

Local Plan Independent Examination

OPDC Response to Matter and Issue 1

Matter 1: Whether the Plan's definition of Strategic Policies and its role envisaged for Neighbourhood Plans is consistent with National Policy (derived from the first and sixth Key Issues of table 5 of Key document 5 identified at Regulation 19(1) stage and representations 2/G/25 and 2/SP6/6 from Old Oak NF and 2/G42 and G43 from the Midland Terrace RA and the St Quentin and Woodlands NF amongst others)

Notwithstanding the officers' response to the Key Issues and representations set out in Appendices E and J to Key Document 5, this Matter would benefit from a discussion at a hearing session.

OPDC response:

- 1.1. OPDC considers that the Local Plan's definition of Strategic Policies is consistent with national policy. The relevant National Planning Policy Framework (NPPF) (2012) paragraphs are 156 and 184. National Planning Practice Guidance (NPPG) 075 Reference ID: 41-075-20140306 states that the NPPF sets out the strategic matters for which Strategic Policies should provide guidance. NPPG Paragraph: 076 Reference ID: 41- 076-20140306 also provides useful considerations for reaching a view on whether a policy is a strategic policy.
- 1.2. In accordance with NPPF paragraph 156, Local Plan paragraph 1.22 defines Strategic Policies as the Strategic Policies (including site allocations), Place Policies and Delivery and Implementation Policies. The issues identified in the above Key Issue and representations relate to the definition of Place Policies as Strategic Policies.
- 1.3. The identification of Place Policies as Strategic Policies is consistent with the NPPF and NPPG policies and guidance as set out above. This is demonstrated by the Place Policies:
 - a) setting out the overarching direction and strategic priorities for each place;
 - b) dealing with strategic matters such as how many homes and jobs must be delivered in each place;
 - c) providing guidance at a strategic scale, beyond the scale of neighbourhoods, that reflects the level of growth and regeneration proposed for Old Oak and Park Royal;
 - d) supporting site allocations which are central to achieving the Spatial Vision and homes and jobs targets;
 - e) setting out the important infrastructure, community facilities and publicly accessible open spaces that are essential to support the sustainable regeneration of that place and of the wider plan;
 - f) providing guidance for conserving and enhancing heritage assets where relevant;
 - g) illustrating broad locations of development on indicative place diagrams for each Place Policy which are inset figures to the key diagram; and

h) being identified as Strategic Policies within the Local Plan.

1.4. In considering the above content of the Place Policies, OPDC considers that the Plan is positively prepared and consistent with national policy as these policies assist in demonstrating how objectively assessed development and infrastructure needs will be met by identifying where such development and infrastructure should be located, i.e. where they will be delivered. This is consistent with national policy requirements (see NPPF (2012) paragraph 154). This approach has also been delivered through the London Borough of Newham's Local Plan that was adopted in December 2018.

Role envisaged for Neighbourhood Plans

1.5. Local Plan Policy DI3(c) and paragraph 11.36 set out OPDC's commitment to support Neighbourhood Forums in the development of Neighbourhood Plans.

1.6. OPDC considers that the Local Plan's policy in respect of Neighbourhood Plans is consistent with National Policy. The relevant NPPF (2012) paragraphs 183 to 185 specifically relate to neighbourhood plans. In identifying Place Policies as Strategic Policies, OPDC has considered the role Neighbourhood Plans can play in providing non-strategic policies. OPDC considers that there are opportunities for Neighbourhood Plans across Old Oak and Park Royal to provide detailed guidance for specific areas, neighbourhoods, site allocations and/or types of development in accordance with NPPF paragraphs 183-185 and the guidance in the NPPG.

1.7. OPDC has worked closely with communities to support the designation of Neighbourhood Areas and Forums within a complex, long term and largescale regeneration context and in the development of Neighbourhood Plans. Currently there are two Neighbourhood Areas and Forums within the OPDC area:

- a) Harlesden – at time of writing the forum's Neighbourhood Plan is undergoing independent examination; and
- b) Old Oak – at time of writing, OPDC is providing resources to support the drafting of the forum's Neighbourhood Plan.

1.8. OPDC recognises that the designated Old Oak Neighbourhood Area is smaller than the area originally applied for. The amendments were considered by OPDC Planning Committee and OPDC Board. The rationale for the amended boundary is set out in the [Old Oak Neighbourhood Area Decision Document](#) which had regard to the factual and policy matrix relevant to the proposed Old Oak Neighbourhood Area.

1.9. OPDC is also updating its Statement of Community Involvement to meet the requirements of the Neighbourhood Planning Act 2017 which will set out further information for supporting Neighbourhood Forums.

Inadequate engagement

1.10. OPDC considers that the consultation undertaken for the Regulation 19(1) Local Plan was adequate and of a high quality. OPDC undertook a lengthy consultation exercise as part of the public consultation on the Regulation 19(1) Local Plan. The document was consulted on for 11 weeks - well in excess of the 6 week requirement outlined in OPDC's Statement of Community Involvement and as required by law. This extended consultation was to take account of the fact that the document was being consulted on during the summer. OPDC also offered extensions to the consultation to consultees who requested an extension.

- 1.11. Officers hosted 6x1.5 hour drop-in sessions, consisting of a presentation and question and answer session. Officers also hosted two live Twitter sessions. Prior to consultation, officers also hosted two presentation events, to provide community groups with an overview of the results and key changes resulting from the Regulation 18 consultation and to inform stakeholders of the content of the Regulation 19 Local Plan and how stakeholders should respond to the consultation. During the consultation, emails to OPDC officers were responded to as soon as was practicable.
- 1.12. In summary, the consultation activities associated with the Regulation 19 Local Plan exceeded nationally set requirements and OPDC's own Statement of Community Involvement requirements. Further details on OPDC's engagement activities in respect of the Local Plan can be found elsewhere in this Statement of Consultation document.