

## Soundness Self-Assessment Checklist (March 2014)

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

**In summary – the key requirements of plan preparation are:**

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

### **The Tests of Soundness at Examination**

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

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

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

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

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

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

- Research/fact finding: the choices made in the plan are backed up by facts.

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- 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.

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<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>		

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<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 relating to the area are well-documented. ‘Convergence’, meaning bringing equality of opportunity to equivalent to London wide levels being central to the 2005 Olympic bid onwards, notably within the Strategic Regeneration Framework, 2009 and 2011 which sets out the action aimed to tackle this level of social disadvantage documented through the LPCD and the PLP. More information on the SRF is found in Appendix 1.</p> <p>Responses to the initial consultation influenced Chapter 2 of the Draft Local Plan Consultation Document (LPCD), December 2013 which sets out the issues within the area. Section 2 of the Publication Local Plan (PLP), August 2014, supplemented by further information provided within the Spatial Portrait Background Paper, 2014 show the issues within the area. Section 3.5 of the Local Plan Sustainability Appraisal Scoping Report, 2013 also sets out the key issues which have been taken forward into the sustainability objectives within the Framework.</p> <p><b>Relationships between vision, objectives and policies</b></p> <p>Section 3 of the Publication Local Plan, August 2014 sets out a clear vision for the whole of the LLDC area over the plan period which is the spatial demonstration of the organisation’s <i>Ten Year Plan, 2013</i>. The diagram on page 13 demonstrates how the Objectives relate to the overarching organisational purposes within the Ten Year Plan. Each of the five Objectives within the Plan directly stem from this Vision, each having a clear outcome within the start of each section (pages 19, 41, 69, 101 and 125). Each of the Sub Area sections also contain a Sub Area Vision (pages 145, 173, 187 and 205).</p> <p>Policies within the Plan are directly linked to the relevant objective, clearly demonstrated by their inclusion within a separate Plan</p>

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		<p>section. The Objectives encompass all topics within the Section and Table 10 on page 227 clearly demonstrates how they will be delivered and monitored. Table 9 on page 223 also shows how the policies will deliver the required infrastructure over the plan period.</p> <p><b>Alternatives</b></p> <p>Appendix E and Section 3 of the Sustainability Appraisal, 2014 sets out the alternatives for each policy area considered within the Plan-making process, including the spatial strategy. Alternatives to the economic growth and quantum of housing development within the Spatial Strategy were considered, where conformity with the London Plan allows.</p> <p><b>Consistency</b></p> <p>Consistency between the objectives has been achieved through separation of topic issues. Policies within the plan are consistent with one another by striking an appropriate balance between housing and economic growth, environmental protection and achievement of sustainability, and infrastructure provision.</p> <p><b>Delivery</b></p> <p>The Local Development Scheme, 2014 gives details on the Local Plan and CIL schedule only as the Plan alone will provide the coherent strategy for the area.</p> <p>The Local Plan explains how the policy objectives are to be achieved through the Delivery and Implementation section (Section 14), and the explanation of the objectives at the front of each section (see above). Timescales of infrastructure delivery are set out within the Infrastructure Delivery Plan, 2013.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p>	<ul style="list-style-type: none"> <li>• An evidence base which establishes the development needs of the plan area (see Justified below) and</li> </ul>	<p><b>Development needs</b></p> <p>The Local Plan is underpinned by evidence on the development</p>

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<p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> <li>—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</li> <li>—specific policies in this Framework indicate development should be restricted.</li> </ul>	<p>includes a flexible approach to delivery (see ‘Section 3 Effective’, below).</p> <ul style="list-style-type: none"> <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>needs, quantum of development, and the reasons behind the overall strategy and plan area distribution of development within the area contained within the London SHLAA, 2013; the London SHMA, 2013; the SHMA Review, 2013; the Gypsy and Traveller Accommodation Assessment, 2014; the Gypsy and Traveller Site Assessment, 2014; the Employment Land Review, 2014; the Retail and Leisure Requirements Review, 2014; the Infrastructure Delivery Plan, 2013; Schools Mapping Study, 2013 and the Local Open Space Review, 2014</p> <p>The strategy within the Plan strikes an appropriate balance between economic growth, housing and infrastructure delivery and environmental protection, which is flexible to change by not relying solely on one particular element. The approach to delivery which includes private sector investment and the work of other bodies, alongside the Legacy Corporation’s own delivery arm ensures that it is in a position to rapidly respond to change ensuring flexibility is maximised.</p> <p><b>Audit trail</b></p> <p>The quantum of housing development within the area has been determined by London Plan targets developed through the London SHLAA, 2013, taking into account needs within the London SHMA, 2013, on which the Legacy Corporation worked closely with the GLA. This shows the methodology behind this standardised approach across London as a whole. Distribution of housing across the area is determined by site availability. The Housing Table within Appendix 2 of the PLP shows the distribution of the housing according to capacity, with further information provided within the Housing Background Paper, 2014 on how the housing target was arrived at by the GLA.</p> <p>GLA Population projections have been used to determine the potential impacts of this housing growth on community, retail and</p>

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		leisure requirements within the evidence base above. Employment needs have been determined by responding to supply and demand, factoring in the economic growth role of the organisation as a whole and the requirements of new residents.
Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.	<ul style="list-style-type: none"> <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>	Policy SD.1 of the PLP sets out the Legacy Corporation's interpretation of presumption in favour of sustainable development.
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> <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>	The evidence base supporting the Local Plan sets out the objectively assessed needs. This main evidence is contained within the London SHLAA, 2013; the London SHLAA, 2013; the London SHMA, 2013; the SHMA Review, 2013; the Gypsy and Traveller Accommodation Assessment, 2014; the Gypsy and Traveller Site Assessment, 2014; the Employment Land Review, 2014; the Retail and Leisure Requirements Review, 2014; the Infrastructure Delivery Plan, 2013; Schools Mapping Study, 2013 and the Local Open Space Review, 2014. The Housing, Business and Natural Environment background papers as well as the Housing Position Statement demonstrate further how these needs are to be met and how the approach within the Plan is related to the evidence.
<b>NPPF Principles: Delivering sustainable development</b>		
<b>1. Building a strong, competitive economy (paras 18-22)</b>		
Set out a clear economic vision and strategy for the area which positively and proactively	<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</li> </ul>	The Local Plan Vision on page 14 of the PLP and Strategic Policy SP.1 and its supporting text sets out the clear economic vision and

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encourages sustainable economic growth (21),	Strategy and marine policy documents where appropriate.	strategy for the area, encouraging sustainable growth. These are clearly linked to the organisations vision and purposes set out within the Ten Year Plan and the Strategic Regeneration Framework for east London, 2009 and 2011.  Policy B.1 also sets out the approach to encouraging sustainable economic growth.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> <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>	The Infrastructure Delivery Plan, 2013 sets out the infrastructure requirements within the area. Table 9 of the PLP on page 223 sets out how the policies and allocations within the plan will help meet these requirements.  Allocated sites containing employment are part of mixed use development. Many of these sites are already subject to outline permissions, for example, within the Stratford City or Legacy Communities Scheme applications. Where applicable anticipated delivery of the housing elements of schemes are set out within Table 12 within Appendix 2. The Business Background Paper also gives some indication of phasing of redevelopment of employment land.
<b>2. Ensuring the vitality of town centres (paras 23-37)</b>		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	<ul style="list-style-type: none"> <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</li> </ul>	Policies within the PLP promote positive town centre environments. Linked to Policy B.2, Table 3 on page 31 sets out the retail hierarchy, and where possible, the centre boundaries for Stratford, East Village and Hackney Wick are shown on the Proposals Map, and on page 32 in the case of Stratford Town Centre extension. Table 3 also sets out how residential development is encouraged within the Centres, and the relevant allocations (SA3.1, SA4.1, SA1.1, SA2.2 and SA4.3) also set out how



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	<p>centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</p>	<p>residential will be incorporated into the centres.</p> <p>Allocations are made at SA3.2 where cultural and leisure requirements cannot be met within the Centre. Policy B.2 sets out how proposals for retail and leisure outside the Centres will be dealt with.</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>Sites are allocated to town centre use requirements within the Local Plan at SA3.1, SA4.1, SA1.1, SA2.2 and SA4.3. The Stratford Town Centre boundary has been expanded to cover parts within the Legacy Corporation area as shown within Figure 7 to take in the existing development, the London Plan Metropolitan Centre designation and the SA3.1 allocation. Paragraph 4.21 shows the approach to the designation of retail frontages within the area.</p>
<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</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</li> </ul>	<p>The Local Plan aims to facilitate sustainable development and contribute to health objectives through its approach to transport within the area. The Legacy Corporation has cooperated with adjoining authorities, transport providers and other agencies to deliver a sustainable approach to transport provision.</p>

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<p>recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <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</p>	<p>referred to in paragraph 31.</p> <ul style="list-style-type: none"> <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> <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 strategy is set out within Page 107 of the PLP which demonstrates how emphasis is placed on pedestrians and cyclists and then public transport above that of vehicular transport, as well as promoting service enhancement and access to public transport.</p> <p>The following Local Plan policies show how the transport strategy will be implemented. A clear commitment to the development of infrastructure to widen transport choice is made through Strategic transport improvements in particular stopping international services at Stratford International promoted by Policy T.1 while Policy T.2 sets out how proposals that enhance the capacity of the transport network will be supported and promoted by the Legacy Corporation. Where possible, it will use its own funding, or loans secured, to deliver transport infrastructure improvements which will also be heavily dependent on the actions and investments of third parties, such as TfL. A notable example being Hackney Wick station improvements.</p> <p>Policy T.3 lends support to appropriate transport schemes within the area. Policy T.4 demonstrates how cyclists and pedestrians will be prioritised and T.5 how the street network and traffic generating uses will be considered. Policy T.6 seeks to facilitate local connectivity. Policy T.7 sets out how the development proposal requirements of significant or other relevant schemes. The development parking requirements within the London Plan will be applied within the area and are set out within Policy T.8 and Policy T.9 shows how pedestrians and cyclists will be provided for through developments. The inclusion of Policy T.10 which sets out how the waterways will be promoted for transport use shows clear links with the role of green infrastructure networks and health and lifestyle benefits.</p> <p>Considerations within other sections of the Plan also contribute to the aims of the transport strategy where clear relationships between location and modal split can be shown. Mixed use developments are promoted throughout the plan with</p>

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<p>particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>consideration of transport accessibility. PTAL is a strong consideration for housing density of schemes, as shown within para 5.12 and Figure 10. This encourages the use of public transport from new developments, and minimises the reliance on the private car. Mixed use allocations and promotion of new retail centres and schools provision in appropriate locations also combine to minimise trips for work or essential day-to-day activities within the area. Policy S.1 also requires consideration of access issues to community services and infrastructure, encouraging walking and cycling from a health perspective.</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 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> <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 IN.1 sets out considerations when new telecommunications infrastructure is proposed. Policy SP.1 also supports development of smart technology within the area, supported by the Smart London Plan.</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'</p>	<ul style="list-style-type: none"> <li>• Identification of:             <ol style="list-style-type: none"> <li>a) five years or more supply of</li> </ol> </li> </ul>	<p>The Housing Trajectory at Figure 9 on page 44 and Table 10 within Appendix 2 identify five years supply of housing sites, plus the 5%</p>

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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>specific deliverable sites; plus the buffer as appropriate</p> <ul style="list-style-type: none"> <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>buffer. Further detail is provided within the Housing Background Paper and Housing Position Statement, 2014.</p> <p>Housing policies are supported by the London SHLAA, 2013.</p>
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	<ul style="list-style-type: none"> <li>• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</li> </ul>	<p>The Housing Trajectory at Figure 9 on page 44 and Table 10 within Appendix 2 identify a supply of deliverable housing site for years 6 to 10 and 11 to 15 of the Plan period. Further detail is provided within the Housing Background Paper.</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)	<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 Housing Trajectory at Figure 9 on page 44 and Table 10 within Appendix 2 show expected housing delivery. Further detail is provided within the Housing Background Paper.</p> <p>The Authority Monitoring Report, 2012/13 shows delivery for the monitoring year. The Legacy Corporation regularly inputs and updates information within the London Development Database for quarterly updates on housing delivery.</p> <p>Housing policies are supported by the London SHLAA, 2013.</p>
Set out the authority's approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> <li>• Policy on the density of development.</li> </ul>	<p>Policy H.1 sets out how density considerations should be made, in conformity with the London Plan.</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)	<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</li> </ul>	<p>Strategic Policy SP.2 sets out the strategic approach to housing delivery within the area. Policy H.1 provides for a mix of housing types within the area to meet identified demand within the London SHMA, 2013 and the SHMA Review, 2013. Further information is set out within the Housing Background Paper.</p> <p>Policies H.3 to H.5 encourage specialist forms of accommodation,</p>

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	<p>particular locations, reflecting local demand. (50)</p> <ul style="list-style-type: none"> <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>including for older persons. Each of these policies also sets out the requirements for these forms of accommodation, drawing from evidence from the SHMAs and Gypsy and Traveller Accommodation Assessment, 2014.</p> <p>Policy H.2 sets out the approach to affordable housing provision within the area, including how on-site provision is the priority.</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>	Not applicable.
<b>7. Requiring good design (paras 56-68)</b>		
<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</li> </ul>	<p>Local Plan design policies cover the principles of the NPPF which are clearly linked to the Vision for the area by creating high quality, well-connected and locally distinctive environments, setting a standard for London as a whole. Policy BN.1 sets out the quality of</p>

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	<p>the area and specific local issues</p>	<p>development which is expected within the area. Policy BN.4 requires residential development to meet the Mayor of London’s Baseline Quality and Design Standards. Policy BN.5 requires inclusive design to maintain quality over the lifetime of developments. BN.10 sets out how proposals for tall buildings will be assessed according to design principles. Policy BN.14 applies good design principals specifically to residential developments and BN.15 to design of advertisements.</p> <p>Sub area policies address specific micro identity conditions, for example, Policies 1.2 and 1.4 which respond to the industrial archaeological heritage of Hackney Wick and Fish Island.</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>Policies within the Local Plan promote community interaction through provision of multi-use community space and social interaction within Policy Cl.1; Policy BN.5 encourages inclusive design through amongst other measures, application of the Corporation’s inclusive design standards. Other design policies listed above seek to promote safe and accessible environments. Housing mix Policy H.1 also promotes balanced and mixed communities, which will maximise social interaction. This will also be achieved on specific sites through the mixed use site allocations.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	<ul style="list-style-type: none"> <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 ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</li> </ul>	As above, Policy CI.1 promotes community interaction through provision of multi-use community space.
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	<ul style="list-style-type: none"> <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>	Policies within the PLP respond to assessment of availability of open space and playspace within the area. Policy BN.7 requires provision of new local open space where deficiencies are identified. Access will be improved through provision of additional publically accessible local open space within this policy. The Local Open Space Review, 2014 within the Natural Environment Background Paper makes a quantitative assessment of requirements. Policy T.6 and specific policies within each of the sub areas protects key connections across the area.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance	<ul style="list-style-type: none"> <li>• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated</li> </ul>	It is not envisaged that the Legacy Communities area contains any publically accessible and developable Greenfield land (i.e. meets para 77 criteria and not already protected by Local Open Space or

## LLDC Soundness Self-Assessment Checklist (November 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>to them – ‘Local Green Space’ (76-78).</p>	<p>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)</p>	<p>Metropolitan Open Land designations) potentially suitable for Local Green Space designation.</p>
<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>Although not strictly applicable. The PLP sets out at Policy BN.6 how the Metropolitan Open Land, which has the same level of protection of the Green Belt will be managed.</p> <p>The policy sets out how development proposals within the MOL will be determined. The Natural Environment Background Paper provides information on how the boundaries have been determined according to criteria.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<b>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</b>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</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 improvements to existing building.</li> <li>• Local requirements for a building’s sustainability which are consistent with the Government’s zero carbon buildings policy . (95))</li> </ul>	<p>Policies within the Local Plan combine to mitigate and adapt to climate change. Strategic Policy SP.5 shows the overarching approach to creation of sustainable and healthy places within the area. Policy S.2 sets out how energy within new developments should reduce carbon dioxide emissions and reduce consumption. Policy S.3 provides support for new, and connections to, energy infrastructure within the area. Policy S.4 requires application of highest standards of sustainable design and construction. Policy S.5 specifies particular water use reduction measures for major schemes. Policy S.6 sets out how waste reduction measures should be applied and Policy S.7 how proposals should be designed to minimise over-heating.</p> <p>Policy S.8 also sets out how flood risk will be minimised and mitigated against.</p>
<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 Legacy Corporation has a positive strategy to maximise energy from renewable and low carbon sources which, as above, is set out within policies S.2 and S.3. Policy S.2 sets out how energy within new developments should reduce carbon dioxide. Policy S.3 provides support for new, and connections to, energy infrastructure within the area. This also shows how the existing infrastructure can be utilised.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Minimise vulnerability to climate change and manage the risk of flooding (99)	<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>	In order to minimise the area's vulnerability to climate change and manage the risk of flooding policies are included within the local Plan on flood risk. Policy S.8 shows how flood risk is managed as well as how development form is influenced by location. The Sites Report, 2014 provides further information on the sequential and exceptions tests for the allocated sites.
Take account of marine planning (105)	<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>	Not applicable.
Manage risk from coastal change (106)	<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</li> </ul>	Not applicable.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	appropriate.	
<b>11. Conserving and enhancing the natural environment (paras 109-125)</b>		
Protect valued landscapes (109)	<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>	The Legacy Corporation seeks to protect and enhance green infrastructure and biodiversity networks within its area. This is achieved through the following Local Plan policies. Policy BN.2 optimises the functions of the waterways including biodiversity value and BN.3 seeks to maximise biodiversity, while BN.7 protects Local Open Space as a green infrastructure as well as recreational resource.
Prevent unacceptable risks from pollution and land instability (109)	<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>	Policy BN.13 seeks to prevent unacceptable risks from pollution and land instability through specific development requirements.
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	<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>	In order to minimise impacts on biodiversity the Legacy Corporation seeks to protect and enhance green infrastructure networks and biodiversity through Policy BN.2 and BN.3. Policy BN.12 protects archaeological remains within the area.
<b>12. Conserving and enhancing the historic environment (paras 126-141)</b>		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	<ul style="list-style-type: none"> <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> </ul>	The Legacy Corporation has a positive strategy for the conservation and enjoyment of the historic environment, based upon a clear understanding of the heritage assets present within the area. The Strategic Policy SP.3 sets out the overall strategy for integrating

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <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>the built with the natural environment within the area. Policy BN.16 sets out how the heritage assets within the area will be preserved or enhanced. The Built Environment Background Paper gives further information on the local listing review that is underway and the Conservation Areas are shown on the Proposals Map.</p> <p>Based on an in depth understanding of the character of the area, Policies 1.2 and 1.4 set out specific considerations within Hackney Wick and Fish Island, and Policy 4.4 within Three Mills Island and Sugar House Lane. These policies take account of the special architectural and historic interest of these areas.</p>
<b>13. Facilitating the sustainable use of minerals (paras 142-149)</b>		
<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>Account has been taken of the requirements of the NPPF. Although the area does not have any sources of minerals or aggregates, sites are safeguarded for uses which include aggregates distribution at Bow Goods Yard East (Cluster B.1a3) and Bow Goods Yard West (Cluster B.1a2).</p>
<p><b>Justified:</b> The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</p>		

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>The Statement of Community Involvement was adopted in March 2013. Consultation on the Local Plan has been carried out in accordance with the commitments within the SCI.</p> <p>The Consultation Reports produced for each stage of consultation set out how consultation has taken place including when, with whom and how it has influenced the plan, and how efforts were made to increase the engagement with hard to reach groups.</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</li> </ul>	<p>Core documents contain the main studies, evidence base documents and technical papers used for the preparation of the Local Plan. Reports have primarily been produced by consultants on behalf of the Legacy Corporation, which are all referenced and dated. Due to the short lifetime of the organisation all these documents are new and up-to-date. The evidence base is support of the London Plan and the adopted planning policies of the boroughs have also been used in some cases, which all have their respective dates.</p> <p>Chapter 2 of the PLP, supported by further detail within the Spatial Portrait Background Paper provide evidence of how the main issues facing the area have influenced the Vision and Objectives within the Local Plan. These have also directly influenced the inclusion of policies.</p> <p>Throughout each of the sections the evidence used to formulate the policies has been referenced. The Background Papers (Business, Housing, Built Environment, Natural Environment and Transport) also provide further detail of how the evidence has influenced policy. For example, the Business Survey, 2014 and the Employment Land Review, 2014 are key pieces of evidence for the</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>preferences.</p> <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>employment policy B.1 which is specifically referenced within page 24 of the Plan.</p> <p>The Sustainability Appraisal Scoping Report, 2013 also sets out how the main issues identified within the appraisal have influenced the sustainability framework and assessment and development of plan policies.</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</li> </ul>	<p>Both the Sustainability Appraisal 2013 and 2014 set out how the main alternatives to the adopted strategy were assessed, and how the approach is the most appropriate strategy taking all relevant considerations into account. The 2014 SA also shows how the SA process has influenced the development of the Plan. Appendix E and Section 3 of the Sustainability Appraisal, 2014 sets out the alternatives for each policy area considered within the Plan-making process.</p> <p>The various background papers show how the evidence has been developed into policy, including how policy decisions were made. Appendices 9, 10 and 11 of the Consultation Report, 2014 show how consultation responses have been taken into account and changes made at each stage of plan-preparation.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.</p>	
<p><b>Effective:</b> <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></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</li> </ul>	<p>Section 14 of the Local Plan sets out how the plan will be delivered including monitoring information and Appendix 2 sets out timing of housing delivery within the area.</p> <p>Support of relevant agencies has been achieved through engagement as part of the development of the Infrastructure Delivery Plan. The Environment Agency has inputted into the sequential and exception tests within the Sites Report.</p> <p>The LDS sets out the scope and content of the Local Plan.</p> <p>Section 3 shows linkages between the organisation's aims and the Objectives within the plan which in turn directly relate to each topic section of the Plan. Section 14 shows the direct linkages between infrastructure delivery and the policies, as well as monitoring and the objectives/topic sections. Separation of the topics by objective policy means a direct relationship can be</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>how they combine to provide a coherent policy structure.</p> <ul style="list-style-type: none"> <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>demonstrated.</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>The infrastructure implications of the policies have been clearly demonstrated within Section 14 of the Plan. The Infrastructure Delivery Plan sets out requirements, based upon expected delivery, agencies responsible for delivery, costs and phasing. As above, the policies seeking to provide for these requirements are clearly linked in Section 14. The CIL schedule shows what projects are to be funded through the levy.</p> <p>The Combined Policies Viability Study ensures policies do not place unviable burdens on developers and the Community Infrastructure Levy and Affordable Housing testing also assess viability impacts of CIL charges and affordable housing thresholds.</p> <p>Policies within the plan also ensure that impacts of development on existing infrastructure are mitigated against, in particular those relating to transport within Section 7.</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 for the area is the spatial representation of the aims of the organisation integrated with the Strategic Regeneration Framework for east London, 2009 and 2011.</p> <p>The Local Plan embraces the concept of spatial planning by setting out a clear Vision for the area in Section 3 linked to the SRF (shown in Appendix 1) and the organisation's Ten Year Plan but also to the strategic objectives and policies within the plan itself. Policy development has been based upon evidence, community</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>engagement and sustainability appraisal outcomes. The Local Plan reflects the policies and programmes of its delivery arm as well as its partner organisations in its policies and infrastructure delivery plan. It also sets out policies which go beyond traditional land use planning by ensuring that the life chances and opportunities of communities are maximised, for example local access to skills and employment training through Policy B.5 and S.1 with regard to health and well-being.</p> <p>The Legacy Corporation also has regeneration and real estate functions, which have influence on the nature of places. These strategies and projects are drawn together and integrated with the Local Plan.</p>
<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</li> </ul>	<p>The Local Plan has a great deal of flexibility integrated within it. As above, the strategy within the Plan strikes an appropriate balance between economic growth, housing and infrastructure delivery and environmental protection, which is flexible to change by not relying solely on one particular element. The approach to delivery which includes private sector investment and the work of other bodies, alongside the Legacy Corporation's own delivery arm ensures that it is in a position to rapidly respond to change ensuring flexibility is maximised.</p> <p>Many policies already have a great deal of flexibility within them to enable a response without the need for a review of planning policy, for example Policy H.2 and the approach to affordable housing which considers past delivery rates as a factor in decisions.</p> <p>The monitoring framework of the Local Plan will ensure that a rapid response can be made to the identification of adverse trends if necessary. Where a negative or unexpected impact is identified within the AMR the Legacy Corporation will assess whether it is appropriate to take action, review policies or consider alternative strategies. Section 4 of the Sustainability Appraisal also sets out</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>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</p> <ul style="list-style-type: none"> <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>the monitoring framework.</p> <p>Table 10 within Section 14 of the Local Plan sets out how the Local Plan and its impacts will be monitored. Through this process indicators of success will be determined, and actions such as policy review or management processes put into place where adjustment is required.</p>
<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</li> </ul>	<p>The Legacy Corporation considers that that it has sufficient information to demonstrate how it has complied with the duty to cooperate. The Duty-to-Cooperate Background Paper sets out a statement of how strategic issues have been addressed. This sets out the formal consultation arrangements and the policy outcomes of on-going engagement with the Growth Boroughs and other bodies such as the Lee Valley Regional Park Authority and Transport for London.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>understanding; aligned or joint core strategies and liaison with other consultees as appropriate.</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 measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</li> <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>	<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 information on the delivery of policies</li> <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>The Local Plan contains a number of targets and milestones, as well as monitoring framework to ensure delivery. Policy SP.2 sets out the housing target within SP.2, and the housing trajectory on page 44 shows how this is to be delivered over the timescale of the Local Plan. Appendix 2 provides information on the delivery of key sites as well as estimated capacity within the area. The Housing Background Paper provides further information of how this target is to be met, with a degree of flexibility. As above there is also flexibility in the policy in terms of the delivery of affordable housing units. The Business Background Paper also gives some indication of phasing of redevelopment of industrial land.</p> <p>The targets will be measured by the monitoring framework set out within Section 14 of the Plan. This will also be used to monitor the sustainability impacts of the Plan.</p> <p>The Authority Monitoring Report will, on an annual basis, monitor the performance of the indicators, highlighting performance against the targets. If it identified that Local Plan targets are not being met the Legacy Corporation will determine whether policies need to be reviewed or management processes put into place. The Legacy Corporation also regularly inputs and updates information within the London Development Database for quarterly updates on housing delivery.</p>
<p><b><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></b></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</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</li> </ul>	<p>Policies within the Local Plan are consistent with the NPPF. The NPPF is referenced where appropriate throughout the Local Plan, the principles of which have been applied to policies without</p>

## LLDC Soundness Self-Assessment Checklist (November 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>justification?</p> <ul style="list-style-type: none"> <li>• Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?</li> </ul>	<p>reasons.</p> <ul style="list-style-type: none"> <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>repetition. Additionally, to avoid repetition with the London Plan, references to the relevant policy have been included.</p> <p>All policies have been developed from the issues identified through the plan-preparation process, wider strategic considerations, public consultation and the outcomes of the sustainability appraisals so are locally specific and representative.</p> <p>The Consultation Report shows how responses have influenced the development of the Plan while the sustainability appraisal shows how sustainability considerations have been taken into account.</p>

# LLDC Soundness Self-Assessment Checklist (November 2014)

## 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

## LLDC Soundness Self-Assessment Checklist (November 2014)

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>Engagement with the traveller community and representatives of these communities has taken place at each stage of the Plan preparation process. Responses have been received and meetings taken place with these representatives. Information within these responses were key considerations for the matters and sites considered within Gypsy and Traveller Accommodation Assessment, 2014 and the Gypsy and Traveller Site Assessment, 2014.</p> <p>Engagement also took place with these communities as part of both of these studies which included qualitative research interviews with occupants of the only existing site within the area and attempts were made to contact those gypsies and travellers living in bricks and mortar. In addition, views were sought from the London Gypsy and Traveller Unit (LGTU).</p>
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</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 plan.</li> <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>The Legacy Corporation has demonstrated a clear understanding of the likely needs of gypsy and traveller communities, engaged in a proportionate manner and worked collaboratively with other local planning authorities. As above, engagement has taken place with gypsy and traveller communities and their representatives through the plan preparation as well as through the development of the evidence base. Through the development of this evidence base the Legacy Corporation has a clear understanding of the needs of the communities over the plan period.</p> <p>Gypsy and traveller provision has been the subject of duty-to-cooperate discussions with the Growth boroughs, with</p>

## LLDC Soundness Self-Assessment Checklist (November 2014)

Policy Expectations	Possible Evidence	Evidence Provided
		<p>particular dialogue taking place with LB Hackney where the needs arise within the area.</p> <p>Evidence on specific, phased requirements is contained within the Gypsy and Traveller Accommodation Assessment, 2014.</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>The pitch target, based upon evidence within the Gypsy and Traveller Accommodation Assessment is contained within paragraph 5.25 on page 56 of the Plan and a site is allocated at SA1.9 at Bartrip Street South to meet a proportion of these needs. This allocation ensures a supply of site of between 3.5 and 7.5 years.</p> <p>Broad locations for growth are not possible; however the Legacy Corporation makes a further commitment to work collaboratively with Growth boroughs to ensure the sub-regional requirements are met.</p> <p>Policy H.5 sets out criteria which has guided the allocation and will be used for any subsequent proposals. These criteria ensure that new sites are economically, socially and environmentally sustainable.</p>
<p><b>Policy C: Sites in rural areas and the countryside (para 12)</b></p>		
<p>When assessing the suitability of sites in rural</p>		<p>Not applicable.</p>

## LLDC Soundness Self-Assessment Checklist (November 2014)

Policy Expectations	Possible Evidence	Evidence Provided
or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		
<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>		
Local planning authorities should consider, wherever possible, including traveller sites	<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</li> </ul>	The site allocation made at Bartrip Street is not for a mix of uses, however Policy H.5 which will be used to assess any other potential sites within the area does not preclude gypsy



## LLDC Soundness Self-Assessment Checklist (November 2014)

Policy Expectations	Possible Evidence	Evidence Provided
suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	<p>the occupants and neighbouring residents), or separate sites in close proximity to one another.</p> <ul style="list-style-type: none"> <li>• N.B. Mixed use should not be permitted on rural exception sites</li> </ul>	and traveller accommodation as part of a mixed use development.
<b>Policy G: Major development projects (para 19)</b>		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	<ul style="list-style-type: none"> <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>	There are no proposals within the area which will involve relocation of existing gypsy and traveller accommodation. Policy h.5 however does safeguard existing gypsy and traveller accommodation so should this be the case in the future the accommodation would need to be re-provided.

## Soundness Self-Assessment Checklist

Integration of marine and terrestrial planning

## LLDC Soundness Self-Assessment Checklist (November 2014)

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

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

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

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

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

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

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

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

## LLDC Soundness Self-Assessment Checklist (November 2014)

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all<sup>1</sup> public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions<sup>2</sup>

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

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

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

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

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

## LLDC Soundness Self-Assessment Checklist (November 2014)

Policy Expectations	Possible Evidence	Evidence Provided
<b>Key requirements under the Duty to Co-Operate</b>		
Consistency between marine and terrestrial policy documents and guidance	<ul style="list-style-type: none"> <li>• Demonstration of consistency of aim between relevant local plan policies and marine policy documents (i.e. the MPS and any relevant adopted marine plans)</li> <li>• Proof of collaborative working with the MMO and that the MPS has been taken into account.</li> </ul>	Not applicable.
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	<ul style="list-style-type: none"> <li>• Early and effective policy development engagement undertaken, including discussions with the MMO</li> <li>• Evidence of iteration of policies and plans as a result of engagement with the MMO</li> <li>• Evidence of engagement with the MMO in relation to monitoring, implementation and throughout the policy cycle</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	Not applicable.
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	<ul style="list-style-type: none"> <li>• Evidence that the LPA has shared or provided relevant data to the MMO that can help inform Marine Plans or MPS review</li> <li>• Demonstration that local plan policy has been underpinned by data provided by the MMO or the MPS</li> <li>• Explicit cross-referencing in local plan to MPS, the MMO, their roles, and relevant marine plans</li> </ul>	Not applicable.

## LLDC Soundness Self-Assessment Checklist (November 2014)

Policy Expectations	Possible Evidence	Evidence Provided
<b>Marine Policy Statement- Chapter 2: General Principles for Decision-Making<sup>3</sup></b>		
<b>Sections 2.1 -2.2: The UK vision for the marine environment</b>		
<p>The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')</p> <p>Achieving the vision through marine planning</p>	<ul style="list-style-type: none"> <li>• Reference in DPD where appropriate to UK vision for the marine environment</li> <li>• Contribution to the vision through local plan policies and supporting text</li> </ul>	Not applicable.
<b>Section 2.4: Considering benefits and adverse effects in marine planning</b>		
<p>Consider benefits and adverse effects of plan policies</p>	<ul style="list-style-type: none"> <li>• Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal</li> </ul>	Not applicable.
<b>Section 2.5: Economic, social and environmental considerations</b>	<ul style="list-style-type: none"> <li>•</li> </ul>	
<p>Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water</p>	<ul style="list-style-type: none"> <li>• Reference to relevant EU Directives in DPD and sustainability appraisal</li> <li>• Consideration of contribution of DPD policies to the objectives of</li> </ul>	Not applicable.

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

## LLDC Soundness Self-Assessment Checklist (November 2014)

Policy Expectations	Possible Evidence	Evidence Provided
Framework Directive)	relevant EU Directives	
<b>Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities</b>		
<b>3.1 Marine Protected Areas</b>		
<p>Incorporate identified areas and features of importance for nature conservation</p> <p>Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts</p>	<ul style="list-style-type: none"> <li>• Identification of relevant areas and features of importance for nature conservation within relevant marine plan area(s)</li> <li>• Consideration of impacts of policy and/or terrestrial development on those areas and features of importance</li> <li>• Measures to mitigate, monitor and manage negative impacts on those areas and features of importance</li> </ul>	Not applicable.
<b>3.4 Ports and shipping</b>		
<p>Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety</p> <p>Protect the efficiency and resilience of continuing port operations</p>	<ul style="list-style-type: none"> <li>• Evidence that policy with potential impact on ports and shipping minimises negative impacts on sector</li> <li>• Where relevant, evidence that economic, employment and transport policies are protective of ports and shipping sector</li> </ul>	Not applicable.
<b>3.8 Fisheries</b>		
<p>Consider potential economic, social and environmental impacts of other developments on fishing activity</p>	<ul style="list-style-type: none"> <li>• Where relevant, evidence that other policies minimise negative impacts on fishing activity and/or aquaculture</li> </ul>	Not applicable.
<b>3.9 Aquaculture</b>		

## LLDC Soundness Self-Assessment Checklist (November 2014)

Policy Expectations	Possible Evidence	Evidence Provided
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	<ul style="list-style-type: none"> <li>Where relevant, evidence that the benefits of aquaculture industry development have been considered</li> </ul>	Not applicable.
<b>3.10 Surface water management and waste water treatment and disposal</b>		
Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment	<ul style="list-style-type: none"> <li>Reference to and consideration of the co-existence of waste water infrastructure with other marine activities, including the potential for waste water infrastructure to mitigate marine impacts through design or location</li> </ul>	Not applicable.
<b>3.11 Tourism and recreation</b>		
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and local communities	<ul style="list-style-type: none"> <li>Where relevant, reference to marine tourism and recreation</li> <li>Evidence that the potential for marine tourism and recreation has been recognised in plan-making</li> </ul>	Not applicable.

### Appendix One

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



## Soundness Self-Assessment Checklist (March 2014)

Adur	Copeland	Huntingdonshire	Preston
Allerdale	Cornwall	Ipswich	Purbeck
Arun	County Durham	Isle of Wight	Redcar and Cleveland
Babergh	Dartford	Isles of Scilly	Richmond upon Thames
Barking and Dagenham	Doncaster	Kensington and Chelsea	Rochford
Barrow-in-Furness	Dover	King's Lynn and West Norfolk	Rother
Basildon	East Cambridgeshire	Lake District National Park	Scarborough
Bassetlaw	East Devon	Lambeth	Sedgemoor
Bexley	East Lindsey	Lancaster	Sefton
Blackpool	East Riding of Yorkshire	Lewes	Selby
Boston	Eastbourne	Lewisham	Shepway
Bournemouth	Eastleigh	Liverpool	South Cambridgeshire
Broadland	Exeter	Maidstone	South Downs National Park
Broads Authority	Exmoor National Park	Maldon	South Gloucestershire
Canterbury	Fareham	Medway	South Hams
Carlisle	Fenland	Middlesbrough	South Holland
Castle Point	Fylde	New Forest	South Lakeland
Chelmsford	Gateshead	New Forest National Park	South Norfolk
Cheshire West and Chester	Gloucester	Newark and Sherwood	South Ribble
Chichester	Gosport	Newcastle upon Tyne	South Somerset
Chorley	Gravesham	Newham	South Tyneside
Christchurch	Great Yarmouth	North Devon	Southend-on-Sea
City of London	Greenwich	North East Lincolnshire	Southwark
City of Brighton and Hove	Halton	North Lincolnshire	Stockton-on-Tees
City of Bristol	Hambleton	North Norfolk	Stroud
City of Kingston upon Hull	Hammersmith and Fulham	North Somerset	Suffolk Coastal
City of Peterborough	Hartlepool	North Tyneside	Sunderland
City of Plymouth	Hastings	North York Moors National Park	Swale
City of Portsmouth	Havant	Northumberland	Taunton Deane
City of Southampton	Havering	Norwich	Teignbridge
City of Westminster	Horsham	Poole	Tending
Colchester	Hounslow		Test Valley



## LLDC Soundness Self-Assessment Checklist (November 2014)

Thanet  
Thurrock  
Tonbridge and Malling  
Torbay  
Torridge  
Tower Hamlets  
Wandsworth  
Warrington  
Waveney  
Wealden  
West Devon  
West Dorset  
West Lancashire  
West Lindsey  
West Somerset  
Weymouth and Portland  
Winchester  
Wirral  
Worthing  
Wyre  
York