Hammersmith and Fulham Soundness Checklist

January 2017

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; and

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 DPD 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; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD 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. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

In addition, the Legal Compliance checklist (a separate document, see www.pas.gov.uk) should be completed to ensure that this aspect is covered.

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

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Positively Prepared: the plan should be prepared 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.		
Vision 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.	The Local Plan's Introductory chapters and in particular Hammersmith and Fulham (Section 2) sets out the issues and the challenges facing Hammersmith and Fulham. The Plan's Spatial vision and strategic objectives are set out within Section 3. The vision and strategic objectives identified acknowledge and link to the goals of the Council contained in the Labour Manifesto - "The change we need" . The policies follow logically from the objectives (section 3) and, as mentioned above, the objectives themselves flow from the Labour Manifesto. The council considers that there are no policy gaps. The Local plan and the London Plan provide a comprehensive development plan for the borough. Sustainability Appraisal (SA) is an iterative part of the plan making process. An SA was carried out simultaneously during preparation of the Plan and informed option selection, policy direction and decision making. Policies have been agreed corporately and the Council considers that the preparation of the Plan has eliminated internal inconsistencies. The Local Plan includes timescales which are considered realistic. It will cover the period up to 2035. The housing regeneration programme is supported by a SHLAA that identifies when and where the growth will take place. The Plan also includes expected delivery dates for infrastructure within the Infrastructure Delivery plan. Ongoing monitoring, for example through the AMR, will highlight if changes to the timescales are required. Policy DEL1 – Delivery and Implementation sets out how the Plan will be delivered. The council have produced an Infrastructure Delivery Plan 2016 which supports the Local plan. This document was prepared in collaboration with the infrastructure providers. It sets out responsibilities for the delivery of each scheme, funding arrangements and likely timescales of delivery. Information is provided for infrastructure relating to children and education services; healthcare services; adult care services; leisure and community facilities; emergency services; strategic transport; utilities and physical infrastructure. The Council has also consulted infrastructure providers at key stages of the Plan's development. Key comments made by infrastructure providers are set out in the Consultation Statement.
The presumption in favour of sustainable development (NPPF paras 6-17) Plans and decisions need to take local circumstances into account, so that	• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective',	The council have produced an evidence base which establishes the development needs of the plan area and provides an audit trail of how quantums of development and the distribution of development have been arrived at. All evidence under pinning the Local Plan is listed in the supporting documents list submitted to the Planning Inspectorate for examination (available

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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.	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)	on the Council's website). Objectively assessed housing needs have been identified (Strategic Housing Market Assessment - SHMA 2016) and targets have been derived from these in line with London Plan. The Local Plan is also underpinned by objective assessments of development needs for a number of other key forms of development (including employment and retail). The Local Plan identifies four regeneration areas where growth will be concentrated. Area based SPDs for these growth areas have been adopted and they include evidence on development quantumns and distribution which have informed the Local plan.
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 created in accordance with the NPPF and therefore policies follow the approach of the presumption in favour for sustainable development. The Local Plan is based on the principles of sustainable development as demonstrated through the vision, strategic objectives and policies which seek sustainable solutions. A policy explicitly setting out the presumption in favour of sustainable development is no longer required.
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 specifically supports and encourages mixed use developments in appropriate locations and supports the effective and efficient use of land and buildings in Hammersmith and Fulham. As part of the plan preparation process, we objectively assessed economic, social and environmental needs of the borough by compiling a comprehensive evidence base. This evidence includes an infrastructure delivery plan, employment land Study, a Strategic Housing Market Assessment, a joint strategic Needs Assessment, Sport and Physical Activity Strategy and a retail needs study. Policy approaches have then been derived from these studies, such as H01, H03, E1 and INFRA1. Background papers have also been provided which add further detail to how our policies have been informed by our evidence base.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Where relevant, the Local Plan also takes into account wider geographic and strategic issues and incorporates principles of the London Plan. The document has been prepared involving other authorities and a number of statutory bodies. Details of which can be found within the Consultation and Duty To Co-operate Statements.
NPPF Principles: Delivering sustainable development		
1. 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 economic vision and strategy for the Local Plan are outlined in the Spatial Vision (Section 3), Strategic Objectives (Section 3), Regeneration Area Strategies (Section 5) and the Local Economy and Employment Chapter (Section 6). Local Plan policies are expected to deliver the vision and objectives of the Local Authority by helping to provide the jobs and training opportunities needed to support Hammersmith and Fulham's growing population and securing land and premises for the borough's businesses. Policies within Chapter 6 (Local Economy and Employment) have been informed by the council's Employment Land Study 2016. Policy E1 in particular sets out the industries the council seeks to support, such as creative industries, health services, bio-medical and other research based industries.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)	The Local Plan seeks to make the most efficient use of the land available while also seeking to protect the quality of the borough's environment. Regeneration Strategies form a key part of the Local Plan. Strategic Policy 'Regeneration Strategies' and specific regeneration area and site polcies for the four regeneration areas are detailed in Section 5 of the Local Plan. Infrastructure needs are identified in the Infrastructure Delivery Plan and policy INFRA1 'Delivering and monitoring the Local Plan' provides more detail on the Council's approach to infrastructure provision.

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		Policy E1 seeks to strengthen and enhance the local economy. It also seeks to safeguard existing employment premises. However, as the supporting text stipulates, there is scope for appropriate change of use in certain circumstances, including where employment sites or buildings cannot be made viable in the longer term. The Local Plan does not allocate employment sites rather the emphasis is on safeguarding existing employment premises and land. This should ensure that a supply of land is available for prospective businesses and minimises the need for developing new sites. A review was undertaken of existing employment sites through the Employment study. The Employment Land Study has been updated at regular intervals, the most recent being 2016. Its assesses the demand for and the supply of, land for employment use, by forecasting future employment land needs by using labour forecasting and projecting previous employment trends forward.
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.	Local Plan objectives 1 and 4 and Plan policies TLC1 and TLC2 - support the existing and future development of Hammersmith and Fulham's Town Centres ensuring that they are competitive and are positively managed. A hierarchy of town and local centres is set out in appendix 2. Regeneration area policies WCRA, HTC and FRA, together with associated site policies encourage residential developments on appropriate sites and allocate land for town centre uses.
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 centres (23)	• 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 allocated.	Hammersmith and Fulham's Retail Needs Study 2016 assesses the retail need for new convenience and comparison retail floorspace up to 2036 and makes recommendations regarding the allocation of land for retail. Policy TLC2 and appendix 2 designates primary and secondary retail frontages. Primary frontages contain high proportions of shops (A1 uses) while secondary frontages are also expected to contain shops, but can also accommodate other town centre uses. These frontages are also shown on the proposals map.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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.	Not applicable.
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 (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 providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)

Opportunities for sustainable transport | • 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.

• 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 borough's drive to promote sustainable modes of transport and active travel is articulated in Local Plan objective 14. The aim is to reduce congestion, improve air quality and increase levels of physical activity.

Local Plan Policy HRA2 and Transport policy T6 seek to identify sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan (Local Implementation Plan)

Local Plan Policies T1, T3, RTC1 and RTC2 facilitate the use of sustainable modes of transport, reducing the need to travel by vehicles, promotes the sustainable movement of goods and materials.

Local Plan policies T4 and T5 requires car parking permit free measures in all new development in Hammersmith and Fulham, with the exception of parking for disabled people and essential uses where necessary. In setting this parking standard the Council considers that the evidence provided has taken into account the criteria required of paragraph 39 of the NPPF. |

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)		
Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)		
Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)		
Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)		
For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)		
The setting of car parking standards including 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)		

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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 recognises the importance of digital infrastructure in development and expects electronic communication networks, including telecommunications and high speed broadband as indicated by the Strategic objectives (Section 3) and Policy DC10 'Telecommunications' to be of an appropriate design and in a suitable location. The Infrastructure schedule set within the Infrastructure Delivery Plan indicates whether further digital infrastructure may be required.
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	Table 2 (Page 70) of the Local Plan sets out targets for the overall numbers of additional homes expected in the borough over the Plan period. This is supported by evidence in the form of a Five Year Land Supply document and a 20 year housing trajectory which indicate that there are sufficient identified sites in place to exceed our housing targets in the early years of the Plan period. Deliverable sites are in place to provide more than 7,828 homes in the next 5 years exceeding Hammersmith and Fulham's overall housing target of 1,031 per year and the 5% buffer. The GLA coordinates preparation of a joint Strategic Housing Land Availability Assessment (SHLAA) for all the London Boroughs and the Cities of London and Westminster. The basis for the current London Plan is The London Strategic Housing Land Availability Assessment 2013. The GLA has started work on a new SHLAA to inform a future London Plan review.
Identify a supply of developable sites or broad locations for years 6-10 and, where	• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-	At present, for years 6 to 10, Hammersmith and Fulham has a supply of sites to accommodate 5,589 homes per year. For years 11 to 15, our supply of sites can accommodate 5,324homes

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
possible, years 11-15 (47).	15	per year. Demand for housing sites in the later years of the Plan is expected to be met by higher density development and intensification of the existing built environment, and delivery of additional housing from sites identified in the London Strategic Land Availability Assessment (SHLAA) 2013, including town centres, Opportunity areas and regeneration areas. Preparation has also begun on a new London SHLAA. Additional sources of supply will be included in future housing trajectories.
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	• A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47)	5 year and 20 year housing trajectories have been produced to support the Local Plan and illustrate the expected rate of housing delivery. Monitoring, completions and permissions are set out in our Annual Monitoring Report. We expect the new Mayor to undertake a new Strategic Housing Land Availability Assessment (SHLAA) as part of a full review of the London Plan in 2017 and will update our housing trajectories as required.
Set out the authority's approach to housing density to reflect local circumstances (47).	• Policy on the density of development.	Local Plan Policy HO4 and its supporting text indicates that we will expect the maximum reasonable provision of housing on sites that are underused or vacant, and explains how we will use the London Plan's density matrix to make the best use of sites for housing.
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) 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	The Council has undertaken a full review of its housing needs by preparing an up to date Strategic Housing Market Assessment (SHMA). The SHMA provides the objectively assessed need based on population projections and market signals, and also considers the size, type and tenure of housing required, and the needs of different groups including families with children, older people, people with disabilities, service families and people wishing to build their own homes. The Council has also prepared a joint Gypsy and Traveller Needs Assessment 2017 (GTANA) to explore the accommodation needs of Hammersmith and Fulham and Kenington and Chelsea's (RBKC) traveller community. The SHMA and the GTANA have directly informed our Housing policies. Local Plan Policy HO1 seeks to meet the full objectively assessed need for housing. Policies H07 to H010 seek to meet the full needs of other particular groups including older people, students and travellers.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	creating mixed and balanced communities. (50)	Policy HO5 seeks to increase the supply and choice of high quality residential accommodation that meets local resident's needs and aspirations and demand for housing. In order to deliver this accommodation Policy H05 states that there should be a mix of housing types and sizes in development schemes, including family accommodation. Policy HO3 aims to maximise the supply of affordable housing and seeks a borough-wide target that at least 50% of all dwellings built should be affordable. This target falls short of the need estimated in the SHMA for affordable homes over the Plan period, but is considered to be the highest target that would be viable and deliverable. Policy HO3 also includes consideration for the need for on-site provision and outlines the circumstances where off-site provision or financial contributions would be sought.
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.	Not applicable.
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	Policy H04 'Housing quality and density' and Policy DC2 'Design of new build' seek to increase the quality of development.
8. Promoting healthy communities (paras 69-77)		
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe	• Inclusion of a policy or policies on inclusive communities.	Mixed use development is a key element of delivering growth in Hammersmith and Fulham as stated within Regeneration and site policies in Section 5 of the Local Plan. Policies H06 and

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
and accessible environments; and are accessible developments (69).	• Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)	DC1 within the Plan also seek to promote safe and accessible environments and developments. The Plan's transport policies also seek to improve the pedestrian environment.
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.	Local Plan policies CF1 and CF2 seek to protect and promote spaces and places which provide social interaction. Furthermore, other policies within the Plan, particularly those relating to the regeneration areas and site allocations (section 5), town centres (TLC1-8) and employment (E1-3) seek to ensure that key services and development is directed to accessible locations.
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) • Protection and enhancement of rights of way	The Council identified open space, sports and recreation facility needs through its Leisure Needs update 2017, Sport and Physical Activity Strategy, Parks Strategy, Open Space audit and Infrastructure Delivery Plan 2016. Local Plan Policies OS1 and OS2 set out how the Council proposes to protect, enhance and improve access to the borough's parks and open spaces. Local Plan Policies CF1, CF2 and CF3 meanwhile seeks to protect sports and recreational

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
and access. (75)		buildings from development with specific exceptions.
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)	Neighbourhood Forums can through the preparation of neighbourhood plans designate Local Green Space in accordance with paragraph 77 of the NPPF. There are currently no desigated Neighbourhood Forum's in Hammersmith and Fulham.
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 features likely to be permanent' amongst other things (85)
	• Where Green Belt policies are included, these should reflect the need to:
	
	   o Enhance the beneficial use of the Green Belt. (81)
	
	   o Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)
	
	   o Specify that inappropriate development should not be approved except in very special circumstances. (87)
	
	   o Specify the exceptions to inappropriate development (89-90)
	
	   o Identify where very special circumstances might apply to renewable energy development. (91)
		Not applicable.

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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))	Local Plan policies in the Environmental Sustainability chapter seek to ensure new buildings are designed to be energy and resource efficient and much more of the borough's waste to be sustainably managed with an increase in recycling. In particular, new development will be required to minimise energy use and the use of other non renewable resources, as well as facilitating an increase in the use of low and zero carbon technologies to help minimise carbon dioxide (CO2) emissions. Local Plan policies for transport, employment and town centres all seek to ensure that new developments are in accessible locations and help to reduce greenhouse gas emissions.
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 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)	Local Plan policy CC1 requires all major developments to implement energy conservation measures by requiring energy assessments for all major developments to demonstrate and quantify how the proposed energy efficiency measures and low/zero carbon technologies will reduce the expected energy demand and CO2 emissions; Policy CC1 also requiries major developments to demonstrate that their heating and/or cooling systems have been selected to minimise CO2 emissions. This includes the need to assess the feasibility of connecting to any existing decentralised energy.
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)	The impacts of climate change are noted in Local Plan policies CC1 and CC2. Local Plan policy CC3 has been informed by the Council's draft Strategic Flood Risk Assessment 2016. The sequential test seeks to ensure that development is steered from medium and high flood risk areas (flood zones 2 and 3). Policy CC3 seeks to ensure that development does not increase the risk of flooding and reduces risk where possible.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	• Policies to manage risk, from a range of impacts, through suitable adaptation measures	
Take account of marine planning (105)	• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation • 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	As one of the Specific consultees, all previous stages of policy have been sent to the Marine Management Organisation, with no comments received at Regulation 18 or Regulation 19 stage. Hammersmith and Fulham have a dedicated section of the Local Plan to the River Thames which includes polices to protect and promote the river.
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. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.	Not applicable.
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 identifies nature conservation areas in Appendix 4 and on the proposals map. Policy OS4 seeks to portect designated Nature Conservation Areas and green corridors from development likely to cause demonstrable harm to their ecological value. Policy OS5 ' Greening the borough' seeks to enhance biodiveristy and green Infrastructure in the borough.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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.	Policy CC13 seeks to manage the impact of development. The policy considers a number of different factors including contaminated land and pollution caused by odours, dust and fumes. Policies CC9 'Land contamination', CC10 'Air Quality', CC11 'Noise, CC12 'Light Pollution' also seek development which is appropriate for its location having regard to the effects on pollution on health, the natural environment and general amenity.
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	• Identification and mapping of local ecological networks and geological conservation interests. • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species	Policy OS4 seeks to portect designated Nature Conservation Areas and green corridors from development likely to cause demonstrable harm to their ecological value. Policy OS5 ' Greening the borough' seeks to enhance biodiveristy and green Infrastructure in the borough.
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)	Local Plan policy DC8 and Table 5 identify the heritage assets and conservation areas in the borough. Archaeological priority areas and gardens of historic interest are identified on the proposals map and in appendix 5. Policy DC8 provides a positive strategy for the conservation and enjoyment of Hammersmith and Fulham's historic environment, including heritage assets at risk. Both policies DC8 'Heritage and Conservation' and DC2 ' Design of New build' seek to promote new development to be of the highest design quality, making a positive contribution to Hammersmith and Fulham's character and distinctiveness.
13. Facilitating the sustainable use of minerals (paras 142-149)		
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	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;	Not applicabale.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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)	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.	
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. To be 'justified' a DPD needs to be: • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives.		
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	The Council has summarised the consultation that took place during preparation of the Plan in a Consultation Statement. The report outlines the various stages of consultation, the methods used and summarises the responses received. Officers made sure to also solicit the views of 'hard to reach' groups including younger people, people with disabilities and people from ethnic minorities.
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	The Council considers that the content of the Plan is justified by the evidence gathered. A range of studies and reports have been undertaken to provide a sound evidence base for the Plan. The list of documents is available to view on the Council's website. Policies have been updated to take into account changes in the evidence base, for example a more recent Waste study undertaken jointly with the Western Riverside Waste Authorities has led to minor amendments to the waste section of the Local Plan. The Local Plan is accompanied by a Sustainability Appraisal that complies with all necessary requirements.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	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).	
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 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?	• Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • 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.	Reasonable alternatives were prepared and considered within the Plan's sustainability appraisal. Alternatives were also consulted upon within the Draft Local Plan 2015.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Effective: *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.* To be 'effective' a DPD needs to: • 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 • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • 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 which address delivery, the means of delivery and the timescales for key developments and initiatives. • 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. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).	The Local Plan contains policy DEL1 which sets out how the Plan will be delivered and monitored. The Plan has been informed by the priorities of other agencies and services (e.g. Environment Agency, Transport for London and the Hammersmith and Fulham Clinical Commissioning Group). Furthermore, policies within the Plan have been informed by Hammersmith and Fulham's duty to co-operate partnerships. Chapter 1 contains details regarding the scope and content of the Plan. The Plan's Spatial vision and strategic objectives are set out within Section 3. The vision and strategic objectives identified acknowledge and link to the goals of the Council contained in the Labour Manifesto - "The change we need" . The policies follow logically from the objectives (section 3) and, as mentioned above, the objectives themselves flow from the Labour Manifesto. The council considers that there are no policy gaps. The Local plan and the London Plan provide a comprehensive development plan for the borough.
Infrastructure Delivery • Have the infrastructure implications of the policies clearly been identified?	• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.	The Local Plan contains a Policy on Infrastructure Planning and the mechanisms for delivery. The Local Plan is also supported by an Infrastructure Delivery Plan. The Infrastructure Delivery Plan includes a schedule of Infrastructure projects which will assist delivery of the Plan. The

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
• 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 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.	schedule includes details of the delivery lead and how the project is expected to be funded. The infrastructure schedule was prepared in collaboration with infrastructure providers. It sets out responsibilities for the delivery of each scheme, funding arrangements and likely timescales of delivery. Information is provided for infrastructure relating to children and education services; healthcare services; adult care services; leisure and community facilities; emergency services; strategic transport; utilities and physical infrastructure.The timescales stated are considered to be consistent with the Plan.
Co-ordinated Planning Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?	• 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 for other strategies affecting the area	The Local Plan pulls together the objectives of a wide range of strategies such as those relating to air quality, transport and health etc. into a cohesive strategy. It goes beyond traditional land use planning by setting firm visions, objectives and principles for the area. Expressions of support and representations from bodies responsible for other strategies have been received and taken into account in the preparation of the Plan.

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
		The Local Plan is regarded as flexible enough to respond to unexpected changes in circumstances. The council considers that the Local Plan policies are written in such a way that they can be interpreted flexibly if necessary. Policy DEL1 also states how the Plan will be annually monitored to assess effectiveness of the Plan's policies.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	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.	
Co-operation • 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 under the duty to co-operate protocol. Details of which can be seen within the Duty to Co-operate Statement.
Monitoring • Does the DPD contain targets, and milestones which relate to the delivery of	• Sections of the DPD setting out indicators, targets and milestones • Sections of the current annual monitoring	Policy DEL1 and appendix 6 contains details of how the Council intends to use a series of indicators to assess the effectiveness of the Plans policies. Monitoring will also provide a key role in ensuring the Plan remains flexible and can be adjusted if necessary. Annual Monitoring

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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?	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	reports are available on the Council's [website]().
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 considers that the Local Plan policies are consistent with national policy.

Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. 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

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement with both settled and traveller communities.	• Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.	Evidence of housing need has been provided within the Council's Gypsy and Traveller Needs Assessment 2016. The study was informed by discussions with households on the shared traveller site in the Royal Borough of Kensington and Chelsea. Engagement with the community has included engagement from an early stage, a number of consultation events pre and post the needs assessment was published, organised jointly by LPA officers; engagement with the London Gypsy and Traveller Unit during the needs assessment, and the TMO officers, and direct involvement in assessing housing need from the traveller community.
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	• 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. • A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.	The Council's Gypsy and Traveller and Needs Assessment 2016 has informed Policy HO10 which seeks to meet the additional need identified. The assessment of need has been carried out jointly with the Royal Borough of Kensington and Chelsea as the site is shared between the to boroughs.
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	• 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	The Council has identified a need for 3 additional sites in the first 5 years. The

Policy Expectations	Possible Evidence	Evidence Provided
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.	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 13	Council will seek to address this need by, if possible, increasing capacity at the Stable Way site, identifying sites through further Site Appraisel work and working with RBKC and other neighbouring authorities.
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.		Not applicable.
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.
Policy E: Traveller sites in Green Belt (paras 14-15)		
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. 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.	• Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.	Not applicable.
Policy F: Mixed planning use traveller sites (paras 18-20)		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed	• 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	The council in the first five years primarily seeks to increase, where

Policy Expectations	Possible Evidence	Evidence Provided
residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	separate sites in close proximity to one another. • N.B. Mixed use should not be permitted on rural exception sites	possible, capacity on the existing site at Westway where there is an existing community.
Policy G: Major development projects (para 21)		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	• 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.	Additional supporting policy text has been added to the Local Plan to outline this.