Soundness Self-Assessment Checklist (March 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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Positively Prepared: *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.*	
Vision and Objectives Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve? Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives? Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? Have reasonable alternatives to the quantum of development and overall spatial strategy been considered? Are the policies internally consistent? Are there realistic timescales related to the objectives? Does the DPD explain how its key policy objectives will be achieved?	Chapter 3: Issues Shaping the Local Plan sets out the issues and opportunities for Huntingdonshire up to 2036. These are informed by concerns arising during early consultation on the Local Plan; the chapter includes partners' work on the issues too, providing links to their strategies where relevant. Chapter 3 summarises the key economic, social and environmental challenges and opportunities followed by the Spatial Vision which sets the headline priorities for Huntingdonshire up to 2036. The assessment of challenges and opportunities directly informs the Spatial Vision and Objectives which are also set out in Chapter 3. Each objective is accompanied by a listing of the principal responding policies to identify the mechanisms by which the objective will be achieved. The first two stages of Local Plan consultation in 2012 focussed strongly on consideration of the quantum of development required and differing approaches possible. Outcomes of these are reflected in the Statement of Consultation under Regulation 18. The Cambridgeshire SHMA (2013) and Huntingdonshire Objectively Assessed Housing Need (2017) have provided more quantified assessment of requirements in accordance with national policy and guidance. Sustainability Appraisal has been undertaken as an iterative process throughout preparation of the Local Plan; this presents details of assessment of alternatives for the spatial strategy. The objectives of the Local Plan have been tested against the objectives of the Sustainability Appraisal to ensure the approach is internally consistent and that they are broadly compatible with the aims of sustainable development as set out in government guidance. Chapter 4: The Development Strategy summarises how the objectives inform the Strategy Approach for the Local Plan.
The presumption in favour of sustainable development (NPPF paras 6-17) Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for	The Spatial Vision and Objectives set out in Chapter 3 place a strong focus on promoting growth and investment in Huntingdonshire to meet the needs of the expected future population balanced with conserving and enhancing environmental assets, particularly the district's strategic green infrastructure. Objectively assessed needs are presented within the Local Plan's evidence base with key documents being:

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achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or —specific policies in this Framework indicate development should be restricted.	Huntingdonshire's Objectively Assessed Housing Need (2017), The Gypsy and Traveller Accommodation Assessment (2016), Employment Land Study (2014) and Huntingdonshire Retail and Commercial Leisure Needs Assessment (2017). Objectively assessed need for housing has been established through the Cambridgeshire SHMA (2013) and the Huntingdonshire Objectively Assessed Housing Need (2013). Policies LP1 and LP2 set out how the requirement will be delivered. A section entitled 'Delivering the Strategy' in Chapter 4 details the flexible approach that the Local Plan will take to achieving the required housing numbers and how the Council will respond in the event of under-delivery becoming an issue.
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.	The Local Plan is based on the principles of sustainable development as demonstrated through the spatial vision, objectives and overall development strategy supported by detailed policies shaping sustainable implementation of individual development proposals. The presumption in favour of sustainable development that is central to the National Planning Policy Framework is included in the Introduction to the Local Plan and provides the basis for the policies that follow.
Objectively assessed needs The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	The development needs for Huntingdonshire are primarily set out in the following elements of the evidence base: Huntingdonshire's Objectively Assessed Housing Need (2017), The Gypsy and Traveller Accommodation Assessment (2016), Employment Land Study (2014) and Huntingdonshire Retail and Commercial Leisure Needs Assessment (2017). The Infrastructure Delivery Plan (2017) and the Huntingdonshire Strategic Transport Study (2017) identify the social and economic infrastructure needed to support these. Policy approaches have been developed from these, in particular policies LP1, LP2 and LP7-11, which set out the amount of development required based on the evidence and the strategy for how this will be accommodated and delivered. Environmental needs are reflected in the Cambridgeshire Green Infrastructure Strategy (2011) and the Huntingdonshire Landscape and Townscape Assessment SPD. Cross-boundary issues relating to the Nene Valley Improvement Area are reflected in policy LP3.The Local Plan promotes a spatial strategy which incorporates two substantial strategic expansion locations promoting mixed use developments. The allocation of Alconbury

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	Weald (SEL1.1 and 1.2) is intended to complement the Enterprise Zone designated for the Greater Cambridgeshire Greater Peterborough LEP in August 2011 which provides strategic scale business and employment opportunities for Huntingdonshire and beyond. This makes effective use of strategic scale brownfield land through re-use of the former Alconbury airfield and military base. Policy LP7 specifically supports mixed use developments within each spatial planning area. The Statement of Compliance with the Duty to Co-operate and the Statement of Consultation under Regulation 18 set out how the Council has co-operated with relevant bodies in the preparation of the Local Plan, including its evidence base.
NPPF Principles: Delivering sustainable development	
1. Building a strong, competitive economy (paras 18-22)	
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	One of the four key elements of the Spatial Vision set out in Chapter 3 is supporting a diverse, thriving economy; this is complemented by objectives 5-11 which focus on supporting the prosperity of the local economy, diversifying the range of activities and maximising the benefits arising from the Alconbury enterprise zone. Policy LP1 plans for approximately 14,400 additional jobs in the district by 2036. This is informed by the Huntingdonshire Objectively Assessed Housing Need (2017) which relates the number of homes and jobs together and the Huntingdonshire Economic Growth Plan 2013-2023. Chapter 6 focuses entirely on policies to help build a strong, competitive economy. This identifies key industrial sectors in the local economy, the importance of small and medium sized businesses, nurturing established employment areas (LP19) and the role of the rural economy within the district (LP20). These combine to shape the delivery of economic growth, encourage investment and job creation and allow Huntingdonshire to maximise its economic potential.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	LP2: Strategy for Development seeks to focus growth in areas of the district with greatest opportunities to benefit from existing or planned infrastructure improvements. Allocation of 10,500 homes within the two strategic expansion locations provides clear foci for investment in infrastructure and service provision. LP4: Contributing to Infrastructure coupled with the Infrastructure Delivery Plan (2017) provide information on the levels of infrastructure provision required and how this may be achieved. The Employment Land Study (2014) considers the quantity and quality of employment land in the district and assesses the merits of retaining or releasing established employment areas. LP19 protects a specified list of established employment areas which

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	provide opportunities for reuse and redevelopment of sites along with some new opportunities. Previously protected areas which the Employment Land Study (2014) identified as no longer being viable or desirable have been excluded from this list.
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)	Objective 10 focuses on enhancing the role of the district's four main town centres; this is supported by development strategy policies which seek in accordance with national policy and guidance to concentrate main town centre uses within defined town centres and apply a sequential approach to developments in excess of 600 sqm. LP22 defines town centre boundaries, primary shopping frontages and primary shopping areas and seeks to promote the vitality and viability of these to ensure the town centres retain their roles as the focus for local communities whilst responding positively to the rapid evolution of the retail sector. Outside town centres LP23 shapes the supporting role of villages in meeting everyday retail and service needs. Huntingdonshire's Retail and Commercial Leisure Needs Assessment (2017) informed development of the strategy and recognises the differing strengths of each town centre. A Business Improvement District (BID) operates in Huntingdon to promote a competitive town centre and coordinate management of the centre. The Business Plan 2017-22 supported successful renewal of the BID in June 2017.
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)	Huntingdonshire's Retail and Commercial Leisure Needs Assessment (2017) studied the need for additional retail and commercial leisure floorspace within the district based on expected available expenditure to support growth. Mixed use allocations are included to promote neighbourhood centres within the two strategic expansion locations to facilitate provision of retail and services to meet everyday needs. Significant expansion of the defined town centre boundaries is not considered to be necessary due to the limited amount of growth required; the completion of the Chequers court redevelopment in Huntingdon town centre and the availability of redevelopment opportunities available within the existing town centres. Criteria based policies LP7-10, LP22-24 and LP40 allow for development proposals for retail, leisure, commercial, office, tourism, cultural and community services uses. LP22 designates town centre boundaries along with primary shopping areas and primary shopping frontages and provides criteria to guide the nature of development permitted within each of these. The relevant areas are shown on the Policies Map. No other designations are set out in the Local Plan as there are insufficient

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	concentrations of retail and service provision in other places to merit protection as a local centre.
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)	Objective 10 focuses on supporting agriculture, rural diversification, estate management and rural tourism to sustain the function and character of Huntingdonshire's countryside and its communities. This is supported by LP20 which specifically looks to promote and support opportunities for sustainable development related to maintaining a healthy rural economy and facilitates new business development and the expansion of existing ones along with farm diversification proposals. LP21 aims to support the rural economy by supporting homes specifically for rural workers.

LP10 provides for development within and on land well-related to the built-up area of small settlements to ensure that organic growth can be maintained to help sustain the vitality of communities as average household size declines and support existing services and facilities. This policy is complemented by policies LP29 and LP30 which support community based development proposals and rural exceptions housing, both focused on providing positive guidance on provision of sustainable rural communities.

LP23 supports the retention or further provision of local services and community facilities to maintain the sustainability of rural communities.

LP24 supports new and expanded tourism, sport or leisure uses in the countryside subject to environmental and sustainability issues being addressed. |
| **4. Promoting sustainable transport (paras 29-41)** | |
| Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)

Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and | The Council has worked closely with infrastructure providers on identifying the infrastructure needs arising from development proposed in the Local Plan with outcomes set out in the Infrastructure Delivery Plan – Infrastructure Schedule (2017). This has been complemented by extensive work on transport modelling and identification of potential highway improvement schemes undertaken in conjunction with Cambridgeshire County Council.

Within Chapter 4 the section entitled 'Delivering the Strategy' highlights proposed transport infrastructure improvements to the A14, A428, East Coast mainline railway and the East-West rail corridor along with the |

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opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)	work of the Cambridgeshire and Peterborough Combined Authority towards improving transport connectivity within the area.
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)	Objective 14 seeks to facilitate sustainable modes of travel, prioritise access to public transport and facilitate provision of segregated routes for walking and cycling. As an extensive rural district opportunities for non-car modes of travel are constrained outside the main settlements.. However, LP17 expects new development to maximise use of sustainable travel modes and requires assessment of the likely transport impacts of any development proposal.
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)	The distribution of growth proposed through the development strategy set out in Chapter 4 along with the allocations in chapters 9-11 seek to concentrate the majority of growth within Huntingdon, St Neots and St Ives spatial planning areas as they are the district's most accessible locations. Huntingdon and St Neots both have railway stations providing access to the East Coast Mainline railway and Huntingdon and St Ives are both served by the Guided Bus providing high quality public transport connections to Cambridge and Peterborough.
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)	The Local Plan also provides for two major mixed use developments at Alconbury Weald (SEL1) and St Neots East (SEL2); these will offer a mixture of residential, employment, commercial and community facility uses to promote opportunities for use of sustainable modes of travel.
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)	LP18 reflects the design-led approach to car parking provision elaborated in the Huntingdonshire Design Guide SPD (2017); it also seeks to promote cycling by requiring provision of at least one secure cycle parking space per bedroom for residential properties.
Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)	Allocations SEL1.1 and HU1 both note the requirement for potential safeguarding of land to facilitate provision of a realigned A141 around the north west of Huntingdon.
Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)	
For larger scale residential developments in particular, planning policies should promote a	

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mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38) The setting of car parking standards including provision for town centres. (39-40) Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)	
5. Supporting high quality communications infrastructure (paras 42-46)	
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)	The Connecting Cambridgeshire programme has worked to expand access to high speed broadband as recognised in the Economic Issues identified in Chapter 3. Along with commercial providers this has successfully delivered superfast broadband accessibility to its original target of 95% of premises in Cambridgeshire and Peterborough by the end of 2017. The target has now been increased to bringing superfast broadband access to 99% of premises across Cambridgeshire and Peterborough by the end of 2020. so its inclusion in policy is no longer as relevant. However, LP15 requires all homes, businesses and main town centre uses to incorporate appropriate measures to ensure they are capable of being served by super-fast broadband. LP3 recognises the Great Fen as a green infrastructure priority area for which a landscape and visual setting area is defined to protect the Great Fen from intrusive development.This requires consideration of the impact of telecommunications masts within the defined area but does not institute a blanket ban.
6. Delivering a wide choice of high quality housing (paras 47-55)	
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing	Policy LP1 sets out the amount of housing development for which provision will be made in Huntingdonshire between 2011 and 2036. The latest housing trajectory is presented in the Annual Monitoring Report –

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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)	December 2017. Following a significant retrospective increase to the housing target in 2013 persistent under-delivery has been identified and a 20% buffer allowed addressing this. The housing trajectory indicates an achievable supply of 7,165 dwellings against a 5 year requirement + shortfall +20% buffer of 6,203 dwellings; representing the equivalent of 5.78 years of supply. A small number of unallocated sites are included in the 5 year supply where prior approval or planning permission has been granted, and a 10% discount is applied to those not under construction to allow for potential non-delivery. No further allowance is made for small or windfall sites. The Housing and Economic Land Availability Assessment (2017) provides additional evidence concerning deliverable sites setting out details of the suitability of sites, the landowner or promoter's aspirations for delivery timing and a sustainability appraisal of each site.
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	The Annual Monitoring Report – December 2017 identifies a supply of 5,703 dwellings for years 6-10 and 3,500 dwellings for years 11-15. Beyond this a further 2,025 dwellings are identified for delivery up to the end of the plan period.
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	A housing trajectory through to the end of the plan period has been prepared and presented in the Annual Monitoring Report – December 2017. Completions and permissions are also presented in the AMR. Within Chapter 4 of the Local Plan a section entitled 'Delivering the Strategy' sets out the Council's approach to maintaining an ongoing supply of housing sites and the actions that will be taken if this is not achieved.
Set out the authority's approach to housing density to reflect local circumstances (47).	The Local Plan takes a design-led approach to housing density rather than a quantitative one. LP12 requires development to respond positively to its context to ensure housing density reflects local circumstances. This is supported by policies LP13-15 which are all intended to guide the form and nature of development whilst ensuring adequate residential amenity.
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)	Strategic Housing Market Assessments were completed for the Cambridge HMA in 2013, which covers the whole of Cambridgeshire, including Huntingdonshire, as well as West Suffolk; and for the Peterborough HMA in 2014, which also includes the most northern parts of the district.These provide comprehensive reviews of the housing needs of each HMA. The Huntingdonshire Objectively Assessed Housing Needs 2017 provides updated quantitative information on

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	housing need; it considers market signals and affordable housing need. The Huntingdonshire Accessible and Specialist Housing Evidence Paper (2018) provides details on the nature and quantity of housing needs for residents with additional accessibility needs and older people in general. Altogether the above support a series of policies focusing on meeting the housing needs of the district. LP26 focuses specifically on housing mix and includes support for proposals for self and custom-build homes. LP25 seeks to secure a target of 40% affordable housing on eligible sites balanced with the need to consider viability to ensure housing delivery rates overall are not compromised. LP30 supports provision of rural exception sites to help meet needs for affordable homes for local people. LP27 promotes both self-contained specialist housing and residential institutions where appropriate. The Council worked with a wide range of partners to produce the Cambridgeshire, King's Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment 2016 to ascertain the accommodation requirements within each district. This has directly informed LP28 which provides a criteria based policy for determining planning applications for additional proposals.
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	LP30 supports provision of mixed market and affordable housing schemes on rural exception sites to help meet needs for affordable homes for local people and provide for small scale organic growth within Huntingdonshire's many small settlements to promote diversity and choice in the housing market. LP29 complements this by promoting community planning proposals which may include an element of market housing or plots for self or custom-build homes to facilitate community projects to help sustain or enhance the vitality and viability of small settlements.
7. Requiring good design (paras 56-68)	
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	Chapter 5 sets out a series of policies which seek to ensure the quality of new development throughout the district and achieve a high standard of design which contributes positively to the character of the surrounding area. LP12 sets out the overarching mechanism for achieving high standards of design, complemented by more detail in LP13 which emphasises the expectations for new developments to respond positively to an understanding of constraints. Applicants will also be expected to draw on evidence from the Huntingdonshire Design guide SPD

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	2017 to inform their proposal and demonstrate how it responds to local context. Other policies will also influence the design and layout of new development, particularly LP18 which takes a design-led approach to parking provision and vehicle movement and LP36 which guides development affecting heritage assets and their settings.
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).	Objectives 12-16 form a group focused on providing sufficient infrastructure to support healthy communities which seek to provide opportunities to facilitate active lifestyles and provide facilities to support physical and mental well-being. Objective 20 also recognises the need to create attractive and safe residential environments where people can access health requirements. LP31 addresses health issues directly through the requirement for proportionate health impact assessment of large scale developments. LP7 supports mixed use developments within spatial planning areas and the two strategic expansion locations strongly emphasise this to ensure development of mixed, inclusive communities which offer opportunities to pursue sustainable lifestyles. These are complemented by the range of design policies in Chapter 5, particularly LP13 which emphasises the need for development proposals to ensure ease of getting around and provision of well-designed public spaces.
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	Provision and protection of local services and community facilities are supported through LP23. This primarily addresses built facilities but also includes sports venues, and seeks to protect and promote premises which offer opportunities for social interaction and provision of community services and facilities. Policies within the development strategy seek to promote provision of commercially-led services and facilities which are considered to be main town centre uses of an appropriate scale to the community they serve. LP29 supports provision of community based proposals responding to an identified community need; these may include uses as diverse as outdoor sports facilities, community centres, allotments or shops.
Identify specific needs and quantitative or	Objective 16 seeks to provide for sports, play and open space complemented by objectives 21 and 25 focusing

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qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	on conserving and enhancing Huntingdonshire's green infrastructure and natural habitats. LP4 seeks to facilitate provision of open space, sports and recreational facilities through use of the community infrastructure levy; provision is expected to respond to locally identified need including those identified through the Regulation 123 CIL list. The Developer Contributions SPD (2011) provides detailed guidance on the quantity and nature of open space, sports and recreation facilities required alongside new development. LP34 specifically addresses the protection of open space of public value and promotes designation of local green spaces through neighbourhood plans. An objective assessment of need for open space, sports and play facilities is required to accompany proposals for each strategic expansion location to ensure these uses are adequately provided for within these new communities and reflect need likely to arise from detailed development proposals put forward.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	LP34 promotes the designation of local green spaces through neighbourhood plans.
9. Protecting Green Belt land (paras 79-92)	
Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81) Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)	Not applicable.

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When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84) Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)	
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)	
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)	The fourth strand of the Local Plan's spatial vision is to work with the climate and landscape .Objective 2 sets a framework for seeking development that is adaptable to climate change and resilient to extreme weather. This is complemented by objectives 22 and 23 which focus on sustainable construction techniques, minimisation of energy and water use and reduction of carbon emissions. The spatial strategy set out in Chapter 4, especially in LP2, seeks to reduce the need to travel thereby reducing greenhouse gas emissions by steering development towards locations where people have opportunities to walk or cycle to local services as well as being locations away from areas of greatest flood risk. LP2 also provides support for integration of climate change adaptation measures through green infrastructure enhancement. The development strategy is complemented by LP17 which encourages use of sustainable travel modes, LP13 which guides use of sustainable design and construction methods and LP15 which seeks to ensure that predicted adverse impacts from air and water pollution will be made acceptable. Flood risk and water management are focal issues in Huntingdonshire given the low lying nature of much of the district. LP5 specifically addresses flood risk and provides detailed guidance on the location of development with respect to sequential flood risk. The Strategic Flood Risk Assessment 2017 provides the basis for sequential and exception testing. Additional detailed guidance is provided in the Cambridgeshire Flood and Water SPD. Water supply and waste water management issues are addressed in LP6. Water capacity issues have been considered through the Huntingdonshire Stage 2 Detailed Water Cycle Study 2014. The evidence and policies have been developed in close consultation with the Environment Agency and relevant water companies.

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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)	LP37 provides the local response to promoting proposals for renewable energy and incorporates specific guidance on provision of wind turbines which is supplemented by detailed advice in the Wind Energy in Huntingdonshire SPD 2014.
Minimise vulnerability to climate change and manage the risk of flooding (99)	LP2 provides support for integration of climate change adaptation measures through green infrastructure enhancement. LP3 promotes provision of additional green infrastructure with particular reference to The Great Fen which is a major wetland creation project. LP5 provides extensive guidance on flood risk, managing flood water and site-specific flood risk assessments reflecting the importance of this issue locally. The sequential test seeks to steer development to areas of least flood risk with limited exceptions for previously developed land in defended areas given the extent of the district's three largest towns which lies in areas of higher flood risk. LP16 provides guidance on addressing surface water flooding and use of sustainable drainage systems which is informed by evidence in the Cambridgeshire Flood and Water SPD 2017.
Take account of marine planning (105)	The Marine Management Organisation has been consulted at each stage of preparation of the local plan. The Marine environment has only a very limited impact on the district. The Anglian District River Basin Management Plan 2 (2015) has been taken into account as the River Great Ouse is the district's primary linkage to the marine environment.
Manage risk from coastal change (106)	Not applicable.
11. Conserving and enhancing the natural environment (paras 109-125)	
Protect valued landscapes (109)	Huntingdonshire benefits from high grade agricultural land with 98% of that in the district classified as grades 1-3. Objective 11 seeks to protect the best and most versatile agricultural land from built development; this is reflected in LP2 where the development strategy and the allocations promoted to deliver it have focused on eliminating the use of grade 1 agricultural land. Objective 21 seeks to maintain, enhance and conserve Huntingdonshire's historic environment, characteristic

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	landscapes, natural habitats and biodiversity. This is supported by a series of detailed policies. LP3 is of particular relevance to protecting valued landscapes through promotion of a series of green infrastructure priority areas. LP11 guides development in the countryside and places a strong emphasis on avoiding the irreversible loss of best and most versatile agricultural land and protecting the intrinsic character and beauty of the countryside. LP20 seeks to balance promotion of sustainable economic development in the countryside with the need to protect best and most versatile agricultural land and the wider landscape.
Prevent unacceptable risks from pollution and land instability (109)	LP15 relates to the amenity experienced by users and occupiers of new developments and neighbouring land and buildings. This includes guidance on impacts from various forms of pollution. LP38 focuses specifically on air quality and provides guidance on the need for air quality assessments and low emissions strategies. LP39 addresses ground contamination and groundwater pollution along with the protection of groundwater. This indicates the situations where investigation will be required, potential remediation strategies and compliance reassurance. The supporting text notes that ground instability is not considered to be a problem for development in Huntingdonshire but where it might pose a risk national guidance provided in the NPPG will be followed.
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	Objective 21 seeks to maintain, enhance and conserve Huntingdonshire's historic environment, characteristic landscapes, natural habitats and biodiversity. This is supported by a series of detailed policies. LP32 specifically addresses biodiversity and geodiversity. It indicates appraisal requirements, sets out a hierarchy of protected sites and provides guidance on complementing or enhancing biodiversity within new developments. At a landscape scale LP3 seeks to support strategic scale green infrastructure and designates a series of green infrastructure priority areas with potential to consolidate and link important habitats.
12. Conserving and enhancing the historic environment (paras 126-141)	
Include a positive strategy for the conservation	Objective 21 seeks to maintain, enhance and conserve Huntingdonshire's historic environment. This is

Soundness Test and Key Requirements	Evidence Provided
and enjoyment of the historic environment, including heritage assets most at risk (126)	supported in Chapter 8 by inclusion of a statement setting out a heritage strategy for Huntingdonshire, complemented by detailed guidance in LP36 on proposals which might affect heritage assets and/or their settings. This includes reference to risks to the district's heritage assets and the Buildings At Risk register, provides guidance on proposals within conservation areas and sets out requirements for archaeological assessments. LP13 which focuses on design implementation is also of relevance to the historic environment , particularly through its requirements for development proposals to respond positively to the area's character and identity.
13. Facilitating the sustainable use of minerals (paras 142-149)	
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	Huntingdonshire is not a minerals planning authority. Cambridgeshire County council have been consulted at all stages of local plan preparation. Section D: Allocations states that any proposal involving a proposed allocation should ensure that any relevant policies contained in the Cambridgeshire and Peterborough Minerals and Waste Core Strategy and Site Specific Proposals Plan are taken into account. A number of proposed site allocations are affected by these but in all instances this is referred to and site specific guidance provided.
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. To be 'justified' a DPD needs to be: • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives.	
Participation Has the consultation process allowed for effective engagement of all interested parties?	Details of all engagement opportunities are set out in the Statement of Consultation; these are summarised as: • Initial Issues and Options – May to June 1012 • Spatial Strategy and Strategic Policies plus Environmental Capacity Study – August to November 2012 • Stage 3 Local Plan, plus initial Sustainability Appraisal, plus Environmental Capacity Study – May to July 2013

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Soundness Test and Key Requirements	Evidence Provided
	- Additional sites Environmental Capacity Study – November to December 2013 - Targeted Consultation (statutory consultees, town/parish councils and landowners/ developers only) – January to March 2015 - Housing and Economic Land Availability Assessment (additional sites) – September to November 2016 - Wind Energy Developments – November 2016 – January 2017 - Local Plan consultation draft 2017, draft Final Sustainability Appraisal, Housing and Economic Land Availability Assessment and Formal Call for Sites – July to August 1017 - Housing and Economic land Availability Assessment (additional sites arising from summer Call for Sites) – October to November 2017
Research / fact finding Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?	The Council considers that the policies and proposals of the Local Plan are justified by the extensive and up-to-date evidence base gathered to support its preparation and submission. Key elements which have shaped the Local Plan include: - Huntingdonshire Objectively Assessed Housing Need - April 2017 - Housing and Economic Land Availability Assessment - December 2017 - Retail and Commercial Leisure Needs Assessment – February 2017 - Strategic Transport Study – May and December 2017 - Final sustainability Appraisal – December 2017 - Strategic Flood Risk Assessment – June 2017 - Habitats Regulations Assessment – May and November 2017 - Infrastructure Delivery Plan - June and December 2017 - Viability Assessment – June and December 2017 Earlier versions of key documents have been used during preparation of the Local Plan, particularly the Sustainability Appraisal which has been an iterative process throughout. The Cambridge sub-region Strategic Housing Market Assessment 2013 informed the development strategy until the Huntingdonshire Objectively Assessed Housing Need - April 2017 was completed to provide a locally specific update. Any assumptions made in the evidence documents should be clearly set out within them. The full list of evidence base documents is available on the Council's website.
Alternatives Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable	The Sustainability Appraisal sets out how alternatives were developed and consulted on during the preparation of the Local Plan and the reasons for selecting the preferred strategy. Stage B looks at the earlier preparation of the Local Plan with paras 4.6ff providing an explanation of

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Evidence Provided
alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?	preparation of the development strategy and differing growth options; Table 4.3 providinga comparative assessment of three initial growth options; and paras 4.15ff refining this with further comparative assessments of alternatives presented in Table 4.4. Table 4.5 then appraises alternative strategic options for the distribution of growth. Stage D considers how the Local Plan has evolved and assesses significant changes to policies and proposals with the majority of details contained in Chapter 6. Chapter 7 reflects changes made arising from engagement on the Local Plan consultation draft 2017, the Housing and Economic Land Availability Assessments of July and October 2017 and the Call for Sites 2017. Of particular significance in terms of alternative approaches is the section entitled 'Growth' contained in paras7.12ff through to Table 7.3 which assessed the impact of changes to the approach proposed and its following conclusions and addition of the Local Service Centres policy appraised in Table 7.16.

Effective: *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.*
 	
To be 'effective' a DPD needs to:
 	
    • Be deliverable
 	
    • Demonstrate sound infrastructure delivery planning
 	
    • Have no regulatory or national planning barriers to its delivery
 	
    • Have delivery partners who are signed up to it
 	
    • Be coherent with the strategies of neighbouring authorities
 	
    • Demonstrate how the Duty to Co-operate has been fulfilled
 	
    • Be flexible
 	
    • Be able to be monitored	

Deliverable and Coherent • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent?	The spatial vision and objectives for Huntingdonshire are set out in Chapter 3 with the principal policies through which the objectives are expected to be delivered being identified alongside them. All of the objectives are met by policies and proposals within the Local Plan so no policy gaps are considered to exist. The timescale to meet the objectives is 2036 coinciding with the Local Plan period.

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Evidence Provided
• Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved?	
Infrastructure Delivery • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?	Infrastructure implications have been assessed through the Infrastructure Delivery Plan and its accompanying Infrastructure Schedule. These were prepared in collaboration with infrastructure providers. The Infrastructure Delivery Schedule includes details on delivery mechanisms, timescales and responsible parties for delivery. These have been prepared taking into account the package of sites proposed for development in the Local Plan. Developers will be expected to contribute towards the reasonable costs of enhancing existing infrastructure or providing new infrastructure to meet the needs arising from their proposals. These will be secured through Section 106 agreements, unilateral undertakings, planning conditions and the Community Infrastructure Levy as appropriate. LP4 specifically addresses the use of the Community Infrastructure Levy to contribute to infrastructure delivery.
Co-ordinated Planning Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?	Chapter 3 identifies a range of economic, social and environmental issues which have influenced development of the Local Plan and its spatial approach; these also reflect partners' responses to these and their strategies which will work alongside the Local Plan to address the issues. Extensive liaison with partners has been undertaken during preparation of the Local Plan to ensure their concerns and opportunities are reflected in its policies and proposals.
Flexibility • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need adjustment?	Chapter 4 contains a section entitled 'Delivering the Strategy' which specifically addresses the need for the Local Plan to be flexible in order to be resilient to changing circumstances. This highlights the importance of monitoring delivery and incorporates a sequence of remedial actions that will be taken if housing delivery targets are not achieved. Each policy is accompanied by an implementation and monitoring framework setting out the indicators that will be used to measure achievement of the policy which will assess its effectiveness.

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Evidence Provided
	Where references are included to existing policy guidance and evidence base documents they are typically accompanied by the phrase 'or successor documents' to ensure the most up-to-date guidance or evidence can be taken into account when applying a policy without the need to formally review and update the policy itself.
Co-operation • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? • Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?	Extensive co-operation has been undertaken with partners with common interests within Huntingdonshire as well as those involved in cross-border or more strategic scale matters. Details are set out in the Statement of Compliance with the Duty to Cooperate including strategic matters raised concerning planning for new homes, additional jobs, transport and other infrastructure, social infrastructure and environmental issues. Further details of specific comments received are incorporated into the Statement of Consultation. A Memorandum of Co-operation for all Cambridgeshire and Peterborough authorities was agreed in 2013 and Strategic Spatial Priorities: Addressing the Duty to Co-operate across Cambridgeshire Peterborough was agreed in 2014. The Council is also working collaboratively with the Cambridgeshire and Peterborough Combined Authority to promote delivery of projects which will assist with delivering objectives set out in the Local Plan.
Monitoring • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?	Overall monitoring of the effectiveness of the Local Plan will be set out each year in the Annual Monitoring Report. The most recent is the Annual Monitoring Report 2017 which covers policies from the Core Strategy 2009, Huntingdon West Area Action Plan 2011, and saved policies of the Local Plan 1995 and Local Plan Alteration 2002. Each policy is accompanied by an implementation and monitoring framework setting out the indicators that will be used to measure achievement of the policy which will assess its effectiveness. These indicators will be included in the AMR. This framework also identified the responsible agencies for delivery, delivery mechanisms and the timescale involved. The AMR identifies the Sustainability Appraisal objective(s) related to each policy monitoring indicator.
Consistent with national policy: *the plan should enable the delivery of sustainable development in accordance with the policies*	

Soundness Self-Assessment Checklist (March 2014)

Soundness Test and Key Requirements	Evidence Provided
in the Framework.	
The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.	
• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?	As part of its preparation process each policy of the Local Plan has been assessed against the relevant elements of the National Planning Policy Framework 2012 and Planning Practice Guidance. All policies and proposals are considered to be consistent with national policy and guidance. LP13 requires application of the optional higher building regulations for water efficiency supported by evidence in the Detailed Water Cycle Study and in both Anglian Water and Cambridge Water's Water Resource Management Plans promoting water efficiency in response to the levels of water stress identified in the East of England. The Huntingdonshire Accessible and Specialist Housing Evidence paper provides qualification on why all new homes are required to meet Building Regulation M4(2) 'accessible and adaptable dwellings'.

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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

Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	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.	A Cambridge Area Gypsy and Traveller Accommodation Needs Assessment was undertaken in 2006, the main data source for this was a survey involving interviews of 313 gypsies and travellers across the study area with extensive involvement by Gypsy and Traveller Liaison Groups and a team of main gypsy and Traveller interviewers. The GTANA was updated in 2011 building on the same survey base. The Cambridgeshire, Kings Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment was completed in 2016 which reflected the updated Planning Policy for Travellers Sites of 2015. This included a new survey that attempted to interview households on all occupied authorised and unauthorised pitches and plots along with engagement with a wide range of interested stakeholders including Gypsy and Traveller Liaison Officers, Education, Environmental Health and Highways along with representatives of the local Gypsy and Traveller community, the Showmen's Guild and registered housing providers. Prior to preparation of the Local Plan a Gypsy and Traveller sites housing land availability assessment was undertaken and published for consultation in 2010 which included 17 potential sites for consideration. Five exhibitions were held around the district attended by over 1,200 people and in excess of 3,300 comments were received and a number of petitions. All sites were eventually eliminated due to physical or technical difficulties inhibiting their delivery. However, a series of planning approvals have since been granted on alternative sites sufficient to meet local need. Specific efforts were made to contact all known Gypsy and Traveller representative organisations at both the Strategic Options and Policies consultation in 2012 and the Stage 3 draft Local Plan consultation in 2013 to ensure early input.
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	The Cambridgeshire, Kings Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment 2016 has informed LP28 and provides a criteria based approach to guide planning applications for Gypsy and Traveller pitches and plots for Travelling Showpeople. Preparation of the GTAA included engagement with travellers, other stakeholders and neighbouring local authorities, many

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Policy Expectations	Evidence Provided
understanding of likely permanent and transit accommodation needs of their areas.	of which were participants in the study, reflecting the duty to cooperate.
Policy B: Planning for traveller sites (paras 7-11)	
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs. Set criteria to guide land supply allocations where there is identified need. Ensure that traveller sites are sustainable economically, socially and environmentally.	The Cambridgeshire, Kings Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment 2016 sets out targets for pitches in each participating authority; this identifies a range of additional pitch needs reflecting households who do or don not meet the new definition of gypsy and Traveller households set out in the PPTS as updated in 2015. Planning approvals have been granted sufficient to meet identified needs for the next 5 years; LP28 provides criteria against which further proposals can be judged. There are no occupied Travelling Showpeople yards in Huntingdonshire and no current or future need has been identified.
Policy C: Sites in rural areas and the countryside (para 12)	
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.	LP28 requires any new site outside the built-up area of a settlement to respect the scale of the nearest settled community.
Policy D: Rural exception sites (para 13)	
If there is a lack of affordable land to meet	There is one public site in Huntingdonshire with 6 families on the waiting list 3 of whom are already resident

Policy Expectations	Evidence Provided
local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	there. The Local Plan does not seek to allocate rural exception sites for any tenure of development to avoid the risk of raising hope value on such land.
Policy E: Traveller sites in Green Belt (paras 14-15)	
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.	Not applicable.
Policy F: Mixed planning use traveller sites (paras 16-18)	
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	LP18 does not specifically address the issue of mixed uses within any Gypsy or Traveller site but this could be permitted through an individual planning application where it can demonstrate that the proposal would not have a detrimental impact on the surrounding area and uses.
Policy G: Major development projects (para	

Soundness Self-Assessment Checklist (March 2014)

Policy Expectations	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.	SEL2 St Neots Eastern Expansion adjoins the existing Gypsy and Traveller sites south of Cambridge Road, St Neots. The site will remain in situ.

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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.

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'.

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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 all[1] 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
- 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 decisions[2]

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.

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[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.
[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	Evidence Provided
Key requirements under the Duty to Co-Operate	
Consistency between marine and terrestrial policy documents and guidance	The Marine Management Organisation has been consultation at each stage of preparation of the Local Plan. The MMO has confirmed that the River Great Ouse is part of the East Inshore Marine Plan Area due to its tidal nature although this only affects the river downstream from Earith which is close to the boundary with East Cambridgeshire resulting in extremely limited applicability to the Local Plan.
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	The Marine Management Organisation has been consultation at each stage of preparation of the Local Plan. The most recent response received was in 2015 which confirmed that the MMO had no comments to make on the draft Local Plan.
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	No relevant evidence or data has been raised by the MMO in response to consultation.
Marine Policy Statement- Chapter 2: General Principles for Decision-Making[3]	
Sections 2.1 -2.2: The UK vision for the marine environment	
The UK vision for the marine environment ('clean, healthy, safe,	No reference to the marine environment is included in the Local Plan although the importance of the River Great Ouse is recognised in several places including Objective 25 and LP3 and LP5 is of relevance as it

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[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	Evidence Provided
productive and biologically diverse oceans and seas') Achieving the vision through marine planning	requires development proposals to address all forms of flood risk. The Habitats Regulations Assessment also considers the impact of policies and proposals on the River Great Ouse and its associated flood meadows,
Section 2.4: Considering benefits and adverse effects in marine planning	
Consider benefits and adverse effects of plan policies	Not applicable
Section 2.5: Economic, social and environmental considerations	
Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water Framework Directive)	LP6 and numerous proposed allocations refer to the Water Framework Directive and require agreement with the Environment Agency that its requirements would not be compromised. LP40 provides specific guidance on water related development and includes requirements to maintain or enhance water quality and quantity and river morphology with reference to the Environment Agency's Anglian river basin district River Basin Management Plan and the Water Framework Directive.
Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities	
3.1 Marine Protected Areas	
Incorporate identified areas and features of importance for nature conservation Activities or developments that may result in adverse impacts on	The potential impact of the Local Plan's policies and proposals on the Ouse Washes has been considered through the Habitats Regulations Assessment; the Local Plan has been amended to remove any potential for detrimental impacts.

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Policy Expectations	Evidence Provided
biodiversity should be designed or located to avoid such impacts	
3.4 Ports and shipping	
Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety Protect the efficiency and resilience of continuing port operations	Not applicable
3.8 Fisheries	
Consider potential economic, social and environmental impacts of other developments on fishing activity	Not applicable
3.9 Aquaculture	
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	Not applicable
3.10 Surface water management and waste water treatment and disposal	
Maximise opportunities for co-existence of waste water infrastructure	Not applicable

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Policy Expectations	Evidence Provided
with other activities in the marine environment	
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 local communities	LP40 provides specific guidance on water related development and includes criteria relating to tourism and the use of leisure moorings along with requirements to maintain or enhance water quality and quantity and river morphology with reference to the Environment Agency's Anglian river basin district River Basin Management Plan and the Water Framework Directive.

Appendix One

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

Adur	Castle Point	Copeland	Fylde
Allerdale	Chelmsford	Cornwall	Gateshead
Arun	Cheshire West and Chester	County Durham	Gloucester
Babergh	Chichester	Dartford	Gosport
Barking and Dagenham	Chorley	Doncaster	Gravesham
Barrow-in-Furness	Christchurch	Dover	Great Yarmouth
Basildon	City of London	East Cambridgeshire	Greenwich
Bassetlaw	City of Brighton and Hove	East Devon	Halton
Bexley	City of Bristol	East Lindsey	Hambleton
Blackpool	City of Kingston upon Hull	East Riding of Yorkshire	Hammersmith and Fulham
Boston	City of Peterborough	Eastbourne	Hartlepool
Bournemouth	City of Plymouth	Eastleigh	Hastings
Broadland	City of Portsmouth	Exeter	Havant
Broads Authority	City of Southampton	Exmoor National Park	Havering
Canterbury	City of Westminster	Fareham	Horsham
Carlisle	Colchester	Fenland	Hounslow

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Huntingdonshire
Ipswich
Isle of Wight
Isles of Scilly
Kensington and Chelsea
King's Lynn and West Norfolk
Lake District National Park
Lambeth
Lancaster
Lewes
Lewisham
Liverpool
Maidstone
Maldon
Medway
Middlesbrough
New Forest
New Forest National Park
Newark and Sherwood
Newcastle upon Tyne
Newham
North Devon
North East Lincolnshire
North Lincolnshire
North Norfolk
North Somerset
North Tyneside
North York Moors National Park
Northumberland
Norwich
Poole
Preston
Purbeck
Redcar and Cleveland

Richmond upon Thames
Rochford
Rother
Scarborough
Sedgemoor
Sefton
Selby
Shepway
South Cambridgeshire
South Downs National Park
South Gloucestershire
South Hams
South Holland
South Lakeland
South Norfolk
South Ribble
South Somerset
South Tyneside
Southend-on-Sea
Southwark
Stockton-on-Tees
Stroud
Suffolk Coastal
Sunderland
Swale
Taunton Deane
Teignbridge
Tendring
Test Valley
Thanet
Thurrock
Tonbridge and Malling
Torbay
Torridge
Tower Hamlets

Wandsworth
Warrington
Waveney
Wealden
West Devon
West Dorset
West Lancashire
West Lindsey
West Somerset
Weymouth and Portland
Winchester
Wirral
Worthing
Wyre
York