlement boundaries (<i>Policy SP 2 C</i>) whilst <i>Policy H 3 Rural Exceptions</i> (P.60) supports affordable housing in the rural areas. <i>Policy E 2 Centre Hierarchy/ Retail Policy</i> (P. 66-67) specifically seeks to protect village shops at G. Food production is supported by <i>Policy E 3 Food Production and Glasshouses</i> (P. 69).</p> <p><i>Policy E 4 The Visitor Economy</i> (P.71) seeks to: <i>strengthen existing rural leisure businesses at (i) and encourage sustainable tourism in rural areas at (iv) as well as encouraging local food/produce and appropriate tourism development that supports rural business and farm diversification at (vii).</i></p> <p>The plan allocates land for housing and employment uses in villages – for example in Nazeing <i>Policy P 10</i> (P. 158) and Thornwood <i>Policy P 11</i> (P.160). Two policies <i>P 13 Rural Sites in the East of the District</i> (P.174) and <i>P 14 Rural Sites in the West of the District</i> (P. 176) allocate a range of sites for employment, traveller and</p>

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		residential uses. These allocations will directly and indirectly support the rural economy.
c. Promoting sustainable transport (paras 29-41)		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate</p>	<ul style="list-style-type: none"> • Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. • Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. • A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. • If local (car parking) standards have been prepared, are they justified and necessary? (39) • Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan. 	<p>The LPSV identifies two related issues at page 10:</p> <ul style="list-style-type: none"> • <i>Addressing the transport needs of current and future populations for both rural and urban populations along with many other infrastructure needs such as health...</i> • <i>The management of congestion, HGV's on local roads and provision of opportunities for walking, cycling and public transport, in addition to the management of commuter parking around London Underground stations.</i> <p>Within the Transport section (P.71) specific local challenges with regard to sustainable transport are outlined. The policy framework within the plan seeks to address these challenges.</p> <p>The vision (P.19) identifies that the District will be a place where:</p> <p><i>(iv) development needs will be met in the most sustainable locations;....</i></p> <p><i>(ix) access to places by public transport, walking and cycling will be promoted;</i></p>

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<p>significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>The Local Plan objectives (P.20) include:</p> <p><i>D. Infrastructure and Movement</i></p> <p><i>(i) to identify and help fund and facilitate the timely delivery of necessary infrastructure and services through a planned and co ordinated Infrastructure Delivery Plan working with relevant authorities, agencies, developers and stakeholders;</i></p> <p><i>(ii) to improve public transport , walking and cycling opportunities with the aim of promoting healthy lifestyles, reducing the effects of traffic congestion and improving accessibility to services and the countryside without requiring the use of the car..</i></p> <p><i>E. Climate Change and Flood Risk</i></p> <p><i>(i) to locate new development where there are the greatest opportunities for utilising public transport and cycling and walking instead of private car use...</i></p> <p>The spatial strategy of the plan seeks to support sustainable patterns of transport in its location policies. <i>Policy SP 3 Place Shaping</i> (P. 34) expects development to... <i>(xiii) provide for sustainable movement and access to local and strategic destinations (including rail, bus and pedestrians/cycling...)</i> and provides a housing density policy that guides the most efficient use of land in this respect.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The Harlow and Gilston Garden Town is dependent upon the delivery of <i>integrated sustainable transport systems that put walking, cycling and public transport networks and connections at the heart of growth in the area, to create a step change in modal shift</i> [Policy SP 4 (xii)] and requires Sustainable Transport Corridors to maximise the use of the sustainable transport modes....in order to improve air quality and reduce emissions and promote healthy lifestyles [Policy SP 4 (xiii)]. The aspiration is for 60% of journeys to and from the Garden Town Communities to be made by non car modes (para 2.118).</p> <p>Policy SP 5 Garden Town Communities (P. 42) requires specific measures in respect of sustainable transport for each of the three major sites to be master planned.</p> <p>In addition, the overarching Policy T 1 Sustainable Transport Choices (P.74) outlines the Councils strategy with respect to partnership working to deliver transport choice and minimise the need to travel. It identifies criteria applicable to developments and the requirement for Transport Statements or Assessments and Travel Plans for significant generators of traffic. Policy T2 Safeguarding of Routes and Facilities (P.75) seeks to protect important land that may be required for future sustainable transport projects.</p> <p>Site guidance contained in Appendix 6 includes that relating to sustainable transport provision and parking measures to encourage modal shift. The</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>selection of sites for allocation included the use of sustainable transport criteria. These are contained in the “Site Selection Methodology Report” 2016 (EB801A) and 2017 (EB805AK) including access to various services for residential use and the strategic road network for employment uses.</p> <p>Finally, the Council’s “Infrastructure Delivery Plan” 2017 (EB1101A & EB 1101B) has been developed with all relevant partners and the transportation work streams have involved a significant degree of work with Essex and Hertfordshire County Councils and Highways England. The IDP contains an outline of the work undertaken with partners. The “Highways and Transport Infrastructure for the West Essex/ East Hertfordshire Housing Market Area” February 2017 (EB1201) has been signed by Essex County Council, Hertfordshire County Council and Highways England in addition to the relevant District Councils. This is testament to the level of inter-agency working that has informed the plan and will continue to deliver the plan.</p>
d. Supporting high quality communications infrastructure (paras 42-46)		
Support the expansion of the electronic communications networks, including telecommunications’ masts and high speed	<ul style="list-style-type: none"> Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, 	<i>Policy D 5 Communications Infrastructure (P.189)</i> promotes enhanced digital connectivity by supporting high speed broadband and telecommunications

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>broadband. (43)</p> <p>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)</p>	<p>noting the caveats in para 44.</p>	<p>infrastructure. Applicants submitting planning applications for major development proposals should demonstrate how high speed broadband infrastructure will be accommodated within the development. This approach supports the Superfast Essex programme objective that 95% of Essex should have access to fibre broadband by 2019.</p>
<p>e. Delivering a wide choice of high quality housing (paras 47-55)</p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> • Identification of: <ul style="list-style-type: none"> a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) • A SHLAA 	<p>"Epping Forest District Local Plan Housing Implementation Strategy" December 2017 (EB410) demonstrates that the LPSV identifies sufficient deliverable sites to provide a five year housing supply. This includes the 5% buffer to ensure choice and competition in the market. It also makes provision for recent undersupply to be delivered over the plan period.</p> <p><i>Policy SP 5 Garden Town Communities</i> (P.42-44) and <i>Place Policies P 1 – P 15</i> (P. 113-180) identify the supply of sites that will support the delivery of the LPSV Housing Requirement including that for Travellers and Travelling Showpeople. An important document which contributed to this evaluation is the "Site Selection Report" March 2018 (EB805). This identified the most favourable parcels of land across the District for development.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Development of Green Belt land is required to meet the Council's housing requirement and to ensure the Council has a five year housing supply available. The "Background Paper on Green Belt and District Open Land for Draft Plan Consultation 2016 (update 2018)" (EB1608) sets out the exceptional circumstances that exist that require alterations to Green Belt boundaries.
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	<ul style="list-style-type: none"> • Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 	Policy SP 5 (P.42-44) and Policies P 1 – P 15 (P.113-180) identify the supply of sites that will support the delivery of the LPSV Housing Requirement (including that for Travellers and Travelling Show People) for the whole of the Plan period. In addition a windfall allowance for residential development has been included for the years 6-10 and 11-15. The justification for the inclusion of a windfall allowance is set out in the "Housing Implementation Strategy" (EB410)
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)	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	<p>Appendix 5 of the LPSV (P.242-243) shows the expected phasing of housing delivery in five year segments for each settlement or area in the Housing Trajectory.</p> <p>The "Authority's Monitoring Report" (EB170A-L), which is published annually includes the monitoring of completions and permissions.</p> <p>The "Housing Implementation Strategy" (EB104) sets out how a five year supply will be maintained.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Set out the authority's approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> Policy on the density of development. 	The Council's approach to housing density is set out in <i>Policy SP 3 Place Shaping</i> (P.34) which reflects local circumstances regarding the character of the area and accessibility to public transport as appropriate.
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)	<ul style="list-style-type: none"> Policy on planning for a mix of housing (including self-build, and housing for older people SHMA Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) Evidence for housing provision based on up to date, objectively assessed needs. (50) Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50) 	<p>The "Strategic Housing Market Assessment Establishing the OAN" 2017 (EB407) and the "Strategic Housing Market Assessment Affordable Housing Update" 2017 (EB408) set out the objectively assessed needs of the authorities making up the East Hertfordshire and West Essex Housing Market Area (HMA) and is (together with previous versions) the basis for identifying the mix of housing required within the plan period.</p> <p><i>Policy H 1 Housing Mix and Accommodation Types</i> (P.57) sets out the Council's approach to ensuring the provision of the right type and mix of housing. It expects a range of types, and requires the mix in proposals to be justified and reflect the latest Council published housing needs evidence. This policy will be used in conjunction with other housing policies.</p> <p><i>Policy H 2 Affordable Housing</i> (P.59-60) sets out the thresholds for, and percentage of, affordable housing as well as tenure mix. It states that provision should be on-site and highlights that off-site provision or financial contributions will only be accepted in justified exceptional circumstances.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p><i>Policy H 1</i> (P.57) sets out the Council's approach to the provision of specialist housing for older and vulnerable people, and for self-build/custom build housing, sites for caravans and mooring houseboats, and to ensure that housing delivered is accessible and adaptable to meet the changing needs of occupants (and to ensure choice in respect of housing size, type and location). It also resists the loss of bungalows, recognising that such accommodation provides for the needs of the elderly and those with mobility difficulties and that evidence has indicated the gradual erosion of the existing stock.</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> • Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new isolated homes listed at para 55. 	<p><i>Policy H 3 Rural Exceptions</i> (P.60-61) establishes the criteria for Rural Exception Affordable Housing schemes to come forward in areas where an affordable housing need exists, and includes the approach that the Council will take when considering the provision of a small proportion of market housing.</p> <p>The whole of the District outside of the defined settlements is designated as Metropolitan Green Belt. <i>Policy DM 4 Green Belt</i> (P.178) outlines the approach to development in the Green Belt, including for agricultural or forestry purposes.</p>
<p>f. Requiring good design (paras 56-68)</p>		
<p>Develop robust and comprehensive policies that set out the quality of development that</p>	<ul style="list-style-type: none"> • Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in 	<p><i>Policy SP 3 Place Shaping</i> (P.34) sets out place shaping principles, bringing together all the component parts</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
will be expected for the area (58).	paras 59-61, linked to the vision for the area and specific local issues	of a successful place. <i>Policy SP 4 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town</i> (P. 40) sets out the approach to be taken in achieving a holistic and planned approach to the development of the Garden Town Communities framed by the Town and Country Planning Association's nine Garden City principles. A similar Garden Town policy is contained within Harlow District Council's proposed Local Plan to ensure a consistent approach across the Garden Town, particularly as the East Harlow site straddles the two administrative boundaries. <i>Policy DM 9 High Quality Design</i> (P. 92-93) makes it clear that all new development must achieve a high specification of design and contribute to the distinctive character and amenity of the local area. <i>Policy DM 10 Housing Design and Quality</i> (P.94) requires the provision of adequate internal and external space to ensure that people have a quality living environment, and that mixed tenure development proposals should be designed to be 'tenure blind' to ensure the creation of inclusive and attractive places.
g. Promoting healthy communities (paras 69-77)		
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).	<ul style="list-style-type: none"> • Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments 	<p><i>Policy SP 3 Place Shaping</i> (P.34) sets out place shaping principles, including that which will H(x) ensure positive integration and connection with rural and urban communities thereby contributing to the revitalisation of existing neighbourhoods.</p> <p><i>Policy SP 4 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>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 quality public space, which encourage the active and continual use of public areas. (69)</p>	<p>(P. 40) sets out the approach to be taken in achieving a holistic and planned approach to the development of the Garden Town Communities. In particular to accord with the principles of:</p> <p><i>C (x) provide for balanced and inclusive communities through a mix of homes of different sizes, tenures and types.... and</i></p> <p><i>(xiv) Create sociable, vibrant, healthy and walkable neighbourhoods with equality of access for all to local employment opportunities, a range of community services and facilities including health, education, retail, culture, community meeting spaces, multi-functional open space, the Green Wedge Network, sports and leisure facilities and to high quality digital infrastructure.</i></p> <p><i>Policy DM 9 High Quality Design (P. 92-93) makes it clear that all new development must achieve a high specification of design and in particular:</i></p> <p><i>A (v) incorporate design measures to reduce social exclusion, the risk of crime and the fear of crime.</i></p> <p><i>Policy DM 10 Housing Design and Quality (P.94) requires the provision of adequate internal and external space to ensure that people have a good quality living environment, and that mixed tenure development proposals should be designed to be 'tenure blind' to ensure the creation of inclusive and attractive places.</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> • Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure. 	<p><i>Policy SP 3 Place Shaping (P.34) sets out place shaping principles, including that which will:</i></p> <p><i>A (vii) extend, enhance and reinforce strategic green infrastructure and public open space..</i></p> <p><i>Policy SP 4 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town (P.40) sets out the approach to be taken in achieving a holistic and planned approach to the development of the Garden Town Communities including the provision of community facilities (B.) and design and management of the public realm (C. (viii)) and at:</i></p> <p><i>(xiv) Create sociable, vibrant, healthy and walkable neighbourhoods with equality of access for all to local employment opportunities, a range of community services and facilities including health, education, retail, culture, community meeting spaces, multi-functional open space, the Green Wedge Network, sports and leisure facilities and to high quality digital infrastructure.....</i></p> <p><i>Policy DM 9 High Quality Design (P.92-93) makes it clear that all new development must achieve a high specification of design and in particular:</i></p> <p><i>F. where appropriate development proposals must contribute positively to the public realm, and to public spaces to which it is physically or functionally linked.</i></p> <p><i>Policy DM10 Housing Design and Quality (P.94)</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>requires ground floor family housing, where no private amenity space is feasible to provide access to shared communal amenity space and children's play space (B.).</p> <p><i>Policy D 2 Essential Facilities and Services (P.186)</i> requires services to be provided or improved relative to the scale of development and seeks to protect existing services and facilities.</p> <p><i>Policy D 4 Community Leisure and Cultural Facilities (P.188)</i> seeks to retain and improve the quality and capacity of facilities valued by the community, whilst large scale developments are expected to provide them on site and seek financial contributions from development when this is not possible. The policy also identifies positive partnership work with governing bodies and communities to achieve facilities.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<ul style="list-style-type: none"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75) 	<p><i>Policy DM 6 Designated and Undesignated Open Spaces (P.88)</i> requires development proposals to provide open space or links to it in line with the up to date evidence in the "Infrastructure Delivery Plan" (EB1101A & B) and "Open Space Strategy" 2017 (EB703). Standards of provision are set out in the Open Space Strategy.</p> <p><i>Policy D 4 Community Leisure and Cultural Facilities (P.188)</i> seeks to retain and improve the quality and capacity of facilities valued by the community including sports facilities.</p> <p><i>Policy DM 5 Green and Blue Infrastructure (P.86)</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>requires that proposals must demonstrate that they have been designed to:</p> <p><i>A (iv) enhance connectivity and integration by providing pedestrian/ cycle access to existing and proposed Green Infrastructure networks and established routes, including footpaths, cycleways and bridleways/ Public Rights of Way.</i></p> <p>This policy seeks to protect such rights of way and improve access.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78) 	<p>There is no specific policy in relation to Local Green Spaces as the Council relies on national policy. However, <i>Policy D 6 Neighbourhood Planning</i> (P.189) supports the development of neighbourhood plans.</p>
<p>h. Protecting Green Belt land (paras 79-92)</p>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in</p>	<ul style="list-style-type: none"> • Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> ○ Enhance the beneficial use of the Green Belt. (81) ○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) ○ Specify that inappropriate development 	<p><i>Policy SP 6 Green Belt and District Open Land</i> (P.51) and <i>Policy DM 4 Green Belt</i> provide for the strategic and detailed approaches to protecting the Green Belt. As the whole of the District, outside of the identified settlement boundaries is designated as Metropolitan Green Belt policies relating to the natural environment, habitat protection and improvement and landscape character, ancient landscapes and</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<p>should not be approved except in very special circumstances. (87)</p> <ul style="list-style-type: none"> ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	<p>geodiversity are relevant in this regard.</p> <p>The approach to reviewing and proposing alterations to the Green Belt boundaries, including the use of physical features is set out in “The Green Belt and District Open Land Background Paper Update 2018” (EB1608) in which the justification for all detailed alterations to the Green Belt are found. This is supported by the “Green Belt Review” undertaken by the Council (EB704A & B, EB705A & B).</p>
<p>i. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> • Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building’s sustainability which are consistent with the Government’s zero carbon buildings policy . (95)) 	<p>The overall approach to climate change in the Plan is outlined in <i>the Climate Change Background Paper</i> (EB1604) which also deals with matters relating to renewable energy.</p> <p><i>Ensuring that sustainable development is achieved, and that climate change is considered in the policies and proposals of the Plan...</i> is the first key issue identified to be addressed in the Plan (P.9). The vision of the plan notes that:</p> <p><i>(iv) development needs will be met in the most sustainable locations.</i> (P.19)</p> <p>The Local Plan Objectives include a section:</p> <p><i>E. Climate Change and Flood Risk</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>(i) to locate new development where there are the greatest opportunities for utilising public transport and cycling and walking instead of private car use;</p> <p>(ii) to require development to meet high standards of energy efficiency and use of renewable energy;</p> <p>(iii) to ensure new development makes full provision for recycling and, where appropriate, encourages the production of energy from waste; and</p> <p>(iv) to ensure that new development is located away from areas at risk of flooding, and that such development will not increase flood risk elsewhere.</p> <p>These objectives are pursued throughout the plan and are threaded into the majority of the policies.</p> <p>Examples include:</p> <p><i>Policy SP 2 Spatial Development Strategy 2011-2033 (P. 31)</i></p> <p><i>Policy SP 4 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town (P.40)</i></p> <p><i>Policy SP 7 The Natural Environment, Landscape Character and Green and Blue Infrastructure (P.52)</i></p> <p><i>Policy T 1 Sustainable Transport Choices (P.74)</i></p> <p><i>Policy DM 9 High Quality Design (P.92)</i></p> <p><i>Policy DM 16 Sustainable Drainage Systems. (P.102)</i></p> <p><i>Policy DM 20 Low Carbon and Renewable Energy</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		(P.108)
<p>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)</p>	<ul style="list-style-type: none"> • A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97) 	<p>The Councils approach to renewable and low carbon energy is set out in <i>Policy DM 20 Low Carbon and Renewable Energy</i> (P.108) which encourages the incorporation of these measures in all development.</p> <p>The <i>Climate Change Background Paper</i> (EB1604) explains the evidence regarding renewable energies and conclusions regarding policy.</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<ul style="list-style-type: none"> • Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures 	<p>The Background Paper: Addressing Climate Change (EB1604) explains the approach taken in the Plan. The key impacts of climate change in the District relate to flood risk, water quality, air quality and urban heating. This is supported by the Epping Forest District Council Carbon Reduction and Renewable Energy Assessment 2013 (EB907).</p> <p>The Plan contains a suite of measures designed to mitigate against the risk of flooding.</p> <p>The choice of spatial strategy has included a sequential flood risk assessment at <i>Policy SP 2 A (ii)</i> (P. 31). The approach to green and blue infrastructure provides key mechanisms to combat flood risk, urban heating and air quality in Policies SP 7 (P.52) and DM 5 (P.86).</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p><i>Policy DM 15 Managing and Reducing Flood Risk (P.100)</i> details flood avoidance measures including in location and design including managing run off whilst <i>Policy DM 16 Sustainable Drainage Systems (P.102)</i> provides for sustainable drainage management, and water quality impacts. In pursuit of improved drainage <i>Policy DM 17 Protecting and Enhancing Watercourses and Flood Defences (P.103)</i> seeks naturalisation of water courses where feasible and avoidance of development that could increase the risk of flooding. <i>Policy DM 19 Sustainable Water Use (P. 106)</i> seeks to reduce levels of water use in the interests of maintaining local water supply and quality in this water stressed District.</p> <p><i>Policy DM 22 Air Quality (P.111)</i> specifically identifies air pollution as a risk that requires mitigation in relation to local receptors. The policy requires larger development to undertake air quality assessments with a view to identifying and implementing mitigation measures.</p> <p>Probably the most significant mitigation project in this respect is that being developed with partners under the Memorandum of Understanding “Managing the Impacts of growth within the West Essex/ East Hertfordshire Housing Market Area on the Epping Forest Special Area of Conservation” March 2017 (EB1200).</p>
Take account of marine planning (105)	<ul style="list-style-type: none"> Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation 	Epping Forest District is not a coastal authority therefore this section is not applicable.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development Integrate as appropriate marine policy objectives into emerging policy Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	
Manage risk from coastal change (106)	<ul style="list-style-type: none"> 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. Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	Epping Forest District is not a coastal authority therefore this section is not applicable.
j. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	<ul style="list-style-type: none"> A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs. 	<p><i>Policy SP 2 Spatial Development Strategy</i> (P.31) refers at A(vii) of the sequential approach to the choice of location for development and the protection of higher quality agricultural land. The green infrastructure and landscape strategy contained in <i>Policies SP 7</i> (P.52) <i>Garden Town Policies SP 4 and SP 5</i> and green infrastructure design <i>Policy DM 5</i> present a clear approach to the subject.</p> <p>In addition landscape value is a key aspect of <i>Policy DM 3 Landscape Character Ancient Landscape and Geodiversity</i> (P.84) it requires that proposals should:</p> <p>(i) <i>be sensitive to their setting in the landscape, and</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p><i>its local distinctiveness</i></p> <p>(ii) <i>use techniques to minimise impact on , or enhance the appearance of the landscape by:</i></p> <ul style="list-style-type: none"> • <i>taking into account existing landscape features from the outset;</i> • <i>careful landscaping of the site</i> • <i>ensuring the sensitive use of design, layout, materials and external finishes and</i> • <i>having regard to protecting, and where possible enhancing, long views to distant landmarks and landscapes of interest.</i>
Prevent unacceptable risks from pollution and land instability (109)	<ul style="list-style-type: none"> • Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity. 	<p><i>Policy DM 21 Local Environmental Impacts, Pollution and Land Contamination (P.109) covers residual local environmental impacts of all development including but not limited to air and water, (surface and groundwater) pollution, dust, noise, vibration, light pollution, odours, and fumes as well as land contamination. It also addresses development where there is a risk of contamination or land instability including the construction phase.</i></p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> • Identification and mapping of local ecological networks and geological conservation interests. • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species 	<p>The Policies map identifies the key green infrastructure assets broken down into their respective designations from international to local.</p> <p>Given the impressive biodiversity assets in the District the plan is unsurprisingly clear in the manner in which it addresses this key issue. The particular assets of international importance are appropriately protected together with national and local levels of biodiversity importance.</p> <p><i>Policy SP 7 The Natural Environment, Landscape</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p><i>Character and Green and Blue Infrastructure</i> (P.52) outlines the overall approach together with the requirement in <i>Policy SP 3 Place Shaping</i> (P.34) that development proposals:</p> <p><i>A (vi) ...ensure generous, well connected and biodiverse rich green space provision .</i></p> <p>The following policies then provide more detailed guidance regarding this issue in development;</p> <p>The Garden Town policies SP 4 C(xvi) (P.41) and SP 5 F.(iv) G. (iii) H. (iii) (P.43) incorporate requirements relating to improving biodiversity and the provision of natural and semi natural open space.</p> <p>The individual place policies include site allocations – many of these have a requirement regarding protection of biodiversity as set out in the site specific requirements in Appendix 6 of the Plan.</p> <p>All development is covered by <i>Policy D M 1 Habitat Protection and Improving Biodiversity</i> (P.79) and relevant proposals by <i>Policy DM 2 Epping Forest SAC and Lee Valley SPA</i> (p.83) which include key mitigation measures.</p>
<p>k. Conserving and enhancing the historic environment (paras 126-141)</p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. 	<p><i>Policy DM 7 Heritage Assets</i> (P.90) and <i>Policy DM 8 Heritage at Risk</i> (P.91) provide a positive strategy for the conservation and enjoyment of the historic</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> A map/register of historic assets A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) 	environment, including heritage assets at risk. The Council undertakes periodic reviews of its designated and non-designated heritage assets and will introduce additional levels of protection, where appropriate, through the use of, for example, Article 4 Directions and areas of Special Advertisement Control.
I. Facilitating the sustainable use of minerals (paras 142-149)		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	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.	This is primarily a matter for Essex County Council (ECC) as the Minerals Planning Authority. Minerals Safeguarding Areas were taken into consideration through the Site Selection process detailed in the Site Selection Reports and Appendices 2016/17 (EB 801A-AC, EB802B & EB804) and 2018 (EB805A-AK).
<p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. The most appropriate strategy when considered against reasonable alternatives. 		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	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	The Regulation 22 Consultation Statement (EB115) contains information on the consultations carried out at the Regulation 18 stages of the plan – community visioning, community choices and Draft Local Plan.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	reach groups, key stakeholders etc. Reference SCI	<p>This statement lists the specific and general consultation bodies that have been consulted and those that made representations, as well as the individuals that have contributed. The 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; media briefings, dedicated website with video, letters, emails, twitter and facebook posts, advertisements in local media, newsletters delivered to all 57,000 addresses in the District and commuter post cards. The Council has also made efforts to consult hard to reach groups, through: presentation, exhibitions and public meetings. A number of these groups are also on the consultation database and received regular updates.</p> <p>The adopted “Statement of Community Involvement” 2013 (EB104) has been used to guide the public consultation on the Local Plan.</p>
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> 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. <p>AND</p> <ul style="list-style-type: none"> 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. 	<p>The LPSV has been informed and is supported by a credible, up to date and comprehensive evidence base. This evidence base is listed on the Council’s website. 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 document list.</p> <p>The Regulation 18 version of the Draft Local Plan 2016 (EB 123) incorporates base information regarding the</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>OR</p> <ul style="list-style-type: none"> A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. <p>OR</p> <ul style="list-style-type: none"> 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). 	<p>evidence used to support the policies and how this has supported them. The structure of this version of the plan sets out for every policy/ policy area:</p> <ul style="list-style-type: none"> the issue, the Evidence Base, the responses from the previous consultation under “What you told us” , the preferred approach including the draft policy the alternative options considered and narrative in this respect. <p>The “Sustainability Appraisal (incorporating Equalities Impact Assessment) for the Epping Forest District Local Plan” 2017 (EB204) documents the process of plan making including how the evidence has informed decisions.</p> <p>A number of Background Papers identify key subjects that were considered to require further explanation in relation to the evidence base, and its use, accompanied the Draft Local Plan at Regulation 18. They were published in 2016 and identify the position at that time;</p> <ul style="list-style-type: none"> Housing Background Paper (EB1600); Transport Background Paper (EB1601); Background Paper on Open Space and Standards (EB1602); Green Belt and District Open Land (explains exceptional circumstances and boundary changes) (EB1603) and updated in 2018 (EB 1608); Background Paper: Addressing Climate Change (EB1604);

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Background Paper: The Economy and Town Centres (EB1605); • Background Paper on Natural Environment (EB1606); and • Background Paper on Historic Environment (EB1607). <p>The LPSV itself, together with the Regulation 18 Draft Local Plan, background papers and SEIA 2017 provide a thorough explanation of how the options were selected and how the policies have been formulated.</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> • Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the 	<p>The Sustainability Appraisal process clearly informed the policy formulation throughout the plan and this can be seen from Scoping in 2010 (EB200) to the final report in 2017 (EB204).</p> <p>The process of formulation of the preferred strategy through the Regulation 18 process and leading to the conclusions on the spatial development strategy in the LPSV is documented in detail through the sustainability appraisal and equalities impact assessment (EB203-EB204). The audit trail for site selection undertaken within the overall strategy chosen is included within this documentation and detailed in the Site Selection Reports and Appendices 2016/17 (EB 801A-AC, EB802b & EB804) and 2018 (EB805A-AK).</p> <p>Many consultees responding to the Regulation 18 consultation promoted alternative sites and strategies for development. The "Sustainability Appraisal (incorporating Equalities Impact Assessment) for the Epping Forest District Local Plan" 2017 (EB204)</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	content of policies.	<p>reviewed the alternative growth options confirming the preferred option as the most suitable. It documents the alternatives considered for the plan in 2012, 2016 and 2017 at Part 1.</p> <p>The alternatives considered for individual policies are documented and briefly explained in each relevant section of the Regulation 18 version of the plan (EB123) together with the key issues raised regarding the policy matter so that a clear trail, of what evidence and consultation responses were considered and how, is recorded. Whilst additional background on the use of evidence to inform policy is contained in the background papers noted above. (EB1600-1608)</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 • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		
<i>Deliverable and Coherent</i>	<ul style="list-style-type: none"> • Sections of the DPD which address delivery, the means of delivery and the timescales for key 	The structure of the LPSV outlines a clear top down

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<p>developments and initiatives.</p> <ul style="list-style-type: none"> • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	<p>relationship between the Vision (P.19), the Plan Objectives (P.20) and the policies that will enable the Council's aspirations to be met. The vision, objectives and policies seek to address the key issues (P.9-10) facing the District.</p> <p>The policies are internally consistent and presented as a complete set. This is demonstrated by the policy coverage of the plan in addition to specific wording of policy.</p> <p>The timescales related to the objectives of the plan span twenty years. This is a realistic overall time period to be able to assess impact. The monitoring provisions for policies are set out in <i>Policy D 7 Monitoring and Enforcement</i> and <i>Appendix 3 List of measures to monitor the effectiveness of policies in the Local Plan</i> which highlights the different time scales for the monitoring of various indicators that will enable the evaluation of the effectiveness of the plan.</p> <p>Chapter 6 (P.182 onwards) deals with delivery and explains how infrastructure should be delivered in the District.</p> <p>The Council's continued engagement with the West Essex and East Hertfordshire Co-operation for Sustainable Development Members Board and Officers Group demonstrates its commitment to continued co-operation with delivery partners. A number of bodies have expressed their support through representations submitted to the consultations. The delivery of matters agreed in the</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>MOU's of the partnership continue. Details can be found in "The Duty to Co-operate Compliance Statement" (EB119). In addition following Government announcement of the Harlow and Gilston Garden Town in January 2017, the Council is part of the Garden Town Members and Officers Board.</p> <p>Please also refer to the response to "Vision and Objectives" section at the top of this checklist.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<ul style="list-style-type: none"> • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	<p>Chapter 6 Infrastructure and Delivery deals with the infrastructure to accompany development in terms of policy, <i>Policy D1 Delivery of Infrastructure</i> (P.183) requires this. The development trajectories at Appendix 5 (P.242) identify the proposed phasing of Housing, Employment and Travellers pitches to be delivered across the plan period. Provision of necessary infrastructure is integral to the delivery of the proposed development and key infrastructure is identified in the "Infrastructure Delivery Plan" 2017 (EB1101A & EB 1101B). This document was produced in consultation with relevant stakeholders and agencies. It provides information with regard to current and future infrastructure provision, key projects, delivery mechanisms, costs and timescales. This is a live document which will continue to be updated as new information emerges.</p> <p>The use of Masterplans and Concept Frameworks are key to delivery of sites in the District and this includes the incorporation of key infrastructure. Examples include:</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Masterplans for the Garden Town Communities at <i>Policy SP 4 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town</i> (P.40) which refer to the IDP (EB1101A & B). The IDP has a combined schedule for these sites and individual schedules for the sites (P.24-33 of EB1101B). The paper “Requirements for Strategic Masterplans” details these including infrastructure matters (EB1106). • Concept Frameworks for West Ongar in <i>Policy P 4 Ongar</i> (P.134) and Appendix 6 (P.106) which sets out the required infrastructure improvements to bring forward the sites. The settlement schedule for Ongar infrastructure is in IDP Part B (P. 73 EB1101B). <p>The extensive work relating to the delivery of infrastructure at Harlow and Gilston Garden Town continues with further work on infrastructure for the Garden Town being commissioned.</p> <p>Building on the Infrastructure Delivery Plan Parts A and B (EB1101A and EB1101B), a technical paper on infrastructure delivery for the District is being produced. The purpose of the technical paper is to provide more information and certainty on infrastructure delivery, as well as a more general update on the work undertaken since the IDP was published. Discussions are ongoing with infrastructure providers, and particularly Essex County Council, in order to provide greater clarity on future infrastructure requirements, and to respond to</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>representations received as part of the Regulation 19 Publication.</p> <p>The technical paper will include a high level framework for apportionment and pooling arrangements to be taken forward for key infrastructure (highways, public transport, education, health (GP surgeries), and open space, sports, green infrastructure and community facilities). The paper will provide more information on those external funding sources outlined in the IDP, including: which ones are being considered; work currently ongoing to progress/secure funding; and any risks of funding not being in place and contingency measures for this. The paper will also cover the potential contribution of the Community Infrastructure Levy (CIL) in funding infrastructure delivery.</p> <p>A whole plan viability assessment has been produced “Assessment of the Viability of Affordable Housing, Community Infrastructure Levy and Local Plan” (EB301A-E & EB300). This study assessed the financial viability of the policies in the plan when considering a series of generic development typologies. The affordable housing requirement was also taken account of through this document. This work concluded that the policies in the plan provided good prospects of delivery overall.</p>
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial</p>	<ul style="list-style-type: none"> Sections of the DPD that reflect the plans or strategies of the local authority and other bodies 	<p>Spatial Planning has been the basis for the production of the LPSV. The Council has also included the London</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area 	<p>Stansted Cambridge Corridor (LSCC) Vision (P.16) as the Council recognises the need to reflect the aspirations and opportunities identified in the LSCC Vision which is a strategic and spatial vision for growth across a large area consisting of a number of local authorities. The Council has also included the Lee Valley Regional Park Vision recognising that part of Epping Forest District lies within the Park's boundary and the authority is a key partner.</p> <p>Joint evidence studies and the establishment of objectively assessed needs has been undertaken at a partnership level within West Essex and East Herts for Housing and Employment and within and beyond Essex for Gypsy, Travellers and Travelling Showpeoples' needs. (Please refer to "objectively assessed needs" section above).</p> <p>The Duty to Co-operate Compliance Statement (EB 119) and the Regulation 22 Consultation Statement (EB115) provide details of the consultation and co-operation that has influenced the development strategy and the range of partners involved in its production. The MOUs noted in the "<i>presumption in favour of sustainable development</i>" section above are testament to the work undertaken with Natural England and the Conservators of Epping Forest regarding impacts on the Epping Forest SAC, with Highways England and Essex County Council on transportation and with the West Essex/East Hertfordshire authorities on the distribution of employment and housing needs.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The IDP (EB1101A & B) has been produced in conjunction with infrastructure and service providers and therefore the strategies of these bodies have been considered and work with infrastructure providers is integrating and informing their delivery strategies.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<ul style="list-style-type: none"> • Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed. • Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> a. the effectiveness of policies and what evidence is being collected to undertake this b. changes affecting the baseline information and any information on trends on which the DPD is based • Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances • Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision • Sections of the DPD identifying the key indicators 	<p>Flexibility and adaptability have been built into the plan throughout the process particularly with regards to development allocations for housing land, employment land, and Gypsy and Travellers Pitch allocations. Currently the LPSV provides for a higher number of houses than the OAN as identified in the SHMA Update (EB408), including that already delivered. The development trajectories in Appendix 5 indicate (P.242) the timescales for delivery of the site allocations in the Plan.</p> <p>The Council has adopted a flexible approach to development in the villages with the inclusion of a <i>Policy H 3 Rural Exceptions</i> (P.60).</p> <p><i>Appendix 3 Measures to monitor the effectiveness of policies in the Local Plan</i> (P.217) sets out a number of indicators that will be used to monitor the effectiveness of the policies. Data is collected on a relevant frequency to the indicator. 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>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	of success of the strategy, and the remedial actions which will be taken if adjustment is required.	
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? 	<ul style="list-style-type: none"> A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues 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. 	<p>The Duty to Co-operate Compliance Statement (EB119) 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 has signed a number of MOUs and intends to sign a number of Statements of Common Ground with statutory consultees following Regulation 19 representations and with developers of sites.</p> <p>A number of the proposed developments require infrastructure provision to ensure the site is sustainable. The Council has produced an IDP (EB 1101A & B) 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"> Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? Is it clear how the significant effects identified 	<ul style="list-style-type: none"> Sections of the DPD setting out indicators, targets and milestones Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories Reference to any other reports or technical documents which contain information on the delivery of policies Sections of the current annual monitoring report and the sustainability appraisal report setting out 	<p><i>Appendix 3 Measures to monitor the effectiveness of policies in the Local Plan</i> (P.217) sets out a number of indicators that will be used to monitor the effectiveness of the policies. Data is collected on a relevant frequency to the indicator. This will allow the Council to identify if the plan is not being implemented as anticipated and whether a review is required or if policy adjustments are needed.</p> <p>The Authority Monitoring Report (for example</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</p>	<p>the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal</p>	<p>EB1708L) records the monitoring of development completions and will monitor the development trajectories (P.242), as well as, reporting on the effectiveness of the policies contained within the Plan. The first Authority Monitoring Report following submission of the LPSV will begin to include the indicators noted in Appendix 3 of the LPSV. 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 indicators relate to key sustainability topics assessed in the “Sustainability Appraisal (incorporating Equalities Impact Assessment) for the Epping Forest District Local Plan” 2017 (EB204).</p>
<p><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p>		
<p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<ul style="list-style-type: none"> Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement 	<p><i>Policy SP 1 Presumption in favour of sustainable development</i> (P.23) provides a version of the NPPF policy recommended by the Planning Inspectorate for local plans. <i>Policy DM 4 Green Belt</i> is close to a repetition of National Policy but has been included to reassure stakeholders of the importance of Green Belt protection. The Regulation 18 Draft Local Plan 2016 relied on the NPPF. In all other respects policies are consistent with national policy but locally distinctive and as such do not repeat or re-formulate national guidance.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none">• Reports or copies of correspondence as to how representations have been considered and dealt with.	

Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement with both settled and traveller communities.	<ul style="list-style-type: none"> • Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups. 	The key evidence in respect of the approach taken to the assessment of need is contained in the original work undertaken in 2014 that was then update in 2017. The original detailed survey work with groups was not repeated in its entirety but interviews were also undertaken in 2017. Please refer to "Essex, Southend-on-Sea and Thurrock, Gypsy and Traveller Accommodation Assessment Methodology Modelling Current and Future Needs" 2017 (EB401B). In particular P.13 & 14. "Essex Gypsy, Traveller and Travelling Showpeople accommodation assessment on behalf of for the Essex Planning Officers Association" 2014 P.16 Stage 4 (EB403).
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.	<ul style="list-style-type: none"> • Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions. 	The evidence base supporting the allocation of sites for Travellers was produced jointly with Essex authorities, Southend-on-Sea and Thurrock Councils. The most up to date study "Essex, Southend-on-Sea and Thurrock, Gypsy and Traveller Accommodation Assessment Summary 2016 -2033" (EB401A) and" Epping Forest District Gypsy, Traveller and Showpeople Accommodation Assessment Summary Report" (EB402) provide the fundamental evidence base for the work. In addition, the Councils own

Policy Expectations	Possible Evidence	Evidence Provided
		records relating to planning permissions, appeals and enforcement actions have been used to update the information contained in the GTAA and effectively provide a live data base of needs.
Policy B: Planning for traveller sites (paras 7-11)		
<p>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.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> • Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 11 	<p>The LPSV allocates sites to cover need across the whole plan period, as expressed at the point of publication, plus a small number of additional plots.</p> <p><i>Policy H 4 Traveller Site Development (P.62) together with Policies SP 2 Spatial Development Strategy 2011-2033 (P.31-32), SP 4 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town (P.40-41) and Chapter 5 (P.114 – 180) provides for the timely provision of Gypsies and Travellers and Travelling Showpeople pitches and plots across the plan period in the form of site allocations. Policy H 4 contains criteria to guide applications beyond those allocated sites.</i></p>
Policy C: Sites in rural areas and the countryside (para 12)		
When assessing the suitability of sites in rural		The majority of the existing and future sites for

Policy Expectations	Possible Evidence	Evidence Provided
or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		Gypsies, Travellers and Travelling Show people in the District are in relatively rural areas. The consultation undertaken with Gypsy and Traveller and settled communities has indicated a preference for smaller sites. <i>Policies SP 4 and H 4</i> seek to ensure that new sites do not exceed 5 pitches or 0.5 hectares without specific justification for more up to a maximum of 10 pitches. The intensification or extension of sites sought do not exceed 15 pitches in total. In the allocation of sites the Council sought to keep to these thresholds. This is explained in the "Site Selection Report" at "Appendix D- Traveller Site Selection Methodology" (P.D13 & D14) (EB805A1)
Policy D: Rural exception sites (para 13)		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	<ul style="list-style-type: none"> If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity. 	The plan provides for need through allocations and there is no specific exceptions policy.
Policy E: Traveller sites in Green Belt (paras 14-15)		
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.	<ul style="list-style-type: none"> Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process. 	The site allocations are a mix of sites included in larger housing allocations that alter the boundaries of the Green Belt, and sites that

Policy Expectations	Possible Evidence	Evidence Provided
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.		remain washed over by Green Belt. The sites identified within the Green Belt are considered to be justified by exceptional circumstances to be appropriate.
Policy F: Mixed planning use traveller sites (paras 16-18)		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	<ul style="list-style-type: none"> Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. N.B. Mixed use should not be permitted on rural exception sites 	A number of existing sites in the District are in mixed business and residential use for Gypsies and Travellers. The amenity impacts of individual proposals for new mixed sites, or changes of use from purely residential purposes for Gypsies and Travellers to a mixed use will be considered in line with <i>Policy H 4</i> and all other relevant policies in the Plan.
Policy G: Major development projects (para 19)		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	<ul style="list-style-type: none"> 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. 	No relocation of any site is proposed to facilitate major development projects.

Integration of marine and terrestrial planning

This part of the checklist has not been completed as it does not apply to Epping Forest District.