

Soundness Self-Assessment Checklist (August 2018)

This note was prepared by AMEC and URS on behalf of the Planning Advisory Service. It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework. A separate checklist looks at legal compliance.

In summary – the key requirements of plan preparation are:

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

The Tests of Soundness at Examination

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

In addition, the Legal Compliance checklist (a separate document, see www.pas.gov.uk) should be completed to ensure that this aspect is covered.

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

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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>		

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<p><i>Vision and Objectives</i></p> <p>a) 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?</p> <p>b) 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?</p> <p>c) 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?</p> <p>d) Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>e) Are the policies internally consistent?</p> <p>f) Are there realistic timescales related to the objectives?</p> <p>g) Does the DPD explain how its key policy objectives will be achieved?</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>a) The unique issues facing Harlow as a former New Town constrained by tight administrative boundaries, have been identified and considered through the preparation of the Harlow Local Development Plan (the Local Plan). These recognise the spatial characteristics of the District and this has resulted in the development of a spatial vision, strategic objectives and a suite of strategic and development management policies that will help secure the Council's corporate priorities and shape the future growth of Harlow. These priorities have also been informed by technical evidence, some of which has been prepared jointly with neighbouring planning authorities through the provisions of the Duty to Cooperate, resulting in support for the development of new Garden Communities to be delivered as the Harlow and Gilston Garden Town (See paragraphs 2.39 - 2.45 of the Local Plan).</p> <p>b) The Local Plan sets out a clear vision and set of objectives and</p>

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		<p>explains how these will be delivered through a suite of policies and proposals (See paragraphs 3.1- 3.5 of the Local Plan). In addition, arising from the Duty to Co-operate, the Local Plan acknowledges the common set of values, objectives and commitments that have been achieved to secure growth across the wider Harlow area as part of the Harlow and Gilston Garden Town.</p> <p>c) Throughout the Local Plan the justification and implementation sections of the policies explain how the objectives will be met and how related matters will be addressed. Also included in the Local Plan is a specific policy relating to the development and delivery of Garden Communities in the Harlow and Gilston Garden Town (Policy HGT1).</p> <p>d) Supporting technical studies, undertaken by AECOM, explain how alternative scenarios were considered that informed the preparation of the spatial strategy set out in the Local Plan (see the</p>

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		<p>Harlow Strategic Sites Final Report (Sept 2016) and the Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area (Sept 2016) and the Sustainability Appraisal which accompanied the pre-submission consultation. In preparing the spatial strategy the quantum of development needed and potential spatial approaches that could be used to deliver this need, had been considered through the Core strategy Issues and Options (2010) and Emerging Strategy and Further Option (2014) consultation documents. In addition the more detailed Development Management Policies were developed further through the Development Management Policies consultation (2017).</p> <p>e) The policies contained in the Local Plan have been developed to provide a holistic approach to address a range of issues and to ensure they are internally consistent. These include</p>

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		<p>overarching strategic policies together with a suite of more detailed development management policies. In addition, and where appropriate, they have had regard to the wider strategic objectives of the Harlow and Gilston Garden communities (see paragraphs 5.1-5.26 of the Local Plan).</p> <p>f) The timetable set out in the Local Plan is considered realistic based on the supporting technical evidence, the expectations set out in the four signed Memorandums of Understanding and the Infrastructure Delivery Plan. The Memorandums of Understanding relate to the Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area (March 2017), Highways & Transportation Infrastructure for the West Essex/East Hertfordshire Housing Market Area (February 2017), Managing the impacts of growth within the West Essex/East</p>

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		<p>Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation (February 2017) and the Distribution of Objectively Assessed Employment Need across the West Essex-East Hertfordshire Functional Economic Market Area (May 2018).</p> <p>g) The implementation sections that underpin the policies, and the monitoring and implementation chapter of the Local Plan, explain how the policy objectives of the Local Plan will be achieved.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>h) 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.</p> <p>i) Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —any adverse impacts of doing so would</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 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) 	<p>h) The core evidence base documents have established the housing and other development needs of both Harlow and the wider area, including the joint Strategic Housing Market Area (SHMA) assessments, the West Essex and East Hertfordshire Assessment of Employment Needs (October 2017), the Green Belt Review (2016) and the Retail and</p>

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<p>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>Leisure Needs Study (July 2016). These reflect the differing development needs across the wider Harlow area, taking into account differing circumstances.</p> <p>i) The joint SHMA, Strategic Sites Assessment, and the related signed joint Memorandums of Understanding, identifies the objectively assessed housing need for Harlow and the wider area. This will be delivered through the Harlow Local Development Plan, the East Hertfordshire District Plan and the Epping Forest Local Plan. However in order to address regeneration and affordability issues, the housing requirement for Harlow exceeds the OAHN. This reflects the flexibility needed to take into account the differences across the wider Housing Market Area. The Local Plan is supported by technical evidence to explain why growth across the wider Harlow area is needed. Agreement has been reached between East Hertfordshire, Epping Forest and</p>

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		Harlow Councils supported by Essex and Hertfordshire County Councils, through the duty to co-operate to deliver the identified growth. This is to be taken forward and delivered through the Harlow and Gilston Garden Town work.
j) 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.	<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) 	j) The policies in the Local Plan reflect the presumption in favour of development and is emphasised in particular in Policy SD1.
<p><i>Objectively assessed needs</i></p> <p>k) 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. 	k) Various technical documents including the Greater Essex Demographic Forecasts (2015), the SHMA (2015) and Assessment of Employment Needs (2017) have been produced, some jointly with adjoining LPA's, in accordance with the Duty to Cooperate, which have considered the socio-economic and demographic

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		conditions of Harlow and the wider area. Arising from this the housing requirement for the wider Harlow area has been confirmed in the joint MOU relating to the Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area (Mach 2017). Also taken into consideration have been the relevant environmental constraints that have shaped the character of Harlow, including the Green Wedge Review 2014, Green Belt Review 2016, Local Wildlife Site Review 2011 and the Harlow Area Landscape and Environment Study 2015. The Harlow Future Prospects Study examines regeneration linked to growth and supports the need for Harlow to be regenerated through an increase of housing growth. This has supported the strategy put forward in the Local Plan and the Garden Town work.
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for	<ul style="list-style-type: none"> Articulation of a clear economic vision and strategy for the plan 	The Local Plan sets out the spatial

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the area which positively and proactively encourages sustainable economic growth (21),	area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.	context for Harlow including that relating to employment. The associated economic issues have been reflected in the spatial vision and Local Plan strategic objectives and in the Spatial Development Strategy. This is underpinned by the Harlow Economic Development Strategy and will be supported by the Strategic and Development Management Policies of the Plan (see paragraphs 3.1-3.5).
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) 	Given the complex socio-economic conditions and environmental constraints affecting Harlow, policies have been developed that aim to address infrastructure deficiencies and to secure regeneration. This is reflected in policies HS3, WE1, SIR1, SIR2, PL7, L2, L3 and IN1 and is underpinned by the joint policy approach arising from joint working through the Corporation for Sustainable Development Board.
2. Ensuring the vitality of town centres (paras 23-37)		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	<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 not available; consideration of retail and leisure 	Policy RS1 of the Local Plan sets out the Retail Hierarchy of Harlow, whilst Policy RS2 identified the future retail floorspace requirement. In addition a separate Harlow Town Centre Area

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	proposals which cannot be accommodated in or adjacent to town centres.	Action Plan (HTCAAP) is being prepared that will provide a catalyst for a comprehensive regeneration of the town centre that will reinforce its important retail function across the wider area and in particular for the Harlow and Gilston Garden Town.
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>The HTCAAP will ensure that appropriate sites are identified to meet the scale and type of uses needed to enhance and reinforce the retail function and the regeneration of the town centre.</p> <p>Policy PR8 of the Local Plan provides the policy framework for the definition of primary and secondary frontages in retail areas. For Neighbourhood Centres these are set out in Appendix 3 of the Local Plan and will be defined for the town centre in the HTCAAP.</p>
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	<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 	This is not directly relevant to Harlow as the district is predominantly urban in character with tight administrative

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	services and facilities.	boundaries.
4. 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>	<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>Through joint working, co-ordinated by the Co-operation for Sustainable Development Board, and by the Garden Town Member Board, a suite of strategic policies have been developed to secure sustainable development across Harlow and the wider area. Key to this overarching is the Harlow and Gilston Garden Town Transport Strategy together with the creation of Sustainable Transport Corridors across Harlow, that will increase transport choice and promote a modal shift to more sustainable transport modes (see policies SIR1, SIR2, HGT1 and IN1 of the Local Plan).</p> <p>In addition the Strategic Housing Site East of Harlow will be required to provide a mix of uses and facilities that are integrated with a range of sustainable transport modes (see policy HS3 of the Local Plan).</p> <p>The Essex Parking Standards: Design and Good Practice - 2009 remains adopted as Council policy on parking</p>

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<p>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)</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>matters in Harlow. This is currently under review across the County (see policy IN3 of the Local Plan). The Garden Town Policy also intends to set out parking provision for the Garden Town akin to the nature of the town and in line with improving sustainable transport movements.</p>
5. Supporting high quality communications infrastructure (paras 42-46)		

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<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed 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>	<ul style="list-style-type: none"> Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44. 	<p>The Local Plan includes policies that support expansion of electronic communications networks, including telecommunications and high speed broadband (see policies IN4 and IN5). This also underpins the Superfast Essex initiative being rolled out by Essex County Council.</p>
<p>6. 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>The Local Plan identifies the housing need for the district and sets out how and where this will be delivered. This has been developed from a jointly prepared SHMA's with East Hertfordshire, Epping Forest and Uttlesford District Councils and through the preparation of a district wide SHLAA. The requirement set out in the Local Plan is in excess of the OAHN identified in the SHMA.</p> <p>Based on technical evidence including the joint SHMA for the wider Harlow area, the Harlow Local Development Plan has identified a 5 year supply of deliverable housing sites together</p>

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		with an appropriate buffer, notwithstanding the districts tight administrative 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 	The Local Plan identifies housing sites to help meet the identified need (see policies HS2 and HS3 of the Local Plan. As part of an ongoing programme of review and monitoring, the supply of developable sites is being reviewed, as required, to take into account new commitments and completions.
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) 	An up to date housing trajectory has been prepared taking into account new commitments and completions together with an annual Authority Monitoring Report. The SHLAA remains “open” to enable new sites to come forward and be assessed. However because of the districts tight administrative boundaries there are few opportunities for new sites to come forward as part of a “call for Sites”.
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. 	Harlow, as a former new town, was developed with an average density of around 40 dwellings per hectare. However, to reflect local

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		circumstance, and in particular the character of the area, Policy PL1 has been developed to allow some flexibility in approach, on a site by site basis.
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 be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50) 	A policy has been developed that aims to secure a range of housing types across range tenures based on the SHMA and the SHLAA having regard to affordability and the range of housing densities in Harlow that reflects its new town heritage (see policies H5, H6, H8 and H9 of the Local Plan). This also includes policy support for Community-led housing (Policy H6). In addition a Register of self and custom built homes has been created to help quantify demand in the district (Policy H9).
<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. 	Not directly relevant to Harlow as the district is predominantly urban in character with tight administrative boundaries, however, affordability is addressed through other policies in the Plan.
7. Requiring good design (paras 56-68)		

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Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	<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 paras 59-61, linked to the vision for the area and specific local issues 	Policies are included in the Plan that support the overall theme of place shaping that relate to sustainable design principles, protection of heritage assets and enhancement of green infrastructure in order to promote overall good quality placeshaping and design (See policies PL1, PL2, PL4, PL5, PL6, PL7, PL8 and PL11 of the Local Plan). The Garden Town Policy also makes reference to a separate spatial vision and design charter for the Garden Town.
8. Promoting healthy communities (paras 69-77)		
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).	<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 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) 	A suite of policies, under the five key themes of the Local Plan; Placeshaping, Housing, Prosperity, Lifestyle and Infrastructure, has been developed that promote community interaction, together with safe and accessible developments.
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	<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 	Policies have been included within the Plan that plan positively for the provision, retention and use of community facilities, including recreational, sporting and cultural

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	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.	uses and activities (see policies L1, L2 and L3 of the Local Plan) .
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).	<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) 	Technical evidence (Sports Facilities Study) has been prepared to consider the provision of open space, sports and recreational facilities and to underpin the development of policies and will be used to inform updated standards in existing and future SPD's (See policies L1, L2 and PL5 of the Local Plan).
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	<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) 	The Plan contains a number of policies that protect locally important open spaces, including Green Wedges and Green Fingers, which also reflect the new town heritage of Harlow and its original masterplan prepared by Sir Frederick Gibberd (see policies WE1, WE2, PL4, PL5 and PL7 of the Local Plan).
9. Protecting Green Belt land (paras 79-92)		
Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and	<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 	The Green Belt in Harlow, which was subject to a review and subsequent alterations during the preparation of the Local Plan, is shown on the

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>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)</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>clarity on the status of safeguarded land, in particular. (85)</p> <ul style="list-style-type: none"> ○ Specify that inappropriate development should not be approved except in very special circumstances. (87) ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	<p>Policies Map. Also see Policy WE1.</p> <p>Development proposals on Green Belt land will be considered against the relevant criteria, relating to inappropriate development in the Green Belt, set out in the National Planning Policy Framework.</p> <p>Alterations to the Green Belt boundary have taken into account the need to promote sustainable patterns of development across the wider Harlow area, given existing constraints, using the criteria set out in the NPPF.</p> <p>The policies relating to Green Infrastructure (WE1, WE2, WE3, PL4, PL5, PL6, PL7 and PL8) seek the overall preservation and enhancement of the different types of Green Infrastructure in the district.</p>
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and</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. 	<p>A holistic suite of policies are set out in the Local Plan that, in combination, aims to mitigate against the impact of</p>

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
demand considerations. (94)	<ul style="list-style-type: none"> Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy. (95)) 	climate change including flood risk and ensuring security of water supply. This is achieved by, among other measures, ensuring high standards of sustainable design, construction and efficient energy usage in new development. (See policies PL3 and PL10 of the Local Plan).
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)	<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) 	A policy is included in the Local Plan to promote high standards of sustainable design, constructions and energy. (See policy PL3 of the Local Plan).
Minimise vulnerability to climate change and manage the risk of flooding (99)	<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 	Policies are included in the Local Plan to promote high standards of sustainable design, constructions and energy usage to help mitigate the impacts on climate change and to manage flood risk (See policies PL3 and PL10 of the Local Plan).
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 Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic 	Harlow is remote from any marine/ coastal environment so this test does not apply.

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>development</p> <ul style="list-style-type: none"> 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. 	Harlow is remote from any marine/coastal environment so this test does not apply.
11. 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. 	Harlow's new town heritage is based on the masterplan prepared by Sir Frederick Gibberd which has resulted in residential neighbourhoods been set within a distinctive landscape framework defined by a network of Green Wedges and Fingers. These key spaces are supplemented by other Green Infrastructure, including open spaces, within the town. Policies WE1, WE2, PL5, PL6 and PL7 aim to protect and enhance the Green Infrastructure network in the town, including the Green Wedges and Green Fingers.
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 	A policy has been developed that addresses a range of risks from

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	natural environment or general amenity.	pollution and contamination (see policy PL9 of the Local Plan).
<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 	A policy has been developed to protect and enhance designated and non-designated biodiversity and geodiversity assets within the district (see policies WE3 and PL8 of the Local Plan).
12. Conserving and enhancing the historic environment (paras 126-141)		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	<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. • 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) 	Policies have been developed to protect Heritage assets and their setting within the district (See policies WE4 and PL11 of the Local Plan).
13. 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</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.	The Essex County Councils Waste Development Plan and the Minerals Development Plan Document are acknowledged within the Local Plan as forming part of the suite of Development Plans for Harlow.

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
steady and adequate supply of industrial materials (146)		
<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>	<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 reach groups, key stakeholders etc. Reference SCI</p>	<p>The preparation of the Local Plan has been subject to an iterative consultation process, undertaken in accordance with the Councils adopted Statement of Community Involvement (Sept 2014) and the requirements set out in the NPPF, PPG and the Town and Country Planning (Local Development) (England) Regulations 2012. This is set out in detail in the Reg 22 Statement.</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>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 	<p>A substantial number of Evidence Base and other supporting documents and studies have been assembled over the course of the preparation of the Local Plan to inform policy development. These have considered the socio-economic and environmental characteristics of Harlow, and where appropriate, the surrounding area. These have taken into account Harlow's key sub-regional role and</p>

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</p> <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>location within the M11/London, Stansted and Cambridge corridor, its former New Town legacy and the spatial constraints arising from its tight administrative boundaries. This has necessitated close working with East Hertfordshire and Epping Forest district councils and Essex and Hertfordshire County Councils in order to identify development and infrastructure needs and to develop an appropriate and sustainable spatial strategy. These evidence base technical documents are listed as follows:</p> <ul style="list-style-type: none"> Green Belt review 2016 Green Belt review 2016 appendices Green Wedge Review - 2014 Green Wedge Review Appendices Harlow Open Space and Green Infrastructure Study 2013 - Chapters 1 to 5 Harlow Open Space and Green

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Infrastructure Study 2013 - Chapters 6 to 9</p> <ul style="list-style-type: none"> • Harlow Open Space and Green Infrastructure Study 2013 - Appendices • Green Infrastructure Plan for the Harlow Area - 2005 • Green Infrastructure Plan for the Harlow Area - Maps and Figures Part 1 • Green Infrastructure Plan for the Harlow Area - Maps and Figures Part 2 • Green Infrastructure Plan for the Harlow Area - Maps and Figures Part 3 • Harlow Area Landscape and Environment Study - 2005 • Strategic Flood Risk Assessment - 2016 • Appendix A - Level 2 Assessment Detailed Site

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Summary Tables</p> <ul style="list-style-type: none"> • Appendix B - Watercourses in Harlow • Appendix C - Flood Zone mapping • Appendix D - Climate change mapping • Appendix E - Surface water mapping • Appendix F - Groundwater mapping • Appendix G - Flood Warning Coverage • Index map • Harlow Surface Water Management Plan July 2013 • Local Wildlife Site Review - 2011 • Great Crested Newt Study Report - 2007

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Stort Valley Feasibility Study - 2007 • Strategic Housing Market Assessment July 2017 • Strategic Housing Market Assessment 2015 • Strategic Housing Market Assessment - Affordable Housing Update July 2017 • Impact of Formation Rates on OAHN February 2017 • Updating the Overall Housing Need Paper August 2016 • London Commuter Belt Sub-region Strategic Housing Market Assessment: Update 2012 • London Commuter Belt (East) / M11 Sub-region Strategic Housing Market Assessment - 2010 • London Commuter Belt (East)

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>/ M11 Sub-region Strategic Housing Market Analysis: Viability Assessment - 2010</p> <ul style="list-style-type: none"> • Strategic Housing Land Availability Assessment 2014 • Harlow Urban Capacity Study - 2006 • Gypsy and Traveller Accommodation Assessment Need Summary Report August 2017 • Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment - July 2014 • Essex Gypsy and Traveller Accommodation Assessment - November 2009 • Assessing the housing needs of Gypsies and Travellers in Essex - 2006 • Sustainability Appraisal of Strategic Spatial Options for the West Essex and East

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Hertfordshire Housing Market Area 2016</p> <ul style="list-style-type: none"> • Harlow Strategic Site Assessment 2016 • Harlow Spatial Options Study - 2014 • Generating and Appraising Spatial Options for the Harlow Area - 2010 • Harlow Area Study - Master planning Principles and Sustainability Criteria - 2005 • Greater Essex Demographic Forecasts 2013- 2037 May 2015 • Harlow Future Prospects Study – August 2013 • Harlow Regeneration and Social Inclusion Strategy 2010-15 • Harlow Regeneration Strategy Analysis of Needs

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Harlow Regeneration Strategy and Implementation Plan 2007-2009 - July 2007 • Harlow Regeneration Strategy Consultants Report - July 2005 • Harlow Area Investment and Renewal Framework - 2006 • West Essex and East Herts Assessment of Employment Needs 2017 • Economic Evidence to Support the Development of the OAHN 2015 • Harlow Employment Land Review - January 2013 - • Harlow Economic Development Strategy April 2017 • Retail and Leisure Needs Study 2016 • Retail and Leisure Needs Study 2016: Plans &

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Appendices</p> <ul style="list-style-type: none"> • Retail Leisure Needs Study 2016: Household Survey • Harlow Retail Study Update Addendum - 2011 • Harlow Retail Study Update - 2010 • Retail Frontages Study - 2018 • Harlow Retail Study and Town Centre Health Check - July 2007 • Harlow Labour Market Statistics - April 2009 • Sports Facilities Study 2017 - Part 1 - Background and Context • Sports Facilities Study 2017 - Part 2 - Built Facilities Strategy • Sports Facilities Study 2017 - Part 3 - Playing Pitch Strategy • Sports Hall Provision in

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Harlow- 2012</p> <ul style="list-style-type: none"> Swimming Pools Facilities - 2011 Playing Pitch Strategy 2009 Harlow Play and Youth Activity Strategy 2009 Delivery Study for Harlow and Surrounding Area: Infrastructure Delivery Plan – March 2018 Local Plan Viability Assessment, Affordable Housing and CIL Review – March 2018 Harlow Infrastructure Study - Stage 2 Report March 2010 Harlow Infrastructure Study - Stage 1 Report November 2008 Garden Town Water Cycle Study(to be completed) Garden Town Water Cycle

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Study Addendum(to be completed)</p> <ul style="list-style-type: none"> • Rye Meads Water Cycle Strategy - 2009 • WEEH Local Plan Modelling Technical Note 1: Forecast Methodology • WEEH Local Plans Modelling Technical Note 2: Spatial Options A-E (March 2016) • Harlow Local Plan Modelling Technical Note 3: Stort Crossing / Northern Bypass Initial Testing (May 2016) • WEEH Local Plans Modelling Technical Note 4: WEEH Emerging Option (September 2016) • WEEH Local Plans Modelling: Technical Note 5: East Harlow VISSIM Study • WEEH Local Plans Modelling Technical Note 6: South and West Harlow Study

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Harlow Transportation Study - 2005 • Memorandum of Understanding: Objectively Assessed Housing Need • Memorandum of Understanding: Highways • Memorandum of Understanding: Epping Forest • Memorandum of Understanding: Objectively Assessed Employment Need • Thames Water Greater Harlow Position Statement - June 2017 • Thames Water Greater Harlow Position Statement - October 2018 • Garden Town Expression of Interest 2016 • Garden Town Vision(to be completed)

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Garden Town Design Guide(to be completed) • Sustainable Transport Corridor Study(to be completed) • Transport Strategy(to be completed) • Garden Town IDP(to be completed) • Strategic Viability Study(to be completed) • Affordable Housing Supplementary Planning Document • Affordable Housing Sustainability Appraisal • Affordable Housing Consultation • Affordable Housing Adoption Statement • Open Spaces, Sport and Recreation Supplementary

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Planning Document</p> <ul style="list-style-type: none"> • Open Spaces, Sport and Recreation Sustainability Appraisal • Open Spaces, Sport and Recreation Consultation • Open Spaces, Sport and Recreation Adoption Statement • Harlow Design Guide SPD - Part 1 • Harlow Design Guide SPD - Part 2 • Harlow Design Guide SPD - Part 3 • Harlow Design Guide SPD - Part 4 • Harlow Design Guide SPD - Part 5 • Harlow Design Guide SPD - Part 6

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Harlow Design Guide SPD - Part 7 • Harlow Design Guide SPD - Part 8 • Harlow Design Guide SPD - Part 9 • Harlow Design Guide SPD - Part 10 • Harlow Design Guide SPD - Part 11 • Harlow Design Guide SPD - Part 12 • The Stow Neighbourhood Centre Design Framework SPD • The Stow Neighbourhood Centre Design Framework Consultation • The Stow Neighbourhood Centre Design Framework Adoption Statement

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Essex and Southend-on-Sea Waste Local Plan July 2017 • Essex Minerals Local Plan • The Essex Design Guide • The Essex Parking Standards: Design and Good Practice - 2009 • The Essex County Council Developers' Guide to Infrastructure Contributions - Revised Edition 2016 • Harlow Council Corporate Plan 2018/19 - 2020/21 • Harlow Health and Wellbeing Partnership Strategy 2018 - 2028
<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</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 	<p>Given Harlow's tight administrative boundaries and other environmental constraints, and in accordance with the Duty to Cooperate, the Council has</p>

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>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>	<p>not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</p> <ul style="list-style-type: none"> • 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. 	<p>been working closely with adjoining districts to consider the socio-economic and environmental characteristics of the wider area. In addition to assessing housing and other needs arising from the SHMA and FEMA, other studies were undertaken to consider appropriate spatial options. This includes separate joint work to assist in the coordination of strategic planning matters, in accordance with the provisions of the Duty to Cooperate, particularly in respect of the consideration of large development sites.</p> <p>The SA Report has also assisted in the consideration and evaluation of options, considering other alternatives to development including the potential for increasing densities at particular locations. A wider SA to inform plan making in the SHMA was undertaken to understand how the OAHN for the SHMA area should be delivered and where. These options have informed the decision making process both locally and wider.</p>
<p>Effective: the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</p> <p>To be 'effective' a DPD needs to:</p>		

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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 		
<p><i>Deliverable and Coherent</i></p> <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? 	<ul style="list-style-type: none"> • 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). 	<p>The Local Plan provides a top down framework between the Vision and the Strategic Objectives (P.20) to ensure that the policies deliver the Council's aspirations. The policies seek to address the key issues and challenges set out in the Spatial Context (Page 10).</p> <p>The Sustainability Appraisal (2018) of the Local Plan appraises the policies in terms of their contribution to achieving the vision and strategic objectives.</p> <p>Chapter 19 of the Local Plan relates to implementation and explains how through partnership working, coupled with the Infrastructure Delivery Plan, how the plan will be delivered. The</p>

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>timescale for proposed developments to come forward is set out in the Strategy Worksheet at Appendix B (P. 308).</p> <p>Paragraphs 1.29 – 1.33 demonstrates the Council's commitment to continued co-operation with key delivery partners. This is being taken forward through the strategies being developed to support the development of the Harlow and Gilston Garden Town. A number of MOUs have been signed with key partners to address the over-arching strategic matters affecting the area.</p> <p>The Council's most recent Local Development Scheme (Feb 2018) sets out the Plan framework and timetable for the area.</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 	<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>The Infrastructure Delivery Plan considers the overarching infrastructure requirements needed to support the Plan as contained in Policy SIR1 and Chapter 17 of the Plan. Through the Duty to Co-operate the Council has been working with key partners to secure a co-ordinated approach to the delivery of infrastructure across the Harlow and</p>

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
policies?		Gilston Garden Town.
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> Sections of the DPD that reflect the plans or strategies of the local authority and other bodies Policies which seek to pull together different policy objectives Expressions of support/representations from bodies responsible for other strategies affecting the area 	<p>The principles of spatial planning underpin the Local Plan as reflected in Chapters 4 and 5 and a suite of supporting policies. This reflects Harlow's location in the London Stansted Cambridge Corridor and the key economic, social and cultural role it plays. This means there is wide support of the strategy set out in the Plan reinforced by the Harlow and Gilston Garden Town initiative. A Duty to Co-operate statement has been prepared showing how the authority has worked with a number of agencies and organisations over the course of the Plan.</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: <ol style="list-style-type: none"> the effectiveness of policies and what evidence is being collected to undertake this 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 	<p>The Local Plan aims to provide a catalyst for sustainable growth in the Harlow area beyond the plan period based on the provision of enhanced and new infrastructure. This includes new Sustainable Transport Corridors that will support current and future housing and employment needs.</p> <p>The Plan is supported by a monitoring</p>

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>robustness and how the plan could cope with changing circumstances</p> <ul style="list-style-type: none"> 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. 	framework and a delivery chapter.
<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. 	The Local Plan has been prepared through a process of positive, pro-active and ongoing co-operation with East Hertfordshire, Epping Forest and Uttlesford Council's, together with Essex and Hertfordshire County Councils. This has been underpinned through a series of signed MOUs. A Duty to Co-operate statement has been prepared showing how the authority has worked with a number of agencies and organisations over the course of the Plan. Where appropriate the Plan has identified those responsible to implement/deliver those aspects of the Policy/Strategy.
<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 	<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 	The Local Plan contains a monitoring and implementation chapter that sets out indicators and targets related to

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>contains housing allocations)?</p> <ul style="list-style-type: none"> • 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? 	<ul style="list-style-type: none"> • 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 	<p>policies in the Local Plan.</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 • Reports or copies of correspondence as to how representations have been considered and dealt with. 	<p>In order to ensure that policies are locally distinctive to Harlow and do not repeat national guidance Policy SD1 has been developed. This sets out the presumption in favour of sustainable development.</p>

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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

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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. 	This is reflected in the findings of Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment on behalf of Essex Planning Officers Association (July 2014) and the Harlow Council Gypsy and Traveller Accommodation Assessment Need Summary Report (August 2017) and reflected in policy HS4 of the Local Plan.
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. 	See above.

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Policy Expectations	Possible Evidence	Evidence Provided
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>Policy HS4 of the Local Plan identifies the requirement for pitches in Harlow. This will exceed the requirement set out in the joint Essex wide Traveller and Travelling Showpeople Accommodation Assessment.</p>
Policy C: Sites in rural areas and the countryside (para 12)		
<p>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.</p>		Not relevant to Harlow.
Policy D: Rural exception sites (para 13)		
<p>If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating</p>	<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. 	Not relevant to Harlow.

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Policy Expectations	Possible Evidence	Evidence Provided
and releasing sites solely for affordable travellers' sites.		
Policy E: Traveller sites in Green Belt (paras 14-15)		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>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.</p>	<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. 	<p>.The need in Harlow has been established through the evidence set out above and provision set out in policy HS4. No Green Belt revisions have been made in response to the identified need.</p>
Policy F: Mixed planning use traveller sites (paras 16-18)		
<p>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.</p>	<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 	See above
Policy G: Major development projects (para		

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Policy Expectations	Possible Evidence	Evidence Provided
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. 	The need for Harlow has been identified from the evidence described above and the policy approach to provision is set out in policy HS4 of the Local Plan.

Soundness Self-Assessment Checklist

Integration of marine and terrestrial planning

As the UK marine area and marine plan area boundaries extend up to the level of mean high water spring tides while terrestrial planning boundaries generally extend to mean low water spring tides (including estuaries), the marine plan area will physically overlap with that of some terrestrial plan. Local authorities with any tidal frontage, even if far inland and not conventionally regarded as coastal, must therefore take full account of the MMO, the MPS and marine plans under S.58 of the Marine and Coastal Access Act and the Duty to Co-operate in Section 110 of the Localism Act 2011. A full list of the local planning authorities whose areas overlap with the UK marine area appears in Appendix One.

Soundness Self-Assessment Checklist of the Harlow Local Development Plan (August 2018)

Furthermore, the Duty to Co-Operate requires all local planning authorities, even if landlocked, to take account, where relevant, of the MMO's plans and activities when preparing their Local Plans. Finally, the NPPF requires LPAs to take the MPS into account under the tests of soundness (specifically, to test if an emerging DPD is consistent with national policy, which includes the MPS).

The Marine and Coastal Access Act 2009 (the Act) provided for the introduction of a marine planning system for England's inshore and offshore marine area, establishing the Secretary of State as the Marine Planning Authority for these areas. The Act also provided for the establishment of the Marine Management Organisation (MMO) and for the Secretary of State to delegate various planning functions. The planning functions including preparation and review were delegated to the MMO in 2010. The Act also provided for the adoption of the UK Marine Policy Statement (MPS). The MPS was adopted on 18 March 2011 and provides the policy framework for marine planning and for all decisions likely to affect the marine area.

There are eleven plan areas in English waters, for each of which a Marine Plan will be prepared by the MMO and adopted by the Secretary of State for the Environment, Food and Rural Affairs.

In practical terms, all activities undertaken in the marine area require land based infrastructure, without which our ability to benefit economically and socially from activities in the marine area would be extremely limited.

The UK Government's vision for the marine environment, as articulated in the MPS, is:

'clean, healthy, safe, productive and biologically diverse oceans and seas'.

In the absence of a marine plan prepared by the MMO and adopted by the Secretary of State the MPS is the relevant marine policy document. Where a marine plan has been adopted both the MPS and the Marine Plan are relevant marine policy documents for the marine plan area.

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all¹ public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise

¹ Like the Duty to Co-Operate, no distinction is made by the Marine and Coastal Access Act between public authorities with a tidal frontage and those without. Emphasis is placed on the likelihood of the decision being made affecting the marine area.

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- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions²

In addition, the MPS seeks integration of marine planning and the terrestrial planning system through:

- Consistency between marine and terrestrial policy documents and guidance
- Liaison between respective responsible authorities for terrestrial and marine planning, including in plan development, implementation and review stages
- Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions

These aims are further supported by footnote 36 in the NPPF.

² For example, decisions about what representations they should make as a consultee or about what action they should carry out themselves.

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Policy Expectations	Possible Evidence	Evidence Provided
Key requirements under the Duty to Co-Operate		
Consistency between marine and terrestrial policy documents and guidance	<ul style="list-style-type: none"> • Demonstration of consistency of aim between relevant local plan policies and marine policy documents (i.e. the MPS and any relevant adopted marine plans) • Proof of collaborative working with the MMO and that the MPS has been taken into account. 	Not relevant, there are no marine habitats in Harlow.
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	<ul style="list-style-type: none"> • Early and effective policy development engagement undertaken, including discussions with the MMO • Evidence of iteration of policies and plans as a result of engagement with the MMO • Evidence of engagement with the MMO in relation to monitoring, implementation and throughout the policy cycle • Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	Not relevant, there are no marine habitats in Harlow.
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	<ul style="list-style-type: none"> • Evidence that the LPA has shared or provided relevant data to the MMO that can help inform Marine Plans or MPS review • Demonstration that local plan policy has been underpinned by data provided by the MMO or the MPS 	Not relevant, there are no marine habitats in Harlow.

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Policy Expectations	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> Explicit cross-referencing in local plan to MPS, the MMO, their roles, and relevant marine plans 	
Marine Policy Statement- Chapter 2: General Principles for Decision-Making³		
Sections 2.1 -2.2: The UK vision for the marine environment		
<p>The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')</p> <p>Achieving the vision through marine planning</p>	<ul style="list-style-type: none"> Reference in DPD where appropriate to UK vision for the marine environment Contribution to the vision through local plan policies and supporting text 	Not relevant, there are no marine habitats in Harlow.
Section 2.4: Considering benefits and adverse effects in marine planning		
Consider benefits and adverse effects of plan policies	<ul style="list-style-type: none"> Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal 	Not relevant, there are no marine habitats in Harlow.

³ As the Marine Policy Statement was not targeted specifically at terrestrial planning authorities, some of its sections are, in practice, relevant to marine planning authorities only and/or there is already a comprehensive policy framework governing terrestrial development (e.g. energy infrastructure), Where this is considered to be the case, i.e. where it is considered likely that a terrestrial planning DPD would be found sound without referencing that section, the section in question has been omitted from this checklist.

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Policy Expectations	Possible Evidence	Evidence Provided
Section 2.5: Economic, social and environmental considerations	•	
Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water Framework Directive)	<ul style="list-style-type: none"> Reference to relevant EU Directives in DPD and sustainability appraisal Consideration of contribution of DPD policies to the objectives of relevant EU Directives 	Not relevant, there are no marine habitats in Harlow.
Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities		
3.1 Marine Protected Areas		
<p>Incorporate identified areas and features of importance for nature conservation</p> <p>Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts</p>	<ul style="list-style-type: none"> Identification of relevant areas and features of importance for nature conservation within relevant marine plan area(s) Consideration of impacts of policy and/or terrestrial development on those areas and features of importance Measures to mitigate, monitor and manage negative impacts on those areas and features of importance 	Not relevant, there are no marine habitats in Harlow.
3.4 Ports and shipping		
Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety	<ul style="list-style-type: none"> Evidence that policy with potential impact on ports and shipping minimises negative impacts on sector Where relevant, evidence that economic, employment and transport policies are protective of ports and shipping sector 	Not relevant, there are no marine habitats in Harlow.

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Policy Expectations	Possible Evidence	Evidence Provided
Protect the efficiency and resilience of continuing port operations		
3.8 Fisheries		
Consider potential economic, social and environmental impacts of other developments on fishing activity	<ul style="list-style-type: none"> Where relevant, evidence that other policies minimise negative impacts on fishing activity and/or aquaculture 	Not relevant, there are no marine habitats in Harlow.
3.9 Aquaculture		
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	<ul style="list-style-type: none"> Where relevant, evidence that the benefits of aquaculture industry development have been considered 	Not relevant, there are no marine habitats in Harlow.
3.10 Surface water management and waste water treatment and disposal		
Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment	<ul style="list-style-type: none"> Reference to and consideration of the co-existence of waste water infrastructure with other marine activities, including the potential for waste water infrastructure to mitigate marine impacts through design or location 	Not relevant, there are no marine habitats in Harlow.
3.11 Tourism and recreation		
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and	<ul style="list-style-type: none"> Where relevant, reference to marine tourism and recreation Evidence that the potential for marine tourism and recreation has 	Not relevant, there are no marine habitats in Harlow.

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Policy Expectations	Possible Evidence	Evidence Provided
local communities	been recognised in plan-making	

Appendix One

This is an alphabetical list of all local planning authorities in England whose area overlaps with the UK marine area.

Adur
Allerdale
Arun
Babergh
Barking and Dagenham
Barrow-in-Furness
Basildon
Bassetlaw
Bexley
Blackpool
Boston
Bournemouth
Broadland
Broads Authority
Canterbury
Carlisle
Castle Point

Chelmsford
Cheshire West and Chester
Chichester
Chorley
Christchurch
City of London
City of Brighton and Hove
City of Bristol
City of Kingston upon Hull
City of Peterborough
City of Plymouth
City of Portsmouth
City of Southampton
City of Westminster
Colchester
Copeland
Cornwall

County Durham
Dartford
Doncaster
Dover
East Cambridgeshire
East Devon
East Lindsey
East Riding of Yorkshire
Eastbourne
Eastleigh
Exeter
Exmoor National Park
Fareham
Fenland
Fylde
Gateshead
Gloucester

Gosport
Gravesham
Great Yarmouth
Greenwich
Halton
Hambleton
Hammersmith and Fulham
Hartlepool
Hastings
Havant
Havering
Horsham
Hounslow
Huntingdonshire
Ipswich
Isle of Wight
Isles of Scilly

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Kensington and Chelsea	Rother	Wandsworth
King's Lynn and West Norfolk	Scarborough	Warrington
Lake District National Park	Sedgemoor	Waveney
Lambeth	Sefton	Wealden
Lancaster	Selby	West Devon
Lewes	Shepway	West Dorset
Lewisham	South Cambridgeshire	West Lancashire
Liverpool	South Downs National Park	West Lindsey
Maidstone	South Gloucestershire	West Somerset
Maldon	South Hams	Weymouth and Portland
Medway	South Holland	Winchester
Middlesbrough	South Lakeland	Wirral
New Forest	South Norfolk	Worthing
New Forest National Park	South Ribble	Wyre
Newark and Sherwood	South Somerset	York
Newcastle upon Tyne	South Tyneside	
Newham	Southend-on-Sea	
North Devon	Southwark	
North East Lincolnshire	Stockton-on-Tees	
North Lincolnshire	Stroud	
North Norfolk	Suffolk Coastal	
North Somerset	Sunderland	
North Tyneside	Swale	
North York Moors National Park	Taunton Deane	
Northumberland	Teignbridge	
Norwich	Tendring	
Poole	Test Valley	
Preston	Thanet	
Purbeck	Thurrock	
Redcar and Cleveland	Tonbridge and Malling	
Richmond upon Thames	Torbay	
Rochford	Torridge	
	Tower Hamlets	