

I've been looking at the table Q5 from the OPDC. I thank them for the work which has been put into this, which goes a long way towards an acceptable response to my Q5.

What table Q5 appears to do is to look at, and comment on, all the existing references to the IDP within the submitted Local Plan. I will respond below to each comment in turn. What also needs to be done is the obverse process; an assessment of the IDP to make sure that each entry is sufficiently introduced and identified within the Local Plan. My understanding of the relationship of the Local Plan to the IDP is that the Local Plan should contain sufficient information to identify and locate a proposed infrastructure project; the IDP can elaborate and provide further detail but there shouldn't be anything in the IDP which is just encompassed in a general catch-all policy (such as SP10(c) or (e)) and can't be specifically identified within the Local Plan itself.

Specific comments and suggestions in relation to table Q5;

Reference 3.49. can I suggest; "...details can be found in the Place Policies and policies T2 and T6 of the Transport chapter..."

3.64. "...can be found in the places chapter (P1, P2, P3) and in Policies SP8 and EU1..."

SP10(c) and (e) "...required infrastructure identified elsewhere in the Local Plan and elaborated in OPDC's Infrastructure..."

3.89. Suggested modification acceptable.

OOS.15. "...policies P1(e) and P1(i) and..."

OOC.3. Response acceptable.

OON.14. Response acceptable.

OON23. Suggested modification to P2(b) acceptable. Suggest additional modification to OON23, second sentence; "Local Plan policies P2(b) and P2(h) and OPDC's IDP..." Modification to final line; "...Local plan policies P2(b) and P2(h) and..."

GUC.15 Penultimate sentence; "OPDC's IDP Policy 3(d) and (j) identifies..." Final sentence; "...and updated details will be recorded in OPDC's IDP".

NA.16. Suggested modification to P7(d) acceptable. Suggest modify NA16 second sentence; "Within Acton Wells, OPDC's IDP identifies that there is...". Other modification suggested acceptable.

NA18. Response acceptable.

OCL.2 Response acceptable.

SL12 "...preceeding policies P10 (d) and (e) and cluster policies P10C1(e), P10C2(c), P10C3(c) and P10C4(c) which follow and are detailed in OPDC's....."

WJ.8. Response acceptable.

WS.7. Response acceptable.

6.12 Suggest; "... as set out in the Places chapter P1, P2 and P3 and policies SP8 and EU1(c)(ii) and elaborated in the IDP"

6.34 Suggest; "... this policy EU3(b)(c)(i), the relevant place policies (P3(l)(ii) and P12(f)) and the relevant infrastructure proposals ~~requirements in the Infrastructure delivery Plan.~~"

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6.101, EU10(f) and 6.110 I am not convinced by these responses that policy EU10 and its references to the IDP would be effective for the following reasons.

EU10(a) is referred to in the response but that is a self-contained policy not referring to the IDP. As I understand it, it would require each and every major development to support the delivery of a smart energy grid. A smart energy grid does not appear to be defined in the glossary but is adequately described in paragraph 6.109 as including metering, control systems and energy storage. So, that is all clear and any developer can understand what is expected of the development to comply with that element of the policy.

EU10(b) likewise referred to in the response does not defer to the IDP but stands alone in its own right. It requires each and every major development to support and contribute to and or deliver heat networks but, in contrast to the relative clarity of EU10(a), the rest of the policy talks about making contingent provision for connections and concludes, in reference to a heat network "if and when it becomes available" which does not suggest that there is any finite proposal to construct a heat network anywhere within the plan area during the plan period.

EU10(c), likewise referred to in the response does not defer to the IDP but stands alone in its own right. It refers to cooling systems in terms similar to EU10(b)'s reference to heating systems but qualified by "where feasible and appropriate" and concluding even more tentatively with "if it becomes available", which also does not suggest that the plan contains any proposal to construct a cooling network anywhere within the plan area during the plan period.

Policy EU10(f) is different, in that it requires each and every major development to contribute to and or/deliver new heat, cooling and electricity networks in terms which do not suggest that there is any doubt but that such networks are proposed. For details of such networks, it defers to the IDP. But, when I consult sections 4.3 and 4.4 of the IDP, I find that the only specific proposals for decentralised energy are at Car Giant and Scrubs Lane. These refer to Place Areas P2 and P10. But the infrastructure section of P2 makes no suggestion that a decentralised energy system is envisaged for that Place Area and there is no infrastructure section in P10. The rest of IDP section 4.3 confirms that Place Area P7 is not appropriate for an area wide network (but no exception is made in EU10) and makes only nebulous suggestions for a strategic area-wide district heat network, a strategic Area-wide District heat network extracting heat from sewers and a strategic Area-wide District heat network extracting heat from

other sources, three suggestions which seem ill-defined and mutually exclusive and unlikely to be effective in advising a potential developer of a particular site what that development is expected to provide. Section 4.4 of the IDP has specific proposals for an Old Oak North substation in Place Area P2 and for an upgrade at the Atlas Road substation within P9 but there is no reference to either in those Place Areas. The other entries in IDP section 4.4 take us little further than the plan-wide provisions of EU10 itself. And, of course, table 3.1. detailing site allocations, makes no reference to anything other than housing and employment numbers, not referring to any kind of infrastructure requirement on any allocation at all.

So; I am left with the conclusion that, in fact, there are no effective proposals for any kind of heating or cooling networks and that, in fact, most development would take the form envisaged in entry NU5 of the IDP, i.e site specific decentralised energy delivery and that a great many words could be saved if policy EU 10 simply said so.

6.124 I accept the response, though I note that the "specification requirements where known" which paragraph 6.124 promises will be found in the IDP amount to no more than a requirement for ducting, of a specification not given in the IDP. This could just as easily have been stated in the policy itself.

T2(a) Suggested modification acceptable.

7.14 Suggest ; "Figure 7.5 and the OPDC's IDP...."

T3(a) Suggested modification acceptable.

7.24 Suggested modifications to paragraphs 3.53 and 7.24 acceptable.

T5(a) suggested modification acceptable.

T6(a) Response acceptable.

7.45 response acceptable.

TCC4(c) and (d)(i). Suggested modification acceptable.

10.26. Suggested modification acceptable.

10.27. Suggested modification acceptable.

10.33. Suggested modification acceptable.

10.35. Suggested modification acceptable.

10.37. Response acceptable

TCC6(c(iv)) Suggested modification acceptable.

10.50. Suggested modification acceptable.

10.61. Response acceptable.

DI1(b). Response acceptable.

11.7. Suggested modification acceptable.

11.11. Suggested modification acceptable.

11.33. Suggested modification acceptable.

11.50(c). Suggested modification acceptable.

Table 11.1 (P4). Suggested modification acceptable.

Paul Clark
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