OPDC Regulation 19(2) Second Revised Draft Local Plan

Draft Policy Formulation Reports

Delivery and Implementation Policies

Planning Committee Version

June 2018

Overview

Policy Formulation Reports are being produced to help demonstrate how individual policies have been developed.

These reports continue to be developed. Further updates will be made to them ready for the second Regulation 19 and to support the submission of the Local Plan.

DI1: Balancing priorities

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
15	Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.
173	Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
174	Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.
175	Where practical, Community Infrastructure Levy charges should be worked up and tested alongside the Local Plan. The Community Infrastructure Levy should support and incentivise new development, particularly by placing control over a meaningful proportion of the funds raised with the neighbourhoods where development takes place
203	Local planning authorities should consider whether otherwise

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204	unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Planning obligations should only be sought where they meet all of the following tests: ● necessary to make the development acceptable in planning terms; ● directly related to the development; and ● fairly and reasonably related in scale and kind to the development.

National Planning Practice Guidance (NPPG)

Community Infrastructure Levy

Policy / paragraph reference	Policy and paragraph text
011	In relation to the levy, the relevant Plan is the Local Plan in England, Local Development Plan in Wales, and the London Plan in London. Charging schedules are not formally part of the relevant Plan, but charging schedules and relevant Plans should inform and be generally consistent with each other. Charging authorities should think strategically in their use of the levy to ensure that key infrastructure priorities are delivered to facilitate growth and the economic benefit of the wider area.

Local Plans

Policy / paragraph reference	Policy and paragraph text
018	A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when (including in relation to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the plan as a whole will not prejudice the viability of development. Where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself.

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
4.5	A The Mayor will, and boroughs and relevant stakeholders should: a) support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London b) seek to achieve 40,000 net additional hotel bedrooms by 2036, of which at least 10 per cent1 should be wheelchair accessible c) ensure that new visitor accommodation is in appropriate locations: – beyond the Central Activities Zone (CAZ) it should be focussed in town centres and opportunity and intensification areas, where there is good public transport access to central London and international and national transport termini d) support provision for business visitors, including high quality, large scale convention facilities in or around the CAZ C LDFs should: a) seek to ensure that all new visitor accommodation meets the highest standards of accessibility and inclusion and encourage applicants to submit an accessibility management plan with their proposals b) promote high quality design of new visitor accommodation so that it may be accredited by the National Quality Assurance Scheme c) identify opportunities for renovation of the existing visitor accommodation stock d) promote and facilitate development of a range of visitor accommodation, such as hotels, bed and breakfast accommodation, self-catering facilities, youth hostels and camping and caravan sites e) support and encourage development of good quality budget category hotels, especially in outer London.
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
8.1	A The Mayor will work collaboratively to deliver a positive approach to enabling new development in London, optimising land use and promoting/enabling locations for strategic development. B The Mayor will consider promoting the establishment of further **Mayoral Development Corporations (MDCs)** and Enterprise Zones (EZs) as well as further Tax Increment Finance (TIF) initiatives where they would assist significantly with realising substantial development potential. C The Mayor will work with boroughs, infrastructure providers, national government, regulators and others involved in infrastructure planning, funding

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8.2	and implementation to ensure the effective development and delivery of the infrastructure needed to support the sustainable management of growth in London and maintain its status as a world city in accordance with the vision and objectives set in Policy **1.1**. F Boroughs should set out a clear framework for negotiations on planning obligations in DPDs having regard to relevant legislation, central Government policy and guidance and local and strategic considerations to the effect that: a It will be a material consideration whether a development makes an appropriate contribution or other provision (or some combination thereof) towards meeting the requirements made necessary by, and related to, the proposed development b Negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and kind to the proposed development and its impact on a wider area c Boroughs must refer to planning obligations that would be sought in the relevant parts of the DPDs (such as transport and housing policies).
8.3	D The Mayor will work with boroughs to ensure that priorities for the application of the CIL for strategically important infrastructure are identified through the LDF process, particularly to support development of opportunity and intensification areas.

Draft New London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
GG2	To create high-density, mixed-use places that make the best use of land, those involved in planning and development must: A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites. B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach. C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character. D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening. E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth. F Maximise opportunities to use infrastructure assets for more than one

	purpose, to make the best use of land and support efficient maintenance.
DF1	Delivery of the Plan and Planning Obligations A Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery. B If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application. C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG. D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this: 1) Recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth. E Boroughs are also encouraged to take account of part D in developing their Community Infrastructure Levy Charging Schedule and Regulation 123 list.

Supplementary Planning Guidance (SPG)

Policy / paragraph reference	Policy and paragraph text
	None directly applicable

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	No alternative policy options were considered.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Infrastructure Delivery: Concern raised over various aspects of infrastructure delivery, Including education - with the Boroughs concerned regarding the ability of the existing schools capacity to expand; and health – the need to be flexible with this.	Old Oak Park (DP9), HUDU, Hammersmith and Fulham Council, Grand Union Alliance, Brent Council, 3 local residents	Change proposed. Further work on education provision has been undertaken as part of OPDC's Education and Health Needs Study. This identifies that there are schools that can be expanded off-site to meet the needs of early phases of development. The revised Local Plan also now clearly identifies the needs for on-site provision. The supporting text to Policy TCC4 recognises that this need is based on current population projections based on tenure, mix and capacity assumptions and that this need might flex over time and needs to be carefully monitored and that there therefore needs to be a degree of flexibility in the approach taken to social infrastructure provision.
Infrastructure Prioritisation: Various opinions expressed regarding what infrastructure should be prioritised. Consensus that education and health in particular are important for social infrastructure. Improvements to Willesden Junction Station also got particular mention.	Brent Council, Diocese of London, 15 local residents	Change proposed. Education and health needs have been informed by OPDC's Education and Health Study. Needs are contingent on the speed of delivery and type of housing (tenure, size, quantum), but the Infrastructure Delivery Plan (IDP) identifies likely dates that facilities need to be delivered or expanded. On-site requirements have had sites allocated and these are referenced in Policy TCC4 and in the relevant place policies.
Infrastructure costs and funding gap: Some concern were expressed regarding the level of funding gap, how this would be covered and the impact this could have on the delivery of Affordable	Grand Union Alliance, Hammersmith and Fulham Disability Forum, Old Oak Park (DP9)	Change proposed. The revised Local Plan sets out further detail in the Delivery and Implementation chapter on the strategies that OPDC will employ to support the timely regeneration of the

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Housing.		area and secure the necessary infrastructure to support the needs of the new population. OPDC's Local Plan is supported by an Affordable Housing Viability Assessment and Whole Plan Viability Assessment, which has assessed the viability of affordable housing delivery to inform OPDC's affordable housing policy. The Delivery and Implementation chapter recognises that a balance will have to be struck between the requirements of the Local Plan and the priorities to deliver affordable housing, sustainability standards and infrastructure.
Table 16: Infrastructure requirements additional items: Requests were made to add items to Table 16: - Mitre Road Bridge; - Additional capacity on North and West London Lines; - Infrastructure to support operation of the Grand Union Canal; - Public realm enhancements; - Cycling facilities; - Items from Park Royal Transport Strategy; - Soil treatment; - Link to Kensal canalside; - Future of Grand Union Canal sub surface 132kV cables; and - Waste disposal facilities.	GLA, TfL, Hammersmith and Fulham Council, Brent Council, The Hammersmith Society and 2 local residents	Change proposed. OPDC's evidence base has been significantly updated between the Regulation 18 and Regulation 19 versions of the Local Plan. The Regulation 19 Plan includes a longer list of infrastructure requirements, informed by this evidence. Suggested infrastructure items were considered as part of this evidence. OPDC's Infrastructure Delivery Plan (IDP) supports the Local Plan and sets out the required infrastructure to support development in the area.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

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Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Within the plan period, the OPDC area has capacity to deliver 20,100 new homes and space for 40,400 new jobs.
Development Infrastructure Funding Study	• **The funding gap and cashflow needs addressing**. Steps could be taken to narrow the gap identified, and overcome cashflow difficulties, as discussed above. • **Enterprise Zone status and a TIF should be investigated,** using the model established at Vauxhall Nine Elms Battersea (VNEB). • **Local Development Orders and Mayoral Development Orders could be considered** in order to give planning certainty to developers. Similar methods were used at Canary Wharf, and were an important component in encouraging investment. • **The business case for development could be developed:** we suggest that the OPDC may wish to work further on the economic benefits that investment, particularly in transport, may bring. This would allow the generation of a funding case to Government, and may form part of a TIF application. • **CIL and S106 policy needs to be put in place as early as possible,** to allow developers to bid for sites in the knowledge of what they will be paying in infrastructure contributions – allowing them to pay the 'right' price for the land they need. In advance of CIL and S106 policy, policy intentions should be communicated consistently and clearly.
Infrastructure Delivery Plan	• Deliver a range of new and enhanced transport, green, utilities and social infrastructure within, and where appropriate outside, the OPDC area. • The IDP will be used by the OPDC to assist in the delivery of projects and assist in identifying and negotiating appropriate Section 106 contributions from developers and for the prioritisation of the use of other monies received as developer contributions e.g. Community Infrastructure Levy (CIL) by OPDC.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	None

Other evidence base

Supporting Study	Recommendations
	• **None**

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Policy DI2: Timely Delivery and Optimised Phasing

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
177	It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment	Housing and economic land availability assessment

Local Plans

Policy / paragraph reference	Policy and paragraph text
018	A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when (including in relation to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the plan as a whole will not prejudice the viability of development.

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
8.1	A The Mayor will work collaboratively to deliver a positive approach to enabling new development in London, optimising land use and promoting/enabling locations for strategic development.

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Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG2	To create high-density, mixed-use places that make the best use of land, those involved in planning and development must: A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites. B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach. C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character. D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening. E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth. F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.
DF1	Delivery of the Plan and Planning Obligations A Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery. B If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application. C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG. D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this: 1) Recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth. E Boroughs are also encouraged to take account of part D in developing

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	their Community Infrastructure Levy Charging Schedule and Regulation 123 list.

Supplementary Planning Guidance (SPG)

Policy / paragraph reference	Policy and paragraph text
	None directly applicable

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	No alternative policy options were considered.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Phasing of development and infrastructure: A range of respondents commented on the phasing of development across the area. Several private landowners expressed a desire to bring their sites forward sooner than set out within the Local Plan. Members of the public were more concerned that the planning for the longer term phases was occurring too soon and that the infrastructure was not in place to support the amount of development that was occurring in earlier phases. Conversely developers	Old Oak Park (DP9), Canary Wharf PLC, Brent Council, Montagu Evans (for a private land owner, Quod (for a private land owner)	Change proposed. The phasing diagrams and Development Capacity Study have been updated to take on board comments from stakeholders. Policy SP10 supports development being brought forward in advance of the phasing identified. The Local Plan is supported by an Infrastructure Delivery Plan (IDP) which identifies what infrastructure is needed, when and sources of funding/financing. Further work has been undertaken across a number of studies to identify infrastructure requirements and the phasing of

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claimed that infrastructure was being front-loaded and that this was not required.		infrastructure to support the delivery of homes and jobs and this has been included in the IDP.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Within the plan period, the OPDC area has capacity to deliver 20,100 new homes and space for 40,400 new jobs.
Development Infrastructure Funding Study	• **Planning policy and strategy must remain flexible** enough to cope with changing market and economic conditions – for example, perhaps by delivering lower levels of affordable housing in the early phases in order to pump-prime infrastructure delivery with increased levels of funding. • **A very practically orientated project delivery 'roadmap' needs to be written** which would identify tasks on the critical path, set dates for those issues to be resolved, and clarify delivery roles and responsibilities; focus head-on on how any problems will be resolved; and define issues in time sequence, which would allow the focusing of resources on short term issues and a process of active planning for medium term issues. This would also help the political process by clarifying decisions that need to be taken, when they need to be taken, and what the ramifications of choices are.
Infrastructure Delivery Plan	• Deliver a range of new and enhanced transport, green, utilities and social infrastructure within, and where appropriate outside, the OPDC area to meet demands of the development. • The IDP will be used by the OPDC to assist in the delivery of projects and assist in identifying and negotiating appropriate Section 106 contributions from developers and for the prioritisation of the use of other monies received as developer contributions e.g. Community Infrastructure Levy (CIL) by OPDC.
Social Infrastructure Needs Study	• 1 primary school • 1 secondary school • 1 health hub • Expansions to Central Middlesex Hospital and Hammersmith Hospital • 4 supernurseries • 2 community hubs

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	• 2 sports centres
Utilities Study	• The pace, timing and location of specific plots that are released for development, in addition to their intended mix, ownership and decision-making responsibility, creates a complex challenge for the overall configuration of essential enabling infrastructure, energy assets and utility systems. There is a progressive opportunity, which should be reviewed cyclically, to establish core assets and to optimise systems in order to deliver: • Resource efficiencies • Cost efficiencies (reducing the capital outlay for new infrastructure assets) • Innovation and technology advancement (delivering an international exemplar of smart enabled development)

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	None

Other evidence base

Supporting Study	Recommendations
	• **None**

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DI3: Stakeholder Engagement and Being a Proactive Planning Authority

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	Planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues.
66	Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.
69	Local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning
71	Local planning authorities should take a positive and collaborative approach to enable development to be brought forward under a Community Right to Build Order, including working with communities to identify and resolve key issues before applications are submitted

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph textss
Paragraph: 017 Reference ID: 12-017-20140306 Revision date: 06 03 2014	Who should be involved in preparing a Local Plan? Local planning authorities will need to identify and engage at an early stage with all those that may be interested in the development or content of the Local Plan, including those groups who may be affected by its proposals but who do not play an active part in most consultations. Those communities contemplating or pursuing a neighbourhood plan will have a particular interest in the emerging strategy, which will provide the strategic framework for the neighbourhood plan policies. The local planning authority will also need to ensure that it works proactively with other authorities on strategic cross boundary issues in line with the duty to cooperate.

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	Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out specific bodies or persons that a local planning authority must notify and invite representations from in developing its Local Plan. The local planning authority must take into account any representation made, and will need to set out how the main issues raised have been taken into account. It must also consult the Strategic Environmental Assessment consultation bodies on the information and level of detail to include in the sustainability appraisal report. Section 18 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement, which should explain how they will engage local communities and other interested parties in producing their Local Plan and determining planning applications. The Statement of Community Involvement should be published on the local planning authority's website.s

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate. G Boroughs should work with and support their local communities to set goals or priorities for their neighbourhoods and strategies for achieving them through neighbourhood planning mechanisms

Draft New London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
GG1	To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must: A Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city. B Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation. C Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish. D Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.

	E Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements. F Support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.

Supplementary Planning Guidance (SPG)

Policy / paragraph reference	Policy and paragraph text
	• Character and Context SPG (2014) • Planning for Equality and Diversity in London SPG (2007)

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	No alternative policy options were considered.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Transparency/ Planning applications: Various comments were received in regards to the transparency of the OPDC of particular note were requests for information of the land transfer, the need for a transparent spend process in regards to s106 and CIL and clarification of the planning applications process for OPDC.	Hammersmith and Fulham Council, The Hammersmith Society, Old Oak Interim Forum, Wells House Road Resident's Association, 2 local residents	Change proposed. Following comments, OPDC has updated its Statement of Community Involvement to make the requirements of developers both pre and post submission of planning applications clearer. Details on s106 and CIL spend would be published as part of OPDC's Authority Monitoring Report (AMR). Details about the land transfer are provided on OPDC's

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		website, but this is not a matter related to the Local Plan.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Statement of Community Involvement	• OPDC is committed to achieving a high level of community involvement. As a result, it has incorporated 10 ground rules which are intended to ensure a consistent and minimum standard for community involvement. • These ground rules are applied to the methodologies set out to engage with communities and stakeholders in the plan making process for the Local Plan, SPDs, CIL Charging Schedule and Neighbourhood Plans.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	None

Other evidence base

Supporting Study	Recommendations
	• **None**

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Policy DI4: Planning Powers and Monitoring

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
62	Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. They should also when appropriate refer major projects for a national design review. In general, early engagement on design produces the greatest benefits. In assessing applications, local planning authorities should have regard to the recommendations from the design review panel.

National Planning Practice Guidance (NPPG)

Design

Policy / paragraph reference	Policy and paragraph text
035	Design Review is a tried and tested method of promoting good design and is an effective way to improve quality. Local planning authorities should have local design review arrangements in place to provide assessment of proposals and to support high standards of design. Local authorities should, when appropriate, refer major projects for a national design review. Design review is most effective if done at the early stages of an application, and in many cases local authorities charge for this as part of a pre-application service.

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate. G Boroughs should work with and support their local communities to set goals or priorities for their neighbourhoods and strategies for achieving them through neighbourhood planning mechanisms

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Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG2	To create high-density, mixed-use places that make the best use of land, those involved in planning and development must: A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites. B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach. C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character. D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening. E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth. F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.
DF1	Delivery of the Plan and Planning Obligations A Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery. B If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application. C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG. D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this: 1) Recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth. E Boroughs are also encouraged to take account of part D in developing

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	their Community Infrastructure Levy Charging Schedule and Regulation 123 list.

Supplementary Planning Guidance (SPG)

Policy / paragraph reference	Policy and paragraph text
	None directly applicable

Local Plan Regulation 18 Draft Policy Options

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Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Monitoring: Several suggestions were made regarding additional matters to monitor, including: - the impact of the development on the existing communities; - Biodiversity; - Heritage; and - Brownfield land	Hammersmith and Fulham Council, Brent Council, GiGL, Historic England	Change proposed. OPDC's Local Plan is supported by a range of Key Performance Indicators, set out in a supporting document to the Delivery and Implementation chapter, which will be monitored through OPDC's Authority Monitoring Report (AMR), to monitor the success of OPDC's planning policies. Policy DI3 also requires developers to submit a post-occupancy survey to support continual learning and dissemination of acquired knowledge on the success or otherwise of developed schemes.

Regulation 19(1) consultation

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
	• None applicable.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	None

Other evidence base

Supporting Study	Recommendations
	• None

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