

## Soundness Self-Assessment Checklist

*This self-assessment of the draft Revised Local plan (Submission Version) is based on the Planning Advisory Service's Soundness Self-Assessment Checklist with updates to cover the new tests of soundness set out within the NPPF (2018) and the revised Planning Policy for Traveller Sites (August 2015) . Changes made by the Legacy Corporation are shown in red font. The integration of the marine and terrestrial planning section has been omitted as it is not applicable to the Legacy Corporation's area as the river boundaries for the Newham and Tower Hamlets areas are outside the boundary of the Legacy Corporation's area boundary.*

### 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 Legacy Corporation 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 35) "Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:"

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- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

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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<p><i>Positively Prepared:</i> providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p>		

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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 have been well-documented. The concept of ‘Convergence’ stems from the Strategic Regeneration Framework (2009) and its successor the Convergence Framework (2011) (together the 'SRF'). The SRF is therefore key to the purpose of the Legacy Corporation set out within paragraph 3.1 of the Adopted Local Plan and now the Revised Local Plan. More information on the SRF is found in Appendix 1.</p> <p>Although few responses were received in relation to Section 2 of the Adopted Local Plan at Regulation 18 consultation stage, the information contained within Section 2 has been updated to 2018. Section 2 of the Revised Local Plan supplemented by further information provided within the Spatial Portrait Background Paper, 2018 together identify the issues within the area. Section 4 of the IIA Scoping Report, 2017 also sets out the key issues relating to the area which have been taken forward into the 24 sustainability objectives against which the Revised Local Plan has been assessed.</p>

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		<p><b>Relationships between vision, objectives and policies</b></p> <p>Section 3 of the Revised Local Plan 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>Five-Year Strategy, 2016</i>. Paragraph 3.2 sets out the Legacy Corporation's purpose, which is broken down into five focus areas for its strategy and five Objectives. The five Objectives within the Revised Local Plan stem from this Vision.</p> <p>A section of the Revised Local Plan is dedicated to each of the five Objectives (Sections 4, 5, 6, 7 and 8) with the relevant Objective identified at the start of its section. Sections of the Revised Local Plan are also dedicated to each of the four Sub Areas (Sections 10, 11, 12 and 13) each of which contain a Sub Area Vision.</p> <p>Policies within the Revised Local Plan are directly linked to the relevant Objective, clearly demonstrated by their inclusion within the section of the Revised Local Plan to which the Objective relates. Each Objective is relevant to all topics covered in its section, and Table 15 clearly</p>

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		<p>demonstrates how they will be delivered and monitored. Table 14 shows how the policies will deliver the required infrastructure over the plan period.</p> <p><b>Alternatives</b></p> <p>An initial screening within the Integrated Impact Assessment (IIA) took place identifying which policies had significantly changed and required reassessment within the IIA. Appendix D of the IIA sets out the alternatives (non-selected options) for each policy area where a change to the Adopted Local Plan has been proposed within the Revised Local Plan.</p> <p><b>Consistency</b></p> <p>Consistency between the Objectives has been achieved through separation of topic issues. Policies within the Revised Local 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>

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		The Revised 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, 2018.
<p><i>The presumption in favour of sustainable development (NPPF Para 11)</i></p> <p><i>Plans and decisions should apply a presumption in favour of sustainable development.</i></p> <p><i>For plan-making this means that:</i></p> <p><i>a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;</i></p> <p><i>b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</i></p> <p><i>i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</i></p> <p><i>ii. any adverse impacts of doing so would</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 includes a flexible approach to delivery (see 'Section 3 Effective', below).</li> <li>• An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</li> <li>• Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)</li> </ul>	<p><b>Development needs</b></p> <p>The Revised Local Plan is underpinned by evidence on the objectively assessed needs of the area. In particular the quantum of development and the reasons behind the overall strategy and distribution of development within the Legacy Corporation's area are underpinned by evidence including the London SHLAA, 2017; the London SHMA, 2017; the Housing Requirements Study, 2018 (including Gypsy and Traveller Accommodation Assessment); the Combined Economy Study, 2017 (including Employment Land Review, Retail and Town Centre Needs Study; Business Survey; Creative and Cultural Opportunities Assessment); the Infrastructure Delivery Plan, 2018; Transport Study,</p>

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<p><i>significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.</i></p> <p><i>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</i></p> <p><i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</i></p> <ul style="list-style-type: none"> <li><i>—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</i></li> <li><i>—specific policies in this Framework indicate development should be restricted.</i></li> </ul>		<p>2018; Schools Study, 2018, Viability study, 2018; Flood Risk Study and Addendum, 2018; and the Open Space and Play Assessment (2018). The Population Review (2018) and the household projections contained within this provide a basis for these studies above.</p> <p>The strategy within the Revised Local 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 Legacy Corporation's area has been determined by targets developed through the London SHLAA, 2017 and included within the draft New London Plan. Local and strategic evidence has also taken into account needs within the London SHMA, 2017</p>



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		<p>and the Housing Requirements Study, 2018. The 2017 SHLAA (on which the Legacy Corporation worked closely with the GLA) shows the methodology behind this standardised approach to housing targets and how it has been developed across London as a whole. The Housing Table within Appendix 2 of the Revised Local Plan shows the distribution of the housing according to allocations, permissions and additional capacity identified within the SHLAA, with further information provided within the Housing Background Paper, 2018 and the Housing Delivery Explanatory Note, 2019.</p> <p>The Population Review, 2018 includes population projections for the area based upon data from a 2017 Household Survey which have then been used within the above evidence base to determine the demand for, and potential impacts of, growth in community, retail and leisure requirements. Employment requirements have additionally utilised supply and demand and growth scenarios, factoring in the economic growth role of the organisation as a whole and the requirements of new residents.</p>

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<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> <li>• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see <a href="http://www.planningportal.gov.uk">model policy at www.planningportal.gov.uk</a>)</li> </ul>	<p>Policy SD.1 of the Revised Local Plan sets out the Legacy Corporation’s interpretation of presumption in favour of sustainable development.</p>
<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>	<p>The evidence base supporting the Revised Local Plan sets out the objectively assessed needs. This evidence is primarily contained within the Population Review, 2018; London SHLAA, 2017; the London SHMA, 2017; the Housing Requirements Study, 2018 (including Gypsy and Traveller Accommodation Assessment); the Combined Economy Study, 2017 (including Employment Land Review, Retail and Town Centre Needs Study; Business Survey; Creative and Cultural Opportunities Assessment); the Infrastructure Delivery Plan, 2018; Transport Study, 2018; Schools Study, 2018; Viability study, 2018; Flood Risk Study and Addendum, 2018; and the Open Space and Playspace Assessment (2018).</p> <p>The 2018 Background Papers (Housing, Economy, Natural and Built Environment, Infrastructure, Transport, Sites Report and Duty-to-</p>

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		Cooperate) as well as the Housing Delivery Explanatory Note, 2019 demonstrate further how these needs are to be met and how the approach within the Revised Local Plan is related to the evidence.
<b>NPPF Principles: Delivering sustainable development</b>		
<b>Building a strong, competitive economy (paras 80-82)</b>		
<p style="color: red;">Planning policies should:</p> <p style="color: red;">set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration (81a)</p> <p style="color: red;">set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; (81b)</p> <p style="color: red;">seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and (81c)</p> <p style="color: red;">be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances. (81d)</p>	<ul style="list-style-type: none"> <li>• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.</li> </ul>	<p>The Vision in Section 3 of the Revised Local Plan and Strategic Policy SP.1 and its supporting text sets out the clear economic vision and strategy for the area, encouraging sustainable growth. These are clearly linked to the organisation's vision and purposes set out within the Legacy Corporation's Five-Year Strategy (2016).</p> <p>Policy B.1 also sets out the approach to encouraging sustainable economic growth.</p>

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<p style="color: red;">Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations (82)</p>	<ul style="list-style-type: none"> <li>• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</li> <li>• An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)</li> </ul>	<p>The Infrastructure Delivery Plan, 2018 sets out the infrastructure requirements within the area. Table 14 of the Revised Local Plan sets out how the policies and allocations within the plan will help meet these requirements.</p> <p>The Combined Economy Study, 2018 assessed the specific economic requirements of the area, with specific growth scenarios. Policies B.1 and B.2 direct particular economic uses to the Employment Clusters and the town centres.</p> <p>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 Appendix 2 with more detail contained within the Housing Background Paper, 2018 and the Housing Delivery Explanatory Note, 2019. The Business Background Paper also gives some indication of phasing of redevelopment of employment land.</p>

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<p><b>1. Ensuring the vitality of town centres (paras 85-90)</b></p>		
<p style="color: red;">Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation (85).</p>	<ul style="list-style-type: none"> <li>• The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</li> </ul>	<p>Policies within the Revised Local Plan promote positive town centre environments. Linked to Policy B.2, Table 4 sets out the retail hierarchy, the centre boundaries for Stratford, East Village and Hackney Wick are shown on the Policies Map, and on page 43 of the Illustrated version of the Revised Local Plan in the case of Stratford Metropolitan Centre. Table 4 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 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 style="color: red;">Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under</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 Revised Local Plan at SA3.1, SA4.1, SA1.1, SA2.2 and SA4.3.</p> <p>As shown on Figure 6 on page 43 of the illustrated version of the Revised</p>

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review where necessary (85d);		Local Plan, the Stratford Metropolitan Centre boundary includes land outside of the Legacy Corporation's area which is within the planning area of the London Borough of Newham. The figure also shows the location of potential future extension to accommodate further development needs, forming site allocation SA3.2
<b>2. Supporting a prosperous rural economy (para 83-84)</b>		
<p>Planning policies and decisions should enable:</p> <p>a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;</p> <p>b) the development and diversification of agricultural and other land-based rural businesses;</p> <p>c) sustainable rural tourism and leisure developments which respect the character of the countryside; and</p> <p>d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship (83)</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>	Not applicable.
<b>3. Promoting sustainable transport (paras 102-111)</b>		

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<p>Transport issues should be considered from the earliest stages of plan-making and development proposals, (102)</p> <p>The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making (103)</p> <p>Planning policies should:</p> <p>Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities (104a)</p> <p>Be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned (104b)</p> <p>Identify and protect, where there is robust evidence, sites and routes which could be</p>	<ul style="list-style-type: none"> <li>• Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31.</li> <li>• Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35.</li> <li>• A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.</li> <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>Transport issues have been considered from the outset of the preparation of the Revised Local Plan, and supported by evidence within the Transport Study, 2018. The Revised Local Plan aims to facilitate sustainable development and the approach seeks to limit the need to travel. The strategy set out within Section 7 of the Revised Local Plan demonstrates how emphasis is placed on pedestrians and cyclists and then public transport above vehicular transport.</p> <p>The Legacy Corporation has cooperated with adjoining authorities, transport providers and other agencies to deliver a sustainable approach to transport provision.</p> <p>The following policies show how the transport strategy will be implemented:</p> <p>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.</p>

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<p>critical in developing infrastructure to widen transport choice and realise opportunities for large scale development (104c)</p> <p>Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans) (104d)</p> <p>Provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements (104e)</p> <p>Recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy (104f).</p> <p>The setting of local car parking standards including provision for town centres. (105 - 106)</p> <p>Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution</p>		<p>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 which were partially funded through S106 funds.</p> <p>Policy T.3 lends support to appropriate transport schemes within the area.</p> <p>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.</p> <p>Policy T.6 seeks to facilitate local connectivity.</p> <p>Policy T.7 sets out how the development proposal requirements of significant or other relevant schemes.</p> <p>The development parking</p>



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<p style="color: red;">centres should make provision for sufficient lorry parking to cater for their anticipated use (107)</p>		<p>requirements within the draft New London Plan will be applied within the area and are set out within Policy T.8.</p> <p>Policy T.9 shows how pedestrians and cyclists will be provided for through developments.</p> <p>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>Mixed use developments are promoted throughout the Revised Local Plan with consideration of transport accessibility. PTAL is a strong consideration for the density assumptions within the London SHLAA, 2017 and within the Revised Local Plan, housing density of schemes, as shown within para 5.15 and Figure 10, for small sites capacity and location of older persons accommodation. 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.</p> <p>Policy S.1 also requires consideration</p>

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		of access issues to community services and infrastructure, encouraging walking and cycling from a health perspective.
<b>4. Supporting high quality communications infrastructure (paras 112-116)</b>		
<p style="color: red;">Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution) (112)</p> <p style="color: red;">Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development (114)</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 S.6 sets out considerations for increasing digital connectivity, safeguarding existing communications infrastructure and enabling future infrastructure.</p>
<b>5. Delivering a wide choice of high quality housing (paras 59-79)</b>		
<p style="color: red;">Strategic policy-making authorities should have a clear understanding of the land available in</p>	<ul style="list-style-type: none"> <li>• Identification of:               <ol style="list-style-type: none"> <li>a) five years or more supply of specific deliverable sites; plus the</li> </ol> </li> </ul>	<p>Land availability has been assessed by the London SHLAA, 2017. This has</p>

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<p style="color: red;">their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:</p> <p style="color: red;">a) specific, deliverable sites for years one to five of the plan period</p> <p style="color: red;">b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan (67)</p> <p style="color: red;">Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:</p> <p style="color: red;">a) 5% to ensure choice and competition in the market for land; or</p>	<p>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> <li>• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</li> <li>• A housing trajectory</li> <li>• Monitoring of completions and permissions (47)</li> <li>• Updated and managed SHLAA. (47)</li> <li>• Monitor against Housing Delivery Test requirements</li> </ul>	<p>been utilised to identify a sufficient supply and mix of sites. The Viability Study, 2018 has assessed a number of sites for a range of uses and housing mixes to assess their viability.</p> <p>The Housing Trajectory at Figure 9 on and Table 17 within Appendix 2 identify five years supply of housing sites, plus a 5% buffer. Further detail is provided within the Housing Background Paper, 2018 and Housing Delivery Explanatory Note, 2019. The Authority Monitoring Reports are updated annually to demonstrate an annual update of the supply of housing.</p>

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<p>b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan<sup>38</sup>, to account for any fluctuations in the market during that year; or</p> <p>c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply (73).</p> <p>A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:</p> <p>a) has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and</p> <p>b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process (74).</p> <p>To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission (75).</p>		
<p>Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out</p>	<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The Housing Background Paper, 2018 highlights that around 18% of all housing capacity comes from sites of</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>relatively quickly. To promote the development of a good mix of sites local planning authorities should:</p> <p>a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;</p> <p>b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;</p> <p>c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and</p> <p>d) work with developers to encourage the subdivision of large sites where this could help to speed up the delivery of homes (68)</p>		<p>less than one hectare. Policy H.1 also aims to bring forward small sites within the Legacy Corporation's area.</p>
<p>Local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority's area (71)</p>	<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Policy H.2 deals with affordable housing, setting out the Mayor's preferred tenures. This approach allows for intermediate products to come forward within the area.</p> <p>The exception site approach is not applicable within this urban area.</p>
<p>Set out the authority's approach to housing density to reflect local circumstances (47).</p>	<ul style="list-style-type: none"> <li>• Policy on the density of development.</li> </ul>	<p>Policy H.1 sets out how density considerations should be made, in</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		conformity with the London Plan.
<p>To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for (60).</p> <p>Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers<sup>25</sup>, people who rent their homes and people wishing to commission or build their own homes<sup>(61)</sup>).</p> <p>Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:</p> <p>a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and</p> <p>b) the agreed approach contributes to the objective of creating mixed and balanced</p>	<ul style="list-style-type: none"> <li>• Policy on planning for a mix of housing (including self-build, and housing for older people</li> <li>• SHMA</li> <li>• Identification of the size, type, tenure and range of housing required in particular locations, reflecting local demand. (50)</li> <li>• Evidence for housing provision based on up to date, objectively assessed needs. (50)</li> <li>• Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)</li> </ul>	<p>Strategic Policy SP.2 sets out the strategic approach to housing delivery within the area including an annual target. This policy is also supported by housing need information from the London SHMA, 2017 and the Housing Requirements Study, 2018 which utilises the standard methodology.</p> <p>Policy H.1 provides for a mix of housing types within the area to meet identified demand within the London SHMA, 2017 and the Housing Requirements Study. Further information is set out within the Housing Background Paper, 2018. Policies H.3 to H.5 encourage specialist forms of accommodation, 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 and the <a href="#">Housing Requirements Study (2018)</a>.</p> <p>Policy H.2 sets out the approach to affordable housing provision within the area, including how on-site provision is the priority. Policy H.2 also sets out the 10-dwelling threshold for</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>communities (62).</p> <p>Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount (63).</p> <p>Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership<sup>29</sup>, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups (64).</p> <p>Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (65)</p>		affordable housing.
<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</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</li> </ul>	Not applicable.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>where appropriate (77).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities (78).</p>	<p>of residential gardens. (This is discretionary)(para 53)</p> <ul style="list-style-type: none"> <li>• Examples of special circumstances to allow new isolated homes listed at para 79.</li> </ul>	
<p><b>6. Requiring good design (paras 124-132)</b></p>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (125, 126).</p>	<ul style="list-style-type: none"> <li>• Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues</li> </ul>	<p>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 development which is expected within the area. Policy BN.4 requires residential development to meet the design quality standards. Policy BN.6 requires inclusive design to maintain quality over the lifetime of developments. BN.5 sets out how proposals for tall buildings will be assessed according to design principles. Policy BN.15 applies good design principals specifically to residential developments and BN.16 to design of advertisements. BN.17 sets out considerations for conserving and enhancing heritage assets.</p> <p>Sub area policies address specific micro identity conditions, for example, Policies 1.2 which responds to the industrial archaeological heritage of</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Hackney Wick and Fish Island.
<b>7. Promoting healthy communities (paras 91-101)</b>		
<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 (91).</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 Revised Local Plan promote community interaction through provision of multi-use community space and social interaction within Policy CI.1.</p> <p>Policy BN.6 encourages inclusive design through amongst other measures, application of the Corporation’s inclusive design standards. Other design policies in Chapter 6 seek to promote safe and accessible environments. Housing mix Policy H.1 also promotes mixed and inclusive communities, which will maximise social interaction. This will also be achieved on specific sites through the mixed use site allocations.</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (92).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies addressing community facilities and local service.</li> <li>• Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and 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>	<p>As above, Policy CI.1 promotes community interaction through provision of multi-use community space.</p>

## Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate (96).</p>	<ul style="list-style-type: none"> <li>• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)</li> <li>• A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74)</li> <li>• Protection and enhancement of rights of way and access. (75)</li> </ul>	<p>The Open Space and Play Assessment, 2018 provides an up to date assessment of the needs of open and playspace. Policies within the Revised Local Plan respond to assessment of availability of open space and playspace within the area. Policy BN.8 requires provision of new local open space where deficiencies are identified. Access will be improved through provision of additional publicly accessible local open space within this policy. The Local Open Space Review, 2014 within the Built and Natural Environment Background Paper, 2018 makes a quantitative assessment of requirements. Policy T.6 and specific policies within each of the sub areas protects key connections across the area.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (99).</p>	<ul style="list-style-type: none"> <li>• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)</li> </ul>	<p>It is not envisaged that the Legacy Communities area contains any publicly accessible and developable Greenfield land (i.e. which is not already protected by Local Open Space or Metropolitan Open Land designations) potentially suitable for Local Green Space designation.</p>
<p><b>8. Protecting Green Belt land (paras 133-147)</b></p>		
<p>Should plan positively to enhance their beneficial use, such as looking for opportunities</p>	<ul style="list-style-type: none"> <li>• Where Green Belt policies are included, these should reflect the need to:</li> </ul>	<p>Although not strictly applicable. The Revised Local Plan sets out at Policy</p>

## Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p style="color: red;">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 (141).</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. (136)</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. (139)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (139)</p>	<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>	<p>BN.7 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 Built and Natural Environment Background Paper, 2018 provides information on how the boundaries have been determined according to criteria.</p>
<p><b>9. Meeting the challenge of climate change, flooding and coastal change (paras 148-169)</b></p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (149, 155-165)</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 Revised 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.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>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.7 sets out how waste reduction measures should be applied and Policy S.9 how proposals should be designed to minimise over-heating.</p> <p>Policy S.10 and S.11 also set 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. (151)</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>
<p>Minimise vulnerability to climate change and manage the risk of flooding (150)</p>	<ul style="list-style-type: none"> <li>• Account taken of the impacts of climate change. (99)</li> <li>• Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</li> <li>• Policies to manage risk, from a range of impacts, through suitable adaptation measures</li> </ul>	<p>In order to minimise the area’s vulnerability to climate change and manage the risk of flooding policies are included within the Revised local Plan on flood risk. Policies S.10 and S.11 show how flood risk is managed</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		as well as how development form is influenced by location. The Flood Risk Study, 2017 and Addendum, 2018 provides further information on the sequential and exceptions tests for the allocated sites.
Take account of marine planning (166-169)	<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 (166-169)	<ul style="list-style-type: none"> <li>• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas.</li> <li>• Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.</li> </ul>	Not applicable.
<b>10. Conserving and enhancing the natural environment (paras 170-183)</b>		
Protect valued landscapes (170a)	<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:

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Policy BN.2 optimises the functions of the waterways including biodiversity value.</p> <p>BN.3 seeks to maximise biodiversity.</p> <p>BN.8 protects Local Open Space as a green infrastructure as well as recreational resource.</p>
Prevent unacceptable risks from pollution and land instability (170e, 178-183)	<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.14 seeks to prevent unacceptable risks from pollution and land instability through specific development requirements. BN.11 and BN.12 also cover matters relating to air quality and noise pollution.
<p>Planning policies should minimise impacts on biodiversity and geodiversity (174)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (174-177)</p>	<ul style="list-style-type: none"> <li>Identification and mapping of local ecological networks and geological conservation interests.</li> <li>Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species</li> </ul>	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.13 protects archaeological remains within the area.
<b>11. Conserving and enhancing the historic environment (paras 184-202)</b>		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (185)	<ul style="list-style-type: none"> <li>A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</li> <li>A map/register of historic assets</li> </ul>	The Legacy Corporation has a positive strategy for the conservation and enjoyment of the historic environment, based upon a clear

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</li> </ul>	<p>understanding of the heritage assets present within the area. The Strategic Policy SP.3 sets out the overall strategy for integrating the built with the natural environment within the area. Policy BN.17 sets out how the heritage assets within the area will be preserved or enhanced. The Built and Natural Environment Background Paper, 2018 gives further information on the local listing review that is underway and the Conservation Areas are shown on the Policies Map. Based on an in depth understanding of the character of the area, Policy 1.2 sets out specific considerations within Hackney Wick and Fish Island which takes account of the special architectural and historic interest of this area.</p>
<p><b>12. Facilitating the sustainable use of minerals (paras 202-211)</b></p>		
<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 (203)</p> <p>Minerals planning authorities should plan for a</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). Site Allocation SA4.5 also deals with the</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
steady and adequate supply of industrial materials (208)		Bow Goods Yard sites.
<p><b>Justified:</b> an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> <li>• <del>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.</del></li> <li>• <del>The most appropriate strategy when considered against reasonable alternatives.</del></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 February 2017. Consultation on the Revised Local Plan has been carried out in accordance with the commitments within the SCI.</p> <p>The Consultation Report, 2019 sets out how consultation has taken place including when, with whom and how it has influenced the Revised Local 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>	<p>The core documents contain the main studies, evidence base documents and technical papers used for the preparation of the Revised Local Plan. Reports have primarily been produced by consultants on behalf of the Legacy Corporation, which are all referenced and dated. The evidence is all up to date. The evidence base in support of</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).</li> </ul>	<p>the draft New London Plan has also been used in particular with respect to housing (ie the SHMA, 2017 and the SHLAA, 2017).</p> <p>Section 2 of the Revised Local Plan, supported by further detail within the Spatial Portrait Background Paper, 2018 provide evidence of how the main issues facing the area have influenced the Vision and Objectives within the Revised Local Plan. These have also directly influenced the inclusion of policies.</p> <p>The evidence used to formulate the policies in each section of the Revised Local Plan has been referenced at the end of the relevant section. The other Background Papers (Economy, Housing, Built Environment and Natural Environment and Transport) provide further detail of how the evidence has influenced policy. For example, the Combined Economy Study, 2018 is a key piece of evidence for the employment policy B.1 which is specifically referenced in Section 4.</p> <p>The Integrated Impact Assessment, 2018 sets out how the main issues identified as part of the sustainability appraisal have influenced the sustainability framework and</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		assessment and development of Revised Local Plan policies.
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA’s chosen approach is <b>an appropriate strategy</b> given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> <li>• Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</li> <li>• An audit trail of how the evidence base, consultation and SA have influenced the plan.</li> <li>• Sections of the SA Report showing the assessment of options and alternatives.</li> <li>• Reports on how decisions on the inclusion of policy were made.</li> <li>• Sections of the consultation document demonstrating how options were developed and appraised.</li> <li>• Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.</li> </ul>	<p>The IIA, 2018 set out how the main alternatives to the adopted strategy have been assessed, and how the approach is the most appropriate strategy taking all relevant considerations into account. Section 8 of the IIA shows how the process (including SA process) has influenced the development of the Revised Local Plan. Appendix D 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. Appendix 1 of the Consultation Report, 2019 shows how consultation responses have been taken into account and changes made at each stage of plan-preparation.</p>
<p><b>Effective:</b> deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground</p> <p>To be ‘effective’ a DPD needs to:</p>		

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> <li>• Be deliverable</li> <li>• Demonstrate sound infrastructure delivery planning</li> <li>• Have no regulatory or national planning barriers to its delivery</li> <li>• Have delivery partners who are signed up to it</li> <li>• Be coherent with the strategies of neighbouring authorities</li> <li>• Demonstrate how the Duty to Co-operate has been fulfilled</li> <li>• Be flexible</li> <li>• Be able to be monitored</li> </ul>		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> <li>• Is it clear how the policies will meet the Plan’s vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</li> <li>• Are the policies internally consistent?</li> <li>• Are there realistic timescales related to the objectives?</li> <li>• Does the DPD explain how its key policy objectives will be achieved?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans).</li> <li>• Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> <li>• Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).</li> </ul>	<p>Section 14 of the Revised Local Plan sets out how the plan will be delivered and monitored. Appendix 2 sets out timing of housing delivery within the area.</p> <p>The Legacy Corporation has worked with various bodies as part of the development of the Infrastructure Delivery Plan, 2018.</p> <p>The LDS, 2017 sets out the scope and content of the Revised Local Plan.</p> <p>Section 3 shows linkages between the organisation’s aims and the Objectives within the Revised Local 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</p>

## Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>objectives/topic sections. Separation of the section topics with reference to each of the five Objectives means a direct relationship can be demonstrated. There are no gaps having regard to the Objectives.</p> <p>Policies within the Revised Local 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><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, 2018 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 draft Regulation 123 list in support of the draft revised CIL charging schedule shows what projects are to be funded through the levy.</p> <p>The Local Plan Viability Study, 2018 ensures policies do not place unviable burdens on developers. It also assesses viability impacts of CIL</p>

## Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>charges and affordable housing thresholds.</p> <p>Policies within the Revised Local Plan also ensure that impacts of development on existing infrastructure are mitigated, 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 Revised Local Plan is the spatial representation of the aims of the Legacy Corporation, as set out in the Strategic Regeneration Framework (2009) and its successor the Convergence Framework (2011) (together the 'SRF').</p> <p>The Revised 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 Legacy Corporation's Five Year Strategy. Policy development has been based upon evidence, community engagement and sustainability appraisal outcomes. The Revised Local Plan reflects the policies and programmes of its delivery arm as well as its partner organisations in its policies within the Infrastructure Delivery Plan. It also sets out policies which go beyond traditional land use</p>

## Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>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 Policy S.1 with regard to health and well-being.</p> <p>The Legacy Corporation also has regeneration and development functions, which have influence on the nature of places. These strategies and projects are drawn together and integrated with the Revised 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 possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</li> </ul>	<p>The Revised Local Plan has a great deal of flexibility integrated within it. As above, the strategy within the Revised Local 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</p>

## Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<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>deal of flexibility within them to enable a response without the need for a review of planning policy, for example Policy H.2 contains flexibility in relation to affordable housing viability routes.</p> <p>The monitoring framework set out within Table 15 within Section 14 of the Revised 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 Authority Monitoring Report the Legacy Corporation will assess whether it is appropriate to take action, review policies or consider alternative strategies. Section 8 of the IIA also sets out the monitoring framework.</p> <p>Table 15 sets out how the Revised 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</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</li> </ul>	<p>The Legacy Corporation considers that that it has sufficient information to demonstrate how it has complied with</p>

## Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>undertaken appropriately for the plan being examined?</p> <ul style="list-style-type: none"> <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>	<p>arrangements have been considered, what decisions were reached and why.</p> <ul style="list-style-type: none"> <li>• The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.</li> </ul>	<p>the duty to cooperate. The Duty-to-Cooperate Background Paper, 2018 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 four Boroughs and other bodies such as the Lee Valley Regional Park Authority and Transport for London.</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 Revised Local Plan contains several 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 at Figure 9 shows how this is to be delivered over the timescale of the Revised Local Plan. Appendix 2 provides information on the delivery of key sites as well as estimated capacity within the area. The Housing Background Paper, 2018 provides further information of how this target is to be met, with a degree of flexibility.</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 Revised Local Plan.</p>



## Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The Authority Monitoring Reports currently monitor the performance of the indicators, highlighting performance against current the targets contained within the Adopted Local Plan. This will continue following adoption of the Revised Local Plan. If an AMR identifies that 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: enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy 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 justification?</li> <li>• Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons.</li> <li>• Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy.</li> <li>• Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement.</li> <li>• Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement</li> <li>• Reports or copies of correspondence as to how representations</li> </ul>	<p>Policies within the Revised Local Plan are consistent with the NPPF. The NPPF is referenced where appropriate throughout the Revised Local Plan, the principles of which have been applied to policies without repetition. Additionally, to avoid repetition with the draft New London Plan, references to the relevant policy have been included.</p> <p>All policies have been developed from</p>

## Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	have been considered and dealt with.	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.  The Consultation Report, 2019 shows how responses have influenced the development of the Revised Local Plan while the sustainability appraisal shows how sustainability considerations have been taken into account.

# Soundness Self-Assessment Checklist

## Planning policy for traveller sites

**Planning Policy for Traveller Sites was updated in August 2015.** 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:

- a. that local planning authorities should make their own assessment of need for the purposes of planning
- b. to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- c. to encourage local planning authorities to plan for sites over a reasonable timescale
- d. that plan-making and decision-taking should protect Green Belt from inappropriate development
- e. to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites
- f. that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective
- g. for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies
- h. to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- i. to reduce tensions between settled and traveller communities in plan-making and planning decisions

## Soundness Self-Assessment Checklist

j. to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure

k. for local planning authorities to have due regard to the protection of local amenity and local environment

Policy Expectations	Possible Evidence	Evidence Provided
<p><b>Policy A: Using evidence to plan positively and manage development (para 7)</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 Revised Local Plan preparation process. Meetings took place with community representatives at the early stage of evidence base preparation and community outreach methods conducted utilised within the methodology. Responses were received at the Regulation 18 stage.</p> <p>Engagement also took place with these communities as part of both of these studies which included qualitative research interviews with occupants of</p>

## Soundness Self-Assessment Checklist

Policy Expectations	Possible Evidence	Evidence Provided
		<p>the only existing site within the Legacy Corporation's area and attempts were made to contact those gypsies and travellers living in bricks and mortar.</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> </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>

## Soundness Self-Assessment Checklist

Policy Expectations	Possible Evidence	Evidence Provided
		particular dialogue taking place with LB Hackney where the needs arise within the area.
<p>Use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.</p>	<ul style="list-style-type: none"> <li>A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.</li> </ul>	<p>Evidence on specific, phased requirements is contained within the Housing Requirements Study, 2018; the Housing Background Paper, 2018 and the Housing Delivery Explanatory Note, 2019.</p>
<p><b>Policy B: Planning for traveller sites (paras 8-13)</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, including a five year land supply for pitches and potential locations thereafter.</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 Housing Requirements Study, is contained within paragraph 5.34 of the Revised Local Plan and a site is allocated at SA1.7 at Bartrip Street South to meet a proportion of these needs. This allocation ensures a supply of up to 9 pitches.</p> <p>Broad locations for growth are not possible; however the Legacy Corporation makes a</p>

## Soundness Self-Assessment Checklist

Policy Expectations	Possible Evidence	Evidence Provided
		<p>further commitment to work collaboratively with four 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 14)</b></p>		
<p>When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.</p>		<p>Not applicable.</p>
<p><b>Policy D: Rural exception sites (para 15)</b></p>		
<p>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.</p>	<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>	<p>Not applicable.</p>

## Soundness Self-Assessment Checklist

Policy Expectations	Possible Evidence	Evidence Provided
<p><b>Policy E: Traveller sites in Green Belt (paras 16-17)</b></p>		
<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>	<p>Not applicable.</p>
<p><b>Policy F: Mixed planning use traveller sites (paras 18-20)</b></p>		
<p>Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.</p>	<ul style="list-style-type: none"> <li>Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another.</li> <li>N.B. Mixed use should not be permitted on rural exception sites</li> </ul>	<p>The site allocation made at Bartrip Street (SA1.7) 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 and traveller accommodation as part of a mixed use development.</p>
<p><b>Policy G: Major development projects (para 21)</b></p>		



## Soundness Self-Assessment Checklist

Policy Expectations	Possible Evidence	Evidence Provided
<p>Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.</p>	<ul style="list-style-type: none"> <li>Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.</li> </ul>	<p>There are 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.</p>

## Soundness Self-Assessment Checklist

### Integration of marine and terrestrial planning

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

## Soundness Self-Assessment Checklist

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.

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

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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.

## Soundness Self-Assessment Checklist

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

## Soundness Self-Assessment Checklist

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</li> </ul>	Not applicable.

## Soundness Self-Assessment Checklist

Policy Expectations	Possible Evidence	Evidence Provided
	roles, and relevant marine plans	
<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>		
The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')  Achieving the vision through marine planning	<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>		
Consider benefits and adverse effects of plan policies	<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>	
Contribute to the objectives of relevant	<ul style="list-style-type: none"> <li>Reference to relevant EU Directives in DPD and sustainability</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.

## Soundness Self-Assessment Checklist

Policy Expectations	Possible Evidence	Evidence Provided
EU Directives (Marine Strategy Framework Directive and Water Framework Directive)	appraisal <ul style="list-style-type: none"> <li>• Consideration of contribution of DPD policies to the objectives of relevant EU Directives</li> </ul>	
<b>Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities</b>		
<b>3.1 Marine Protected Areas</b>		
Incorporate identified areas and features of importance for nature conservation  Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts	<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>		
Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety  Protect the efficiency and resilience of continuing port operations	<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>		
Consider potential economic, social	<ul style="list-style-type: none"> <li>• Where relevant, evidence that other policies minimise negative</li> </ul>	Not applicable.

## Soundness Self-Assessment Checklist

Policy Expectations	Possible Evidence	Evidence Provided
and environmental impacts of other developments on fishing activity	impacts on fishing activity and/or aquaculture	
<b>3.9 Aquaculture</b>		
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.

# Soundness Self-Assessment Checklist

## Appendix One

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

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



## Soundness Self-Assessment Checklist

Stroud  
Suffolk Coastal  
Sunderland  
Swale  
Taunton Deane  
Teignbridge  
Tendring  
Test Valley  
Thanet  
Thurrock  
Tonbridge and Malling  
Torbay  
Torrige  
Tower Hamlets  
Wandsworth  
Warrington  
Waveney  
Wealden  
West Devon  
West Dorset  
West Lancashire  
West Lindsey  
West Somerset  
Weymouth and Portland  
Winchester  
Wirral  
Worthing  
Wyre  
York