Stevenage Borough Local Plan 2011 – 2031

Soundness Checklist

Stevenage
BOROUGH COUNCIL

INTRODUCTION

This check list was prepared for the Stevenage Borough Local Plan 2011 – 2031 publication draft January 2016 and the policies proposals map. Its purpose is for the Council to satisfy itself that the plan is sound for submission to the Secretary of State for Examination in Public by an independent planning inspector.

This check list concludes that the plan being recommended to the Council for submission is sound.

Policies and proposals presented in this Local Plan are considered to represent the most appropriate strategy with the best available options, in the specific circumstances of an under-bounded Borough. Options for growth are available within the Borough administrative area as far as practicable and by agreement with neighbouring Authorities through Duty to Co-operate. In this respect, the Stevenage Borough Local Plan represents the Council's determination to prepare a plan that is justified, effective, realistic and deliverable.

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

In summary – the key requirements of plan preparation are:

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
- Is it deliverable?
- Is it flexible?
- Will it be able to be monitored?
- Is it consistent with national policy?

The Tests of Soundness at Examination
The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): "The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is 'sound' ", namely that it is:

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

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

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

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

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

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

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

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

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

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

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

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

The following table sets out the requirements associated with these four tests of soundness.

The Duty to Co-operate will also be assessed as part of the examination process.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided

Positively Prepared: *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.*

Soundness Test and Key Requirements		Evidence Provided
Vision and Objectives Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve? Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives? Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? Have reasonable alternatives to the quantum of development and overall spatial strategy been considered? Are the policies internally consistent? Are there realistic timescales related to the objectives? Does the DPD explain how its key policy objectives will be achieved?	• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. • Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. • The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.	Section 4 sets out the overarching vision and objectives of the Local Plan (SBLP) including our approach to the delivery of homes, infrastructure, jobs, services and the natural and historic environment. The vision and objectives set out how we will seek to resolve the main challenges identified in Section 2 of the Plan and to build upon the town's context and history. It aims to ensure development is considered strategically, alongside the plans of other authorities and other relevant plans and programmes (as identified in Section 3). The Key Diagram on p24 presents how the vision will be realised spatially. The evolution of strategic policies from the above vision is found in Section 5, where there is a logical flow that demonstrates consistent derivation from the vision. The policies of the plan are internally consistent. Our evidence demonstrates that the plan is deliverable and sets out how and when key infrastructure will be delivered to support the plan. The Infrastructure Delivery Plan (IDP) was produced in consultation with relevant stakeholders and agencies, and provides comprehensive details on key projects, delivery mechanisms, costs, and timescales. This will be a rolling document and will continue be updated as new information becomes available. The SA demonstrates that reasonable alternatives have been considered. Our most recent Local Development Scheme (adopted in June 2016) defines the scope of the SBLP.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
The presumption in favour of sustainable development (NPPF paras 6-17) Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or —specific policies in this Framework indicate development should be restricted.	• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below). • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)	The SBLP allocates sufficient sites to meet our objectively assessed housing needs (OAN). The Strategic Housing Market Assessment (SHMA) identifies the OAN, based on population and household projections, and taking into account demographic and migration changes, in accordance with best practice methodology. The Housing Technical Paper explains how this has been translated into the Local Plan target. The overall position is also summarised under Policy SP7. Due to the constraints of the Borough, as an under-bounded, primarily urban area, full employment needs cannot be met sustainably within the boundary. However, discussions have been held, under the Duty to Co-operate, and neighbouring authorities have agreed to make additional employment provision, within the identified Functional Employment Market Area (FEMA), to meet Stevenage's needs. Our Employment and Economy Baseline Study identifies the employment OAN and our Employment Technical Paper details how this has been translated into the Local Plan. The overall position is also summarised under Policy SP3. In order to meet both housing and employment OAN, the release of Green Belt land is required. Exceptional Circumstances are demonstrated in our Green Belt Technical Paper. Consultations held under Reg. 18 provided options for growth distribution. The SA in turn reviewed growth options confirming the preferred options were the most sustainable.
Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.	• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk)	Strategic Policy SP1 is based on the NPPF model of a presumption in favour of sustainable development. Our detailed policies are framed positively and aim to encourage development.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Objectively assessed needs The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.	A comprehensive evidence base has been produced to inform the Local Plan; covering issues such as population, economy, housing, transport, infrastructure, retailing, environment, conservation and heritage. With specific reference to OAN, the SHMA, HMA Study, Employment and Economy Baseline Study and FEMA study identify the housing and employment OAN for the Borough. These are based on best practice guidance set out in the NPPF, and use the most up-to-date data available at the time. Our Housing, Employment and Green Belt Technical Papers provide a clear demonstration of how all of the evidence has been pulled together and how the most appropriate options were determined to meet the SBLP objectives. The Duty to Co-operate and Regulation 22 Consultation statements provide details of consultation that has taken place to influence option choices.
NPPF Principles: Delivering sustainable development		
Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.	Strategic Policy SP3 and Section 6 'A Strong, Competitive Economy' establish an economic strategy for the Plan. These policies allocate new employment land for development and seek to retain existing employment land, including two employment areas; Gunnels Wood and Pin Green. They also set out the requirement for continued work with neighbouring authorities to ensure additional provision is made within the FEMA, to meet the remainder of the OAN, which we recognise cannot be met within the Borough. Policies specifically aim to attract investment and to support continued, high quality, employment use in suitable locations across the Borough.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		The Plan's employment strategy is consistent with, and supported by, the Hertfordshire LEP and their Strategic Economic Plan (SEP). This places a big emphasis on the A1(M) growth area and the regeneration of Stevenage town centre to provide homes and jobs to boost the Hertfordshire economy. In delivering the vision of the SEP, our town centre policies are also key. Policy SP4 and the detailed policies in Section 7 seek to encourage and allow an ambitious, large-scale regeneration of the town centre. These plans are based around the Stevenage Central Town Centre Framework, produced in partnership with the LEP, to guide development in this area.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)	Section 2 of the Plan identifies the main challenges that face the Borough. Our Plan seeks to address these issues. Our strategic policies set out our approach to increasing investment through the provision of new homes and jobs, the regeneration of the town centre and the provision of infrastructure to support this growth, amongst other outcomes. Policies are founded on up-to-date evidence studies of the local economy and investment requirements that identify the quantitative and qualitative needs for land and floorspace in the period to 2031. The Employment and Economy Baseline study (Section 7) assesses the gap between current land supply and future needs, in both quantitative and qualitative terms. New employment allocations are made on this basis, in Policy EC1. This includes the provision of employment land within the town centre, as part of wider regeneration plans to attract investment. The Plan acknowledges an identified short-fall against the requirement remains, which is being met through Duty to Co-operate discussions with

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		two neighbouring authorities. The supply and delivery of employment land is monitored within the Borough's Monitoring Reports on an annual basis. Policy EC7 allows for existing employment sites to be treated flexibly.
Ensuring the vitality of town centres (paras 23-37)		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	• The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.	Strategic Policy SP4 sets out the broad policy context for the town centre and other retail centres in the Borough. A retail hierarchy is established. Detailed policies in Section 7 'A Vital Town Centre' seek to balance the historic and conservation interest in the town centre with the regeneration and rejuvenation of its competitive appeal. A Stevenage Central Framework, for the mixed use regeneration of the town centre was prepared in 2015 and is reflected in policies TC2 – TC7, which aim to guide and encourage development in specific opportunity areas of the town centre. These policies include large-scale residential development, with the creation of a new housing market in the central area of the town, kick-started by recent office to residential conversions currently underway. Policies for primary and secondary retail frontages are also set out (TC8 – TC10) and new retail comparison and convenience retail provision to meet identified need is made in policies TC11 and TC12. Local retail impact assessment thresholds are established in policy TC13, in the light of the vulnerability of the town centre.
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	• An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages identified and allocated.	Options around strategic town centre enhancement and expansion, including; breaking the ring road collar, relocation of the bus station, re-ordering the railway station and increasing densities, are set out in Section 7 of the Plan, in line with the Stevenage Central Framework recommendations. Policy TC8 addresses the mix of uses, design and the balance of retail

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		between primary and secondary frontages in the town centre. A similar approach follows in policies TC9 & TC10 in relation to the High Street shopping centre (secondary to the town centre in the retail hierarchy). New and out-of-centre considerations are addressed under TC11 - TC13, including provision for new neighbourhoods, and proportionate impact assessment. Policy HC2 protects local shops.
Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	• Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities.	Stevenage is predominantly urban in character, with only small areas of discontinuous countryside on the very peripheries of the Borough. With the exception of land to the west of the A1(M), the majority of countryside in the Borough lies within the Metropolitan Green Belt. As such, a rural economy policy is not required.
Promoting sustainable transport (paras 29-41)		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29) Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)	• 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	The IDP provides an overarching approach to transport infrastructure and details those schemes that will be delivered within the Plan period. Discussions with, and strategies produced by, Hertfordshire County Council (HCC), as Highways Authority, provide the main basis for this information. The Council has worked, and will continue to work, with neighbouring authorities, as well as HCC and the LEP, to encourage the improvement of the A1(M) to enable further growth along this strategic transport corridor. The Duty to Co-operate statement provides evidence of joint working on sustainable transport projects necessary to support growth. The plan as a whole seeks to direct development to the most sustainable locations, through the assessment of options within the SA. Strategic Policies SP5 and SP6 provide the basis for detailed transport policies within the plan. SP6 encourages sustainable transport and

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Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31) Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32) Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34) Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35) Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37) For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38) The setting of car parking standards including provision for town centres. (39-40) Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)	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.	detailed policies in Section 8 follow this approach. Preferred routes, protected access corridors, access points and phasing of infrastructure to major developments are identified in policies IT1, IT2 and IT7. Policy IT4 requires transport assessments and green travel plans to be provided in line with HCC guidance. Policies IT5, IT6 and IT7, particularly, ensure that sustainable transport is provided at all new development, identifying specific schemes to improve sustainable transport networks across the town. The regeneration of the town centre includes proposals to improve the rail and bus interchange, with a regenerated train station and new bus station allowing easier access and reducing the current dominance of vehicular traffic. The Stevenage Central Framework recommends these improvements, with support from the LEP and HCC. Residential and non-residential parking standards are proposed, with lower standards being set in the most accessible areas, to encourage sustainable transport modes.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Supporting high quality communications infrastructure (paras 42-46)		
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)	• Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.	The SBLP has no specific policy on telecommunications. Proposals will be primarily assessed against policy SP1 and the presumption in favour of sustainable development. Strategic policies SP2 (h) and SP5 (e) support provision of infrastructure generally. Policy IT3 requires assessments and appraisals of infrastructure requirements to be carried out in respect of significant development proposals.
1. **Delivering a wide choice of high quality housing (paras 47-55)**		
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing (47).	• Identification of: a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) • A SHLAA	The Housing Technical Paper demonstrates that the Local Plan identifies sufficient deliverable sites to provide a five year housing supply. This includes a 20% buffer, accepting that there has been a persistent under delivery of housing since the start of the plan period. The supply of sites is identified in Policies HO1 to HO4. Sites were originally identified in the Strategic Land Availability Assessment (SLAA), which forms the basis for these site allocations. The development of Green Belt land is required to ensure a five year housing land supply is available. Without this, the Plan could not identify enough sites to meet this requirement. Our Green Belt Technical Paper sets out the Exceptional Circumstances required to roll-back the Green Belt. An allowance for windfall sites is included in the Local Plan (for the last 10 years of the plan period). Windfall sites are not included in the first five year period, or the five year land supply calculation.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15	Policy HO1 identifies a supply of sites considered sufficient to meet a target of 7,600 dwellings by 2031. Sites were originally identified in the Strategic Land Availability Assessment (SLAA), which forms the basis for these site allocations. Succeeding policies deal with the three large urban extensions necessary to meet our OAN. Development beyond year 6 is not phased because, as Para. 5.80 identifies, we are reliant on a number of large schemes and relatively few small sites. Due to the need for infrastructure investment and a relatively long lead-time, many of our homes are likely to be delivered only towards the end of the plan period. However, sites are identified that will endure for the latter part of the plan period. An allowance is also made for windfall sites beyond the first 5 years and Policy HO5 aims to allow these, where appropriate.
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	• A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47)	A housing trajectory is provided in both the SLAA and the Authority's Monitoring Reports (AMR), which also measures progress against housing targets, including the monitoring of completions and permissions. Updates of the SLAA and AMR are produced each year. The most recent version of the SLAA was published in June 2015. The Housing Technical Paper provides an update to this, taking into account completions and permissions figures to 30 September 2015 and providing the most up-to-date housing trajectory.
Set out the authority's approach to housing density to reflect local circumstances (47).	• Policy on the density of development.	Density is reflected in policies HO1 – HO4, where site capacity is estimated, based on site-specific considerations. Densities are explicitly not included in Policies TC2 – TC7, for the town

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		centre, to allow the market greater flexibility. However, significantly higher densities are encouraged in all five policies, to deliver the 2,000 homes identified in Policy HO1.
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	• Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50) • Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)	A SHMA is available for Stevenage Borough, with linkages to neighbouring authorities, setting out objectively assessed needs. This was an update to the previous SHMA (2013), which continues to provide the basis for housing mix. Strategic Policy SP7 includes provisions for affordable housing, a mix of dwelling types and sizes, aspirational homes and self-build opportunities. Policies HO7 & HO8 set out the targets for affordable housing provision, tenure mix and design. Policy HO9 sets out considerations for house types and sizes in residential schemes, according to the characteristics of the existing supply and particular localised need evidence provided by the SHMA. Policies HO10 and HO11 set out specific requirements for sheltered and supported, and accessible and adaptable housing, to meet identified local needs.
In rural areas, be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new isolated homes listed at para 55.	Stevenage is predominantly urban in character, with only small areas of discontinuous countryside on the very peripheries of the Borough. As Stevenage has no significant rural area, a policy detailing exceptional circumstances for allowing isolated new homes is not relevant.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
2. Requiring good design (paras 56-68)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	• Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues	Policies SP8 and GD1 express locally based design requirements for all new development. Appendix B provides car parking standards. In Appendix C, particular reference is made to exceeding national space standards. A table of separation distances for dwellings is provided.

These policies also require schemes to have regard to the Stevenage Design Guide SPD and the Parking Provision SPD, which set out more detailed guidance on the issues of design and parking. |
| **3. Promoting healthy communities (paras 69-77)** | | |
| Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69). | • Inclusion of a policy or policies on inclusive communities.
• Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of 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) | Inclusiveness is addressed through Policies HC1 to HC8, which seek to retain and provide new community facilities across the town.

Policy HC1 supports the concept of mixed use neighbourhood centres that formed part of the original New Town ideal. Some of these centres are also allocated in HO1 for regeneration, with the aim of intensifying their use.

New neighbourhood centres / community facilities are also required in the new urban extensions to ensure community cohesion and interaction (HO2 to HO4).

The Plan's town centre policies, underpinned by the Stevenage Central Framework, also place emphasis on creating and enhancing public spaces and facilities, including the creation of an evening economy to ease current safety concerns.

Policy GD1 aims to create safe, accessible and well-designed environments to encourage activity and use. |
| Policies should plan positively for the provision and use of shared space, community facilities and other local services (70). | • Inclusion of a policy or policies addressing community facilities and local service.
• Positive planning for the provision and integration of community facilities and | The neighbourhood centres concept of Stevenage ensures local facilities and services are available and accessible to serve the community. Policy HC1 seeks to protect these local facilities and, in the justification (Para's. 11.10 – 11.13) sets parameters for their use. |

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	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.	Policies HC2 to HC10 aim to protect existing leisure, cultural, health, social, education and community facilities and to ensure new facilities are provided to meet the needs created by population growth. These policies are informed by the IDP, which was developed in consultation with community infrastructure and healthcare providers, as well as the Sports Facility Assessment and Strategy, to ensure needs are adequately met.
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75)	Evidence includes the Open Space Strategy and the Sports Facilities Assessment and Strategy. These strategies are reflected in SBLP policies, with identified deficiencies directly informing proposed new facilities. The evidence base has justified the release of the former playing fields at Bragbury End for housing (part of HO4) and – subject to relocation – the Rugby Club at North Road (policy HO1/11), also for housing. Site specific considerations require any acceptable losses to be mitigated and in the case of HO1/11, for facilities of equivalent or better quality or quantity to be provided. Open spaces are primarily protected through NH1, and Strategic Policy SP12 recognises the multi-functional use of these spaces.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)	No designations of Local Green Spaces have been made and nothing in our evidence base has suggested that such designations should be considered. Stevenage has extensive protected green areas within the urban area, and any surrounding land remaining is designated as Metropolitan Green Belt.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
4. Protecting Green Belt land (paras 79-92)		

Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)
 	
Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)
 	
When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)
 	
Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)
	• Where Green Belt policies are included, these should reflect the need to:
	  o Enhance the beneficial use of the Green Belt. (81)
	  o Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)
	  o Specify that inappropriate development should not be approved except in very special circumstances. (87)
	  o Specify the exceptions to inappropriate development (89-90)
	  o Identify where very special circumstances might apply to renewable energy development. (91)
		Policy GB1 identifies the land that is designated as Metropolitan Green Belt.
		
		Policy GB2 follows NPPF guidance and provides criteria for appropriate small-scale development within Green Belt settlements. This policy also states that inappropriate development elsewhere in the Green Belt will not be permitted, and refers applicants to NPPF para's. 89-91.
		
		The area of designated Green Belt in this plan is significantly reduced from its predecessor plan.
		
		A comprehensive two-stage Green Belt review (part 1 and 2) has been carried out, which has led to proposals to roll-back the inner Green Belt boundary around the town in order to facilitate necessary development. The Green Belt Technical Paper sets out further details and identifies the Exceptional Circumstances required in accordance with national guidance.

Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)	• Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy .	Sustainable development (with the aim of addressing climate change) is an underlying theme of the SBLP. Strategic Policies SP1 and SP2 specifically relate to this and seek to locate development in the most sustainable locations, amongst other things. Strategic Policy SP2, criteria (l), also concerns energy efficiency. Strategic Policy SP11 and Policy FP1, together, seek to address climate change directly, through a variety of measures. This includes a specific

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	(95))	requirement to reduce water consumption, recognising that Stevenage is in an area of water stress. Policy FP1 promotes energy efficiency from new and existing stock. The justification in Para. 13.5 proposes energy efficiency measures and supply sources.
Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)	• A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)	Strategic Policy SP2, criteria (l), concerns energy efficiency. Policy FP1 promotes energy efficiency from new and existing stock. The Plan encourages development to draw its energy supply from local sources such as photo-voltaic panels; micro wind generators and the installation of ground source heat pumps. Our policies set out a positive approach to the promotion of renewable energy.
Minimise vulnerability to climate change and manage the risk of flooding (99)	• Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures	Section 11 'Flooding and pollution' opens with FP1 on climate change. Ensuing policies in FP2, 3 & 4 address flood risk through a processes of assessment, mitigation, adaptation and protection of flood management assets through criteria based policies and the requirement for a sequential test. Our Strategic Flood Risk Assessment (SFRA) provides the basis for these policies and will be used to guide development to the most appropriate locations. A Level 2 SFRA has also been completed to provide more specific guidance for 'medium/high risk' development sites (as identified in the SFRA) identified in the Plan. A network of flood storage reservoirs are also protected, as a key part of the drainage system of the town.
Take account of marine planning	• Ensure early and close co-operation on	As Stevenage is not a coastal authority, the points relating to marine

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
(105)	relevant economic, social and environmental policies with the Marine Management Organisation • 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	protection are not applicable.
Manage risk from coastal change (106)	• 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.	As Stevenage is not a coastal authority, the points relating to marine protection are not applicable.
Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. • Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.	Stevenage has an extensive network of green infrastructure. Policy NH1 designates a hierarchy of open spaces including parks, amenity areas and woodlands. The related justification summarises the function and characteristics of the designated areas. A similar approach follows in Policies NH2 to NH4, regarding wildlife sites, green corridors and green links, thereby providing a logical management system for networks of biodiversity and green infrastructure. There are no European or nationally designated sites within the Borough. As Stevenage is an intensely urban and under-bounded Borough, with a high growth requirement, it has been necessary to use

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		agricultural/Green Belt land for development purposes. The Council has, however, sought to minimise the loss of higher quality agricultural land.
Prevent unacceptable risks from pollution and land instability (109)	• Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.	Policies FP5, 6, 7 & 8 concern hazardous installations, pollution and pollution sensitive uses, including protection of the chalk aquifer.
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	• Identification and mapping of local ecological networks and geological conservation interests. • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species	Ecological networks are identified and protected under Section 14. NH1 identifies categories of open spaces, parks, greenspaces, woodlands for protection. Wildlife sites, Green Corridors, Green links, Trees and Woodlands and other open spaces are also protected under Policies NH2 to NH6, respectively. The networks of green infrastructure known as Green Corridors and Green links are specifically designated to provide networks and routes for the movement of wildlife and to enable habitat creation, as specified in Para's. 14.8 and 14.21. Related justification at Para. 14.33 also refers to species protection via the retention of trees and woodland.
Conserving and enhancing the historic environment (paras 126-141)		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets • A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)	Strategic Policy SP13 seeks to preserve and enhance the town's historic environment. Policy SP8 also requires these assets to be considered during the design process. Historic assets, discussed below, are shown on the Policies map. Policy NH9 designates Areas of Archaeological Significance. These are based around information provided to us by Hertfordshire County Council as part of the Hertfordshire Historic Environment Record. Policy NH10 refers to the Borough's seven conservation areas and directs applicants to the specific guidance for each area provided by the Conservation Area Management Plan SPD's. Historic Impact Assessments have been completed for proposed

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		development sites within or affecting a conservation area. Site specific mitigation measures have been incorporated to minimise impacts of development, where necessary. These acknowledge that, particularly in the town centre, development can make a positive impact on historic assets. Historic assets are monitored regularly via the Authority Monitoring Reports, which includes the identification of those assets considered to be 'at risk'.
Facilitating the sustainable use of minerals (paras 142-149)		
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.	This is primarily a matter for the Minerals Planning Authority. Hertfordshire County Council have identified that the South East of Stevenage housing allocation (Policy HO4) lies on the Sand and Gravel Belt, such that a trial borehole will be necessary. The land-owners have been made aware of this.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. To be 'justified' a DPD needs to be: • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives.		
Participation Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI	The Regulation 22 Consultation Statement provides details of the consultations held on the SBLP, summarises the issues raised and explains how these have been taken into account. A diverse range of consultation methods have been used to promote the Plan, including; social networking; advertisements in local media; presentations to groups such as the Youth Council and the Older Persons Forum; and drop in sessions, aimed at targeted a wide range of consultees and hard to reach groups. This is evidenced in the Reg. 22 Statement, along with a full list of consultees. All consultations have been undertaken in conformity with, or in excess of, the adopted Statement of Community Involvement.
Research / fact finding Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?	• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. AND • Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. OR • A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and	A comprehensive evidence base has been developed to support and inform the SBLP, including studies covering issues such as, population, economy, housing, transport, infrastructure, retailing, environment, conservation and heritage. These are detailed, in full, in the EiP document library and organised by Plan section. Each document includes its date of production and the author. The Housing, Employment and Green Belt Technical Papers pull various evidence studies together and demonstrate how they have been used to inform Plan policies. These documents, read alongside the SA and the Local Plan itself (primarily Section 5), provide a thorough explanation of how options were selected and the formulation of Plan policies.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	formulation phases; and any other information on community views and preferences. OR • For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).	
Alternatives Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?	• 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 content of policies.	The first consultation on the Local Plan was carried out in June 2013 (Reg. 18). This was an issues and options type document, which asked for opinions on broad topic areas. A second consultation was held in June 2015 (Reg. 18, part 2), which consulted on proposed housing targets and the related issue of Green Belt release. A final consultation was held in January 2016 (Reg. 19), to consult on the final version of the Plan before Submission. Statements of consultation detail the comments received and how these have been taken into account (at the early consultation stages). A summary of all consultations is contained within the Regulation 22 Consultation Statement. A comprehensive evidence base has been developed to support and inform the SBLP, including studies covering issues such as, population, economy, housing, transport, infrastructure, retailing, environment, conservation and heritage. These are detailed, in full, in the EiP document library and organised by Plan section. Each document includes its date of production and the author. The Housing, Employment and Green Belt Technical Papers pull various evidence studies together and demonstrate how they have been used to inform Plan policies. These documents, and the SA and the Local Plan itself (primarily Section 5), provide a thorough explanation of how options were selected and the formulation of Plan policies. The SA provides the detailed account of how alternative options have been assessed and how the most appropriate options were selected. The Matrix tables in the Appendices, in particular, provide the assessment of alternative options. Section 9 summarises how options

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		were developed and refined. Section 10 assesses the effects of the final version of the SBLP, and any further considerations that will be required.
Effective: *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.* To be 'effective' a DPD needs to: • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored		
Deliverable and Coherent • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved?	• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).	Section 15 of the SBLP addresses delivery and monitoring arrangements. The IDP examines the cumulative impacts of the Plan and identifies a series of infrastructure requirements required to support the Plan's growth. This includes the prioritisation of schemes, funding arrangements, costs, and relevant agencies/stakeholders. This is a rolling document, which will continue to be updated throughout the life-cycle of the Plan. Paragraph 15.3 discusses partnership working arrangements and lists some of the key partners. There are on-going discussions with delivery partners being carried out through the Duty to Co-operate. Representations and/or Memoranda of Understanding confirm their on-going support. Our most recent Local Development Scheme (LDS) (adopted in June 2016) defines the scope of the SBLP. This also sets out the programme for adopting CIL, which will aid the delivery of the plan. The structure of the SBLP demonstrates a clear top-down relationship from vision to detailed policies via strategic policies, structured around

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		the headings in the NPPF.

The table following Para. 15.10 provides a broad-brush bottom-up matrix that shows the linkages between the objectives and the corresponding policies, and how these will be monitored to ensure they are meeting the overall aims of the Plan. |
| *Infrastructure Delivery*

• Have the infrastructure implications of the policies clearly been identified?

• Are the delivery mechanisms and timescales for implementation of the policies clearly identified?

• Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? | • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.
• A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.
• Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues.
• Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. | Section 8 addresses infrastructure and transport issues. Policy IT3 provides the general approach to infrastructure, requiring developers to demonstrate how infrastructure needs will be met. This allows for flexibility in a rapidly changing economic environment.

The IDP provides the main evidence base for this section of the Plan, including the prioritisation of schemes, funding arrangements, costs, and relevant agencies/stakeholders. This is a rolling document, which will continue to be updated throughout the life-cycle of the Plan.

The housing allocations (Policies HO1 – HO4, including table 3 on page 105) set out the infrastructure required on a site-by-site basis. A similar approach is followed for the town centre policies (TC2 – TC7).

The most recent version of the SLAA required developers to submit detailed information to confirm their schemes are achievable (deliverable); whilst infrastructure providers have expressed a willingness to assist in the delivery of necessary infrastructure.

A Whole-Plan Viability Assessment has also been completed. This provides the evidence used to determine the levels of affordable homes that the Plan can require, without making development unviable. It also identifies that CIL is viable in Stevenage. Our LDS sets out the programme for adopting CIL, which will aid the delivery of the plan. |
| *Co-ordinated Planning*

Does the DPD reflect the concept of | • Sections of the DPD that reflect the plans or strategies of the local authority and other | Section 3 of the Plan considers the other relevant plans and programmes of the Borough Council and those of other key |

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?	bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area	organisations. The IDP has also been produced in consultation with infrastructure providers and stakeholders, so this also ensures that the plans and strategies of these organisations are taken into account. Several chapters of the plan (Employment, Town Centre, High Quality Homes, Healthy Communities, Green Belt, Delivery and Monitoring) express a cross-cutting approach to the development needs of other organisations in Stevenage, the region and neighbouring authorities; including major employers, health and transport providers. Joint evidence work has also been undertaken, including the SHMA and the FEMA. Memoranda of Understanding, Statements of Common Ground and/or expressions of support exist, or are currently being drafted with several relevant bodies, including Natural England, the Environment Agency, Hertfordshire County Council and the Hertfordshire Local Enterprise Partnership. The Duty to Cooperate Statement provides further details discussions held with our neighbours and other bodies, throughout the plan making process.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided

Flexibility
• Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?
• Does the DPD include the remedial actions that will be taken if the policies need adjustment?
	• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.
	• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:
	  a. the effectiveness of policies and what evidence is being collected to undertake this
	  b. changes affecting the baseline information and any information on trends on which the DPD is based
	• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances
	• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision
	• Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.
		Section 15 details how the Plan will be monitored within the Authority's Monitoring Reports. This will allow the Council to identify if the plan is not being implemented as anticipated and whether a review is required.
		
		Further baseline data, to monitor the significant effects of implementing the Local Plan (as identified in Section 11 of the SA), is also collected on an annual basis.
		
		Due to the urban and under-bounded nature of the Borough, and our reliance on a small number of sites, ensuring all development sites are achievable has been key to developing the Plan. The SLAA has taken a risk averse approach, requiring landowners/developers to submit draft site layouts, viability assessments and timescales to demonstrate that their sites can and will come forward within the Plan period.
		
		The housing sites (Policies HO1 – HO4) are not phased in order to allow development to come forward in response to market signals. The Council has the option of utilising its Compulsory Purchase Order powers, if necessary, to bring forward stalled sites. Policy HO5 is flexible in allowing windfall sites to come forward. A buffer is also provided, which will ensure the housing target can still be met, even if some sites do not come forward (explained in more detail in the Housing Technical Paper).
		
		Town centre policies (Policies TC2 – TC7) are deliberately flexible, by not specifying exact housing numbers and floorspace requirements for each Major Opportunity Area (MOA). This will aid investment opportunities, allows for changing economic circumstances and market conditions to be taken into account.

Co-operation • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken	• 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	The Duty to Co-operate Statement (alongside the Regulation 22 Consultation Statement) provides an outcome-focussed trail of communications and meetings which demonstrates continuous, positive, pro-active and ongoing co-operation over planning issues.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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?	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.	Memoranda of Understanding, Statements of Common Ground and/or expressions of support exist, or are being drafted, with several relevant bodies, including Natural England, the Environment Agency, Hertfordshire County Council and the Hertfordshire Local Enterprise Partnership.
Monitoring • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?	• Sections of the DPD setting out indicators, targets and milestones • Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal	Section 15 provides targets and indicators to monitor the Plan's policies and objectives. Monitoring is undertaken on an annual basis via the Council's Authority's Monitoring Reports. This includes the housing land supply data and housing trajectory, although this is also included in the SLAA each year as well. Para. 15.12 clarifies that if policy targets are not being met or there is an insufficient supply of land, a partial review of the SBLP may be necessary. Section 11 of the SA sets out how the effects of implementing the Local Plan will be monitored. This provides a list of monitoring indicators and details which policies these relate to.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Consistent with national policy: *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.* The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.		
• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?	• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement • Reports or copies of correspondence as to how representations have been considered and dealt with.	Policy SP1 provides a version of the standard NPPF policy recommended by PINS as standard for local plans. Ensuing policies are locally distinctive to Stevenage and do not repeat or re-formulate national guidance. There is no departure from national policy.

Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement with both settled and traveller communities.	• Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.	A Gypsy and Traveller Accommodation Study was carried out in 2013 – all available gypsy and traveller households were interviewed. Consultants undertaking the study also consulted with HCC and internal SBC staff members within the Housing, Planning, Health and Education teams.
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	• Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.	A Gypsy and Traveller Accommodation Study was carried out in 2013 – all available gypsy and traveller households were interviewed. Consultants undertaking the study also consulted with HCC and internal SBC staff members within the Housing, Planning, Health and Education teams. Para's. 5.82 & 5.83 of the Plan, as well as the Housing Technical Paper provide further details on how the identified needs have been translated into Plan targets.
Policy B: Planning for traveller sites (paras 7-11)		
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs. Set criteria to guide land supply allocations where there is identified need. Ensure that traveller sites are sustainable economically, socially and environmentally.	• Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 11	Strategic Policy SP7 and detailed Policy HO12 make provision for identified gypsy and traveller requirements up to 2031. A new site is identified, capable of meeting the full requirement. This can be made available to meet the first 5 year requirement. The requirements of Para. 11 (of the guidance) are reflected in the Gypsy and Traveller Site Search work undertaken to identify a suitable site. Policy HO13 reflects the criteria of Para. 11 for applications on unallocated sites.

Policy Expectations	Possible Evidence	Evidence Provided
Policy C: Sites in rural areas and the countryside (para 12)		
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		The nearest rural community is in North Hertfordshire District (Graveley). The Gypsy and Traveller Site Search demonstrates that it would not be dominated by the proposed site.
Policy D: Rural exception sites (para 13)		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	• If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.	N/A
Policy E: Traveller sites in Green Belt (paras 14-15)		
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.	• Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.	The Green Belt revision proposed in the plan includes the land to be allocated for Gypsy and Traveller provision. This is in response to a specific, identified local need for a site, which could not otherwise be provided. The Green Belt Technical Paper demonstrates the Exceptional Circumstances required to roll-back the Green Belt.
Policy F: Mixed planning use traveller sites (paras 16-18)		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	• Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. • N.B. Mixed use should not be permitted on rural exception sites	Gypsy and Traveller needs are accommodated on a single site in the Plan. This is a small site, inset from the Green Belt, as such is not suitable for a larger mixed-use scheme.

Policy Expectations	Possible Evidence	Evidence Provided
Policy G: Major development projects (para 19)		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	• Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.	N/A

INTEGRATION OF MARINE AND TERRESTRIAL PLANNING

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