

# OPDC LOCAL PLAN SCHEDULE OF REFERENCES TO REASONABLE ALTERNATIVES

20 June 2019



## 1 Purpose of this document

- 1.1 This document has been prepared in response to a request by the Planning Inspector to provide a schedule of locations in the Integrated Impact Assessment (IIA) documents where Reasonable Alternatives have been discussed. The Inspector also requested a schedule of locations in documents, contemporaneous to the IIA, where references to Policy Options and Reasonable Alternatives occurred. This information is summarised in section 2 and tables 1 and 2.

## 2 Documents referring to Reasonable Alternatives

- 2.1 Throughout the development of the Local Plan and accompanying IIA documents, Reasonable Alternatives have been considered and assessed. Where Reasonable Alternatives were not provided, these documents also set out the reasoning for this. The following documents are those containing this information. Further detailed information is provided in tables 1 and 2.
- 2.1.1 **January 2016. OPDC Planning Committee Report and OPDC Board Report regarding Regulation 18 consultation** – these documents present and explain the approach taken to alternatives to Planning Committee and Board members prior to the commencement of the Regulation 18 consultation;
- 2.1.2 **February 2016. OPDC Draft Local Plan (Regulation 18)** – sets out the reasonable alternatives for the four strategic options for delivering affordable housing and other alternative policies throughout the document;
- 2.1.3 **February 2016. OPDC Integrated Impact Assessment (including Habitats Regulations Assessment Screening) (Draft for Regulation 18 Consultation and Appendices)** – sets out the approach to alternatives appraisal including a summary and detailed appraisal matrix for the 4 strategic alternatives for affordable housing and the other alternative policies within the Regulation 18 Local Plan;
- 2.1.4 **June 2018. OPDC Integrated Impact Assessment (including Habitats Regulations Assessment Screening) (to accompany the OPDC Regulation 19 (2) Second Revised Draft Local Plan)** – sets out the reasoning for not providing reasonable alternatives for development capacities; and
- 2.1.5 **April 2019. OPDC Integrated Impact Assessment Addendum** – clarifies the reasoning why reasonable alternatives for development capacities are not provided, the role of a post-addendum statement and how policy recommendations made through the IIA process have been incorporated into the Local Plan or reasons for not incorporating them.

## 3 Table 1: References to Reasonable Alternatives in the IIA documentation

### Document Location Key:

1: OPDC, Integrated Impact Assessment (including Habitats Regulations Assessment Screening) Draft for Regulation 18 Consultation 4 February 2016<sup>1</sup>

2: OPDC, Integrated Impact Assessment (including Habitats Regulations Assessment Screening) Draft for Regulation 18 Consultation 4 February 2016 Appendices<sup>2</sup>

3: OPDC, Integrated Impact Assessment (including Habitats Regulations Assessment Screening) June 2018 (to accompany the OPDC Regulation 19 (2) Second Revised Draft Local Plan)<sup>3</sup>

4: OPDC, Integrated Impact Assessment Addendum April 2019<sup>4</sup>

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<sup>1</sup> [https://www.london.gov.uk/sites/default/files/opdc\\_draft\\_local\\_plan\\_draft\\_ia\\_report\\_new\\_cover.pdf](https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_ia_report_new_cover.pdf)

<sup>2</sup> [https://www.london.gov.uk/sites/default/files/opdc\\_draft\\_local\\_plan\\_draft\\_ia\\_report\\_appendices\\_new\\_cover.pdf](https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_ia_report_appendices_new_cover.pdf)

<sup>3</sup> [https://www.london.gov.uk/sites/default/files/28\\_ia\\_and\\_hra.pdf](https://www.london.gov.uk/sites/default/files/28_ia_and_hra.pdf)

<sup>4</sup> [https://www.london.gov.uk/sites/default/files/opdc-024\\_opdc\\_response\\_to\\_hearing\\_actions\\_matte\\_r\\_2\\_-\\_integrated\\_impact\\_assessment.pdf](https://www.london.gov.uk/sites/default/files/opdc-024_opdc_response_to_hearing_actions_matte_r_2_-_integrated_impact_assessment.pdf)

Options Appraised/ Referenced	Document Location	Details
Appraisal of Strategic Options	1 (Reg 18 IIA): Section 3.2.1	Introduces that the appraisal focusses on strategic and policy alternatives.
	1 (Reg 18 IIA): Section 4.1 and 4.2	Introduces approach to alternatives appraisal and references where to find results.
	1 (Reg 18 IIA): Chapter 5 And 3 (Reg 19(2) IIA): Chapter 5	Summarises appraisal results for 4 strategic alternatives (affordable housing) and explains what the alternatives are.
	2 (Reg 18 IIA Appendices): Appendix F, pages 194-199 And 3 (Reg 19(2) IIA): Appendix E, pages 430-434	Detailed appraisal matrix for 4 strategic alternatives.
	3 (Reg 19(2) IIA): Section 3.4	Explains how development capacities were set in the London Plan/FALP/OAPF and options for these were, therefore, not reasonable alternatives.  Introduces how options were appraised through the IIA.  Explains that the reasons for OPDC's decisions on which strategic options to take forward were based upon the sustainability strengths and weaknesses of each option identified in the IIA.
	4 (Addendum): Sections 1.4, 2.2, 2.3 and 2.4	Clarifies the information in Reg 19(2) Section 3.4 with further detail on the hierarchy of plans and why the broad spatial strategy and quantum of growth were set in the London Plan and are therefore not reasonable alternatives for this IIA.
	4 (Addendum): Section 2.4	Further clarity on what was appraised in the IIA of the London Plan/FALP/OAPF.  Further clarity on why the <u>only</u> reasonable alternatives available to OPDC were strategic affordable housing options and a range of policy options.
	4 (Addendum): Section 3	Clarifies that the SEA Directive/Regulations requirements to give reasons for selecting the proposed approach in light of the alternatives is typically satisfied within the forthcoming post-adoption statement of the Plan.
Appraisal of Preferred Policies and Policy Options	1 (Reg 18 IIA): Section 4.5	Introduces that the appraisal focusses on strategic and policy alternatives and where to find the results.
	2 Appendix G pages 200- 424	Detailed appraisal matrices for preferred and reasonable alternative policies.
	3 (Reg 19(2) IIA): Section 4.4	Explains how policy options were appraised and also references the iteration of appraisal as the Local Plan evolved between the Reg 19(1) and Reg 19(2)

Options Appraised/ Referenced	Document Location	Details
		consultations.
	4 (Addendum): Section 2.4	Table 2.2 reiterates the preferred and reasonable alternative policy options appraised in Reg 18 Appendix G including reasons for their selection or rejection in light of the preferred policy options. It clarifies that for policies where no alternatives have been discussed, there were no reasonable alternatives identified.
	4 (Addendum): Section 3	Table 3.1 clarifies how policy recommendations made through the IIA process have been incorporated into the Local Plan or reasons for not incorporating them.

3.1 Table 1 clearly demonstrates to the reader that the IIA documentation sets out how, when and why reasonable alternatives have been generated and assessed and where reasonable alternatives are not provided the reasoning for this.

## 4 Table 2: References to Policy Options and Reasonable Alternatives in OPDC Documents

Options Appraised/ Referenced	Document Location	Details
Appraisal of Strategic Options	Regulation 18 Local Plan: Paragraphs 7.38 to 7.42	States the four strategic options for delivering affordable housing.
Appraisal of Preferred Policies and Policy Options	Regulation 18 Local Plan: Paragraphs 1.14 to 1.18 and figures 4 and 5.	Identifies within each chapter there are a series of policies which take two forms: 'preferred policies' or 'policy options' and that realistic alternatives are included where relevant.
Appraisal of Preferred Policies and Policy Options	Regulation 18 Local Plan: Paragraph 1.20	Identifies that all draft Local Plan policy options, including the alternative policy options, have been appraised in OPDC's IIA.
Appraisal of Preferred Policies and Policy Options	Regulation 18 Local Plan: Overarching Spatial Policies, Places, Thematic Policies and Delivery Implementation Chapters.	Policy sections within each chapter comprise a 'Preferred Policy Option' and 'Alternative Policy Option(s)' or where no 'Alternative Policy Option' is identified a reason for why an Alternative Policy Option has not been provided.
Appraisal of Preferred Policies and Policy Options	Planning Committee Report Regulation 18 Local Plan consultation (6 January 2016): Section 5	Identifies the use of policy options and alternative policy options within the Regulation 18 Local Plan. The figure within paragraph 5.4 identifies that Alternative Policy Options "Sets out realistic alternatives for the policy and explains potential positive and negatives of the alternative and why at this stage the option is not

Options Appraised/ Referenced	Document Location	Details
Appraisal of Preferred Policies and Policy Options	Board Report Re: Planning Matters: Regulation 18 Local Plan consultation (25 January 2016): Section 3	<p>preferred.”</p> <p>Identifies the use of policy options and alternative policy options within the Regulation 18 Local Plan.</p> <p>The figure within paragraph 3.12 identifies that Alternative Policy Options “Sets out realistic alternatives for the policy and explains potential positive and negatives of the alternative and why at this stage the option is not preferred.”</p>

## 5 Conclusion

- 5.1 Through the four IIA documents referred to in Table 1, this document demonstrates that the IIA has identified what the reasonable alternatives are, that these were the only reasonable alternatives available to OPDC in light of other options, that their selection has been justified and that they have been appraised through the IIA process.
- 5.2 In addition, the Regulation 18 Local Plan and associated Planning Committee and Board reports demonstrate that references were made to preferred policies and alternative policies that were considered to be reasonable.
- 5.3 This complies with the requirements of the SEA Directive which, in Article 5(1) requires that:

**Box 2.6: SEA Directive Art. 5(1)**

*Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.*

- 5.4 And the SEA Regulations which, in Schedule 2, paragraph 8 require that:

**Box 2.7: SEA Regulations Schedule 2, paragraph 8**

*... an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.*

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