L.B. Hillingdon Soundness Self-Assessment Checklist (April 2018)

The checklist provided by the Planning Advisory Service has been used as a template for the soundness self-assessment for the Local Plan. A separate checklist looks at legal compliance.

In summary – the key requirements of plan preparation are:

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

The Tests of Soundness at Examination

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

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

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

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

2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence This means that the DPD should be based on a robust and credible evidence base, involving:

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

Evidence of participation of the local community and others having a stake in the area.

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

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

This means the Local Plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- delivery partners who are signed up to it;
- coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- being flexible and capable of being monitored.

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

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

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy: www.planningportal.gov.uk). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. In addition, the Legal Compliance checklist has been completed to ensure that this aspect is covered.

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

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	based on a strategy which seeks to meet objectively assessed developme authorities where it is reasonable to do so and consistent with achieving	
Wision and Objectives 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? 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? 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? Have reasonable alternatives to the quantum of development and overall spatial strategy been considered? Are the policies internally consistent? Are there realistic timescales related to the objectives? Does the DPD explain how its key policy objectives will be achieved?	 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. Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. 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. Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. 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. 	Section 1 of the Part 2 - Development Management Policies gives an overview of the Local Plan process and the wider policy context in which it sits. It identifies how many new homes, jobs and services are needed to support an enlarged population, and locations in the borough where growth and change will occur. Local Plan Part 1 sets out a series of strategic objectives which outline what will need to be achieved to deliver the Local Plan's strategic vision. The strategic objectives also show the key sustainability issues facing the borough, as identified in the Sustainability Appraisal, will be addressed. Part 2 sets criteria based policies to help acheive these. Reasonable alternatives were considered as part of the Sustainability Appraisal (SA) process. SA is an iterative part of the plan making process. SA was carried out simultaneously alongside the preparation of the Plan and informed the consideration of alternatives and options, as well as making decisions on the final policy direction.
The presumption in favour of sustainable	• An evidence base which establishes the development needs of the	The Local Plan evidence base has

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - specific policies in this Framework indicate development should be restricted.	 plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective', below). An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area) 	informed the objectively assessed needs of the plan area. The Sustainability Appraisal demonstrates that the Council's proposed strategy is the most sustainable approach.
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.	A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk)	The Local Plan has been prepared in accordance with the NPPF. As such, the policies follow the approach of the presumption in favour for sustainable development. The Sustainabilty Appraisal demonstrates that the Council's overall approach is considered to be the most sustainable.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Objectively assessed needs The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	 Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. 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. 	The Local Plan seeks to make effective use of land. Key evidence base documents set out the borough's objectively assessed needs. The Local Plan sets out a strategy to deliver this level of growth in a sustainable manner, in accordance with the NPPF. The Consultation Statement set out the level of consultation undertaken, when it took place, with whom and how it has influenced the plan. The Duty to Cooperate Statement shows how cross boundary issues have been addressed. The Council seeks to provide for local development needs and is not promoting additional development that would conflict with the national and EU legislation and policy. The recommended PINS model policy is included in the Local Plan Part 2 relating to the NPPF and the promotion of sustainable development positively. As Hillingdon is a London borough (forming part of the London Housing Market Area)then, subject to work on a new version of the London Plan and its timetable for adoption, the housing provision element of the Local Plan may need to be subjected to an earlier

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
NPPF Principles: Delivering sustainable develope	ment	review. However, the current borough housing target of 559 units per annum (allocated under the 2016 version of the London Plan) is current, and remains in force until a new version of the London Plan is adopted. The Council does recognise that its hands are tied in terms of the quantum of housing that it must deliver. It has a housing target, set by the London Plan, and must seek to achieve this.
Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	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.	The overall provision for economic growth is dealt with in the Hillingdon Local Plan Part 1 "Strategic Policies" (especially Strategic Objectives SO14 and SO15, Chapter 5 "The Economy"; SO17, SO18 and SO20, Chapter 6 "New Homes", Chapter 9 "Transport and Infrastructure". The detailed proposals economic growth and development are set out in the Local Plan Part 2.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure,	A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental	Local Plan Part 1 Policies E2 "Location and Employment Growth", E3 "Strategy for Heathrow Opportunity

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
services or housing (21)	 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) (22) 	Area", E6 "Small and Medium-Sized Enterprises" and E7 "Raising Skills" deals with these matters and sets a strategic policy framework appropriate to the issues affecting the area.
		In addition, an employment land review was carried out in preparing the Local Plan Part 1. All sites retained or allocated in the Local Plan have a reasonable prospect of development
2. Ensuring the vitality of town centres (paras 23-37)		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	 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. 	In accordance with the NPPF and the London Plan, the Local Plan includes a suite of policies concerned with maintaining the diversity of uses within the Borough's town centres, and with supporting their vitality and their viability.
		An assessment of retail needs and town centre opportunities was carried out in preparing the Local Plan Part 1. The Plan includes retail provision proposals for the period up to 2026. An update review of the Town Centres and Retail was carried out in 2012 for the update of evidence for the Examination. The update did not indicate the need for major change in

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Plan Part 2, there was no need for a further update.
		The Local Plan Part 1 also set out the Strategic Objectives and the hierarchy of Hillingdon's network of town centres and includes the definition of a settlement hierarchy; (Strategic Objective SO16, SO18 and SO20 and Policies E4 "Uxbridge" and E5 "Towns and Local Centres").
		Part 2 contains policies DMTC1-4 which set out policies relating to town and local centres. Town centre boundaries, primary shopping areas and secondary shopping frontages are defined in the Local Plan Part 2. The Local Plan strategy is a "town centres" first approach consistent with the NPPF.
		The Local Plan policies and proposals are consistent with the NPPF. There was no need for immediate review but a review will need to be carried out to deal with the provision beyond 2026 as the Council begin to review the Local Plan Part 1.
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town	 An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. Primary and secondary shopping frontages identified and 	The Local Plan policies are consistent with the NPPF to ensure that continue to be viable and provide range services and facilities to meet the

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
centres (23)	allocated.	needs of the communities.
		Local Plan Part 1 Policies E4 and E5 sets out the proposed framework for the development of Uxbridge as the main urban centre; classified as "Metropolitan centre" and the retail growth in the established town and local centres.
		Local Plan Part 2 Policies DMTC1-4 identify town centre opportunity sites for retail and other appropriate developments. Most of this provision is in the town centres but there is some provision for edge and out of centre development.
		Primary shopping areas and secondary shopping frontages are identified in Part 2 of the Local Plan for all main centres.
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	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.	There are no rural areas in the Borough. Large parts of thenon-urban areas of the Borough is designated Green Belt. In general the policies and proposals in the Council's Local Plan support sustainable economic growth and tourism in the urban fringe areas, and the growth and diversification of

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		agricultural business (see Policy DME7. The policies align with the objectives of para 28 of the NPPF.
		The Local Plan policies also take on board the national and international designations (Green Belt, national and international nature conservation designations) in and close to the Plan area.
4. Promoting sustainable transport (paras 29-41)		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29) Encourage solutions which support reductions in greenhouse gas emissions and congestion	 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. 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. A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. 	In accordance with the NPPF, the Council has worked closely with adjoining authorities, transport poroviders and government agencies in order to support sustainable growth. For example, the Council has been working with Network Rail and Transport for London to help facilitate improvements at West Drayton, and Hayes and Harlington stations. These locations will benefit from the new Elizabeth Line (formerly known as Crossrail) services from late 2019 onwards.
(29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30) Local authorities should work with neighbouring authorities and transport	 If local (car parking) standards have been prepared, are they justified and necessary? (39) Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan. 	The Local Plan includes 'significant' transport schemes which principally aim to reduce the adverse impact of traffic and promote use of public transport, walking and cycling. Additionally, a Transport

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
providers to develop strategies for the		Contributions Policy list of schemes
provision of viable infrastructure necessary to		has been prepared jointly with
support sustainable development. (31)		Transport for London and involved
Opportunities for sustainable transport modes		consultation with neighbouring
Opportunities for sustainable transport modes have been taken up depending on the nature		authorities and transport providers.
and location of the site, to reduce the need for		Local Plan Part 1 Policies T1, T3 and T5
major transport infrastructure. (32)		cover transport issues; T2 in particular
major transport initiastractare. (32)		seeks to promote sustainable
Ensure that developments which generate		transport infrastructure and ensure
significant movement are located where the		development has safe and convenient
need to travel will be minimised and the use of		links to existing and proposed
sustainable transport modes can be maximised		pedestrian and cycle routes. Local Plan
(34)		Part 2 Policies DMT4 and DMT5
Diagonal and an actual and annial transport and the		support the delivery of the sustainable
Plans should protect and exploit opportunities for the use of sustainable transport modes for		transport objectives.
the movement of goods or people. (35)		Those is a specific policy TA for
the movement of goods of people. (55)		There is a specific policy T4 for Heathrow Airport which recognises
Policies should aim for a balance of land uses so		the economic importance of the
that people can be encouraged to minimize		airport and includes facilitating
journey lengths for employment, shopping,		improvements to public transport and
leisure, education and other activities. (37)		cycle links, enhancing public transport
		interchange to provide opportunity for
For larger scale residential developments in		a modal shift from the use of a private
particular, planning policies should promote a mix of uses in order to provide opportunities to		car. This will mitigate some of the
undertake day-to-day activities including work		environmental impacts of what is a
on site. Where practical, particularly within		significant trip generator.
large-scale developments, key facilities such as		Development is encouraged in or
primary schools and local shops should be		adjacent to transport hubs in the
located within walking distance of most		urban areas to reduce the need to
properties. (38)		travel and also to provide access to
The continue of the continue o		areas where there is better provision
The setting of car parking standards including		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
provision for town centres. (39-40) Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)		and opportunity for sustainable travel modes, this includes, walking and cycling both of which can encourage healthier lifestyles (Local Plan Part 1 Policies BE1 and T1). Local Plan Part 1 policies E1, E2 and H1 refer to future development locations where new and improved pedestrian and cycle routes can be provided.
5. Supporting high quality communications infrastructure (paras 42-46)		
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)	Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.	The Council supports the expansion of the electronic communications network, including telecommunication masts and high speed broadband. Local Plan Part 1 Policies CI1 and BE1 together set the appropriate higher level policy framework for the provision of community infrastructure and for all developments to improve and maintain the quality of the built environment to create sustainable neighbourhoods that serve the long term needs of all communities. Local Plan Part 1 Policy CI 1 also states that the Council will ensure that community and social infrastructure is provided to cater for the needs of the existing and future communities and

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		also ensuring that any adverse impacts are minimised, and that decisions on the provision of such infrastructure and how they will tackle climate change.
		The Local Plan does not include policies at the level of detail as set out under NPPF paragraph 44.
6. Delivering a wide choice of high quality housing (paras 47-55)		
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	 Identification of: a) five years or more supply of specific deliverable sites; plus the buffer as appropriate Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) A SHLAA 	The Council has consistently provided more than a 5 years housing supply in recent years to meet its housing requirement. Within the Council's plan area, there is currently healthy supply of housing land. The land supply provides an additional 5% buffer. No windfall provision is included in the 5 year supply, although windfall opportunities continue to occur and will add to the land supply, thus boosting both capacity and potential delivery rates.
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15	The housing provision includes a supply of deliverable sites throughout the plan period.
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five	A housing trajectory	The Council prepares an Annual Monitoring Report which includes a

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
year supply will be maintained. (47)	Monitoring of completions and permissions (47) Updated and managed SHLAA. (47)	housing trajectory showing the expected rate of housing delivery and illustrates how the overall required provision will be achieved. This also demonstrates the maintenance of a 5 years supply to meet the overall housing target. Housing targets across London are set for each borough based on housing capacity. This exercise is undertaken by the GLA with each borough feeding in to the process. The current adopted London Plan (2016) was underpinned by a SHLAA carried out in 2013. The London-wide approach for SHLAA and the robustness of the London SHLAA 2013 were tested at the FALP examination. Paragraph 22 of the Inspector's report states that "I acknowledge that the NPPF requires each local planning authority to identify its own objectively assessed housing need. However, in my view, it is the role of the spatial development strategy to determine the overall level of need for London and to guide the distribution of new housing to meet that need".
		London Plan policy 3.3 and Table 3.1 apportion a 10 year monitoring target

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		of 5,593 units. This translates as a yearly target of 559 units. The current London Plan target of 559 per annum has been exceeded, with delivery averaging at 749 units per year for each of the last four years.
		This target also remains in force until a new version of the London Plan is adopted. The Council does recognise that its hands are somewhat tied in terms of the quantum of housing that it must deliver. London boroughs have a housing target set by the London Plan, and must seek to achieve this.
		As Hillingdon is a London borough (forming part of the London Housing Market Area) then, subject to work on a new version of the London Plan and timetable for adoption, the housing provision element of the Local Plan part 2 may need to be subjected to an early review.
		The removal of brownfield land development targets will have no impact on the Council's land supply. Over recent years, in excess of 90% of housing development has taken place on brownfield sites. This percentage may fall as new planned greenfield sites come into play, but this is in line with the planning strategy and is not

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		an issue for concern.
Set out the authority's approach to housing density to reflect local circumstances (47).	Policy on the density of development.	Chapter 4 of the Local Plan Part 2 – Development Management Policies requires that the number of residential units delivered in new developments is optimised. The Council monitors housing approvals, density and completions and presents this information annually in its Monitoring Report. Local Plan Part 1 Policy BE1: "Built Environment" sets out the need for new development to improve and maintain the quality of the built anytice ment in order to create
		environment. in order to create successful and sustainable neighbourhoods that will serve the long term needs of all communities. All new development will be required to achieve a high quality of design and be appropriate to the to the identity and context of the Borough's townscape, landscape and views and be appropriate in terms of layout,
		form, scale and use of materials. The Mayor's London Plan Policy 3.5 "Quality and Design of Housing Development" also sets out design requirement for all new housing

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	 Policy on planning for a mix of housing (including self-build, and housing for older people SHMA Identification of the size, type, tenure and range of housing) 	developments. The Local Plan is able to meet the housing market trends within the national planning constraints in and close to the authority boundary. Within this context, Local Plan Part 1 Policy H1 "Housing Growth" sets out
	 Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) Evidence for housing provision based on up to date, objectively assessed needs. (50) 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) 	Policy H1 "Housing Growth" sets out the requirement for housing to address the various needs of local people. Additionally, various policies within the London Plan require the borough to prepare local policy promoting housing of a mixture of different bedroom sizes and tenures (both for market and affordable housing), and to cater for specialist needs (including self-build housing and for specialist homes for the elderly). The Local Plan Part 1 includes policy requirements to provide affordable housing. This is a key element of any Local Plan. The Mayor's London Plan Policy 3.11 "Affordable Housing Targets" also sets out the provision for affordable housing (social/affordable rented and intermediate) to help in meeting identified housing needs.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	 Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) Examples of special circumstances to allow new isolated homes listed at para 55. 	There are no rural areas in the Borough. However, there is a large area of urban fringe that is mainly Green Belt. It is not considered necessary that there is a need for such a policy in the local plan. Inappropriate development of residential gardens is covered by policy DMH6 of Local Plan part 2 "Garden and Backland development". This supports London Plan policy 3.5 "quality and design of housing development". Reference to para 55 is not applicable given the nature of the Local Plan area.
7. Requiring good design (paras 56-68)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	 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 	Local Plan Part 1 Policy BE1: "Built Environment" deals with these matters. The principle of good design is also built into other policies in both parts of the Local Plan.
8. Promoting healthy communities (paras 69-77)		
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible	 Inclusion of a policy or policies on inclusive communities. Promotion of opportunities for meetings between members of 	Inclusive communities are principally dealt with through Local Plan Part 2 Policies BE1 "Built Environment"; EM3

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
developments (69).	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)	"Blue Ribbon Network"; EM4 "Open Space and Informal Recreation"; EM5 "Sport and Leisure"; CI1 "Community Infrastructure Provision". Many other policies and proposals are also relevant to these objectives and these include various site-specific proposals included in the Local Plan Part 2.
		In addition, there are number of London Plan policies that are relevant to supporting the objectives of inclusive communities.
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	 Inclusion of a policy or policies addressing community facilities and local service. 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. 	These matters are dealt with in the Local Plan Part 1 Policies CI1 "Community Infrastructure Provision". Various other Local Plan Part 2 policies are also relevant to protecting and enhancing healthy communities. There are number of London Plan policies that are relevant in addressing community facilities and local services objectives.
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	 Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) 	An Open Space Strategy, and a Sport and Physical Activity Strategy were prepared to provide evidence for the development of policies on Open Spaces, Sport and Leisure for the Local Plan Part 1. Policies EM4 "Open Space and

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	Protection and enhancement of rights of way and access. (75)	Informal Recreation" and EM5 "Sport and Leisure" support protecting, developing and enhancing these facilities. These policies are supported by Local Plan Part 2 policies DMCI3 "Public Open Space Provision", DMCI4 "Open Spaces in New Development", DMCI5 "Children's Play Areas" and DMCI6 "Indoor Sport and Leisure Facilities", and includes locally derived standards for open space and play space and ensure adequate local provision. Various London Plan policies also provide strategic policy support for open space, sport and recreational facilities.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	 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) 	The Local Plan Part 1 includes policies protecting green spaces set out in policy EM2 "Green Belt, Metropolitan Open Land and Green Chains". These policies are supported by Local Plan Part 2 policies DMEI4 "Development in the Green Belt or on Metropolitan Open Land" DMEI5 "Development in Green Chains" and DMEI6 "Development in Green Edge Locations". A review of green spaces has been carried out in preparing the Local Plan and those identified as needing protection are protected under these policies. London Plan

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		policies also provide strategic policy support for Metropolitan Open Land and protecting open space and addressing deficiency.
		The Local Plan is consistent with the NPPF on this issue. Any Local Green Spaces identified consistently with paras 76 and 77 of the NPPF can be taken into account in a future review of the Local Plan.
9. Protecting Green Belt land (paras 79-92)		
Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81) Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83) When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84) Boundaries should be set using 'physical	 Where Green Belt policies are included, these should reflect the need to: Enhance the beneficial use of the Green Belt. (81) Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) Specify that inappropriate development should not be approved except in very special circumstances. (87) Specify the exceptions to inappropriate development (89-90) Identify where very special circumstances might apply to renewable energy development. (91) 	Taking into account the nature of the Council's plan area and local circumstances, the Local Plan is consistent with the NPPF on this matter. A substantial part of the north-west part of the borough was already designated Green Belt. This was carried forward into the Local Plan Part 1 in 2012. In the preparation of the Local Plan Part 1, a Green Belt review was undertaken.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
features likely to be permanent' amongst other things (85)		
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)	 Planning of new development in locations and ways which reduce greenhouse gas emissions. Support for energy efficiency improvements to existing building. Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy . (95) 	The Local Plan is consistent with the NPPF on this matter. These issues were explicitly takes into account in the Sustainability Appraisal work that accompanied the preparation of the Local Plan Parts 1 and 2. Part 1 Policy EM1 "Climate Change Adaption and Mitigation" will ensure that climate change mitigation is address at every stage of the development process. This is further supported by Part 2 policies DMEI2 "Reducing Carbon Emissions" and DMEI3 "Decentralised Energy" requiring all developments to make the fullest contribution to minimizing carbon dioxide emission in accordance with the London Plan targets and all major developments to be designed to be able to connect to a Decentralised Energy Network, respectively.
Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)	 A strategy and policies to promote and maximise energy from renewable and low carbon sources, Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would 	London Plan policies 5.1 "Climate Change Mitigation", 5.2 "Minimising Carbon Dioxide Emission", 5.3 "Sustainable design and Construction, 5.4 "Retrofitting", 5.4A "Electricity and

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	 help secure the development of such sources (see also NPPF footnote 17) 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) 	Gas Supply", 5.5 "Decentralised Energy Network", 5.6 "Decentralised Energy in Development Proposals, 5.7 "Renewable Energy" and 5.8 "Innovative Energy Technologies" provides the policy framework to promote energy from renewable and low carbon sources. These policies support the Local Plan Parts 1 and 2 to contribute towards energy supply from renewable and low-carbon technologies and to facilitate where there will be no overriding adverse local impact.
Minimise vulnerability to climate change and manage the risk of flooding (99)	 Account taken of the impacts of climate change. (99) Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) Policies to manage risk, from a range of impacts, through suitable adaptation measures 	The Local Plan Part 1 Policy EM6 "Flood Risk Management" sets out the requirement for directing development away from flood zones 2 and 3. The location of future development was informed by the flood risk assessment and sequential test (see Sustainability Appraisal Report). New development sites avoid flood risk areas. Local Plan Part 2 policy DEI9 "Management of Flood Risk" supports the above policy.
Take account of marine planning (105)	Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation	This is not applicable for Hillingdon.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development	
	 Integrate as appropriate marine policy objectives into emerging policy 	
	Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS	
Manage risk from coastal change (106)	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.	This is not applicable for Hillingdon.
	 Provision for development and infrastructure that needs to be re- located from such areas, based on SMPs and Marine Plans, where appropriate. 	
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	 A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. 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. 	The Local Plan is considered to be consistent with the NPPF. Local Plan Part 1 Policy EM2 "Green Belt, Metropolitan Open Land and Green Chains" sets out the strategy for protecting and enhancing the plan area's special environment (heritage and nature conservation).
		Policy EM3 "Blue Ribbon Network" promotes the positive enhancement of the strategic river and canal corridors that provide associated

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		wildlife and habitats. Local Plan Part 2 policies DMEI4 "Development in the Green Belt or on Metropolitan Open Land" restricts inappropriate development in the protected areas. Policy DMEI 5 "Development in Green Chains" is to ensure that development conserves and enhances the visual amenity and nature conservation value of the landscape. The factors listed in the column to the left were taken into account in drawing up the spatial strategy and in selecting sites for allocation.
Prevent unacceptable risks from pollution and land instability (109)	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.	Local Plan Part 2 Policy DMEI12 "Development of Land Affected by Contamination" sets out the requirements relating to development proposals on land that is known or suspected to be contaminated. The wider considerations outlined by the column to the left were taken into account in the Sustainability Appraisal and in selecting sites for allocation.
Planning policies should minimise impacts on biodiversity and geodiversity (117)	Identification and mapping of local ecological networks and geological conservation interests.	Local Plan Part 1 policy EM7 "Biodiversity and Geological

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species	Conservation" provides the framework for protection and enhancement of all sites of Importance for Nature Conservation in the Borough. Protected sites are identified and listed in the Site Allocation and Designation and Proposal Map documents. The London Plan provides the strategic approach to promoting, protecting, enhancing and managing biodiversity and geodiversity across Greater London. London Plan policies 7.19 "Biodiversity and Access to Nature" and 7.20 "Geological Conservation" provide strategic policy support for the designated areas.
12. Conserving and enhancing the historic environment (paras 126-141)		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	 A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. A map/register of historic assets A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) 	The Local Plan is consistent with the NPPF. Local Plan Part 1 Policy HE1 "Heritage" deals with the conservation and enhancement of the heritage and the wider historic environment and landscape. This is also supported by a series of Conservation Area Appraisals.
13. Facilitating the sustainable use of minerals (paras 142-149)		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided	
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	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.	The Local Plan is consistent with the NPPF. In the Local Plan Part 1, policies EM9 "Safeguarding Mineral Resources" and EM10 "Mineral Extraction" set out the Council's responsibility for safeguarding the mineral resources in the Borough. This makes an appropriate contribution towards the West London apportionment figure in the London Plan.	
Justified: The plan should be the most appropriat	e strategy, when considered against the reasonable alternatives, based of	n proportionate evidence.	
To be 'justified' a DPD needs to be:			
• Founded on a robust and credible evidence bas evidence of participation of the local community	e involving: research / fact finding demonstrating how the choices made and others having a stake in the area.	in the plan are backed up by facts; and	
• The most appropriate strategy when considered against reasonable alternatives.			
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Participation

Has the consultation process allowed for effective engagement of all interested parties?

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

Consultation throughout the preparation of the Borough's local plan allowed for the effective engagement of all interest parties, in accordance with the Council's Statement of Community Involvement.

The Consultation Statement provides details on how consultation was carried out at Regulation 18 and Regulation 19 stages. This includes consultation with both the general and specific consultees, together with

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		other bodies where there is a looser working relationship (e.g. non-adjoining councils which share membership of the same sub-regional forums), as well as stakeholders on the Council's consultation database.
Research / fact finding 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? What assumptions were made in preparing the DPD? Were they reasonable and justified?	 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. AND 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. OR 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. OR 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). 	The plan is fully justified by it having a sound and credible evidence base, which is available to view on the planning policy section of the Council's website. This includes the Consultation Statement and Sustainability Appraisal.
Alternatives Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a	 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, 	Reasonable alternatives were prepared and considered within the sustainability appraisal, and alternatives were also consulted upon as part of the Regulation 18

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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? 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?	 strategic policies and development management policies. An audit trail of how the evidence base, consultation and SA have influenced the plan. Sections of the SA Report showing the assessment of options and alternatives. Reports on how decisions on the inclusion of policy were made. Sections of the consultation document demonstrating how options were developed and appraised. 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. 	consultation.
Effective: the plan should be deliverable over its processing to be 'effective' a DPD needs to:	period and based on effective joint working on cross-boundary strategic pr	iorities.

- Be deliverable
- Demonstrate sound infrastructure delivery planning
- Have no regulatory or national planning barriers to its delivery
- Have delivery partners who are signed up to it
- Be coherent with the strategies of neighbouring authorities
- Demonstrate how the Duty to Co-operate has been fulfilled
- Be flexible
- Be able to be monitored

Deliverable	and	Coherent
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• Is it clear how the policies will meet the Plan's

• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.

The plan and the policies within it informed through been discussions with, and representations

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved?	 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). 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. 	from, the Council's Duty to Cooperate partners and other consultees.
	 Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	
 Infrastructure Delivery Have the infrastructure implications of the policies clearly been identified? Are the delivery mechanisms and timescales for implementation of the policies clearly identified? Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	 A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. 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. Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	The Local Plan sets out a framework for infrastructure planning and the mechanisms for its delivery. This should be considered alongside the Infrastructure Delivery Plan, and the Planning Obligations Supplementary Planning Document. The latter, in particular, provides guidance on the Community Infrastructure Levy process and Section 106 agreements.
 Co-ordinated Planning Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use 	 Sections of the DPD that reflect the plans or strategies of the local authority and other bodies Policies which seek to pull together different policy objectives Expressions of support/representations from bodies responsible 	The Local Plan pulls together the objectives of a wide range of strategies and programmes covering a broad mix of topics into a cohesive policy framework.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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?	for other strategies affecting the area	
 Flexibility Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	 Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: a. the effectiveness of policies and what evidence is being collected to undertake this b. changes affecting the baseline information and any information on trends on which the DPD is based Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 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 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. 	The plan is considered to be flexible enough to respond to unexpected changes in circumstances.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
 Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? 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? 	 A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. 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. 	The Council has worked closely with neighbouring boroughs and the GLA to meet its obligations under the Duty to Cooperate. Details of engagement with neighbouring authorities, the GLA and other partners have been recorded and details are set out in the seperate Duty to Cooperate statement.
 Monitoring Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? 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? 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? 	 Sections of the DPD setting out indicators, targets and milestones Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories Reference to any other reports or technical documents which contain information on the delivery of policies 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 	A monitoring framework is included to assess the effectiveness of the Local Plan part 2 policies. Monitoring will also provide a key role in ensuring the plan remains flexible and to highlight where amendment might be required. Annual monitoring reports are published on the Council's website, www.hillingdon.gov.uk

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. 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.			
 Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	 Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement Reports or copies of correspondence as to how representations have been considered and dealt with. 	The Council has taken into account the applicable national and regional guidance, and the policies are considered to be tailored to meet the particular circumstances of Hillingdon. The Council therefore considers that all the policies in the Local Plan are consistent with national and Londonwide policy.	

Planning policy for traveller sites

Planning Policy for Traveller Sites was updated on 31 August 2015. The original policy was set out by the NPPF in March 2012, at which point Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople were cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

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

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

Government's aims in respect of traveller sites are:

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

In addition, local planning authorities should:

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

Possible Evidence	Evidence Provided
Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.	The Council's Local Plan includes provision for gypsies and travellers related to the most recent Gypsy and Travellers' Accommodation Needs Assessments (2007) which was carried out by the Council in 2013. The Council is currently reviewing the gypsies and travellers requirement and assessing the accommodation needs. This re-assessment has included engagement with travellers and their representatives. The provision made in the Local Plan will be reviewed in the light of the findings of this new assessment.
 Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. Collaborative working with neighbouring local planning authorities. 	As above.
	Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups. Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan.

Policy Expectations	Possible Evidence	Evidence Provided
	decisions.	
Policy B: Planning for traveller sites (paras 7-11)		
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. Set criteria to guide land supply allocations where there is identified need. Ensure that traveller sites are sustainable economically, socially and environmentally.	 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. An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. Policy which takes into account criteria a-h of para 11 	The Council considers that the right approach is to progress the Local Plan to adoption - including provision for gypsy and traveller sites related to the latest assessment, and to review this in due course in the light of the current new assessment. The alternative, of delaying the submission of the Local Plan would have significant overall disadvantages. New sites will be assessed in accordance with Local Plan Part 1 Policy H3 "Gypsy and Traveller Pitch Provision". The criteria set out in criteria a-h of paragraph 11 will be used in consideration of future provision in the light of the current and future reassessment of needs. Overall it is not considered that there is a conflict with the NPPF

Policy Expectations	Possible Evidence	Evidence Provided
		on this issue.
Policy C: Sites in rural areas and the countryside (para 12)		
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.		There is no conflict with the NPPF on this matter. Local Plan Part 1 Policy H3 "Gypsy and Traveller Pitch Provision"sets out the criteria for the assessment of sites. These have been taken into account in identifying sites within the site allocations and designatins document of the Local Plan part 2.
Policy D: Rural exception sites (para 13)		
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.	If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.	Not applicable to Hillingdon.
Policy E: Traveller sites in Green Belt (paras 14-15)		
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate	Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan	The Council's Local Plan does not propose any traveller sites

Policy Expectations	Possible Evidence	Evidence Provided	
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.	making process.	in the Green Belt. There is no conflict with the NPPF on this matter.	
Policy F: Mixed planning use traveller sites (paras 16-18)			
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.	 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. N.B. Mixed use should not be permitted on rural exception sites 	The Council's Local Plan proposes additional provision for travellers but does not specifically refer to mixed residential/business use. This is not an issue that affects the overall strategy, but rather is a detailed matter which can be taken on board in a future review of gypsy and traveller needs.	
Policy G: Major development projects (para 19)			
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable	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.	There are no such proposals in Hillingdon. There is no conflict with the NPPF on this matter.	

Policy Expectations	Possible Evidence	Evidence Provided
for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.		

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.

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 all¹ public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions²

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.

¹ 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.

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

Policy Expectations	Possible Evidence	Evidence Provided	
Key requirements under the Duty to Co-Operate			
Consistency between marine and terrestrial policy documents and guidance	 Demonstration of consistency of aim between relevant local plan policies and marine policy documents (i.e. the MPS and any relevant adopted marine plans) Proof of collaborative working with the MMO and that the MPS has been taken into account. 	As Hillingdon does not overlap with the UK marine area, this section is not applicable.	
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	 Early and effective policy development engagement undertaken, including discussions with the MMO Evidence of iteration of policies and plans as a result of engagement with the MMO Evidence of engagement with the MMO in relation to monitoring, implementation and throughout the policy cycle Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	As Hillingdon does not overlap with the UK marine area, this section is 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	 Evidence that the LPA has shared or provided relevant data to the MMO that can help inform Marine Plans or MPS review Demonstration that local plan policy has been underpinned by data provided by the MMO or the MPS Explicit cross-referencing in local plan to MPS, the MMO, their roles, and relevant marine plans 	As Hillingdon does not overlap with the UK marine area, this section is not applicable.	

Policy Expectations	Possible Evidence	Evidence Provided
Marine Policy Statement- Chapter 2: General Principles for Decision-Making ³		
Sections 2.1 -2.2: The UK vision for the marine environment		
The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas') Achieving the vision through marine planning	 Reference in DPD where appropriate to UK vision for the marine environment Contribution to the vision through local plan policies and supporting text 	As Hillingdon does not overlap with the UK marine area, this section is not applicable.
Section 2.4: Considering benefits and adverse effects in marine planning		
Consider benefits and adverse effects of plan policies	Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal	As Hillingdon does not overlap with the UK marine area, this section is not applicable.
Section 2.5: Economic, social and environmental considerations		
Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water	Reference to relevant EU Directives in DPD and sustainability appraisal	As Hillingdon does not overlap with the UK marine area, this

³ 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.

Policy Expectations	Possible Evidence	Evidence Provided	
Framework Directive)	Consideration of contribution of DPD policies to the objectives of relevant EU Directives	section is not applicable.	
Marine Policy Statement- Chapter 3: Policy Obje	ectives for Key Activities		
3.1 Marine Protected Areas			
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	 Identification of relevant areas and features of importance for nature conservation within relevant marine plan area(s) Consideration of impacts of policy and/or terrestrial development on those areas and features of importance Measures to mitigate, monitor and manage negative impacts on those areas and features of importance 	As Hillingdon does not overlap with the UK marine area, this section is not applicable.	
3.4 Ports and shipping			
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	 Evidence that policy with potential impact on ports and shipping minimises negative impacts on sector Where relevant, evidence that economic, employment and transport policies are protective of ports and shipping sector 	As Hillingdon does not overlap with the UK marine area, this section is not applicable.	
3.8 Fisheries			
Consider potential economic, social and environmental impacts of other	Where relevant, evidence that other policies minimise negative impacts on fishing activity and/or aquaculture	As Hillingdon does not overlap with the UK marine area, this	

Policy Expectations	Possible Evidence	Evidence Provided	
developments on fishing activity		section is not applicable.	
3.9 Aquaculture			
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	Where relevant, evidence that the benefits of aquaculture industry development have been considered	As Hillingdon does not overlap with the UK marine area, this section is not applicable.	
3.10 Surface water management and waste water treatment and disposal			
Maximise opportunities for co- existence of waste water infrastructure with other activities in the marine environment	 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 	As Hillingdon does not overlap with the UK marine area, this section is not applicable.	
3.11 Tourism and recreation			
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and local communities	 Where relevant, reference to marine tourism and recreation Evidence that the potential for marine tourism and recreation has been recognised in plan-making 	As Hillingdon does not overlap with the UK marine area, this section is not applicable.	

Halton

Hambleton

Hartlepool

Hastings

Hammersmith and Fulham

South Somerset

South Tyneside

Southwark

Southend-on-Sea

Stockton-on-Tees

Appendix One

City of Kingston upon Hull

City of Peterborough

City of Plymouth

City of Portsmouth

City of Southampton

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

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

Newham

North Devon

North Norfolk

North Somerset

North East Lincolnshire

North Lincolnshire

Stroud

Suffolk Coastal

Sunderland

Swale

Taunton Deane

Teignbridge

Tendring

Test Valley

Thanet

Thurrock

Tonbridge and Malling

Torbay

Torridge

Tower Hamlets

Wandsworth

Warrington

Waveney

Wealden

West Devon

West Dorset

West Lancashire

West Lindsey

West Somerset

Weymouth and Portland

Winchester

Wirral

Worthing

Wyre

York