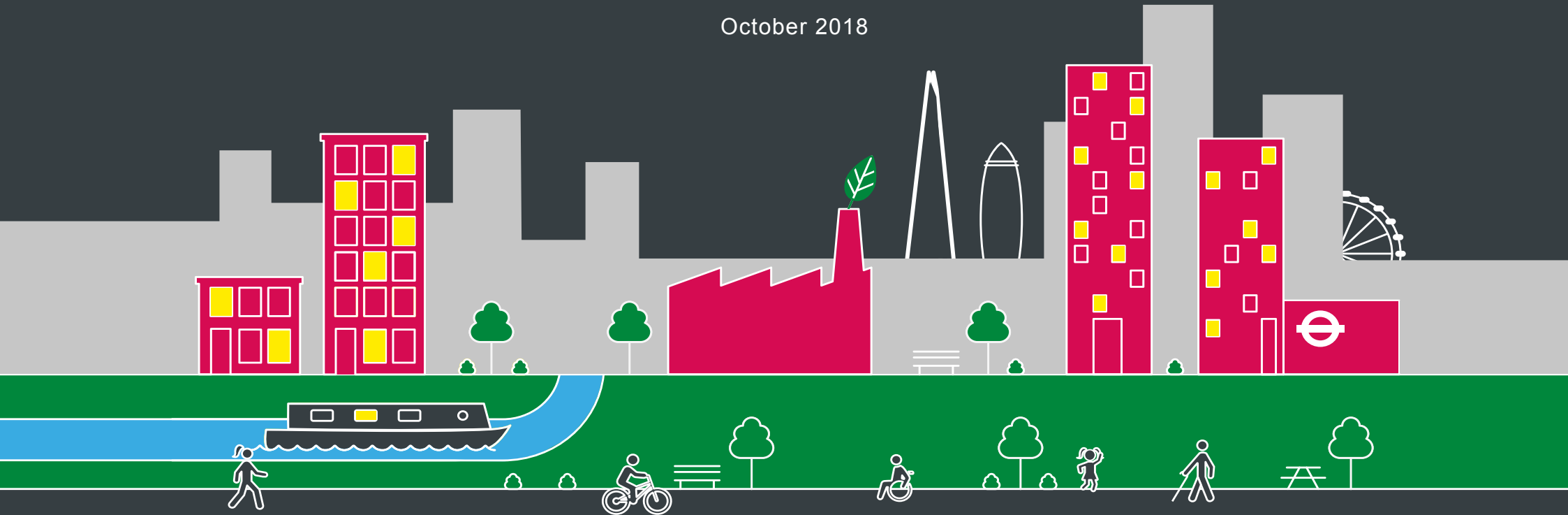


# Local Plan Legal Compliance Checklist

## LOCAL PLAN SUBMISSION DOCUMENT

October 2018



**MAYOR OF LONDON**

# Old Oak and Park Royal Development Corporation Local Plan Legal Compliance Checklist (2018)

This checklist is based on **Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012**. It should be read alongside OPDC's Soundness Self Assessment Checklist.

## Glossary:

"Act" means the **Planning and Compulsory Purchase Act 2004 (as amended)**

"NPPF" means the **National Planning Policy Framework** published March 2012

"Regulations" means the **Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012**

LDS means **Local Development Scheme**

SCI means **Statement of Community Involvement**

DPD means **Development Plan Document**

## Note:

OPDC undertook the first Regulation 19 draft Local Plan consultation from June to September 2017. Normally, a local planning authority would then submit the Local Plan for public examination by an independent inspector. However, OPDC made significant changes to the draft Local Plan text and associated evidence supporting the draft Local Plan and therefore undertook a second Regulation 19 public consultation, prior to submission, from 14 June to 31 July 2018. This allowed stakeholders to comment on the changes that have been made to the draft Local Plan in advance of the Independent Examination

## Stage one: The early stages

Where the 'possible evidence' column refers to a document that will not be complete until a later date, documents that will contribute to that report are relevant at the earlier stages. This way, the submitted report provides the evidence at submission, with an audit trail back to its source.

In terms of legal compliance, the main issues for the early stage are in relation to:

- planning for community engagement
- planning the sustainability appraisal (including consultation with the statutory environment consultation bodies)
- identifying significant cross boundary and inter-authority issues
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

Regulation 17 notes that a statement setting out which bodies and people the council invited to make representations under Regulation 18 is one of the proposed submission documents. In this checklist, the term 'Statement of Consultation' is used to describe this statement.

Section 33A of the Act (introduced by the Localism Act 2011) introduces a duty to cooperate as a mechanism to ensure that local planning authorities and other bodies engage with each other on issues which are likely to have a significant effect on more than one planning area. This pervades every stage of the plan preparation. A plan may be found unsound if a council cannot show that it has taken reasonable steps to comply with the duty. OPDC's Duty to Cooperate Statement sets out information demonstrating how OPDC meets this duty.

## Stage one: The beginning

Activity	Legal requirement	Guidance reference	Additional notes	Confirmation and evidence
1. Is the DPD identified in the adopted LDS? Have you recorded the timetable for its production?	The Act section 15(2) and section 19(1)	NPPF para 153		Yes. The progression of the Local Plan is identified in the Local Development Scheme which is published on OPDC's website and monitored through OPDC's Authority Monitoring Report also published on the website.
2. How will community engagement be programmed into the preparation of the DPD?	The Act section 19(3)  Regulation 18	NPPF paras 150, 155 and 157	If the SCI is up-to-date, use that. If not set out any changes to community engagement as a result of changes in legislation.	OPDC's SCI (February 2017) sets out how the community has been and will be engaged in the preparation of the Local Plan. Specific details for how these activities have been carried out are stated within OPDC's Statement of Consultation.
3. Have you considered the appropriate bodies you should consult?	Regulation 18	NPPF paras 4.25 - 4.26	Regulation 2 defines the general and specific consultation bodies.  The possible evidence may duplicate each other. Only use what you need to.	Yes. OPDC's Statement of Consultation contains a list at Appendix C a list of all consultees contacted as part of the Regulation 18 Consultation and subsequent consultations. The database includes "general" and "specific" consultation bodies, "prescribed" (duty to cooperate) bodies, Sustainability Appraisal

Activity	Legal requirement	Guidance reference	Additional notes	Confirmation and evidence
				bodies, local consultation bodies, Waste Planning Authorities and other interested stakeholders. OPDC keeps a record of the consultees which have been notified at each stage of the consultation.
4. How you will co-operate with other local planning authorities, including counties, and prescribed bodies, to identify and address any issues or strategic priorities that will have a significant impact on at least two planning areas?	The Act section 33A(1)(a) and (b), section 33A(3)(d) (e) & (4)  The Act Section 20(5)(c)  Regulation 4	NPPF paras 178 to 181 (which comprise the guidance referred to in the Act section 33A(7))  Under NPPF Para 182, to be 'Effective' a plan should be based on effective joint working on cross-boundary strategic priorities.  Strategic priorities are listed at NPPF Para 156	Section 33A(4) defines a "strategic matter".  Under section 33A(6) the required engagement includes considering joint approaches to the plan making activities (including the preparatory activities) and considering whether to agree joint local development documents under section 28.  The bodies prescribed by section 33A(1)(c) are set out at Regulation 4(1).	OPDC has produced a Duty to Cooperate Statement which demonstrates how OPDC has engaged with other planning authorities and prescribed authorities to develop effective planning policy. The engagement includes regular Old Oak and Park Royal Duty to Cooperate Project Team meetings, other meetings with bodies to discuss targeted policy issues and through the notification of bodies at each stage of consultation. The Statement identifies the key issues that have been discussed and sets out actions and outcomes based on this engagement activity.
5. How you will co-operate with any local enterprise partnerships (LEP) or local nature partnerships	The Act section 33A(1)(c) and section 33A(9), section 33A(3)(d)	NPPF paras 178 to 181	Section 33A(4) defines a "strategic matter".  Strategic priorities are listed at NPPF Para 156.	As a prescribed body, OPDC has consulted the London-wide LEP called the London Enterprise Panel, now the

Activity	Legal requirement	Guidance reference	Additional notes	Confirmation and evidence
(LNP) to identify and address any issues or strategic priorities that will have a significant impact on at least two planning areas?	and (e)  The Act section 20(5)(c).  Regulation 4		Regulation 4(2) prescribes LEPs and LNPs for the purposes of section 33A(9).  Under section 33A(6) the required engagement includes consulting on joint approaches to relevant activities.	London Economic Action Partnership (LEAP) at each stage of production of the Local Plan. OPDC has also consulted the London Wildlife Trust, the equivalent to the LNP for London at each stage of the Plan's formulation. Neither organisation identified issues for strategic priorities. OPDC's Local Plan's evidence base also did not identify any issues or strategic priorities requiring cooperation with either organisations.
6. Is baseline information being collected and evidence being gathered to keep the matters which affect the development of the area under review?	The Act section 13	NPPF paras 158 - 177		Yes. OPDC has commissioned and prepared 53 supporting studies to help inform the Local Plan. These can be viewed on OPDC's Local Plan examination web page. OPDC has also produced a summary overview of all the supporting studies including their purpose, outputs and recommendations for the Local Plan and where recommendations have not been taken forward.
7. Is baseline information	The Act	NPPF paras 165 and		Yes.

Activity	Legal requirement	Guidance reference	Additional notes	Confirmation and evidence
<p>being collected and evidence being gathered to set the framework for the sustainability appraisal?</p>	<p>section19(5)</p>	<p>167</p> <p>Strategic Environmental Assessment Guide, chapter 5</p>		<p>OPDC has published an Integrated Impact Assessment (IAA) to consider the impact of policies on a range of issues, including a full sustainability appraisal. The scope of the IIA was determined through collecting information on the environmental, social and economic characteristics of the area to provide baseline information for the IIA scoping report. This enabled key issues, opportunities and trends to be identified. A review of other relevant environmental protection objectives and policies was also undertaken. The review of these documents focussed upon identifying key environmental and sustainability objectives that would need to be considered in the IIA and the Local Plan. The scope of the appraisal was documented in a Scoping Report, issued for consultation with the statutory bodies and the public in September 2015. Following the consultation, responses were analysed and amendments made to the</p>

Activity	Legal requirement	Guidance reference	Additional notes	Confirmation and evidence
				scope as appropriate.
8. Have you consulted the statutory environment consultation bodies for five weeks on the scope and level of detail of the environmental information to be included in the sustainability appraisal report?	Regulations 9 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633.	NPPF paras 165 and 167  SEA Guide chapter 3	The Strategic Environmental Assessment consultation bodies are also amongst the 'specific consultation bodies' which are defined in Regulation 2).	Yes. OPDC consulted Natural England, the Environment Agency and Historic England on the scope and level of detail of the Integrated Impact Assessment. The scoping report appendix E summarises the comments received from the statutory environment consultation bodies on the scope and how OPDC responded to them.



## **Stage two: Plan preparation - frontloading phase**

Information assembled during this phase contributes to:

- showing that the procedures have been complied with
- demonstrating cooperation with statutory cooperation bodies
- developing alternatives and options and appraising them through sustainability appraisal and against evidence.

The council should record actions taken during this phase as they will be needed to show that the plan meets the legal requirements. They will also show that a realistic and reasonable approach has been taken to plan preparation.

## Stage two: Plan preparation

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>1. Have you notified:</p> <ul style="list-style-type: none"> <li>• the specific consultation bodies?</li> <li>• the general consultation bodies that have an interest in the subject of the DPD and invited them to make representations about its contents?</li> </ul>	<p>Regulation 18(1) and (2)(a) (b)</p>	<p>NPPF paras 159 – 173</p>	<p>Specific and general consultation bodies are defined in Regulation 2.</p>	<p>Yes.</p> <p>The specific and general consultation were invited to give comments on the emerging Local Plan at each stage of its formulation. Appendix C of OPDC’s Statement of Consultation provides a list of all consultation bodies contacted. The comments made at the Regulation 18 stage and Regulation 19 stages (1) and (2), and OPDC’s responses to them, have been set out in the Statement of Consultation. Appendix A provides the key issues raised and officer responses, including whether changes have been proposed to the Local Plan or where they have not the reasons for this. Appendix B provides a list of all the issues raised and how OPDC has responded, where changes have been made and where they have not the reasons for this.</p>
<p>2. Are you inviting representations from people resident or carrying out business in your area about the content of the DPD?</p>	<p>Regulation 18(1) and (2)(c)</p>	<p>NPPF paras 159 – 173</p>		<p>Yes.</p> <p>As set out in the Statement of Consultation OPDC contacted members of the Local Plan Consultation Database seeking</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				<p>comments on the draft document. This includes people who live in the area and businesses that operate in the area. To ensure that local people and businesses are aware of the Local Plan preparation, OPDC advertised in the local press, used the OPDC email newsletter and its social media sites to raise awareness. OPDC held thematic workshops for Regulation 18 to discuss the draft with residents and businesses and seek feedback. Example of letters set to 55,000 local businesses and residents, invitations to events and adverts can be found in Appendix D of the Statement of Consultation.</p>
<p>3. Are you engaging with stakeholders responsible for delivery of the strategy?</p>	<p>Regulation 18</p>	<p>NPPF para 155</p>	<p>NPPF paras 160-171 4.29 give examples of relevant bodies which should be consulted.</p>	<p>Yes. The specific and general consultation bodies as set out in the Statement of Consultation were invited to give comments on the emerging Local Plan at each stage of its formulation. This included the Greater London Authority, host and surrounding local authorities, Clinical Commissioning Groups, the Environment Agency, Transport for London and Thames Water.</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				<p>The Duty to Cooperate Statement also provides details of meetings held with statutory and other bodies involved in the delivery of the Local Plan. Through the Regulation 18 consultation OPDC has engaged with landowners in the area including through a <a href="#">call for sites</a> to identify additional development capacity. OPDC has set up Delivery Steering Group to work positively with partner organisations in the delivery of regeneration, infrastructure and other measures. OPDC are continually engaging with key stakeholders outside of the Local Plan production process.</p>
4. Are you taking into account representations made?	Regulation 18(3)	NPPF para 155	Evidence from participation is part of the justification. Show how you have taken representations into account.	<p>Yes.</p> <p>The Statement of Consultation sets out how OPDC has taken account of representations made as part of Regulation 18, where changes have been made to the Regulation 19 Local Plan stages (1) and (2) and where changes have not been made and the reasons for this.</p>
5. Does the consultation contribute to the development and	The Act section 19(5)	NPPF paras 165 – 168		<p>Yes.</p> <p>Regulation 18 considered a range of alternative policy</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
sustainability appraisal of alternatives?	Regulations 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	SEA Guide, chapter 3		<p>options which OPDC asked consultees for comments on reasonable alternatives and have been considered in formulating the final policy approaches that have been set out in Regulation 19 stages (1) and (2). The policy options considered and set out in the Regulation 18 draft Local Plan are summarised in the Policy Formulation Reports.</p> <p>The Regulation 18 Integrated Impact Assessment provides an assessment of these policy options. Reasonable alternatives to the quantum of development and overall spatial strategy have been considered and assessed through the Integrated Impact Assessment (IIA). The IIA and Local Plan have been developed in full accordance with the requirements of legislation, national guidance and good practice recommendations to assess reasonable alternatives and strategic options within the IIA of the Local Plan. National Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				<p>considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. NPPF paragraph 167 also states that “Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken. OPDC’s Local Plan is being developed within a context of regional guidance provided by the London Plan and the Old Oak and Park Royal Opportunity Area Planning Framework. These set out housing and jobs targets for the OPDC area and were both subject to separate IIAs which assessed these targets. OPDC’s Local Plan is required to deliver the London Plan targets and to be in general conformity with the London Plan. As such, options for lower amounts of homes and jobs were not provided and were not considered to be realistic or reasonable alternatives in accordance with NPPG Paragraph: 018 Reference ID:</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				<p>11-018-20140306. However, an assessment of strategic options was carried out in the IIA for the Regulation 18 consultation following recommendations of good practice guidance. OPDC considered that the approach to affordable housing warranted assessment as a strategic option. This reflects the potential impact of the different approaches to affordable housing may have on wider placemaking and infrastructure requirements. The regulation 18 Local Plan also proposed alternative policy options. These were considered to be reasonable alternatives and were assessed by the IIA for the Regulation 18 Local Plan. OPDC's Local Plan's spatial vision and narratives, which set out the overall spatial strategy, have been subject to a qualitative review in light of the IIA Framework objectives and an objective compatibility exercise has been used to determine if there are any key conflicts between the Local Plan Objectives and IIA Objectives. A more detailed assessment of the policies and options has been undertaken using an</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				assessment matrix. These assessments are then considered in the round to provide a summary of the assessment which is set out on page iv of the IIA.
<p>6. Is the participation:</p> <ul style="list-style-type: none"> <li>• following the principles set out in your SCI?</li> <li>• integrating involvement with the sustainable community strategy?</li> <li>• proportionate to the scale of issues involved in the DPD?</li> </ul>	The Act section19(3)	NPPF para 155		<p>Yes.</p> <p>OPDC has followed the “ground rules” set out in the Statement of Community Involvement (SCI). These are inclusive invitation, authorisation, continuity, independent advice, early involvement, presenting options, choosing between options, consensus, transparent records and feedback. Consultation also accorded with the requirements set out in section 2 of the SCI.</p> <p>OPDC is not required to have a Sustainable Community Strategy as it is not a local authority, but the Local Plan has been formulated with a focus on integrating existing communities into the regeneration of the area. It is also noted that section 100(2)(b) of the Deregulation Act 2015 removed the requirement for councils to have regard to sustainable community strategies. Through the Socio-</p>



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				<p>Economic Baseline Study OPDC can assess the socio-economic impact of development.</p> <p>Throughout the preparation of the Local Plan OPDC has promoted the participation of local people in plan making. Consultation was proportionate to the strategic nature of the Local Plan, Events included workshops, presentation events, and twitter events.</p> <p>OPDC has also set up a Community Forum to regularly engage with residents and businesses.</p>
<p>7. Are you keeping a record of:</p> <ul style="list-style-type: none"> <li>• the individuals or bodies invited to make representations?</li> <li>• how this was done?</li> <li>• the main issues raised?</li> </ul>	<p>The Act section 20(3)</p> <p>Regulation 17</p>	<p>NPPF paras 158 - 171</p>	<p>You will need to submit a statement of representations under Regulation 22 (1) (c): see Submission stage below. Regulation 35 deals with the availability of documents and the time of their removal.</p>	<p>Yes.</p> <p>The Statement of Consultation (June 2017 and 2018). Appendix A provides the key issues raised as part of the Regulation 18 Local Plan and officer responses, including whether changes have been proposed to the Local Plan or where they have not the reasons for this. Appendix B provides a list of all the issues raised and how OPDC has responded, where changes have been made and where they have not the reasons for this. Comments</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				<p>were also made as part of the first stage Regulation 19 and these and the responses to them were set out in the Statement of Consultation. The Policy Formulation Reports summarise the key issues raised at each stage and by which consultee or organisation.</p>
<p>8. Are you inviting representations on issues that would have significant impacts on both your areas from another local planning authority? Or county issues from an affected county council that is not a planning authority? Or significant cross-boundary issues and strategic priorities of a body prescribed under Section 33A(1)(c)?</p>	<p>The Act section 33A(1)(a) (b) and (c), section 33A(3)(d) &amp; (e) section 33A(4) section 33A(9)</p> <p>The Act section 20 (5)(c)</p>	<p>NPPF paras 178 to 181</p>	<p>Section 33A(3)(d) and (e) requires cooperation on significant cross-boundary issues before and during plan preparation.</p> <p>Section 33A(2) requires you to engage constructively, actively and on an ongoing basis.</p>	<p>Yes.</p> <p>As can be seen in the list of consultees in the Statement of Consultation, OPDC has invited comments from other local planning authorities. These include the London Boroughs of Brent, Ealing and Hammersmith &amp; Fulham and the Greater London Authority as a strategic planning authority. The statement also sets out the comments received at each stage of the process, and explains how OPDC has responded to each comment. The Duty to Cooperate Statement provides further evidence of how OPDC has engaged with neighbouring planning authorities on cross-boundary strategic issues such as providing the homes and jobs needed in the area and waste management. The engagement has taken many forms including</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				emails, letters, regular liaison meetings and working groups.
9. Are you inviting representations on cross-boundary issues and strategic priorities from a local enterprise partnership (LEP) or a local nature partnership (LNP)?	<p>The Act section 33A(1)(c) and Section 33A(9).</p> <p>The Act section 20(5) (c).</p> <p>Regulation 4</p>	<p>NPPF paras 178 to 181</p>	<p>Section 33A(3)(d) and (e) requires cooperation on significant cross-boundary issues before and during plan preparation.</p> <p>Section 33A(2) requires you to engage constructively, actively and on an ongoing basis.</p>	<p>Yes.</p> <p>OPDC has consulted the London-wide LEP, called the London Enterprise Panel, now the London Economic Action Partnership (LEAP), at each stage of production of the Local Plan.</p> <p>OPDC has also consulted the London Wildlife Trust, the equivalent to the LNP for London at each stage of the Plan's formulation.</p>
10. Are you developing a framework for monitoring the effects of the DPD?	<p>The Act section 35</p> <p>Regulation 34</p> <p>Regulation 17 of The Environmental Assessment of Plans and Programmes Regulations 2004 No1363</p>	<p>NPPF paras 165 - 1687</p> <p>SEA Guide, Chapter 5</p>	<p>It is a matter for each council to decide what to include in their monitoring reports while ensuring they are prepared in accordance with relevant UK and EU legislation” Chief Planning Officer letter 30 March 2011 withdrawing ODPM guidance.</p>	<p>Yes.</p> <p>The Delivery and Implementation Chapter 11 sets out the framework for monitoring the effects of OPDC's Local Plan including key performance indicators. This also includes the production of Authority Monitoring Reports which are published on OPDC's website. OPDC has set up a webpage to provide a summary of planning statistics.</p>

### **Stage three: Plan preparation - formulation phase**

This stage has many legal matters, for process and content, to address. The council should be beginning to formulate the preferred strategy for the local plan or supplementary planning document with which the council chooses to address Regulation 18 requirements, using the information gathered and previous collaborative work with stakeholders.

Para 182 of the NPPF makes it clear that explicit consideration of alternatives is a key part of the plan making process.

You should evaluate the reasonable alternatives identified in 'stage two: frontloading phase – plan preparation' phase against the:

- completed body of information from evidence gathering
- results of sustainability appraisal
- findings from community participation
- findings from engagement with statutory cooperation bodies.

This may be written up as a preferred strategy report. The results of participation on the preferred strategy and an accompanying sustainability report will enable the council to gauge the community's response and receive additional evidence about the options. The council can then decide whether, and how, the preferred strategy and policies should be changed for publishing the finished DPD.

Alternatives developed from the evidence and engagement during the frontloading stage need to be appraised to decide on the preferred strategy. Participation will also need to be carried out on it.

These matters need to be considered, and dealt with, in good time, and not left until publication. Supporting documents will assist in providing evidence that decisions on alternatives and strategy are soundly based. These documents will, in due course, become part of the proposed submission documents in stage four.

**The council should tell all parties that this is the main participation opportunity on the emerging plan.** The publication stage is a formal opportunity for anyone to comment on an aspect of the DPD's soundness, and to propose a change to the plan accordingly. The more effectively this message is put across, the lower the chance of late changes being brought forward following publication.

### Stage three: Plan preparation – writing the plan

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
1. Are you preparing reasonable alternatives for evaluation during the preparation of the DPD?	Regulation 12 (2) of The Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633	NPPF paras 152 - 182  SEA Guide, Chapter 5	The sustainability appraisal report and supporting documents relevant to the preparation of the DPD are part of the proposed submission documents (see Regulation 17).	Yes.  Reasonable alternatives to the quantum of development and overall spatial strategy have been considered and assessed through the Integrated Impact Assessment (IIA). The IIA and Local Plan have been developed in full accordance with the requirements of legislation, national guidance and good practice recommendations to assess reasonable alternatives and strategic options within the IIA of the Local Plan.  National Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. NPPF paragraph 167 also states that

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				<p>“Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken.”</p> <p>OPDC’s Local Plan is being developed within a context of regional guidance provided by the London Plan and the Old Oak and Park Royal Opportunity Area Planning Framework. These set out housing and jobs targets for the OPDC area and were both subject to separate IIAs which assessed these targets.</p> <p>OPDC’s Local Plan is required to deliver the London Plan targets and to be in general conformity with the London Plan. As such, options for lower amounts of homes and jobs were not provided and were not considered to be realistic or reasonable alternatives in accordance with NPPG Paragraph: 018 Reference ID: 11-018-20140306.</p> <p>However, an assessment of strategic options was carried out in the IIA for the Regulation 18 consultation following recommendations of good practice guidance. OPDC considered that the approach</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				<p>to affordable housing warranted assessment as a strategic option. This reflects the potential impact of the different approaches to affordable housing may have on wider placemaking and infrastructure requirements. The regulation 18 Local Plan also proposed alternative policy options. These were considered to be reasonable alternatives and were assessed by the IIA for the regulation 18 Local Plan.</p> <p>OPDC's Local Plan's spatial vision and narratives, which set out the overall spatial strategy, have been subject to a qualitative review in light of the IIA Framework objectives and an objective compatibility exercise has been used to determine if there are any key conflicts between the Local Plan Objectives and IIA Objectives. A more detailed assessment of the policies and options has been undertaken using an assessment matrix. These assessments are then considered in the round to provide a summary of the assessment which is set out on page iv of the IIA. The Policy</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				<p>Formulation Reports highlight the reasonable alternatives that were considered through the formulation of the Local Plan. These options were consulted on through the Regulation 18 stage.</p> <p>The reports set out where preferred options have been incorporated into the submission version of the Local Plan and where options have not been taken forward and the reasons for this. The Integrated Impact Assessment provides an assessment of the policy options.</p>
<p>2. Have you assessed alternatives against:</p> <ul style="list-style-type: none"> <li>• consistency with national policy?</li> <li>• general conformity with the regional spatial strategy where still in force?</li> </ul>	<p>The Act section 19 (2), section 24</p>	<p>NPPF para 151</p>	<p>For London boroughs and local authorities where regional strategies are still in force general conformity is tested formally later but you need to consider it during preparation of the DPD.</p>	<p>Yes.</p> <p>The Regulation 18 Integrated Impact Assessment provides an assessment of the policy options. All the policy options were consistent with national guidance and in general conformity with London Plan policies. at the time of writing.</p> <p>The Policy Formulation Reports demonstrate consistency and general conformity of the chosen policy approaches with:</p> <ul style="list-style-type: none"> <li>• National Planning Policy</li> </ul>



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				<p>Framework (NPPF);</p> <ul style="list-style-type: none"> <li>• National Planning Policy Guidance (NPPG);</li> <li>• London Plan 2016 and new draft London Plan 2017;</li> <li>• Supplementary Planning Guidance.;</li> </ul>
<p>3. Are you having regard to (where relevant):</p> <ul style="list-style-type: none"> <li>• adjoining regional spatial strategies?</li> <li>• the spatial development strategy for London?</li> <li>• Planning Policy for Wales?</li> <li>• the National Planning Framework for Scotland?</li> </ul>	<p>The Act sections 19 (2) and 24 (1) and (4)</p> <p>Regulation 10 and 21</p>		<p>Where the regional strategy has been revoked you should record that fact.</p>	<p>Yes.</p> <p>The Policy Formulation Reports demonstrate conformity of each of the chosen policy approaches with:</p> <ul style="list-style-type: none"> <li>• London Plan 2016 (as London's Spatial Development Strategy);</li> <li>• Supplementary Planning Guidance to the London Plan; and</li> <li>• Draft London Plan 2017.</li> </ul> <p>A letter of general conformity has been provided by the GLA confirming that the publication policies are in conformity with the London Plan.</p>
<p>4. Are you co-operating with other local planning authorities including counties, to address significant cross boundary</p>	<p>The Act section 33A(2)(a)</p> <p>Section</p>	<p>NPPF paras 181 and 185</p>	<p>.</p>	<p>Yes.</p> <p>The Duty to Cooperate Statement demonstrates how OPDC has engaged constructively, actively and on an</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
<p>issues? Have you discussed doing joint local development documents?</p>	<p>33A(6)(a)(b)  Section 20(5)(c)</p>			<p>ongoing basis with other planning authorities to develop effective planning policy documents.</p> <p>The engagement has taken many forms, through the regular Old Oak and Park Royal Duty to Cooperate Project Team meetings, other meetings to discuss particular issues and through the notification of each stage of the Local Plan's consultation to all those on the consultation database.</p> <p>The Duty to Cooperate Statement identifies the key issues that have been discussed and sets out actions and outcomes based on this engagement activity.</p> <p>The Statement of Consultation includes the comments that have been provided by other local planning authorities and sets out: where changes have been made as a result of the comment and where no changes have been made and the reasons for this.</p> <p>Yes. Joint local development documents are not considered to be appropriate, However, discussions regarding joint</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				SPDs are ongoing.
5. Are you cooperating with a person prescribed for the purposes of Regulation 33A(1)(c) to address significant cross boundary issues including preparing joint approaches?	<p>The Act section 33A(2)(a), section 33A(6)(a)</p> <p>The Act section 20 (5) (c)</p> <p>Regulation 4</p>	NPPF paras 181 and 182	The bodies prescribed by The Act section 33A(1)(c) are set out at Regulation 4 (1).	<p>Yes.</p> <p>The Duty to Cooperate Statement demonstrates how OPDC has engaged with the prescribed bodies on cross boundary issues such as waste, meeting housing need and jobs targets and transport and social infrastructure provision.</p> <p>The engagement has taken many forms, through the regular Old Oak and Park Royal Duty to Cooperate Project Team meetings, other meetings to discuss particular issues and through the notification of each stage of the Local Plan’s consultation to all those on the consultation database.</p> <p>The Duty to Cooperate Statement identifies the key issues that have been discussed and sets out actions and outcomes based on this engagement activity.</p> <p>OPDC has also received representations through the Regulation 18 and 19 stages (1) and (2) consultations to which responses have been set out in the Statement of</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				Consultation.
6. Are you cooperating with having regard to the activities of the LEP and LNP?	The Act section 33A(2)(b) and section 33A(9). Regulation 4 (2)	NPPF para 181 and 182		<p>Yes.</p> <p>As a prescribed duty to cooperate body, OPDC has consulted the London-wide LEP called the London Enterprise Panel, now the London Economic Action Partnership (LEAP) at each stage of production of the Local Plan.</p> <p>OPDC has also consulted the London Wildlife Trust, the equivalent to the LNP for London at each stage.</p>
<p>7. Are you having regard to:</p> <ul style="list-style-type: none"> <li>• your sustainable community strategy or of other authorities whose area comprises part of the area of the council?</li> <li>• any other local development documents adopted by the council?</li> </ul>	The Act section 19(2)			<p>As a Mayoral Development Corporation and not a local authority OPDC is not required to have a Sustainable Community Strategy as such but the Local Plan has been formulated throughout with a focus on integrating existing communities into the regeneration of the area.</p> <p>It is also noted that section 100(2)(b) of the Deregulation Act 2015 removed the requirement for councils to have regard to sustainable community strategies.</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
<p>8. Do you have regard to other matters and relevant strategies relating to:</p> <ul style="list-style-type: none"> <li>• resources</li> <li>• the local/regional economy</li> <li>• the local transport plan and transport facilities and services</li> <li>• waste strategies</li> <li>• hazardous substances</li> </ul>	<p>The Act section19(2)</p> <p>Regulation 10</p>		<p>As well as the matters and strategies listed in the Act and Regulations there are likely to be other matters identified in planning policy statements, regional and local strategies that you will need to have regard to in preparing the DPD.</p>	<p>Yes.</p> <p>The individual Policy Formulation Reports in relation to Environment and Utilities policies demonstrate how OPDC has had regard for resources (e.g.: EU3 Water), waste strategies (e.g.: policies EU6 Waste and EU12 Extraction of Minerals) and hazardous substances (e.g.: policies EU9 Minimising Carbon Emissions, EU12 Extraction of Minerals and EU13 Land Contamination).</p> <p>The Transport policy formulation reports (e.g.: policies T3 Cycling, T5 Rail and T6 Buses) demonstrate how OPDC has had regard for local and regional transport plans, facilities and services.</p> <p>The Employment Policy Formulation Reports (e.g.: policies SP5 Economic Resilience, E1 Protecting Existing Economic and Employment Functions and E4 Work Live Units) demonstrate how OPDC has had regard to protecting and enhancing the local and regional economy.</p>
<p>9. Are you having regard to the need to include policies</p>	<p>The Act</p>	<p>NPPF paras 93 -108</p>		<p>Yes.</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
on mitigating and adapting to climate change?	section19(1A)			The Local Plan recognises climate change as a key risk to development and that appropriately designed and delivered development can be part of a response to mitigating and adapting to climate (e.g.: policies SP2 Good Growth, EU4 Air Quality, EU8 Sustainable Materials and EU9 Minimising Carbon Emissions). The Transport policies in particular promote sustainable public transport over private car use.
10. Have you undertaken the sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?	The Act section19(5)  Regulation 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF para 182  SEA Guide, Chapter 5	Regulation13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633 sets out the consultation procedures.	Yes. OPDC has published an Integrated Impact Assessment (IAA) to consider the impact of policies on a range of issues, including a full sustainability appraisal. This contains an appraisal of alternatives. These are also summarised in the respective Policy Formulation Reports.
11. Are you setting out reasons for any preferences between alternatives?	Regulation 8(2)	NPPF para 182	This will include Information from the sustainability appraisal.	Yes. OPDC has published an Integrated Impact Assessment (IAA) to consider the impact of policies on a range of issues, including a full sustainability appraisal.

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				<p>This contains an appraisal of alternatives. These are also summarised in the respective policy formulation reports. Reasonable alternatives to the quantum of development and overall spatial strategy have been considered and assessed through the Integrated Impact Assessment (IIA). The IIA and Local Plan have been developed in full accordance with the requirements of legislation, national guidance and good practice recommendations to assess reasonable alternatives and strategic options within the IIA of the Local Plan.</p> <p>National Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. NPPF paragraph 167 also states that</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				<p>“Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken.”</p> <p>OPDC’s Local Plan is being developed within a context of regional guidance provided by the London Plan and the Old Oak and Park Royal Opportunity Area Planning Framework. These set out housing and jobs targets for the OPDC area and were both subject to separate IIAs which assessed these targets.</p> <p>OPDC’s Local Plan is required to deliver the London Plan targets and to be in general conformity with the London Plan. As such, options for lower amounts of homes and jobs were not provided and were not considered to be realistic or reasonable alternatives in accordance with NPPG Paragraph: 018 Reference ID: 11-018-20140306.</p> <p>However, an assessment of strategic options was carried out in the IIA for the Regulation 18 consultation following recommendations of good practice guidance. OPDC considered that the approach</p>



Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
				<p>to affordable housing warranted assessment as a strategic option. This reflects the potential impact of the different approaches to affordable housing may have on wider placemaking and infrastructure requirements. The Regulation 18 Local Plan also proposed alternative policy options. These were considered to be reasonable alternatives and were assessed by the IIA for the Regulation 18 Local Plan. OPDC's Local Plan's spatial vision and narratives, which set out the overall spatial strategy, have been subject to a qualitative review in light of the IIA Framework objectives and an objective compatibility exercise has been used to determine if there are any key conflicts between the Local Plan Objectives and IIA Objectives. A more detailed assessment of the policies and options has been undertaken using an assessment matrix. These assessments are then considered in the round to provide a summary of the assessment which is set out on page iv of the IIA.</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
<p>12. Have you taken into account any representations made on the content of the DPD and the sustainability appraisal? Are you keeping a record?</p>	<p>Regulations 17, 18(3) and 22 (1) (c) (iv)</p> <p>Regulation 13(4) of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>	<p>NPPF paras 150, 155, 157 and 159-171</p>	<p>Records on the sustainability appraisal should also include recording any assessment made under the Habitats Directive.</p>	<p>Yes.</p> <p>The Statement of Consultation sets out all the representations that have been received as part of Regulation 18 and Regulation 19 stages (1) and (2) Local Plans and how OPDC has taken account of representations made, where changes have been made to the Local Plan and where changes have not been made and the reasons for this. Key changes have also been summarised in the respective Policy Formulation Reports. In terms of the SA, the Integrated Impact Assessment (IIA) sets out the Consultation Responses to Draft IIA Report and how this has been amended in response to the representations.</p>
<p>13. Where sites are to be identified or areas for the application of policy in the DPD, are you preparing sufficient illustrative material to:</p> <ul style="list-style-type: none"> <li>enable you to amend the currently adopted policies map?</li> </ul>	<p>Regulations 5 (1)(b) and 9</p>	<p>NPPF para 157</p>	<p>Regulation 2 defines the terms 'submission' and 'adopted' proposals map.</p> <p>A map showing changes to the adopted policies map is part of the proposed submission documents defined in Regulation 17.</p>	<p>As a new Local Planning Authority. OPDC does not have a current adopted policies map. In light of this the Policies Map depicts policy designations set out in the Local Plan. It covers the entire policies map and a series of layers and designations.</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
<ul style="list-style-type: none"> <li>inform the community about the location of proposals?</li> </ul>				<p>The Policies Map will be reviewed and updated when policies are amended in the future.</p> <p>Yes. Consultation materials and content of the Local Plan have been developed and used to depict the location of proposals on maps and place diagrams.</p>
<p>14. Are the participation arrangements compliant with the SCI?</p>	<p>The Act, section 19(3)</p> <p>Regulation 18</p>	<p>NPPF paras 150 and 155</p>		<p>Yes.</p> <p>OPDC has followed the “ground rules” set out in the Statement of Community Involvement. These are inclusive invitation, authorisation, continuity, independent advice, early involvement, presenting options, choosing between options, consensus, transparent records and feedback.</p> <p>Consultation has accorded with the requirements set out in section 2 of the SCI.</p>

## Stage four: Publication

Under Regulation 20, the period for formal representations takes place **before** the DPD is submitted for examination in accordance with a timetable set out in the statement of the representations procedure which is made available at the council's office and published on its website.

When moving towards publication stage, the council should consider the results of participation on the preferred strategy and sustainability appraisal report and decide whether to make any change to the preferred strategy. In the event that changes are required, the council will need to choose either to:

- do so and progress directly to publication

OR

- produce and consult on a revised preferred strategy.

The latter may be appropriate where the changes to the DPD bring in changed policy or proposals not previously covered in community participation and the sustainability appraisal. It avoids having to treat publication as if it were a consultation, which it is not. It also provides insurance in relation to compliance with the Strategic Environmental Assessment Regulations. Legally, during any participation on a revised preferred strategy, you should:

- comply with the requirements of the SCI
- update the sustainability appraisal report.

The council should then produce the DPD in the form in which it will be published. This includes removing material dealing with the evaluation of alternatives and the finalisation of the text. The council should be happy to adopt the DPD in this form, and satisfied that it is sound and fit for examination.

The six weeks publication period is the opportunity for those dissatisfied (or satisfied) with the DPD to make formal representations to the inspector about its soundness. Only people proposing a change to the plan can expect to be heard at examination.

The possibility of change under certain circumstances (which should be exceptional) is allowed for in the new procedures, and is described in 'stage five: submission'.

## Stage four: Publication

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
<p>1. Have you prepared the sustainability appraisal report?</p>	<p>The Act section 19(5)</p> <p>Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>	<p>NPPF paras 165 - 168</p> <p>SEA Guide Chapter 5</p>		<p>Yes.</p> <p>OPDC has completed a sustainability appraisal as part of the publication version Integrated Impact Assessment (IIA). This has been reviewed considering the representations made at the Regulation 18 and Regulation 19 (1) and (2) stages.</p>
<p>2. Have you made clear where and within what period representations must be made?</p>	<p>Regulation 17, 19, 20 and 35</p>		<p>The period must not be less than 6 weeks from when you publish under Regulations 19 and 35 (see below).</p>	<p>Yes.</p> <p>OPDC published on its website details which set out where, and within what period representations on the Publication Stage Local Plan must be made. Letters and emails were sent out as part of the Regulation 18 and 19(1) and (2) Local Plan consultations detailing how to make representations. Examples of these are shown in the Statement of Consultation.</p>
<p>3. Have you made copies of the following available for inspection:</p> <ul style="list-style-type: none"> <li>• the proposed submission documents?</li> <li>• the statement of the representations</li> </ul>	<p>Regulation 19(a)</p>		<p>Regulation 17 gives definitions.</p>	<p>Yes.</p> <p>An email was sent to all of the specific consultation bodies inviting them to make representations on the Regulation 19 (1) and (2) publication policies. This</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
procedure?				<p>correspondence included a link to the electronic copies of the Publication Local Plan, the associated IIA and to all the other supporting studies. Hard copies of the Local Plan, supporting studies and statement of representations have been available at: Brent Civic Centre, Engineers Way, Wembley, HA9 0AF; City Hall, Queens Walk, London, SE1 2AA; Ealing Council Offices, Perceval House, 14/16 Uxbridge Road, W5 2HL; Hammersmith Town Hall, King Street, W6 9JU; Harlesden Library, Craven Park Road, NW10 8SE; and The CoClub, The Perfume Factory, 140 Wales Farm Rd, North Acton W3 6UG (for Regulation 18/ first stage 19 only). The Collective, Old Oak Lane, London, NW10 6FF (second Regulation 19 stage only).</p>
<p>4. Have you published on your website:</p> <ul style="list-style-type: none"> <li>the proposed</li> </ul>	Regulations 19 and 35		Regulations 2 and 17 give definitions.	<p>Yes. All these documents have been published on the website. This includes</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
submission documents? <ul style="list-style-type: none"> <li>• the statement of the representations procedure?</li> <li>• statement and details of where and when documents can be inspected?</li> </ul>				details of where the documents can be inspected in person.
5. Have you sent to each of the specific consultation bodies invited to make representations under Regulation 18(1): <ul style="list-style-type: none"> <li>• A copy of each of the proposed submission documents</li> <li>• The statement of the representations procedure?</li> </ul>	Regulation 19(b)		Regulations 2 and 17 give definitions.	Yes. A letter/email was sent to the specific consultation bodies invited to make representations under Regulation 18(1). This correspondence included a link to the electronic copies of the Publication Local Plan, the associated IIA and to all the other supporting studies including the statement of representations procedure. A copy of this email/letter is contained in the Statement of Consultation.
6. Have you sent to each of the general consultation bodies invited to make representations under Regulation 18(1): <ul style="list-style-type: none"> <li>• the statement of the representations procedure?</li> <li>• where and when the documents can be</li> </ul>	Regulation 19(b)		Regulations 2 and 17 give definitions.	Yes. A letter/email was sent to the general consultation bodies invited to make representations under Regulation 18(1). This correspondence included a link the statement of representations procedure and an address for where bodies could inspect the

Activity	Statutory requirement	Guidance reference	Additional notes	Possible evidence
inspected?				documents. A copy of this email/letter is provided in the Statement of Consultation.
7. Have you requested the opinion of the Mayor of London (if a London Borough or Mayoral DC) on the general conformity of the DPD spatial development strategy?	The Act section 24  Regulation 21		The request must be made on the day you publish the documents under Regulation 19(a) and a response must be made within six weeks from the request (Regulation 21).	Yes. A letter of general conformity has been provided by the GLA confirming that the publication policies are in general conformity with the London Plan.



## Stage five: Submission

At the submission stage, the council should receive and collate any representations made at publication stage. You don't have to report these representations to councillors but there may be requirements deriving from other legislation, Standing Orders or council procedures that must be considered. Or you might just think it is a good idea to report on it anyway.

If they are reported it should be on the facts of the representations made, not the results of a consultation process by the council. They should not be treated as a consultation or an opportunity to make changes or answer representations. NB: under the 2012 Regulations there is no longer any requirement to give notice by local advertisement.

You should ensure you are in legal compliance with the SCI, the Habitats Directive and the Strategic Environmental Assessment Directive in any additional work. Any formal publication of additional or changed matters would need to allow at least a six-week period for representations to be made.

There are different approaches that could be taken to changes. You should be satisfied that you remain fully compliant with the legal requirements if any changes are made (and any consequential effects on the DPD as a whole).

Apart from notification of the examination, this tool does not deal with the legal requirements that need to be followed after submission.

## Stage five: Submission

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
1. Has the DPD been prepared in accordance with the LDS? Does the DPD's listing and description in the LDS match the document? Have the timescales set out in the LDS been met?	The Act section 19(1)		The Act section 15(2) sets out the matters specified in the LDS. As at January 2013, no further matters are prescribed in the Regulations.	Yes. OPDC's Local Development Scheme is provided on OPDC's website. This shows that the Local Plan's listing, description and timescales have been met.
2. Has the DPD had regard to any sustainable community strategy for its area (like a county and district)?	The Act section 19(2)	NPPF para 182		Yes. The Local Plan has been formulated with a focus on economic growth, health and well-being, and affordable housing supply. The Socio-

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				Economic Baseline Study provides indicators intended to be measured on an ongoing basis to measure improvements in socio-economic conditions in the area. OPDC is not a local authority and does not have a sustainable community strategy. In any event the Deregulation Act 2015 removed the requirement for councils to prepare Sustainable Community Strategies or for planning authorities to have regard to them.
3. Is the DPD in compliance with the SCI (where one exists)? Has the council carried out consultation as described in the SCI?	The Act section 19(3)  Regulation 22(1)(c)		Before the SCI is formally amended to take into account the changes in the regulations, you may need to set out how the community engagement that you carried out met the regulations (as amended).	Yes. OPDC's SCI (February 2017) sets out how the community should be engaged in the preparation of the Local Plan. Details for how these activities have been carried out are stated within the Statement of Consultation which shows that OPDC has complied with its SCI.
4. Have you identified and addressed any issues which are likely to have a significant impact on at least two planning areas. In doing so, have you co-operated with other local planning authorities,	The Act section 33A(1) and section 20(5)	NPPF paras 181 and 182	Under NPPF para 182, the plan should be based on effective joint working on cross-boundary strategic priorities to be found 'Effective'.	Yes. In accordance with the Duty to Cooperate (DtC), OPDC has been working closely with the prescribed DtC bodies in the ongoing development of the Local Plan. Feedback received played a key role in the

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>county councils where they are not a planning authority, LEPs, LNPs and the prescribed bodies in identifying and addressing any strategic cross-boundary issues</p> <p>If you have not agreed on the approach is there a justification?</p>				<p>production of both the Regulation 18 Local Plan and Regulation 19 (1) and (2) versions of the Local Plan. This is described in the finalised publication version Duty to Cooperate Statement which set out how OPDC has ensured that cross-boundary issues have been appropriately addressed.</p>
<p>5. Has the DPD been subject to sustainability appraisal? Has the council provided a final report of the findings of the appraisal?</p>	<p>The Act section 19(5)</p> <p>Regulation 22(1)(a)</p>	<p>NPPF para 165</p> <p>SEA Practical Guide, chapter 5</p>		<p>Yes.</p> <p>Sustainability appraisal has been carried out within the wider Integrated Impact Assessment. This has happened throughout the Regulation 18 and 19 (1) and (2) stages of the Local Plan. A final report has been produced for publication which can be found on OPDC's website.</p>
<p>6. Is the DPD to be submitted consistent with national policy?</p>	<p>The Act section 19(2) and Schedule 8</p>	<p>NPPF para 151</p>		<p>Yes.</p> <p>This has been evidenced through the Soundness self-assessment checklist as well as through the individual Policy Formulation Reports.</p>
<p>7. Does the DPD contain any policies or proposals that are not in general conformity with the regional strategy where it</p>	<p>The Act section 24(1)(a) and 24(4)</p> <p>Regulation 21</p>	<p>NPPF para 218 footnote 41</p>	<p>In London the requirement is for general conformity with the spatial development strategy (The London Plan).</p>	<p>No.</p> <p>A letter of general conformity has been provided by the GLA confirming that the policies in the Local Plan are in</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>still exists? If yes, is there local justification?</p> <p>If the LPA is a London borough or a mayoral development corporation has it requested an opinion from the Mayor of London on the general conformity of the plan with the spatial development strategy?</p>				<p>conformity with the London Plan.</p> <p>This is also demonstrated in the individual Policy Formulation Reports.</p>
<p>8. Has the council published the prescribed documents, and made them available at their principal offices and their website?</p> <p>Has the council notified the relevant statutory and non-statutory bodies, and all persons invited to make representations on the plan?</p> <p>Does the DPD contain a list of superseded saved policies?</p>	<p>The Act section 20(2), 20(3) and 20(5)(b)</p> <p>Regulations 8 and 19</p>	<p>NPPF para 182</p>	<p>Requirements relating to publication of the prescribed documents are listed later in this table.</p>	<p>Yes.</p> <p>Hard copies of the Local Plan, supporting studies and statement of representations have been available at: Brent Civic Centre, Engineers Way, Wembley, HA9 0AF; City Hall, Queens Walk, London, SE1 2AA; Ealing Council Offices, Perceval House, 14/16 Uxbridge Road, W5 2HL; Hammersmith Town Hall, King Street, W6 9JU; Harlesden Library, Craven Park Road, NW10 8SE; and The CoClub, The Perfume Factory, 140 Wales Farm Rd, North Acton W3 6UG (for Regulation 18/ first stage 19 only)</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				<p>The Collective, Old Oak Lane, London, NW10 6FF (second Regulation 19 stage only).</p> <p>and published electronically on OPDC's website.</p> <p>A letter/email was sent to the consultation bodies informing them of the submission of the Local Plan.</p> <p>As this is OPDC's first Local Plan there is no list of superseded saved policies. This may become relevant in future iterations of the Local Plan.</p>
<p>9. Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted policies map?</p> <p>If yes, have you prepared a submission policies map?</p>	<p>Regulations 5(1) (b), 9 (1), 17 &amp; 22(1)</p>			<p>Yes.</p> <p>The Policies Map depicts the submission policy designations set out in the Local Plan.</p>
<p>10. Is the DPD consistent with any other adopted DPDs for the area? If the DPD is intended to supersede any adopted development plan policies, does it state that fact and identify the superseded policies?</p>	<p>Regulation 8(3) and (4)</p> <p>Regulation 8(5)</p>		<p>Development Plan is defined in Section 38 of the Act.</p>	<p>Yes.</p> <p>The introduction to the Local Plan states that until OPDC adopts its own Local Plan, the development plan documents (DPDs) from the London Boroughs of Brent, Ealing and Hammersmith and Fulham, that apply to the OPDC area</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				will continue to form part of OPDC's DPD. As OPDC progresses its Local Plan, the weight of these Local Authority DPDs covering parts of the OPDC area will diminish as they are superseded by the growing material weight of OPDC's Local Plan. The exception to this rule is the West London Waste Plan, which was adopted by OPDC Board in July 2015 as a DPD. The Local Plan is consistent with the West London Waste Plan.
<p>11. Have you prepared a statement setting out:</p> <ul style="list-style-type: none"> <li>• Which bodies and persons were invited to make representations under Regulation 18?</li> <li>• How they were invited?</li> <li>• A summary of the main issues raised?</li> <li>• How the representations have been taken into account?</li> </ul>	<p>The Act section 20 (3)</p> <p>Regulation 22(1)(c)</p>		<p>This will bring forward material from the Consultation statement (see Stage 2 above).</p>	<p>Yes.</p> <p>The Submission Version Statement of Consultation provides the details of the Regulation 18 representations.</p>
<p>12. Have you prepared a statement giving:</p> <ul style="list-style-type: none"> <li>• the number of representations made under Regulation 22?</li> <li>• a summary of the main</li> </ul>	<p>The Act section 20(3)</p> <p>Regulation 22(1)(c)</p>			<p>Yes.</p> <p>The Submission Version Statement of Consultation provides the details of the Regulation 22 representations.</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>issues raised?</p> <p>OR</p> <ul style="list-style-type: none"> <li>that no representations were made?</li> </ul>				
<p>13. Have you collected together all the representations made under Regulation 28?</p>	<p>The Act section 20(3)</p> <p>Regulation 22(1)(e)</p>			<p>Copies of the representations made on the soundness of the Local Plan are available on the Examination web page.</p> <p>The supporting evidence base documents are available on the Examination web page.</p>
<p>14. Have you assembled the relevant supporting documents?</p>	<p>The Act section 20(3)</p> <p>Regulation 22(1)(g)</p>			<p>All necessary evidence and records of decisions relevant to the Local Plan have been submitted to PINS. The examination webpage includes an index of all relevant documents.</p>
<p>15. Has your council approved the DPD for submission?</p>			<p>Check the LPA's constitution/standing orders for the authorisation process appropriate for the type of DPD.</p>	<p>The submission Local Plan was approved by the OPDC Board on 25 September 2018 following a recommendation from OPDC Planning Committee on 19 September 2018.</p>
<p>16. Have you sent the Secretary of State (the Planning Inspectorate) both a paper copy and an email of the following:</p> <ul style="list-style-type: none"> <li>the DPD?</li> <li>the submission policies</li> </ul>	<p>The Act section 20(1) and 20(3)</p> <p>Regulations 22(1) and 22(2)</p>		<p>Regulation 35 deals with the availability of documents and the time of their removal.</p> <p>Electronic copies of some of the representations and supporting documents may not be practicable.</p>	<p>Yes. The documents have been sent electronically and by post to the Secretary of State.</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>map (unless there are no site allocation policies)?</p> <ul style="list-style-type: none"> <li>the documents prescribed in Regulation 22(1)?</li> </ul>			<p>Regulation 35 deals with the availability of documents and the time of their removal.</p>	
<p>17. Have you made the following available at the same places where the proposed submission documents were to be seen:</p> <ul style="list-style-type: none"> <li>The DPD?</li> <li>The documents prescribed in Regulation 22(1)?</li> </ul>	<p>Regulation 22(3)</p>		<p>You should do this as soon as reasonably practicable after submission.</p>	<p>Yes. Hard copies of the Local Plan, supporting studies and statement of representations have been available at: Brent Civic Centre, Engineers Way, Wembley, HA9 0AF;  City Hall, Queens Walk, London, SE1 2AA;  Ealing Council Offices, Perceval House, 14/16 Uxbridge Road, W5 2HL;  Hammersmith Town Hall, King Street, W6 9JU;  Harlesden Library, Craven Park Road, NW10 8SE; and  The CoClub, The Perfume Factory, 140 Wales Farm Rd, North Acton W3 6UG (for Regulation 18/ first stage 19 only).  The Collective, Old Oak Lane, London, NW10 6FF (second Regulation 19 stage only).</p>
<p>18. On your website, have you published the:</p> <ul style="list-style-type: none"> <li>DPD?</li> </ul>	<p>Regulation 22(3) and 35(1)(b)</p>		<p>You should do this as soon as reasonably practicable after submission.</p>	<p>Yes.  All these documents have been published on OPDC's examination website.</p>



Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<ul style="list-style-type: none"> <li>• submission policies map?</li> <li>• sustainability appraisal report?</li> <li>• Regulation 22(1)(c) statement?</li> <li>• supporting documents (where practicable) ?</li> <li>• representations made under Regulation 20 (where practicable) ?</li> <li>• statement as to where and when the DPD and the documents are available?</li> </ul>				
<p>19. For each general consultation body invited to make representations under Regulation 18(1), have you sent:</p> <ul style="list-style-type: none"> <li>• notification that the documents prescribed in Regulation 22(3)(a)(i)-(iii) are available for inspection</li> <li>• where and when they can be inspected?</li> </ul>	Regulation 22(3)(b)		You should do this as soon as reasonably practicable after submitting to the Secretary of State.	Emails/letters have been sent to all the general consultation bodies invited to make representations under Regulation 18 notifying them of publication of submission documents with a link to electronic copies and details of where hard copies can be inspected.
<p>20. Have you given notice to persons who have requested to be notified that submission has taken place?</p>	Regulation 22(3)(c)		You should do this as soon as reasonably practicable after submitting to the Secretary of State.	Yes, persons who requested have been notified by letter/email.
<p>21. If an examination is being</p>	The Act section 20			Yes.

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>held, at least six weeks before its opening has the Programme Officer:</p> <ul style="list-style-type: none"> <li>• published the time and place of the examination and the name of the person appointed to carry out the examination on your website?</li> <li>• notified those who have made representations on the published DPD which have not been withdrawn of these details?</li> </ul>	<p>Regulations 24 and 35</p>			<p>At the time of the examination the Programme Officer will published the time and place of the examination and the name of the person appointed to carry out the examination on OPDC's website and will those who have made representations on the published Local Plan.</p>