

# Soundness Self Assessment Checklist

## LOCAL PLAN SUBMISSION DOCUMENT

October 2018



**MAYOR OF LONDON**

# OPDC Draft Local Plan Soundness Self-Assessment Checklist

## September 2018

This self-assessment of the OPDC Draft Local Plan (Submission Version) is based on the Planning Advisory Service's Soundness Self-Assessment Checklist. The Integration of marine and terrestrial planning section has been omitted as it not applicable to the OPDC area.

In summary – the key requirements of plan preparation are:

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

### The Tests of Soundness at Examination

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

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

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

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

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

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

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

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

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

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

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

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

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

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy [www.planningportal.gov.uk](http://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](http://www.pas.gov.uk)) should be completed to ensure that this aspect is covered.

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

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i><b>Positively Prepared:</b> the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Vision and Objectives</i></p> <p>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>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>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>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them.</li> <li>• 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.</li> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery.</li> <li>• 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.</li> </ul>	<p><b>Issues</b></p> <p>The issues which the Local Plan is seeking to address centre on the Corporation’s primary objectives to deliver a vibrant new mixed use community at Old Oak and ensuring that Park Royal continues to thrive and innovates as a key industrial location.</p> <p>The Opportunities and Challenges section of Chapter 2 (Spatial Vision) outlines the main issues which the Local Plan is seeking to address. These issues have been identified as part of the 2015 Old Oak and Park Royal Opportunity Area Planning Framework (OAPF), while the Regulation 18 Draft Local Plan Consultation, in addition to previous consultations on the proposed development at Old Oak and Park Royal have also helped identify these issues.</p> <p><b>Visions, Objectives and relationship between them.</b></p> <p>The Spatial Vision (Chapter 2) sets out a clear vision for Old Oak and Park Royal. The Spatial Vision is comprised of the overarching Vision Statement and Vision Narratives which provide further detail and define outcomes.</p> <p>The objectives for how the Spatial Vision will be delivered are embedded in the Vision Narratives. They are also set out in the Strategic Policy Visions (Chapter 3) and Place Policies (Chapter 4) and Delivery and Implementation Policies (Chapter 11). The Introduction chapter clarifies that these policies all form part of OPDC’s strategic policies for the area and establish the framework for fulfilling the Spatial Vision.</p> <p><b>Policies meeting objectives</b></p> <p>The strategic aims of the Local Plan will be required through the</p>

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		<p>strategic policies and development management policies (chapters 5 to 10) which plan positively to ensure development within OPDC accords with the Spatial Vision and strategic objectives provided in the vision narratives</p> <p>Paragraph 1.3 provides information for how the objectives will be met through future development, while Figure 1.XX sets out the direct relationship between the spatial vision, objectives and individual policies.</p> <p><b>Reasonable Alternatives</b></p> <p>Reasonable alternatives to the quantum of development and overall spatial strategy have been considered and assessed through the Integrated Impact Assessment (IIA). The IIA and Local Plan have been developed in full accordance with the requirements of legislation, national guidance and good practice recommendations to assess reasonable alternatives and strategic options within the IIA of the Local Plan.</p> <p>National Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. NPPF paragraph 167 also states that "Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken."</p> <p>OPDC's Local Plan is being developed within a context of regional guidance provided by the London Plan and the Old Oak and Park Royal Opportunity Area Planning Framework. These set out housing</p>

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		<p>and jobs targets for the OPDC area and were both subject to separate IIAs which assessed these targets. OPDC's Local Plan is required to deliver the London Plan targets and to be in general conformity with the London Plan. As such, options for lower amounts of homes and jobs were not provided and were not considered to be realistic or reasonable alternatives in accordance with NPPG Paragraph: 018 Reference ID: 11-018-20140306.</p> <p>OPDC's Local Plan's spatial vision and narratives, which set out the overall spatial strategy, have been subject to a qualitative review in light of the IIA Framework objectives and an objective compatibility exercise has been used to determine if there are any key conflicts between the Local Plan Objectives and IIA Objectives.</p> <p><b>Internally Consistent</b></p> <p>OPDC is satisfied that policies across the Local Plan are internally consistent with one another. While a separation of topic areas is presented, links between different policy areas and their joint objectives are noted throughout the document.</p> <p>Policy DI1 recognises that given the ambitious targets set for development in the area, OPDC may need to balance key priorities on affordable housing, infrastructure delivery and sustainable standards when applying policies to ensure delivery of regeneration across the area.</p> <p><b>Realistic Timescales and Achieving Key Objectives</b></p> <p>Strategic Policy SP10 and Chapter 11 (Delivery and Implementation) sets out the expected timescales for the phased development of the OPDC area, in particular Policy DI2 (Timely Delivery and Optimised</p>

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		<p>Phasing). These timescales have been determined based on a number support studies, in particular OPDC’s Development Capacity Study (DCS) which has been produced in accordance with DCLG guidance for assessing housing and economic land availability. The Infrastructure Delivery Plan (2017) identifies the infrastructure requirements across the plan period and timescales for when they will be delivered.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i>  Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.  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.</p>	<ul style="list-style-type: none"> <li>• 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).</li> <li>• An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</li> <li>• Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)</li> </ul>	<p>The catalyst for the regeneration of the OPDC area is the opening of Old Oak Common Station in 2026, presenting a once in a generation opportunity to develop a major new mixed use community to take advantage of massively improved connections.</p> <p>Old Oak and Park Royal are identified as opportunity areas in the London Plan and draft New London Plan which establishes the housing and jobs requirements for the area which OPDC must achieve. OPDC has prepared a Development Capacity Study (DCS) as part of its evidence base which determines that this level of development is deliverable, and establishes a trajectory for the phased delivery of developable sites. This is the basis for the Plan’s site allocations and housing and jobs figures.</p> <p>Distribution of housing and employment numbers across the OPDC area has been guided by the OAPF and Spatial Vision, and are supported by the Development Capacity Study, though the entirety of the OPDC evidence base been used to inform an appropriate spatial distribution. The site allocations of Policy SP10 identify the proposed distribution of jobs and homes across the area within the plan period.</p> <p>OPDC’s Local Plan is being developed within a context of regional guidance provided by the London Plan and the Old Oak and Park Royal Opportunity Area Planning Framework. These set out housing and jobs targets for the OPDC area and were both subject to</p>

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		<p>separate IIAs which assessed these targets. OPDC’s Local Plan is required to deliver the London Plan targets and to be in general conformity with the London Plan. OPDC’s Development Capacity Study provides an audit trail in defining the overall strategy and distribution of development.</p> <p>OPDC has prepared a comprehensive evidence base of 63 supporting studies which establishes the development needs associated with such a large scale and complex regeneration site. The Local Plan sets out policies to meet this range of needs.</p> <p>An objectively assessed housing need has been determined through OPDC’s SHMA (2017) based on the housing needs of the three host Boroughs. OPDC has prepared a Housing Evidence Statement which provides an overview of the evidence prepared for Housing need and delivery.</p> <p>Policy DI1 (Balancing Priorities and Securing Infrastructure Delivery) sets out how OPDC will ensure sufficient flexibility in assessing applications to adapt to changing circumstances and ensure the continued delivery of regeneration in the area.</p> <p>Opportunities for achieving sustainable development in different areas are addressed through the Local Plan’s place policies (Chapter 4) and these are supported by a number of spatially specific evidence documents.</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of</p>	<ul style="list-style-type: none"> <li>A policy or policies which reflect the principles of the presumption in favour of sustainable development (see <a href="http://www.planningportal.gov.uk">model policy at www.planningportal.gov.uk</a>)</li> </ul>	<p>All policies are structured to ensure they reflect the principles of the presumption in favour of sustainable development and are appropriately positively worded. The Introduction to the Local Plan reflects this approach by including wording supporting the overall presumption in favour of sustainable development.</p> <p>Policy SP2 (Good Growth) deals specifically with the principles of</p>

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<p>sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>		<p>sustainable development, largely specific to the OPDC area, building on the “Good Growth’ principles in the new Draft London Plan (2017).</p>
<p><i>Objectively assessed needs</i>                      The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.                      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"> <li>• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. .</li> <li>• 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.</li> </ul>	<p>The Local Plan evidence base outlines the objectively assessed needs for the area for housing, employment and infrastructure (both social and physical).</p> <p>As stated, the numbers of homes and jobs that the OPDC must deliver at Old Oak and Park Royal is established by the London Plan (2016) and Old Oak Park Royal OAPF (2015), and is reiterated in the new Draft London Plan (2017). These provide greater detail on the needs of the area resulting from this scale of development. OPDC has prepared a comprehensive evidence base of 63 studies. The key reports assessing the needs of the area include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Absorption Rate Study</li> <li>• Affordable Housing Viability Study</li> <li>• Development Capacity Study</li> <li>• Development Infrastructure Funding Study</li> <li>• Social Infrastructure Needs Study</li> <li>• Environmental Standards Study</li> <li>• Future Employment Growth Sectors Study</li> <li>• Housing Evidence Statement</li> <li>• Industrial Estates Study</li> <li>• Industrial Land Review</li> <li>• Infrastructure Delivery Plan (IDP)</li> <li>• Integrated Water Management Strategy (IWMS)</li> <li>• Old Oak Strategic Transport Modelling Study</li> </ul>

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		<ul style="list-style-type: none"> <li>• Park Royal Transport Strategy</li> <li>• Retail and Leisure Needs Study</li> <li>• Shared Housing Market Assessment (SHMA)</li> <li>• Utilities Study</li> <li>• Waste Technical Paper</li> </ul> <p>OPDC consulted with host Boroughs, statutory bodies and a range of other stakeholders in the preparation of the Local Plan and its evidence base. Details of this cooperation are included in the Statement of Consultation and Duty to Cooperate Report.</p>
<b>NPPF Principles: Delivering sustainable development</b>		
<b>1. Building a strong, competitive economy (paras 18-22)</b>		
<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),</p>	<ul style="list-style-type: none"> <li>• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.</li> </ul>	<p>The economic vision for Old Oak and Park Royal is established in the Spatial Vision, through narratives 2, 7 and 8. Policy SP5 (Economic Resilience) establishes the strategic policy to support economic development in the OPDC area. This is supported by SP1 (Catalyst for Growth) which sets out the unique economic opportunity presented at Old Oak. Place policies provide place specific guidance for employment uses.</p> <p>The London draft Economic Development Strategy (2018) sets out the wider context for how the OPDC area should function as part of the wider City region, including its role in delivering office space to support the growth in services.</p> <p>Chapter 9 (Employment) of the Local Plan sets out detailed employment policies which will deliver the economic vision and strategy set out in the spatial vision and SP5.</p>

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		<p>The vision, strategy and policies for the economic development of the OPDC area are supported by a number of supporting studies, including:</p> <ul style="list-style-type: none"> <li>• Future Employment Growth Sectors Study;</li> <li>• Industrial Estates Study;</li> <li>• Industrial Land Review;</li> <li>• Park Royal Atlas;</li> <li>• Park Royal Intensification Strategy;</li> <li>• Socio-Economic Baseline Study</li> </ul>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<ul style="list-style-type: none"> <li>• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</li> <li>• 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)</li> </ul>	<p>Strategic Policy SP1 (Catalyst for Growth) sets out the unique opportunity to deliver a world class transport super hub at Old Oak Common, in recognition of the significant investment being made by national Government in our area and the role this plays in underpinning the delivery of new homes, jobs and services.</p> <p>Mixed use development will be a key part of development at Old Oak and Park Royal, with the area set cater for 60,700 new jobs. This is clearly established in the Spatial Vision, and through Strategic policies SP2, SP4 and SP5. Strategic Policies SP10, and DI1 set out how OPDC will allow flexibility in planning requirements for specific sectors and to secure infrastructure delivery.</p> <p>The Local Plan Site Allocations identify (where appropriate) employment floorspace for each site allocation and estimated numbers of new jobs resulting from this floor space. Site allocations are based on OPDC’s Development Capacity Study, which represents an up to date assessment of deliverability and capacity of development sites in the area.</p> <p>The Place policies provide specific criteria based policies on a range of issues including the type of land uses, public realm and</p>

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		<p>movement, green infrastructure proposals which would be supported. These criteria recognise and seek to address opportunities and barriers for investment.</p> <p>Another key aspect of OPDC’s mission is enhancing the role of Park Royal as London’s largest and most important industrial area. OPDC has undertaken an Industrial Land Review which assesses the current and future supply and demand for industrial land within Old Oak and Park Royal. This is supplemented by the Park Royal Atlas which provides a detailed context of the nature of businesses across the Park Royal Industrial area. OPDC has also prepared an Industrial Estates Study, Park Royal Intensification Study, Park Royal Development Framework Principles and Infrastructure Delivery Plan which examines ways to enhance the competitive position of Park Royal; to improve the environment and address infrastructure needs; and opportunities for future development, including through industrial intensification.</p> <p>This vision for Park Royal is clearly established in the Spatial Vision, while Strategic Policy SP5 and Employment Policy E1 set how out this will be delivered. Policy E1 designates the Park Royal Industrial area as Strategic Industrial Land (SIL) due to its strategic economic importance to London as a whole. While it is proposed to de-designate Strategic Industrial Land (SIL) in the Old Oak area to allow for mixed use development, the site allocations within the Local Plan support the intensification of industrial uses in Park Royal by allocating specific sites for industrial intensification. Sites identified for industrial intensification have been identified within the Local Plan Site Allocations in Policy SP10. Policy E2 also supports the colocation of employment uses as part of residential led mixed use development in Old Oak.</p> <p>OPDC’s Infrastructure Development Plan outlines the infrastructure requirements identified in the Local Plan which are needed to</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		support new economic floorspace.
<p><b>2. Ensuring the vitality of town centres (paras 23-37)</b></p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> <li>The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</li> </ul>	<p>Policy SP6 (Places and Destinations) sets out the strategic approach to delivering new places and town centre locations across the area.</p> <p>Policy SP6 (Places and Destinations) sets out the hierarchy of new Town Centre locations in the OPDC area, namely:</p> <p>A new Major Town Centre in Old Oak</p> <p>Three Neighbourhood Centres at North Acton, Park Royal Centre and Atlas Junction.</p> <p>Edge of centre sites have not been allocated for town centre uses, as the proposed Major Centre at Old Oak is only indicative and will be defined in future versions of the Local Plan. Policy TCC1 requires proposals for Town Centre uses outside of designated centres to demonstrate how a sequential approach to site identification has been adopted.</p> <p>The Place Policies of Chapter 3 establish in greater detail how new development should contribute towards delivering and enhancing these four identified Town Centres.</p>
<p>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)</p>	<ul style="list-style-type: none"> <li>An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses.</li> <li>Primary and secondary shopping frontages identified and allocated.</li> </ul>	<p>OPDC’s Retail and Leisure Needs study identifies the quantitative need for retail and leisure uses in the OPDC area. The recommendations of this study are set out in Policy TCC3 (A Class Uses) where requirements for different A-Class uses across each identified Town Centre is set out.</p> <p>The Places and Clusters policies establish how sites will be expected</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		to deliver the Town Centres environments set out in Policy TCC1, including where active and positive frontages should be established. This is supported by the site allocations set out in Policy P12 which identify appropriate quanta of commercial floorspace.
<p><b>3. Supporting a prosperous rural economy (para 28)</b></p>		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<ul style="list-style-type: none"> <li>Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities.</li> </ul>	<p>Not applicable</p>
<p><b>4. Promoting sustainable transport (paras 29-41)</b></p>		
<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</p>	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.</li> </ul>	<p>The key catalyst for the redevelopment of Old Oak is the planned opening Old Oak Common Station in 2026. This will be the largest new station built in the UK in over a century, and the only location where HS2 and the Elizabeth Line will interchange.</p> <p>The Old Oak core development area has therefore been identified through the London Plan, and the Old Oak Park Royal OAPF, as being suitable for high density mixed use development, and sustainable transport is therefore a core element of the overall policy approach of the Local Plan.</p> <p>This is established in the Spatial Vision. Narrative 6 sets out how OPDC will be an exemplar in healthy and sustainable largescale development, while narratives 4 and 13 set out the vision for exemplar connectivity at both a national and local levels.</p>

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<p>sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate 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-</p>	<ul style="list-style-type: none"> <li>• Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.</li> <li>• If local (car parking) standards have been prepared, are they justified and necessary? (39)</li> <li>• Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</li> </ul>	<p>The objectives for delivering this vision are firmly established in the Strategic Policies. Policy SP2 (Good Growth) outlines the commitment to delivering a low carbon and environmentally resilient development. Policy SP3 (Improving Health and Reducing Health Inequalities) establishes the need for new development to be designed to improve health and wellbeing. Policy SP7 (Connecting People and Places) requires proposals to create or contribute towards a high quality, safe and accessible movement network which embraces sustainable transport in line with the OPDC sustainable transport hierarchy in figure 3.9. Strategic Policy SP9 (Built Environment) directs high density developments to areas where there are high levels of public transport accessibility to facilitate the use of sustainable transport.</p> <p>The Transport Policies of Chapter 7 detail how development will be expected to deliver sustainable transport. Policy T1 (Roads and Streets) requires development to support and deliver the Mayor of London’s Healthy Streets approach. Policies T2 (Walking) and T3 (Cycling) requires development to contribute towards delivering new and enhancing existing high-quality walking and cycling infrastructure.</p> <p>Policy T4 (Parking) limits car parking to 0.2 spaces per unit for residential units, and requires car-free approach for commercial development, to promote a modal shift towards more sustainable modes of transport. This is approach justified by the OPDC’s Car Parking Study and the Old Oak Strategic Transport Modelling Study.</p> <p>Policies T5 (Rail) and T6 (Buses) establish how development should help facilitate the delivery of new rail and bus infrastructure in the area. Policy T7 (Freight, Servicing and Deliveries) sets out how transport servicing issues should be addressed in new developments. This includes in Park Royal, and addressing the needs for the Park Royal industrial area and requirement to improve the</p>

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<p>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>street environment in the area.</p> <p>Town Centre Policy TCC4 (Social Infrastructure) requires that new social infrastructure be located in highly accessible locations to both existing and new communities and minimise impact on the transport network. This approach is supported by a number of OPDC’s supporting studies, including the Education and Health Needs Study, Development Infrastructure Funding Strategy and Sports Courts and Swimming Pools Study. Additionally, Town Centre Policy TCC7 requires town centre uses to be located within town centres or clusters which are in accessible locations.</p> <p>OPDC has worked closely with Transport for London (TfL) and local authorities as part of the Duty to Cooperate process to determine the transport requirements in the OPDC area, and in the preparing transport related supporting studies. Studies relating directly to transport infrastructure delivery have been prepared by TfL themselves.</p> <p>Policy SP10 and the Place Policies of Chapter 4 identify where land and other assets needed for transport infrastructure need to be safeguarded.</p>
<p><b>5. Supporting high quality communications infrastructure (paras 42-46)</b></p>		
<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</p>	<ul style="list-style-type: none"> <li>Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.</li> </ul>	<p>Policy EU11 (Smart Technology) outlines OPDC’s approach to the delivery of high quality communications infrastructure, including how proposals will be expected to support OPDC to position the area as a world leading location for the adoption of smart city technologies, systems and approaches.</p> <p>Strategic Policy SP10 requires proposals to support the delivery of</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>		<p>the spatial vision by enabling a comprehensive and integrated approach to infrastructure delivery, including communications infrastructure.</p>
<p><b>6. Delivering a wide choice of high quality housing (paras 47-55)</b></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"> <li>• Identification of:                             <ul style="list-style-type: none"> <li>a) five years or more supply of specific deliverable sites; plus the buffer as appropriate</li> </ul> </li> <li>• Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)</li> <li>• A SHLAA</li> </ul>	<p>OPDC has prepared a Development Capacity Study (DCS), which has assessed the capacity for new homes and a trajectory for their potential phased delivery based on a site by site assessment. This has informed the site allocations and identified timescales in Policy SP10 of the Local Plan.</p> <p>The DCS has identified a capacity for 20,100 homes within the Local Plan period. Therefore, OPDC is promoting an annual housing target of 1,005. The housing trajectory demonstrates a five-year supply of deliverable sites.</p> <p>OPDC's SHMA identifies a need for 1,200 new homes within the OPDC area. This equates to 60 new homes a year for the plan period and 300 new homes during the first five years. The additional buffer of 5% equals to a five year need of 315.</p> <p>As such, OPDC's Local Plan and DCS demonstrate that there is a rolling supply of deliverable and developable sites to provide 5 years' worth of housing against its housing requirements.</p> <p>The geographic size and the intention to optimise the development of land within the OPDC area have enabled OPDC to carry out an extensive analysis to identify developable land within its boundary. This is aided by large areas being in single landownerships that enables the majority of the area to be defined as deliverable or</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>developable outside of excluded locations. OPDC's 5-year housing supply will meet its needs for the initial 5-years of the plan period. OPDC does not consider that it has evidence that windfall sites have consistently become available in its area and as such do not provide a reliable source of housing supply. In light of these factors, OPDC does not consider defining a windfall allowance to contribute to its housing need is required.</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<ul style="list-style-type: none"> <li>• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</li> </ul>	<p>The DCS has identified developable sites expected to come forward in years 6-10 and years 10-20. These sites have been identified in the Site Allocations in of Policy SP10.</p> <p>Capacity beyond the Local Plan period has also been identified, to demonstrate the overall capacity of the OPDC area, and to properly gauge infrastructure requirements.</p> <p>OPDC's housing requirement is established in the London Plan. The draft new London Plan (2017) has identified an annual housing target of 1,367 new homes to be delivered within the OPDC area between 2019 and 2029. OPDC's DCS demonstrates that 1,359 homes per annum can be delivered over this period. However, OPDC is committed to supporting the attainment of the Mayoral target by working positively with developers to bring forward early development.</p>
<p>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)</p>	<ul style="list-style-type: none"> <li>• A housing trajectory</li> <li>• Monitoring of completions and permissions (47)</li> <li>• Updated and managed SHLAA. (47)</li> </ul>	<p>The Site Allocations within Policy SP10 illustrate the expected rate of housing delivery, as evidenced by the development trajectory defined in the Development Capacity Study. The indicative housing delivery for years 0-5, 6-10 and 11-20 is also set out in table 8.1 of Policy H1.</p> <p>OPDC will report on housing delivery and provide an update measure of its five-year supply of developable land on an annual basis in its Authority Monitoring Report. This will be supplemented</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Set out the authority’s approach to housing density to reflect local circumstances (47).</p>	<ul style="list-style-type: none"> <li>Policy on the density of development.</li> </ul>	<p>by additional reporting to the London Development Database.</p> <p>In light of the future excellent national, regional and local public transport links to be provided in the area, Old Oak is considered suitable for high density development and Park Royal is considered suitable for protected and intensified industrial uses. This approach is supported by policies set out in the London Plan and reflected in the designation of two Opportunity Areas with a combined target for a minimum of 25,500 new homes and 65,000 new jobs. Opportunity Areas are London’s main reservoirs for growth. As such, the current London Plan 2016 (Policy 2.13) and the Draft New London Plan (Policy SD1) supports development in these areas to exceed the defined targets by optimising development densities. The Mayor of London’s Housing SPG (2016) paragraphs 7.5.7 and 7.5.8 state that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2). The Draft New London Plan 2017 removes the density matrix and instead requires a broader approach that optimises densities. The density range set out in the Local Plan remains unchanged from the Regulation 18 draft Local Plan.</p> <p>OPDC's Development Capacity Study has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments to demonstrate how the London Plan targets can be delivered. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Park Royal Development Framework Principles, the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document. It also includes development management information.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The Local Plan provides series of policies to ensure that high density typologies, required to optimise development capacity to meet targets, is of the highest quality to support sustainable communities and appropriately addresses issues such as, inter alia, context and townscape (SP9), access, inclusivity and Healthy Streets (D2), amenity (D6), provision of 30% publicly accessible open space (EU1), air quality (EU4), high quality social infrastructure provision (TCC4) and noise and vibration (EU5).</p>
<p>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)</p>	<ul style="list-style-type: none"> <li>• Policy on planning for a mix of housing (including self-build, and housing for older people</li> <li>• SHMA</li> <li>• Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50)</li> <li>• Evidence for housing provision based on up to date, objectively assessed needs. (50)</li> <li>• Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)</li> </ul>	<p>OPDC has produced a SHMA (2017) which provides it with an up to date objectively assessed housing need. As the OPDC area itself provides too small a sample for a justified housing need, the SHMA outputs are based upon the population projections and market signals of the three host Boroughs of Brent, Ealing and Hammersmith and Fulham.</p> <p>Policy SP4 (Thriving Communities) sets out the strategic approach to delivering and supporting thriving communities as established in the spatial vision.</p> <p>Policy H2 (Affordable Housing) establishes affordable housing requirements for new development proposals. This sets out an overarching 50% target (reflecting the OAHN for the area) but utilising the 35% threshold and viability approach set out in the Mayor of London’s Housing SPG. The policies are supported by OPDC’s Affordable Housing Viability Assessment, and are in line with the Mayor of London’s Housing SPG.</p> <p>Policy H3 (Housing Mix) establishes the expectations for the mix of units to be delivered in new schemes, requiring 25% of all units as family housing (3+ bed) where feasible. This falls short of the identified need for family housing identified in OPDC’s SHMA, but has been determined through the Affordable Housing Viability</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Assessment to be the maximum amount of family housing new development can deliver while maintaining viability and without impacting on overall affordable housing provision.</p> <p>Policy H9 sets out requirements for Specialist Housing, including the need for major schemes to deliver a set proportion specialist accommodation.</p> <p>More detailed information of the evidence for housing need and delivery in the OPDC area is set out in the Housing Evidence Statement.</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> <li>• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs.</li> <li>• Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)</li> <li>• Examples of special circumstances to allow new isolated homes listed at para 55.</li> </ul>	<p>Not applicable.</p>
<p><b>7. Requiring good design (paras 56-68)</b></p>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<ul style="list-style-type: none"> <li>• 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</li> </ul>	<p>Strategic Policy SP2 (Good Growth) establishes the objective for development to deliver the highest standards of place making, urban design and architecture. Strategic Policy SP9 (Built Environment) sets a series of objectives relating to high quality design, with a particular focus on delivering high quality design at high density, responding to existing communities and importance of the public realm.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The objectives for delivering high quality design established in the strategic policies are supported by the Policies set out in Chapter 5 (Design), Policies D1 – D9.</p>
<p><b>8. Promoting healthy communities (paras 69-77)</b></p>		
<p>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).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies on inclusive communities.</li> <li>• 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)</li> </ul>	<p>Strategic Policy SP2 (Good Growth) establishes the objective to create vibrant, mixed and inclusive lifetime neighbourhoods as set out in the Spatial Vision.</p> <p>Strategic Policy SP4 (Thriving Communities) sets out how proposals will be expected to support OPDC in delivering lifetime neighbourhoods, social cohesion and the integration.</p> <p>Details of how development proposals will be expected to assist in delivering these objectives are embedded throughout the Design Policies (D1 – D9), as well in the Housing and Town Centre and Community Uses Chapter (TCC1 – TCC11).</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies addressing community facilities and local service.</li> <li>• Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and</li> </ul>	<p>Policy TCC4 (Social Infrastructure) addresses community facilities and local services. This includes protecting existing facilities and services, and ensuring new development provides or contributes towards the provision of new social infrastructure to support the estimated number of new homes and jobs in the area. It also requires new social infrastructure to be located in areas easily accessible by public transport and to co-locate facilities when this is appropriate Requirements for new community facilities in the area are set out in the Place policies (chapter 4), Policy TCC4 (Social Infrastructure) and in the IDP.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</p>	<p>The overall spatial strategy for the development of Old Oak will deliver higher density, mixed use development while securing excellent access to community facilities and key services and infrastructure.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<ul style="list-style-type: none"> <li>• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)</li> <li>• A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74)</li> <li>• Protection and enhancement of rights of way and access. (75)</li> </ul>	<p>OPDC’s Environmental Standards Study identifies deficiencies in open space and has established the requirement for new public open space needed to support the redevelopment of the area. It identifies a quantum of 30% of the developable area that should be delivered as publicly accessible open space, including the delivery of 3 Local Parks (2ha+).</p> <p>Strategic Policy SP8 (Green Infrastructure and Open Space) establishes OPDCs objective to deliver this level of open space, while EU1 (Open Space) requires development to either contribute directly towards this, or make financial contributions of an equal value where this is not possible.</p> <p>TCC6 (Sports and Leisure) protects existing sports facilities and playing pitches in the area, and outlines how new recreational facilities are to be provided, the need for which has been established in the Sports Courts and Swimming Pools Study.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> <li>• 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)</li> </ul>	<p>Neighbourhood Forums can designate Local Green Space in accordance with para 77 of the NPPF when preparing their Local Plans. Policies SP8 (Green Infrastructure and Open Space) and EU1 (Open Space) of the Local Plan would protect local green spaces.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><b>9. Protecting Green Belt land (paras 79-92)</b></p>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in 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>	<ul style="list-style-type: none"> <li>• Where Green Belt policies are included, these should reflect the need to:                             <ul style="list-style-type: none"> <li>○ Enhance the beneficial use of the Green Belt. (81)</li> <li>○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)</li> <li>○ Specify that inappropriate development should not be approved except in very special circumstances. (87)</li> <li>○ Specify the exceptions to inappropriate development (89-90)</li> <li>○ Identify where very special circumstances might apply to renewable energy development. (91)</li> </ul> </li> </ul>	<p>While the OPDC area does not include any existing or proposed Green Belt land, it does contain areas of Metropolitan Open Land (MOL) which is awarded the same level of protection under the London Plan. The London Plan deals with most of the NPPF policy requirements and so to avoid duplication these have not been repeated in the Local Plan.</p> <p>Policy EU1 establishes protection for MOL, and how its loss or re-provision will only be supported where it meets the criteria for very special circumstances outlined in para 87 of the NPPF for development or loss of Green Belt. MOL boundaries are depicted on OPDC’s policies map.</p>
<p><b>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</b></p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand</p>	<ul style="list-style-type: none"> <li>• Planning of new development in locations and ways which reduce greenhouse gas emissions.</li> <li>• Support for energy efficiency</li> </ul>	<p>The principle of sustainable development which promotes sustainable modes of movement, is a key aspect of the Spatial Vision and is established throughout the Local Plan Policies.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>considerations. (94)</p>	<p>improvements to existing building.</p> <ul style="list-style-type: none"> <li>Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy . (95))</li> </ul>	<p>The spatial distribution of future development clearly promotes the delivery of transit oriented development, taking advantage of a new transport super hub at Old Oak Common Station, in addition to the new and enhanced stations across the Plan area. This promotes sustainable movement patterns and will significantly reduce greenhouse gas emissions as a result of transport.</p> <p>Policy SP2 (Good Growth) establishes that new development should deliver low carbon and environmentally resilient development that is adaptive to and resilient to climate change.</p> <p>This approach is firmly supported by the Environment and Utilities Policy of Chapter 6. Policies EU1 (Open Space) and EU2 (Urban Green and Biodiversity) sets out the role new and existing green infrastructure should be play in adapting to climate change.</p> <p>Policy EU3 (Water) requires proposals to deliver/contribute towards new water infrastructure as identified in the IDP, be designed to be flood resilient incorporating a 40% climate change allowance, and maximise the efficient use of potable water.</p> <p>Policy EU8 (Sustainable Materials) requires proposals to use materials which are sustainable sourced, and aid in in mitigating extreme weather events.</p> <p>Policy EU9 (Minimising Carbon Emissions and Overheating) sets out how proposals should meet and exceed London Plan CO2 reduction targets, in addition to future proofing energy systems and effectively monitoring environmental performance post occupation. Policy EU10 (Energy Systems) supports this by setting out how proposals should contribute towards delivering efficient energy infrastructure utilising low carbon technology.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> <li>• A strategy and policies to promote and maximise energy from renewable and low carbon sources,</li> <li>• 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)</li> <li>• 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)</li> </ul>	<p>The Spatial Vision sets how Old Oak will be an exemplar in sustainable large scale development. This objective is firmly established in Strategic Policy SP2 (Good Growth), and is a consistent thread throughout the Local Plan Policies.</p> <p>Policy EU9 outlines how development proposals will be expected to minimise carbon emissions through good design and smart technology, while ensuring new developments are resilient to overheating.</p> <p>Policy EU10 (Energy Systems) requires proposals to support/contribute to low carbon heat networks and smart energy grids, including the requirement to connect to a low carbon district heat network when it becomes available. Energy infrastructure in Old Oak will be key to supporting the delivery of the overall development, the importance of which is emphasised in Policy DI1 (Balancing Priorities and Securing Infrastructure Delivery).</p> <p>OPDC’s Utility Study sets out estimated energy demand arising from planned development and the Corporations approach to developing a series of low carbon district heating networks across the area, while the Environmental Standards Study informs appropriate environmental targets which these networks should achieve.</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<ul style="list-style-type: none"> <li>• Account taken of the impacts of climate change. (99)</li> <li>• Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</li> <li>• Policies to manage risk, from a range of impacts, through suitable adaptation measures</li> </ul>	<p>The core development areas of OPDC, as well as all sites within OPDC’s Development Capacity Study (DCS), do not contain any areas within Flood Risk Zones 2 or 3, but does contain areas of surface water flood risk.</p> <p>Policy EU3 addresses the need to new development to adapt to more extreme rainfall and flooding events associated with Climate Change. This policy is evidenced by OPDC’s Integrated Water Management Strategy (IWMS) which identifies options for</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>sustainably managing flood risk across the area.</p> <p>Policy EU9 requires development to be climate change resilient and avoid overheating through good design, use of materials and smart technology.</p>
<p>Take account of marine planning (105)</p>	<ul style="list-style-type: none"> <li>• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation</li> <li>• Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development</li> <li>• Integrate as appropriate marine policy objectives into emerging policy</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	<p>N/A</p>
<p>Manage risk from coastal change (106)</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.</li> </ul>	<p>N/A</p>
<p><b>11. Conserving and enhancing the natural environment (paras 109-125)</b></p>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Protect valued landscapes (109)</p>	<ul style="list-style-type: none"> <li>• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.</li> <li>• 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.</li> </ul>	<p>Strategic Policy SP8 (Green Infrastructure and Open Space) sets out OPDC’s strategy for protecting existing and delivering new networks of biodiversity and green infrastructure.</p> <p>Policy EU1 requires development proposals to deliver/contribute towards the delivery of 30% open spaces across the developable area, while protecting existing public open spaces, and reaffirms protection set out in Policy SP8 for Wormwood Scrubs as Metropolitan Open Land (MOL). Policy EU2 outlines how proposals should deliver biodiversity rich new developments, and measurably conserve Sites of Importance for Nature Conservation (SINCs) across the area.</p> <p>The OPDC area does not contain any National Parks, Broads or AONBs.</p>
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<ul style="list-style-type: none"> <li>• Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.</li> </ul>	<p>Policy EU13 addresses Land Contamination, and requires proposals to treat, contain or control any contamination which exists onsite, guard against unacceptable risks from pollution or threaten land stability.</p> <p>Place Policy P3 (Grand Union Canal) sets out guidance to protect the Grand Union Canal from ground instability caused by development activity.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> <li>• Identification and mapping of local ecological networks and geological conservation interests.</li> <li>• Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species</li> </ul>	<p>Policy EU2 sets out how development proposals should measurably conserve Sites of Importance for Nature Conservation (SINCs) and other priority habitats or species across the area, in addition to delivering biodiversity rich new green spaces. The locations of new green spaces are identified in various Place chapter diagrams, as well in Policy SP8 (Green Infrastructure and Open Space), while SINCs have been identified in the Local Plan policies map.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The Sites of Importance for Nature Conservation (SINCs) Background Paper summarises the evidence for the designation of SINCs within the OPDC area, which has been based on the most up to date reviews undertaken by the respective Boroughs for SINCs in their areas.</p> <p>Geodiversity is managed through Policy 7.20 of the London Plan 2016). No areas of value for geodiversity conservation have been identified within the OPDC area.</p>
<p><b>12. Conserving and enhancing the historic environment (paras 126-141)</b></p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> <li>• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</li> <li>• A map/register of historic assets</li> <li>• A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</li> </ul>	<p>OPDC has prepared a Heritage Strategy as part of its Local Plan evidence base to provide a deep understanding of the historical development and significance of the OPDC area, and to inform Local Plan policies on protecting heritage assets. This builds on Historic England’s Old Oak Historic Outline Assessment.</p> <p>Policy SP9 (Built Environment) sets out OPDC’s strategic approach for responding appropriately to heritage assets across the area, which are identified in the Policy Map and on figure 3.15.</p> <p>Policy D8 (Heritage) outlines how development proposals will be expected to conserve and enhance the historic environment.</p> <p>OPDC has, separately from the Local Plan, produced its <a href="#">draft Local Heritage Listings</a> which identifies both designated and non-designated heritage assets across the area. These assets have been identified on the Local Plan policies map.</p>
<p><b>13. Facilitating the sustainable use of minerals (paras 142-149)</b></p>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<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.</p>	<p>Policy EU12 sets out requirements for the extraction of minerals.</p> <p>The OPDC area is not currently covered by DECC licences to search for minerals, or unconventional oil and gas production. If mineral extraction is to be appropriate in the OPDC area, it would need to demonstrate that it would not impact on the delivery of the ambitious homes and jobs targets which have been identified for the area.</p> <p>The issue of decontamination is addressed through Policy EU13, while issues relating to noise and air quality are addressed through Policies EU4 and EU5. Any proposal for mineral extraction will need to be satisfy the requirements of these policies.</p>
<p><b>Justified:</b> <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"> <li>• 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.</li> <li>• The most appropriate strategy when considered against reasonable alternatives.</li> </ul>		
<p><b>Participation</b></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>OPDC has produced a Statement of Consultation which contains detailed information on how interested parties were engaged across the Local Plan process. It includes all responses received, and summaries of the issues raised, as part of the 2016 Regulation 18 consultation, and both the 2017 and 2018 Regulation 19 consultations. It also sets out OPDC's responses to these issues and how the issues were addressed in the submission document.</p> <p>The Local Plan Consultation was carried out in accordance with OPDC's Statement of Community Involvement (SCI), which was adopted in January 2016, and amended in February 2017.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>As part of the 2016 Regulation 18 consultation, specific activities sought to engage with young people in, and around, the OPDC area including targeted presentations and workshops.</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"> <li>• 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.</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• 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).</li> </ul>	<p>As a recently established organisation producing a new Local Plan for the largest redevelopment area in the UK, OPDC has ensured that a robust and up to date evidence base has been developed. As part of this the Corporation has produced 63 supporting studies across all policy areas which form the evidence base of the Draft Local Plan. The <a href="#">Summary of Supporting Studies</a> provides an overview of the purpose, key outcomes and recommendations of each study.</p> <p>Many of the studies produced support other functions of the Corporation outside of Planning, in particular infrastructure delivery, both social and physical.</p> <p>Policy Formulation Reports (PFRs) have been prepared for each Local Plan policy. These reports detail:</p> <ul style="list-style-type: none"> <li>• the national and regional guidance relevant to the policy, including NPPF requirements and NPPG guidance.</li> <li>• the evidence base studies and recommendations which informed the policy, as well as recommendations which were not reflected in policy and why.</li> <li>• Issues raised through consultation relating to the policy and OPDC’s response.</li> </ul> <p>The key assumptions made in preparing the Local Plan were set out in the London Plan (2016) and Old Oak and Park Royal Opportunity Area Framework. These documents identified Old Oak as London’s</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>largest redevelopment area suitable for a major new mixed used community. They also identify Park Royal as London’s largest and most important Industrial area, a role which future development should support and enhance. These are considered in the Integrated Impact Assessment (IIA).</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA’s chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> <li>• Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</li> <li>• An audit trail of how the evidence base, consultation and SA have influenced the plan.</li> <li>• Sections of the SA Report showing the assessment of options and alternatives.</li> <li>• Reports on how decisions on the inclusion of policy were made.</li> <li>• Sections of the consultation document demonstrating how options were developed and appraised.</li> <li>• 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.</li> </ul>	<p>Reasonable alternatives to the quantum of development and overall spatial strategy have been considered and assessed through the Integrated Impact Assessment (IIA). The IIA and Local Plan have been developed in full accordance with the requirements of legislation, national guidance and good practice recommendations to assess reasonable alternatives and strategic options within the IIA of the Local Plan.</p> <p>National Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. NPPF paragraph 167 also states that "Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken."</p> <p>OPDC’s Local Plan is being developed within a context of regional guidance provided by the London Plan and the Old Oak and Park Royal Opportunity Area Planning Framework. These set out housing and jobs targets for the OPDC area and were both subject to separate IIAs which assessed these targets. OPDC’s Local Plan is required to deliver the London Plan targets and to be in general conformity with the London Plan. As such, options for lower amounts of homes and jobs were not provided and were not</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>considered to be realistic or reasonable alternatives in accordance with NPPG Paragraph: 018 Reference ID: 11-018-20140306.</p> <p>However, an assessment of strategic options was carried out in the IIA for the Regulation 18 consultation following recommendations of good practice guidance. OPDC considered that the approach to affordable housing warranted assessment as a strategic option. This reflects the potential impact of the different approaches to affordable housing may have on wider placemaking and infrastructure requirements. The regulation 18 Local Plan also proposed alternative policy options. These were considered to be reasonable alternatives and were assessed by the IIA for the regulation 18 Local Plan.</p> <p>OPDC's Local Plan's spatial vision and narratives, which set out the overall spatial strategy, have been subject to a qualitative review in light of the IIA Framework objectives and an objective compatibility exercise has been used to determine if there are any key conflicts between the Local Plan Objectives and IIA Objectives. A more detailed assessment of the policies and options has been undertaken using an assessment matrix. These assessments are then considered in the round to provide a summary of the assessment which is set out on page iv of the IIA.</p> <p>The Policy Formulation Reports (PFRs) also set out the reasonable alternative policy approaches considered for each policy, if any.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><b>Effective:</b> 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> <ul style="list-style-type: none"> <li>• Be deliverable</li> <li>• Demonstrate sound infrastructure delivery planning</li> <li>• Have no regulatory or national planning barriers to its delivery</li> <li>• Have delivery partners who are signed up to it</li> <li>• Be coherent with the strategies of neighbouring authorities</li> <li>• Demonstrate how the Duty to Co-operate has been fulfilled</li> <li>• Be flexible</li> <li>• Be able to be monitored</li> </ul>		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> <li>• 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?</li> <li>• Are the policies internally consistent?</li> <li>• Are there realistic timescales related to the objectives?</li> <li>• Does the DPD explain how its key policy objectives will be achieved?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.</li> <li>• 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).</li> <li>• 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.</li> <li>• Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).</li> </ul>	<p>Strategic Policy SP10 (Integrated Delivery) establishes OPDC's approach to ensuring delivery of the Spatial Vision by enabling a comprehensive and integrated approach to development and infrastructure.</p> <p>Chapter 11 (Delivery and Implementation) sets out how development proposals should support OPDC in delivering the vision, objectives and policies of the Local Plan. As one of the largest and most complex regeneration projects in the UK, it is recognised that responsibility for the successful redevelopment of the area rests with a number of stakeholders, most notably landholders (both public and private) and infrastructure providers.</p> <p>OPDC is satisfied that realistic timetables relate to the Local Plan objectives. Policy DI2 sets out how OPDC will work landowners, developers, infrastructure providers and other stakeholders to support the timely delivery and optimised phasing of the development across the area. The Site Allocations in Policy SP10 set out the timeline for development of large sites across the area for both housing and employment uses.</p> <p>The Spatial Vision (Chapter 2) sets out a clear vision for Old Oak and</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Park Royal. The Spatial Vision is comprised of the overarching Vision Statement and Vision Narratives which provide further detail and define outcomes. The objectives for how the Spatial Vision will be delivered are embedded in the Vision Narratives, the Strategic Policies (Chapter 3) and Place Policies (Chapter 4) and Delivery and Implementation Policies (Chapter 11). These policies all form part of OPDC’s strategic policies for the area and establish the framework for fulfilling the spatial vision. Chapters 5 to 10 make up the Development Management Policies, and provide the detail of how development proposals are expected to deliver on objectives of the Plan.</p> <p>OPDC’s Local Development Scheme (LDS) outlines the central role of OPDC’s Local Plan as part of the wider Local Development Framework.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> <li>• Have the infrastructure implications of the policies clearly been identified?</li> <li>• Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</li> <li>• Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.</li> <li>• A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.</li> <li>• 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.</li> <li>• Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</li> </ul>	<p>Policies throughout the Local Plan, in particular the place policies in addition to many development management policies, identify requirements for new infrastructure to be delivered to support the sustainable development of the OPDC area. As one of the largest and most complex redevelopment projects in the UK, the infrastructure requirements are significant, with OPDC’s Development Infrastructure Funding Study estimating that infrastructure costs could total £1.5 billion.</p> <p>All infrastructure requirements identified in the Local Plan are recorded in the separate Infrastructure Delivery Plan (IDP), which forms part of the Plan’s evidence base. The IDP forms a schedule of infrastructure requirements, and estimated timescales for delivery and costs. The IDP is a live document which will be updated on an annual basis. OPDC recognises that infrastructure delivery on the scale envisioned will be an ongoing process led by the delivery element of the organisation, and requiring engagement with a number of public and private partners.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Strategic Policy SP10 (Integrated Delivery) and Policy DI1 (Balancing Priorities and Securing Infrastructure Delivery) require proposals to contribute towards the delivery of infrastructure in OPDC area. Funding of infrastructure will be secured through appropriate planning contributions in the form Section 106 Agreements, and Community Infrastructure Levy payments. However, it is recognised that this alone will not be able to pay for all infrastructure required, and that funding mechanisms utilising both public and private sector investment will need to play a role.</p> <p>The Whole Plan Viability Study assesses and tests the policies within the Local Plan to consider whether the plan’s policies maintain the viability of development. It considers that, in the round, the policies contained in the Local Plan would be viable.</p>
<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"> <li>• Sections of the DPD that reflect the plans or strategies of the local authority and other bodies</li> <li>• Policies which seek to pull together different policy objectives</li> <li>• Expressions of support/representations from bodies responsible for other strategies affecting the area</li> </ul>	<p>The Local Plan clearly reflects the concept of spatial planning. As the Development Corporation for a regeneration area of such scale, the Local Plan is the key tool for establishing the spatial aims for both the Old Oak Common regeneration area, as well as the established employment and residential areas. This is established within the Spatial Vision (Chapter 2) as well as the Strategic Policies (Chapter 3). The Place Policies (Chapter 4) set out how the 12 distinct “Places” will develop over the lifetime of the Plan. Within these Places, a series of “Clusters” are identified, which are characterised as locations that are likely to attract higher footfall and/or have a particular use and as such warrant more detailed policy. This includes transport nodes and important junctions/gateway locations identified in the spatial strategy.</p> <p>As a Mayoral Development Corporation, OPDC has additional functions above a traditional local planning authority, primarily geared towards unlocking development potential and securing benefits for local areas, supporting an innovative Park Royal industrial area and establishing Old Oak as an international exemplar</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>in largescale urban regeneration. These key objectives of the OPDC are engrained in the Spatial Vision (Chapter 2) and form a golden thread across the Local Plan’s strategic and development management policies.</p> <p>The Duty to Cooperate Statement and Statement of Consultation contain details on how OPDC has worked with stakeholders responsible for strategies affecting the area to secure agreement on relevant policy approaches. An example of this is how OPDC has consulted with the Canal River Trust (CRT) on the policies relating to the Grand Union Canal, including the Grand Union Canal Place Policy, other Place Policies for Places adjacent to the Canal, and Transport polices impacting on movement both along and across/over the Canal.</p> <p>Given the infrastructure requirements to support delivery of the Old Oak regeneration, OPDC has worked to ensure that strategic stakeholders support the Local Plan policy approach. Key among these have been HS2 Ltd, who will be developing the new Old Oak Common Station and enabling infrastructure, as well as using large parts of the area for HS2 construction up to 2026. It has also included TfL who will need to approve the primary transport infrastructure to be delivered in the area, including new streets, bridge crossing, new stations and station upgrades.</p> <p>OPDC has also worked closely with local Boroughs, sub regional bodies, and infrastructure providers on formulating local plan policies for social infrastructure, waste and other areas where a strategic regional approach is required. The Duty to Cooperate Statement sets out how OPDC has worked with these stakeholders as part of the DtC process, while the Statement of Consultation includes their responses to the different stages of consultation. The Policy Formulation Reports supporting each policy detail how consultation feedback from these stakeholders informed the</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> <li>• Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</li> <li>• Does the DPD include the remedial actions that will be taken if the policies need adjustment?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.</li> <li>• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> <li>a. the effectiveness of policies and what evidence is being collected to undertake this</li> <li>b. changes affecting the baseline information and any information on trends on which the DPD is based</li> </ul> </li> <li>• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> <li>• 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</li> <li>• 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.</li> </ul>	<p>development of policy.</p> <p>Policy DI1 outlines how OPDC will appropriately balance the priorities of housing needs, infrastructure delivery and sustainability standards with the need for deliverability and securing timely regeneration of the area. This approach ensures that the Local Plan is flexible enough to respond to changing circumstances and to help ensure it can continue to support the delivery of regeneration across the area.</p> <p>Given the complexity and scale for the regeneration of Old Oak, a number of policies allow for flexibility. For example, Policy H2 (Affordable Housing) recognises that in some circumstances sites may be required to provide key local infrastructure or address specific site constraints which may impact upon schemes ability to deliver targeted level of affordable housing.</p> <p>The most crucial item of infrastructure to be delivered in the OPDC area is the new Old Oak Station. This will be the largest new station built in the UK for over a century, and will link HS2, the Elizabeth Line, and West Coast Main Line services. The station itself has been committed as part of the first phase of HS2 works, though work confirming some of the associated infrastructure required to deliver new homes and jobs identified in the Local Plan is being progressed. The supporting text to Policy SP10 identifies that were infrastructure critical to realising home and jobs targets to be delayed or dropped, this would trigger the need for a review of the Local Plan. This will be reviewed on an annual basis as part of OPDC’s Authority Monitoring Report.</p> <p>Policy DI4 states that OPDC will produce an Authority Monitoring Report to measure the success of the Local Plan against the Key Performance Indicators (KPIs). This will be undertaken on an annual basis, and demonstrate if policies are fulfilling their objective or if</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		alterations to the plan are necessary. The proposed Local Plan KPIs have been informed by the proposed Sustainability Appraisal monitoring framework presented in Chapter 8 of the Integrated Impact Assessment.
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> <li>• Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?</li> <li>• 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?</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	<p>The Duty to Co-operate Statement outlines how OPDC has satisfied the requirements of the Duty to Co-operate process. The Statement identifies the key matters and strategic partners that OPDC have engaged with in the development of planning policy, and sets out the actions and outcomes that arose based on this engagement activity.</p> <p>The Statement of Consultation contains the detailed comments made as part of the different stages of consultation, and OPDC’s response to these comments. Policy specific comments and responses are detailed in the Policy Formulation Reports.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> <li>• Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)?</li> <li>• Is it clear how targets are to be</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out indicators, targets and milestones</li> <li>• Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>• Reference to any other reports or technical documents which contain</li> </ul>	<p>Policy DI4 (Planning Powers and Monitoring) commits OPDC to publishing an Authority Monitoring Report (AMR) on an annual basis to report on planning activity and Local Plan performance.</p> <p>OPDC has published AMRs for each monitoring period since it was established in April 2015. As no adopted Local Plan is yet in place, these reports monitored progress towards adoption of a new Local Plan and other Policy documents, as well as details of housing</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</p> <ul style="list-style-type: none"> <li>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?</li> </ul>	<p>information on the delivery of policies</p> <ul style="list-style-type: none"> <li>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</li> </ul>	<p>completions, starts and consents.</p> <p>Future AMRs will measure Local Plan performance against the proposed Key Performance Indicators. The KPIs have been designed to capture measurable trends which will accurately report on the effectiveness of policies across the plan. The KPIs include details of which policies that individual indicators monitor, source of monitoring information, frequency of monitoring and clear targets. If it is identified that the objectives of any Policy are not being achieved, OPDC will determine whether or not it is necessary to revise the policy through an alteration to the Plan or take other action to address the issue.</p> <p>The Local Plan KPIs have been informed by the Sustainability Appraisal monitoring framework presented in Chapter 8 of the Integrated Impact Assessment.</p> <p>The Annual AMR reports will include an updated Development Trajectory, determining the supply of developable sites for housing and employment use over the future 5, 10 and 20 year periods.</p> <p>OPDC, through its other functions outside of planning including development delivery and regeneration, is likely to undertake assessments of socio economic conditions which may provide additional information and data to assist with the review of the Local Plan performance, or suggest required alternations to the Local Plan.</p> <p>OPDC also provide detailed monitoring information to the Greater London Authority via the London Development Database.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><b>Consistent with national policy:</b> <i>the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> <li>• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification?</li> <li>• Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons.</li> <li>• Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy.</li> <li>• Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement.</li> <li>• Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement</li> <li>• Reports or copies of correspondence as to how representations have been considered and dealt with.</li> </ul>	<p>OPDC considers that the Local Plan policies are consistent with the NPPF and other relevant national policy. Chapter One (Introduction) clarifies that care has been taken not to repeat NPPF requirements in the formulation of Local Plan policy, though appropriate references have been made to relevant NPPF requirements throughout the document of for the purposes of the clarity. A similar approach has been taken with regards to relevant London Plan policies.</p> <p>The policies included in the Plan have been developed to respond to unique local circumstances and opportunities and the outcomes of the different stages of public consultations and evidence base outputs.</p> <p>The Policy Formulation Reports (PFRs) set out the national policies and guidance relevant to each policy.</p>

## Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

Policy Expectations	Possible Evidence	Evidence Provided
<p><b>Policy A: Using evidence to plan positively and manage development (para 6)</b></p>		
<p>Early and effective community engagement with both settled and traveller communities.</p>	<ul style="list-style-type: none"> <li>• Early and effective engagement undertaken, including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups.</li> </ul>	<p>Early and effective engagement has been undertaken in planning policy for traveller sites with all sectors of the community.</p> <p>In addition to engagement as part of the Local Plan process, direct engagement with the Traveller Community itself was undertaken as part of the Gypsy and Traveller Needs Assessment (2017). This involved attempts to speak in person with residents of each Traveller household identified in the area, all of which are located at a single site at Bashley Road in Park Royal.</p> <p>As part of this process, Gypsies and Travellers identified as living in “bricks and mortar” accommodation across the area were also interviewed to capture their views and raise awareness about the local plan process.</p> <p>The settled community, including the local business community, have been consulted on planning policy for traveller sites at each stage of the Local Plan.</p> <p>OPDC also consulted the London Gypsy and Traveller Unit (LGTU) as part of the Local Plan consultation process.</p>
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and</p>	<ul style="list-style-type: none"> <li>• Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development</li> </ul>	<p>As outlined above, OPDC undertook a rigorous approach to engage with the local Travelling community and develop a clear understanding of their needs over the lifetime of the plan.</p>

Policy Expectations	Possible Evidence	Evidence Provided
<p>relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<p>plan.</p> <ul style="list-style-type: none"> <li>• Collaborative working with neighbouring local planning authorities.</li> <li>• A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.</li> </ul>	<p>OPDC also worked with neighbouring and host Boroughs on Gypsy and Traveller accommodation issues through the Duty to Cooperate process, in particular the London Borough of Ealing in which the Traveller site at Bashley Road is located. Details of this engagement are set out in the Duty to Cooperate Statement.</p>
<p><b>Policy B: Planning for traveller sites (paras 7-11)</b></p>		
<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"> <li>• 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.</li> <li>• An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified.</li> <li>• Policy which takes into account criteria a-h of para 11</li> </ul>	<p>OPDC’s Gypsy and Traveller Accommodation Assessment concluded that no need arises for additional pitches in the area within the Plan period.</p> <p>If need were to arise, Policy H8, sets out the criteria which proposals for new pitches in the area must satisfy to be approved by OPDC.</p> <p>OPDC also assessed the housing need for Gypsy and Traveller households who fall outside of the updated definition and where there is no requirement in planning terms to provide a pitch. This identified 12 newly forming households, which forms 0.1% of the total objectively assessed housing need for the area.</p>
<p><b>Policy C: Sites in rural areas and the</b></p>		

Policy Expectations	Possible Evidence	Evidence Provided
<b>countryside (para 12)</b>		
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.		Not applicable
<b>Policy D: Rural exception sites (para 13)</b>		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	<ul style="list-style-type: none"> <li>• If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.</li> </ul>	Not applicable
<b>Policy E: Traveller sites in Green Belt (paras 14-15)</b>		
<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"> <li>• Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.</li> </ul>	Not applicable
<b>Policy F: Mixed planning use traveller sites (paras 16-18)</b>		

Policy Expectations	Possible Evidence	Evidence Provided
<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"> <li>• 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.</li> <li>• N.B. Mixed use should not be permitted on rural exception sites</li> </ul>	<p>The authorised site at Bashley Road does not currently have a mix of uses, and as no need has been identified for additional pitches in the area no mixed use traveller sites have been identified.</p> <p>Policy H8 sets out the criteria for new Gypsy and Traveller sites, and certain business uses may be appropriate if they satisfy the requirements of this policy.</p>
<p><b>Policy G: Major development projects (para 19)</b></p>		
<p>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.</p>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>There are currently no proposals to relocate the one Traveller site located within in the OPDC area.</p> <p>Policy H8 of the Local Plan safeguards this site for the purposes of Gypsy and Traveller accommodation.</p>