

PAS SOUNDNESS AND LEGAL COMPLIANCE CHECKLISTS

Submission

Euston Area Plan

April 2014

Soundness Self-Assessment Checklist (January 2013)

This note was prepared by AMEC on behalf of the Planning Advisory Service. It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework. A separate checklist looks at legal compliance.

In summary – the key requirements of plan preparation are:

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

The Tests of Soundness at Examination

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

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

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

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF has 12 principles through which it 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:

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- 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.
- 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](http://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.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>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.</i>		

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<p><i>Vision and Objectives</i></p> <p>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?</p> <p>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?</p> <p>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?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • See relevant parts of EAP, which address these points and set out key issues (Section 2.4) and vision and objectives (Section 1.2). • The descriptions of character areas (section 2.3) and key issues (2.4) flow into the development strategy and place-based development principles in Sections 3 and 4. • In Section 3.1 (Overall strategy), Figure 3.1 illustrates the key spatial elements of the vision and objectives for the area, which are reflected in the overall strategy and subsequent Strategic Principles (Section 3) and Development Principles (Section 4). Above each of the overarching Development Principles (see Section 3), the relevant objectives are listed. • Reasonable alternatives are set out and assessed in the Background Report and Sustainability Appraisal. Plan preparation and sustainability appraisal were carried out simultaneously, allowing the appraisal process to inform option selection, policy direction and decision making • Section 3.1 sets out the overall strategy of the EAP, which shows how the key objectives are achieved through detailed policies, with Figure 3.1 illustrating key spatial elements of the vision and objectives. Relevant objectives for each policy area are also set out in each section of the Development Strategy section, which are subsequently detailed in chapter 4, places. • Section 5 of the EAP addresses the approach taken

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		<p>to realistic timescales, delivery and monitoring, alongside specific monitoring and delivery information for each sub area in Section 4 Places.</p> <ul style="list-style-type: none"> • – Minutes of EAP Management and Strategic Boards illustrate agreement of key delivery agencies to the EAP objectives and plan content: http://www.eustonareaplan.info/documents/ • The plan is identified in the Camden Local Development Scheme (LDS) 2012 and 2013. The 2013 LDS can be accessed via the following link: http://camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-policy/local-development-framework--ldf-/
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <p>—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</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<ul style="list-style-type: none"> • 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’, below). • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. 	<ul style="list-style-type: none"> • The Euston Area Plan seeks to positively contribute towards implementing the vision and objectives of the London Plan and implement the objectives and strategy of Camden’s Core Strategy, taking into account updated evidence and changed circumstances resulting from HS2. • The EAP seeks to contribute towards new housing, jobs and facilities for London and Camden’s population and towards meeting Camden’s development needs. It identifies the potential to significantly exceed the minimum targets set out in the London Plan and Core Strategy, depending on the implications of detailed station design for above station development. • As part of the plan preparation process we objectively assessed needs through the evidence base for the Camden Core Strategy, and the EAP contributes to meeting these needs e.g. for offices,

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		<p>homes, etc.</p> <ul style="list-style-type: none"> • In addition to this wider evidence base, specific evidence was produced as part the preparation of the EAP, including an Economic visioning, retail and development viability study as well as studies on heritage, transport and energy, which helped to inform plan preparation. • This evidence base is summarised in the EAP Background Report, with individual evidence base documents listed in chapter 1 of the EAP and these are available here: www.eustonareaplan.info/documents • Flexibility is built into the EAP principles, in order to allow for changing circumstances and site specific issues. Flexibility forms an important element of the EAP, given the relationship between development and station design. For example, housing and employment targets are provided as ranges to allow for potentially differing development scenarios which would arise from different approaches to station design at Euston, which is not confirmed until Royal Assent of the HS2 Hybrid Bill. • The Background Report sets out the key factors that have influenced the approach taken to the distribution and location of development, including the policy context, key urban design and heritage issues in the area, and a range of other considerations including open space, economy and town centres and transport. • The Background Report also sets out how anticipated development capacities were arrived at,

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		<p>highlighting the constraints affecting development and hence likely development capacities. The Background Report also sets out in detail the wider context (including policy context). Detailed capacity testing was carried out based on this analysis.</p> <p>The EAP Management/Strategic Board decision making process is audited through meeting notes – notes are available on our website (www.eustonareaplan.info) and relevant presentations made can be made available as appropriate.</p>
<p>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.</p>	<ul style="list-style-type: none"> • A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal. 	<p>Text that reflects the principles of the presumption in favour of sustainable development is included in section 3.1 of the EAP.</p>
<p><i>Objectively assessed needs</i></p> <p>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.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> • 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. 	<p>As part of the plan preparation process we objectively assessed economic, social and environmental needs of the borough through the evidence base for the Core Strategy (as well as London-wide needs identified in the London Plan). In addition the EAP has been informed by updated Euston-specific evidence, along with an assessment of the implications of changed circumstances associated with the potential introduction of HS2 at Euston. The EAP contributes to meeting needs identified in the Camden Core Strategy, and provides for a significant increase in housing (Camden's propriety land use) and jobs.</p>

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		<p>The EAP Background Report summarises a range of evidence that provides the background to, and has helped to inform the production of, the EAP.</p> <p>The Duty to Cooperate Statement sets out how the EAP team has involved relevant authorities in the production of the Plan, whilst the Consultation Statement sets out the consultation that has been carried out on the plan, and how the comments received have helped to inform the plan preparation process.</p>
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),	<ul style="list-style-type: none"> Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy and LEP Strategy where appropriate. 	<ul style="list-style-type: none"> The EAP seeks to positively contribute towards implementing the vision and objectives of the London Plan and implement the objectives and strategy of Camden's Core Strategy, including securing new housing, jobs and facilities for London and Camden's population and meeting Camden's development needs. The EAP sets out a clear economic vision (see Objective 5 and Strategic Principle EAP1), providing strong support for jobs growth with an emphasis on the knowledge economy, building on existing strengths in the area. This approach is informed and supported by an economic visioning study.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure,	<ul style="list-style-type: none"> A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure 	<ul style="list-style-type: none"> The EAP positively addresses infrastructure provision and environmental, accessibility and public realm issues as part of its approach to

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<p>services or housing (21)</p>	<p>provision, environmental enhancement.</p> <ul style="list-style-type: none"> 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) 	<p>development, regeneration and attracting investment.</p> <ul style="list-style-type: none"> HS2 Ltd and Network Rail attend Strategic Board and have met with the EAP team regularly, in order to ensure that EAP proposals respond to issues around railway/ station infrastructure, design constraints and redevelopment issues. TfL are part of the project team and have advised on supporting transport infrastructure Environmental, public realm and connectivity are addressed as part of the approach to change in the area. The Strategic Principles set out in Section 3 seek to ensure that growth and development is supported by sustainable transport improvements, social infrastructure, open space and energy/ sustainable urban drainage Section 4 of the EAP (Places) sets out land use and design principles which will guide development in the area and identifies opportunities to provide open space and public realm improvements Section 5 of the EAP addresses the approach taken to realistic timescales, delivery and monitoring, alongside specific monitoring and delivery information for each sub area in Section 4 (Places). This was informed by viability information provided in the Economic Visioning, land use and viability study (GVA, updated December 2013)
<p>2. Ensuring the vitality of town centres (paras 23-37)</p>		

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<p>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)</p>	<ul style="list-style-type: none"> • 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. 	<p>Camden’s Core Strategy policy CS7 sets out the approach to retail distribution and growth in Camden:</p> <ul style="list-style-type: none"> • It distributes in the range of 20-30,000 square metres additional retail at Euston and Camden Town, with the majority expected to take place at Euston (subject to detailed site specific assessments, and an assessment of any impacts on other centres) • It also supports new retail and other town centre uses in Central London Frontages and neighbourhood centres, according to the sequential approach. • Development Policies DP10, DP11 and DP12 set out more detailed policies in relation to retail and other town centre uses, including promoting small and independent retail, markets and managing the impact of food, drink and entertainment uses. <p>The detailed approach taken in the Euston Area Plan was also informed by retail analysis carried out by GVA consultants (updated December 2013). It indicated that up to 20,000 sq m of retail space could be provided at Euston, but that beyond this point a tipping point may be reached where there could be negative impacts on surrounding centres, and therefore additional retail provision beyond this would require very careful analysis of impacts. This is reflected in Strategic Principle EAP1 (land uses) and supporting text.</p>
<p>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</p>	<ul style="list-style-type: none"> • An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages 	<p>Camden’s Core Strategy policy CS7 sets out the approach to retail distribution in Camden, supported by detailed guidance in Camden Planning Guidance CPG5</p>

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centres (23)	identified and allocated.	(Town centres, retail and employment) Reflecting the emphasis of the Camden Core Strategy, the EAP focuses a mix of town centre uses at the Euston station site, alongside some additional such uses in other centres in the Euston Area, to meet more local needs. Potential locations for community and other local-scale uses are also identified elsewhere in the Euston area, including a potential new primary school site on the North Euston Cutting.
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)	<ul style="list-style-type: none"> 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 relevant in the Euston area.
4. Promoting sustainable transport (paras 29-41)		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>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)</p>	<ul style="list-style-type: none"> 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. 	<p>The London Plan and Camden Core Strategy and Development Policies set out a range of policy measures to promote sustainable transport. The EAP provides further information regarding the implementation of these principles at the local level.</p> <ul style="list-style-type: none"> The EAP has been produced jointly by Camden and the GLA with TfL, with input from Network Rail and HS2 through attendance at EAP Management and Strategic Boards and regular meetings. The City of Westminster has also expressed support for the

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<p>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)</p> <p>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)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>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)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>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)</p> <p>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</p>	<ul style="list-style-type: none"> • 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. 	<p>transport provisions within the EAP.</p> <ul style="list-style-type: none"> • The EAP places a strong emphasis on sustainable transport (see Strategic Principle EAP3 Transport). It seeks to enhance a range of sustainable infrastructure/ choices including walking, cycling, bus, tube and rail • It proposes the introduction of an ultra-low emissions zone at Euston, in order to minimise greenhouse gas emissions, address air quality issues and promote low and zero emissions technology • The EAP also supports provision for sustainable freight movement, balanced with a consideration of potential impacts on the local area, and other planning priorities. • The EAP strategy promotes mixed use development in a location with excellent public transport connections, within a designated growth area in the Central London area. It seeks a balanced mix of uses including supporting facilities, which would reduce the need to travel • Proposed development at Euston is associated with, and would sit alongside, significant infrastructure provision, in particular the redevelopment of Euston Station (with or without HS2) • Car free development is proposed in the plan, in line with the Camden Core Strategy <p>The approach taken to transport in the EAP is informed and supported by a Transport Study, which was carried out by TfL in collaboration with LB Camden.</p>

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<p>large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>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)</p>		
<p>5. Supporting high quality communications infrastructure (paras 42-46)</p>		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>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)</p>	<ul style="list-style-type: none"> • Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44. 	<p>This plan does not have specific policies on electronic communications including telecommunications and high speed broadband as it is not identified as a specific issue for Euston. London Plan Policy 4.11 which forms part of Camden's development plan supports and aims to facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs.</p> <p>The EAP places a strong emphasis on promoting the knowledge economy and innovation as part of growth at Euston: this could help to support the development of enhanced communications in the area and wireless working hubs.</p>
<p>6. Delivering a wide choice of high quality housing (paras 47-55)</p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing</p>	<ul style="list-style-type: none"> • Identification of: <ol style="list-style-type: none"> a) five years or more supply of specific 	<ul style="list-style-type: none"> • In line with the ambitions set in the Core Strategy, the Camden Site Allocations document identifies sites suitable for future housing delivery. The EAP

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<p>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)</p>	<p>deliverable sites; plus the buffer as appropriate</p> <ul style="list-style-type: none"> • Where this element of housing supply includes windfall sites, inclusion of ‘compelling evidence’ to justify their inclusion (48) • A SHLAA 	<p>provides updated guidance where relevant to complement Camden’s site allocations DPD, as well as identifying potential additional locations for housing supply in the Euston area.</p> <ul style="list-style-type: none"> • Part 4 of the EAP identifies locations where development will take place in Euston in the period up to 2031. This includes development areas that could be brought forward in the short term (for example in Regent’s Park Estate) and in the medium to long term, where delivery timescales are necessarily longer (for example the Euston Station and Tracks and North Euston Cutting sites). • LB Camden’s Housing Trajectory demonstrates provision of a rolling supply of specific deliverable sites sufficient to provide five years’ worth of housing which provides a buffer of more than 5%.
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<ul style="list-style-type: none"> • Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 	<ul style="list-style-type: none"> • Camden’s recently published Annual Monitoring Report and the Housing Trajectory list a supply of developable sites and broad locations up to 2027/28. This covers years 6-10 and 11-15 beyond the first five years. • Taking forward the principles in the Camden Core Strategy, the Site Allocations document identifies sites suitable for future housing delivery. The EAP provides updated guidance where relevant to complement Camden’s site allocations DPD, as well as identifying potential additional locations in the Euston area that could help to deliver housing over medium and long term.
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing</p>	<ul style="list-style-type: none"> • A housing trajectory 	<ul style="list-style-type: none"> • Camden’s Housing Trajectory is published on a yearly basis. It includes assessment of planning

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implementation strategy describing how a five year supply will be maintained. (47)	<ul style="list-style-type: none"> • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	permissions, starts, completions, assessment of identified sites and windfall assumptions based on the past 5 year delivery of small sites (0-9). This data is refreshed before publication of the Housing Trajectory.
Set out the authority's approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> • Policy on the density of development. 	<ul style="list-style-type: none"> • The London Plan includes a density matrix to guide the density of development in different locations. • Camden aims to make the best use of its limited land. The Core Strategy concentrates development in Camden's growth areas, where development is expected to maximise site opportunities. The Core Strategy expects high density development in Central London, town centres and other locations well served by public transport. • We have not identified a need to specify specific density standards in Euston, however a development capacity testing exercise has allowed the EAP to identify appropriate ranges of homes and jobs that could be accommodated in the area. It does also provide guidance relating to building heights (se Strategic Principle EAP2: Design and Figure 3.4) as well as design guidance for each sub area (see Section 4: Places).
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)	<ul style="list-style-type: none"> • 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) 	<ul style="list-style-type: none"> • LB Camden's approach to affordable housing is set out in policies CS6 of the Camden core Strategy and DP3 of the Development policies • LB Camden's approach to securing a mix of housing types and sizes is set out in Core strategy policy CS6 and policy DP5 of the Camden Development Policies (Homes of different sizes). • The dwelling size priority table provided under

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	<ul style="list-style-type: none"> • Evidence for housing provision based on up to date, objectively assessed needs. (50) • Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50) 	<p>policy DP5 sets out the priorities that development should met for the mix of unit sizes in private, intermediate and social rented housing, with further information provided in Camden Planning guidance CPG2: Housing.</p> <ul style="list-style-type: none"> • Development in the Euston area will be considered against this policy context • The EAP also sets out a framework for the re-provision of homes that will be lost as a result of HS2.
<p>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).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> • 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. 	<p>Not relevant in the Euston area.</p>
<p>7. Requiring good design (paras 56-68)</p>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<ul style="list-style-type: none"> • 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 	<p>Borough-wide design policies are also provided in the Camden Core Strategy and Development Policies, which seek to secure places and buildings that are attractive, safe and easy to use. Strategic guidance (including in relation to strategic views) is also provided by the London Plan and associated supplementary guidance.</p> <p>The EAP builds on this wider design policy context, placing a strong emphasis on the role of development and regeneration in enhancing connectivity and the public realm, enhancing streets and public spaces and</p>

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		<p>the image and attractiveness of the area.</p> <p>The EAP contains a specific policy that seeks to ensure the highest standards of design from new development in the Euston area (EAP2 Design strategy). It sets out key issues that need to be addressed as part of high quality design in the area, including improving connectivity, public realm and active frontages; viewing corridors and ensuring world class, comprehensive station redevelopment.</p> <p>Specific design principles are also provided for each sub area in the EAP.</p>
<p>8. Promoting healthy communities (paras 69-77)</p>		
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).</p>	<ul style="list-style-type: none"> • Inclusion of a policy or policies on inclusive communities. • 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) 	<p>The Euston area is mixed in character and the EAP seeks to reinforce and strengthen this (see part A of Strategic Principle EAP1 Land use). It places a strong emphasis on a mix of uses on the Euston Station site and seeks to support and enhance the role of neighbourhood centres and the Euston Road Central London Frontage in providing amenities for local people.</p> <p>The EAP also identifies the need to create safe and accessible environments by seeking to enhance connectivity through the area and improving the overlooking of streets and public spaces through the provision of active frontages: these issues are highlighted as key issues that need to be addressed in new development (see Strategic Principle EAP2: Design)</p> <p>The plan also seeks to identify opportunities to create new publicly accessible open and green spaces,</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>including spaces within streets and public areas, within development sites and on roof-tops; and by supporting and enhancing community facilities.</p> <p>One of the objectives of the Plan is to prioritise local people’s needs, and Part E of Strategic Principle EAP1 (Land use) states that education, health and other community facilities should be provided to support new development and reflect local priorities and needs.</p> <p>The area-specific principles provided in Section 4 of the EAP set out how a balanced mix of uses will be sought across the area taking into account location-specific characteristics, and reflect the mixed use policy that the Camden Core Strategy promotes (please see CS1).</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> • 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. 	<p>The Camden Core Strategy and Development policies, and supporting Camden Planning Guidance set out the borough-wide approach towards the delivery of community facilities to support growth, the protection of existing community facilities and contributions towards the provision of community facilities as part of development.</p> <p>One of the objectives of the EAP is to prioritise local people’s needs, and Part E of Strategic Principle EAP1 (Land use) states that education, health and other community facilities should be provided to support new development and reflect local priorities and needs. The EAP seeks to positively integrate shops, services and community facilities as part of growth and regeneration at Euston:</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • North Euston Cutting: includes provision for a school and open space as part of development • Euston Station and tracks: provision of a mix of uses including retail and knowledge based, innovative or creative industries as well as contributions towards the provision of supporting social infrastructure • Regent’s Park Estate: re-provision of community facilities lost as a result of HS2 and enhancements to local centres on Robert Street and adjacent to the North Euston Cutting (Figure 4.6) • Drummond Street: protection and enhancement of its role as a neighbourhood centre, serving the needs of local people • Open space provision: given the potential impacts of HS2 on open space provision, the EAP sets out a strategy for new and improved open space provision
<p>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).</p>	<ul style="list-style-type: none"> • 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 and access. (75) 	<p>The Camden Core Strategy (policy CS15) and Development Policies (DP31) set out Camden’s approach to the protection of open spaces and provision of new open spaces as part of new development. This approach was informed by the Camden Open space, sport and recreation study 2008.</p> <p>The EAP Background Report summarises the evidence base for Euston in relation to open space provision, including specific issues for the Euston areas. It identifies the potential to enhance the quality and accessibility of existing open spaces, and mitigating the</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>loss of existing open spaces as a result of HS2, as key open space issues for the Euston area. The development capacity exercise detailed in the EAP seeks to ensure that the amount of development proposed in the area meets the requirements of the wider Camden open space provision targets, although viability issues with building over the tracks and the constrained urban nature of the site mean that a proportion will be provided as balcony or roof gardens.</p> <p>EAP Strategic Principle EAP4 (Environment and open space) sets out a strategy for open spaces, supported by detailed measures set out for the relevant sub areas in Section 4 (Places) of the EAP including:</p> <ul style="list-style-type: none"> • A new open space is proposed for the current Maria Fidelis North Gower Street site (which may need to be relocated as a result of HS2), in order to mitigate the loss of open space associated with HS2; • New open space is also proposed for the North Euston Cutting area, in association with significant new residential development proposed in the area; • The creation of an improved, more accessible and legible network of high quality open spaces as part of an Area Plan-wide approach to supporting growth and addressing open space needs and priorities; • Wider measures such as tree planting and other landscaping measures, improvements to the biodiversity value of existing open spaces; and the provision of new publicly accessible local green and public realm spaces where opportunities emerge, including in Camden’s housing estates.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78) 	The main open spaces within the Euston area are protected through designation via the Camden Core Strategy and Proposals Map.
9. Protecting Green Belt land (paras 79-92)		
<p>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)</p> <p>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)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<ul style="list-style-type: none"> • Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> ○ Enhance the beneficial use of the Green Belt. (81) ○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) ○ Specify that inappropriate development should not be approved except in very special circumstances. (87) ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	Not relevant to the Euston area.
10. Meeting the challenge of climate change,		

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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)	<ul style="list-style-type: none"> • 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)) 	<p>The Core Strategy sets out how Camden Council tackles climate change through promoting higher environmental standards. It encourages all developments to meet the highest feasible environmental standards that are financially viable and requires all developments to take measures to minimise the effects of, and adapt to, climate change (policy CS13). It also promotes sustainable travel (policy CS11), flood prevention measures (CS13) and reducing air pollution (policy CS16).</p> <p>The EAP guides significant development towards a designated growth area which has excellent public transport accessibility. All developments in the Euston area will be assessed against the sustainability policies and guidance in the Core Strategy, Camden Development Policies 2010 and Camden Planning Guidance 3: Sustainability.</p> <p>The EAP also includes a dedicated policy regarding environmental sustainability (Strategic Principle EAP4), which promotes the development of a local energy network (informed by an Energy Masterplan Report carried out by ARUP consultants), as well as setting out how surface water flood risk will be addressed and promoting the introduction of an Ultra Low Emissions Zone for Euston.</p>
Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon	<ul style="list-style-type: none"> • A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable 	The Core Strategy policy CS13 sets out how Camden Council tackles climate change through promoting higher environmental standards, including through

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
energy, and identification of key energy sources. (97)	<p>and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</p> <ul style="list-style-type: none"> • 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) 	<p>decentralised energy networks and sustainable design. Developments in the Euston area will be assessed against this policy, and policy DP22 of the Camden Development Policies, which sets out more detailed requirements for sustainability in developments.</p> <p>An objective of the EAP is to plan for carbon free sustainable development and a local low carbon energy network in Euston. This is reinforced by Strategic Principle EAP4, under which Figure 3.7 provides an initial Energy masterplan illustration to show how new development could be incorporated into a local energy network. This approach was informed by an Energy Masterplan Report carried out by ARUP consultants.</p>
Minimise vulnerability to climate change and manage the risk of flooding (99)	<ul style="list-style-type: none"> • Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures 	<p>Camden's Core Strategy policy CS13 and policy DP23 of the Development Policies seek to ensure that buildings and spaces are designed to cope with, and minimise the effects of, climate change and sets out specific measures relating to water and surface water flooding.</p> <p>The EAP Background Report identifies surface water flood risk as a potential issue in some parts of the Euston area. EAP Strategic Principle EAP4 (and supporting text) responds to this by setting out how this will be managed as part of development, including through SUDS and green infrastructure provision. Section 4.1 also addresses surface water flood risk in the Euston Station area.</p>
Manage risk from coastal change (106)	<ul style="list-style-type: none"> • 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. 	Not relevant to the Euston area.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	<ul style="list-style-type: none"> 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. 	<p>Camden Core Strategy policy CS15 seeks to protect and improve Camden’s parks and open spaces and encourage biodiversity. Development Policy DP31 on provision of, and improvements to, open space and outdoor sport and recreation seeks to deliver the strategy set out in CS15.</p> <p>The Camden Core Strategy (policy CS15) and Development Policies (DP31) set out Camden’s approach to the protection of open spaces and provision of new open spaces as part of new development. This approach was informed by the Camden Open space, sport and recreation study 2008.</p> <p>The EAP Background Report summarises the evidence base for Euston in relation to open space provision, including specific issues for the Euston areas. It identifies the potential to enhance the quality and accessibility of existing open spaces, and mitigating the loss of existing open spaces as a result of HS2, as key open space issues for the Euston area. The amount of development proposed in the EAP is carefully balanced with appropriate open space provision to meet the needs of the area.</p> <p>EAP Strategic Principle EAP4 (Environment and open space) sets out a strategy for open spaces, supported by</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>detailed measures set out for the relevant sub areas in Section 4 (Places) of the EAP including:</p> <ul style="list-style-type: none"> • A new open space is proposed for the current Maria Fidelis North Gower Street site (which may need to be relocated as a result of HS2), in order to mitigate the loss of open space associated with HS2; • New open space is also proposed for the North Euston Cutting area, in association with significant new residential development proposed in the area; • The creation of an improved, more accessible and legible network of high quality open spaces as part of an Area Plan-wide approach to supporting growth and addressing open space needs and priorities • Wider green infrastructure measures such as tree planting and other landscaping measures, improvements to the biodiversity value of existing open spaces; and the provision of new publicly accessible local green and public realm spaces where opportunities emerge, including in Camden’s housing estates.
Prevent unacceptable risks from pollution and land instability (109)	<ul style="list-style-type: none"> • 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. 	<p>The Camden Core Strategy Policy CS16 sets out the Council’s approach to improving health and wellbeing in the borough, and seeks to reduce air pollution levels through the implementation of the Camden Air Quality Action Plan.</p> <p>The EAP proposes the introduction of an Ultra Low Emissions Zone at Euston, in order to address identified air quality issues in the area. The EAP also seeks greening of key roads, through landscaping and</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> • 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 	<p>planting, which will help to mitigate the impact of air borne traffic based pollutants.</p> <p>Policy CS15 of the Core Strategy seeks to ensure that the growth in the number of residents and visitors to Camden will be supported by increases and improvements in open space provision, including outdoor sport and recreation opportunities, and that development protects and makes provision for biodiversity.</p> <p>The EAP sets out a strategy to enhance green infrastructure and biodiversity across the Euston area through the provision of new open spaces, the creation of an enhanced network of open spaces including through improvements to existing spaces, as well as wider green infrastructure measures such as tree planting (see Strategic Principle EAP4 and supporting text).</p>
<p>12. Conserving and enhancing the historic environment (paras 126-141)</p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> • 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) 	<p>Core Strategy policy CS14 and policy DP25 of the Development Policies set out borough-wide policies to seek the protection and enhancement of heritage assets.</p> <p>The EAP provides a positive strategy for the conservation and enhancement of the historic environment in Euston, informed by a Historic Area Assessment (AMUP 2013), which identified non-designated heritage assets, as well as already identified ones and maps these out in the report. Key elements include enhancements to connectivity and the public</p>

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		<p>realm, and the introduction of more positive buildings and frontages in areas that currently detract from the historic environment (for example, Euston Station).</p> <p>Specific measures to conserve and enhance the historic environment are set out where appropriate for each sub area in Section 4 (Places), where key locations where public realm enhancements and new buildings could enhance the setting of heritage assets are identified.</p>
13. Facilitating the sustainable use of minerals (paras 142-149)		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>Not directly relevant to the Euston area</p> <p>Policy DP20 of Camden Development Policies and the Proposals Map safeguard an aggregates facility site north of Kings Cross Central to promote the more sustainable transportation of essential materials in construction.</p>
<p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> • 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. 		
<i>Participation</i>	The consultation statement. This should set out what	Yes. The EAP team has prepared a Consultation

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<p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>consultation was undertaken, when, with who 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</p>	<p>Statement that sets out the various stages of consultation, details of issues and responses and indicates how these have been taken into account. There are also individual reports for each of the two main stages of consultation.</p> <p>The EAP team has also prepared a statement on the Duty to Co-operate.</p>
<p><i>Research / fact finding</i></p> <p>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?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> • 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. <p>AND</p> <ul style="list-style-type: none"> • 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. <p>OR</p> <ul style="list-style-type: none"> • A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. <p>OR</p> <ul style="list-style-type: none"> • 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). 	<p>Yes, the Council considers that the content of the plan is justified by the evidence. It positively reflects the objectives of the NPPF and supports the objectives of the London Plan and Camden’s Core Strategy which are underpinned by a range of supporting evidence.</p> <p>The EAP Background Report summarises the evidence that helped to inform the production of the Euston Area Plan. Where necessary the plan has considered updated evidence since the adoption of those plans in 2010/11, including the following Euston-specific evidence documents:</p> <ul style="list-style-type: none"> • EAP Historic Area Assessment; • EAP Transport Study • EAP Economic visioning, retail and viability report;EAP Energy Masterplan Report. <p>The plan has also been informed by Sustainability Appraisal and consultation evidence. The Sustainability Appraisal Report provides an assessment of the sustainability of the EAP, taking into account the evidence available (Sections 5-7), and summarises how the SA process has influenced the process of plan</p>

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		<p>making (Section 8.2). An Equalities Impact Assessment has also been prepared to inform the drafting and consultation of the plan. The Consultation Statement highlights how consultation has helped to support the plan's preparation. Reports to the council and briefings to lead members have also highlighted key issues raised.</p> <p>Please see the Core Documents List, which sets out the evidence base documents that have helped to inform the EAP.</p> <p>Assumptions</p> <p>The Euston Area Plan is based on objectives for growth and housing and employment targets for Camden that are set out in the Core Strategy and London Plan. An assumption has been made that these targets will remain achievable and relevant over the lifetime of the Core Strategy, with the potential to exceed these targets depending on the eventual approach taken to station design and delivery. The EAP has provided a flexible range of growth figures to taken into account the range of possibility associated with above station development.</p> <p>Development areas identified in the EAP have all been assessed for high level viability and deliverability in order to ensure realistic assumptions are in place and that they can be successfully implemented.</p> <p>It has been assumed that development above the Euston Station site and tracks is feasible, taking into account constraints information that has been provided</p>

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		to the EAP team. HS2 Ltd and Network Rail have been involved in plan preparation to advise on the implications of railway infrastructure for the delivery and viability of development. The EAP team has also reviewed the HS2 Ltd Development Options Study which is also a high level viability study.
<p><i>Alternatives</i></p> <p>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?</p> <p>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?</p>	<ul style="list-style-type: none"> • 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. 	<p>The Consultation Statement for the EAP sets out the methods used for consultation at each stage of plan making, reports on the consultation undertaken and provides a summary of representations received. It also includes the Council's response to the representations showing how consultation has influenced the Plan. This process has allowed for the alternatives to be raised and considered, although no significant strategic alternatives have been proposed as part of the consultation process.</p> <p>An assessment of reasonable alternatives was carried out as part of the sustainability appraisal process.</p> <p>In order to comply with the SEA Directive and Regulations, and to follow best practice in SA, the Sustainability Appraisal of the EAP compares the sustainability impacts of alternatives to the EAP. During the early production of the draft Euston Area Plan, a range of alternative strategic options were considered on a number of key topics, and these were appraised for their relative sustainability appraisal as part of the plan preparation process (see Section 6 of the Sustainability Appraisal Report). A range of detailed draft policies and reasonable alternatives were then</p>

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		<p>considered, which were assessed for their sustainability alongside the continued preparation of the Plan (see Section 7 and Appendix D of the Sustainability Appraisal Report).</p> <p>During the production of the draft EAP, a number of alterations were made to the EAP objectives and policies as a result of the Sustainability Appraisal process. The appraisal process highlighted the importance of specific issues where growth could affect the environment, for example in relation to noise, air quality, flooding and biodiversity. This has led to relevant measures being incorporated into the Euston Area Plan where appropriate, in particular informing the proposal for a green infrastructure network to address these issues on an area wide basis.</p> <p>Consultation was carried out on the draft Sustainability Appraisal Report (which included an assessment of reasonable alternatives) in summer 2013. Following on from this consultation, a number of minor changes were made to the Sustainability Appraisal Report, to respond to comments made on the draft EAP and changes made to the Euston Area Plan (no direct comments were made on the draft Sustainability Appraisal report). Key changes included an updated assessment of station design and development strategy options (see Section 6.4 of the SA Report); an updated assessment of the key strategic options relating to the North Euston Cutting (see Section 6. 5 of the SA Report); and an assessment of cumulative impacts of change on the Somers Town area and on the whole</p>

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		plan area (see Section 7 of the SA Report); and an assessment of an alternative option not to provide an open space on a deck over the railway tracks to the north of North Euston Cutting (see Appendix D – Section 4 character areas of the SA Report).
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • 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 		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • 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? 	<ul style="list-style-type: none"> • 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). • 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 	<ul style="list-style-type: none"> • Yes. Section 1.2 of the Euston Area Plan sets out the overall vision and objectives of the Plan. Section 3 of the EAP sets out the strategic principles which will help Camden and the Mayor to manage the activities in the area in order to achieve the vision and objectives of the plan. • Sections 2.1 and 2.2 of the Euston Area Plan set out how the Euston sits within the wider Camden and London context. Section 2.4 of the EAP sets out the key issues for the Euston area that stem from this context. The EAP is being prepared to implement wider policy in the London Plan and Camden Core

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>coherent policy structure.</p> <ul style="list-style-type: none"> Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	<p>Strategy, taking into account the changed context resulting from proposals for High Speed Two. It seeks to complement, and update where relevant, the policy and guidance of the Camden Site Allocations.</p> <ul style="list-style-type: none"> The EAP Development Principles (Section 3 of the EAP) sets out the overarching strategy for development in the Euston area, and a list of the relevant objectives is provided at the start of each subsection, highlighting how each development principle will help to deliver the EAP objectives. Section 5 of the EAP addresses the approach taken to delivery, including timescales and monitoring. Specific information is provided regarding delivery partners, mechanisms and phasing information for key developments and initiatives for each sub area in Section 4 (Places) As a jointly prepared document, the EAP has support from LB Camden, the GLA and TfL. Network Rail and HS2 Ltd have also been involved in the preparation of the EAP through attendance at EAP Management Board and Strategic Board as well as regular meetings. The EAP will form part of the Local Development Framework, and will be adopted as supplementary planning guidance to the London Plan. It translates the strategic objectives of the London Plan and Camden Core Strategy to the local level. On this basis there is a strong consistency and overarching vision between the documents of Camden's Local development Framework and the London Plan.

Soundness Self-Assessment Checklist (January 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • The Camden Local Development Scheme (2013) identifies the Euston Area Plan as a development plan document that is being prepared to form part of the Camden local development framework, and summarises the scope and content of the EAP. • An objectives matrix linking EAP objectives and policies with wider policies is provided as an appendix to the EAP •
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<ul style="list-style-type: none"> • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	<ul style="list-style-type: none"> • The Core Strategy identifies the infrastructure requirements and their means of delivery across Camden (Appendix 1). This was informed by detailed infrastructure analysis including work on a strategic basis with neighbouring boroughs. • The strategic infrastructure implications of development and growth in the Euston area are highlighted and addressed in Section 3 of the EAP (Development Strategy), for example in relation to social infrastructure, transport, surface water, open space and decentralised energy. • Section 5 of the EAP addresses the approach taken to delivery, including timescales and monitoring. Section 4 (Places) identifies specific information regarding infrastructure to be provided in each sub area regarding delivery partners, mechanisms and phasing information • Transport infrastructure is a key issue for the Euston area, given the role of Euston Station as a national rail terminus, and the proposed terminus for HS2. TfL form part of the project team and management structure producing the EAP, whilst HS2 Ltd and

Soundness Self-Assessment Checklist (January 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Network Rail attend management Board and Strategic Board, ensuring the input of key transport infrastructure providers in the production and delivery of the EAP.</p> <ul style="list-style-type: none"> • Thames Water has identified the need to ensure that developments are supported by sufficient water and waste water infrastructure, with developer funding for additional infrastructure where it is required: this can be addressed as part of the planning application process, where such issues exist. Thames Water have suggested policy wording to this effect, which has been incorporated (with minor alterations) into EAP policy EAP4 (Environment and open space) as suggested. • Development areas identified in the EAP have all been assessed for viability and deliverability in order to ensure realistic assumptions are in place and that they can be successfully implemented. This assessment was provided by GVA consultants as part of the Euston Economic visioning, retail and viability study (taking into account affordable housing requirements). In assessing the deliverability and viability of development above Euston Station and Tracks (and the North Euston Cutting), consideration has been given to constraints information that has been provided to the EAP team. HS2 Ltd and Network Rail have been involved in plan preparation to advise on the implications of railway infrastructure for the delivery and viability of development, and the EAP team has also reviewed the HS2 Ltd Development Options Study.

Soundness Self-Assessment Checklist (January 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> The high level testing of development scenarios has indicated that the EAP capacity ranges and key principles plan for the Euston Station and Tracks and North Euston Cutting areas are sufficiently close to viability to progress, notwithstanding the potential structural decking constraints. Further details regarding viability and funding are provided in the delivery strategies under EAP Sections 4.1 and 4.3 and in the supporting EAP Economic Visioning, retail and viability report.
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for development and the use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> The EAP will form part of Camden's Local Development Framework (LDF) as well as forming supplementary guidance to the London Plan, and will help deliver the vision and objectives of the Camden Core Strategy. Together with the London Plan, the adopted Core Strategy and other documents, the EAP will constitute the Local Plan for the borough. These policy documents reflect the concept of spatial planning as defined in legislation and national planning policy, containing both strategic and detailed development management policies to achieve sustainable development in the borough over the next 20 years. The Core Strategy and the EAP in particular will be key planning documents used both by developers and GLA/ council planning officers to guide long term development in the Euston area. The EAP goes beyond traditional land use planning and sets out vision and objectives for Euston and seeks to implement these through strategic

Soundness Self-Assessment Checklist (January 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>principles for the wider Euston area as well as development principles for specific character areas, guiding development and change towards specific areas whilst having regard to other plans and programmes relevant to Euston.</p> <ul style="list-style-type: none"> • This Plan has taken into account a range of relevant wider strategies including a range of proposed wider mitigation measures associated with the impacts of HS2, TfL's transport strategy, economic development issues and Camden's wider Place shaping, Camden Plan and Community Investment Programme agendas.
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • 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? 	<ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> a. the effectiveness of policies and what evidence is being collected to undertake this b. changes affecting the baseline information and any information on trends on which the DPD is based • Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances • Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how 	<p>Yes. The EAP has been prepared to be flexible enough to cope with change, while ensuring our vision and objectives for the area, and key strategic and development principles are delivered.</p> <ul style="list-style-type: none"> • Development quanta and requirements set out in Section 3 (Development Strategy) have been worded flexibly where appropriate in order to allow for deliverability and viability issues. • There has been a particular need for flexibility in relation to development at Euston Station, as the potential station design is yet to be confirmed. However, whilst there is significant flexibility built in to the plan to allow this, key priorities are emphasised that should be addressed by any station design approach, for example enhanced connectivity and the provision of active frontages. • Where there are particular potential issues and risks associated with the approach to be taken, these are acknowledged in the EAP (see the

Soundness Self-Assessment Checklist (January 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>that would impact on other aspects of the strategy and on infrastructure provision</p> <ul style="list-style-type: none"> 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. 	<p>delivery sections for each sub area in Section 4: Places). For example, whilst highlighting well established demand for a range of uses in the station area, the EAP acknowledges costs and constraints associated with development above the Euston Station and Tracks (see Section 4.1) and the North Euston Cutting (Section 4.3).</p> <ul style="list-style-type: none"> Network Rail and HS2 Ltd will play an important part in delivering the key aims of the EAP, and both organisations have been involved in the preparation of the document through attendance at the EAP management board and strategic board. Section 5 of the EAP sets out the approach to be taken to delivery, monitoring and review It should also be noted that LB Camden’s wider policies relating to development and development management (i.e. the Core Strategy and Development Policies) have also been designed to incorporate flexibility
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> 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? 	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Yes. The Duty to Co-operate Statement sets out how the relevant ‘Duty to co-operate’ bodies have been involved in the evolution of the EAP, and how this involvement has helped shape the proposals as they emerged. Section 4 of the EAP provides delivery information for each sub area, including delivery partners and mechanisms. This sets out the organisations that will be responsible for the delivery of specific sites and projects Part 5 of the EAP sets out the overall approach to delivery and monitoring, including working with our

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>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.</p>	<p>partners (Section 5.2).</p> <ul style="list-style-type: none"> It is considered that EAP team has demonstrated effective co-operation through constructive, active and on-going engagement with relevant authorities and bodies that have an interest in the Plan (as well as through wider engagement through the local development framework process), and that the plan reflects the various views and outcomes of these different processes and activities. The EAP team is of the view that the duty to co-operate has been fulfilled and has not received any objections to the EAP regarding the Duty to co-operate.
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<ul style="list-style-type: none"> Sections of the DPD setting out indicators, targets and milestones Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories Reference to any other reports or technical documents which contain information on the delivery of policies Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal 	<ul style="list-style-type: none"> Delivery timescales are provided for key development sites and projects in the Delivery strategy for each sub area in Section 4 (Places) of the EAP Part 5 of the EAP sets out the approach to delivery and monitoring, including phasing and monitoring on a plan wide basis Camden Council will monitor the effectiveness of this Plan in delivering its objectives. The Council currently monitors its LDF Core Strategy and Development Policies by regularly assessing their performance against a series of indicators and publishing the results annually. The Council will assess planning outcomes in the Euston area and the implementation of this Plan against these indicators, where they are relevant, and publish the results alongside the findings of borough-wide monitoring. The key sustainability indicators in the EAP SA

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Framework reflect those identified in the SA Report and Scoping Report for the Camden Core Strategy, and are already reflected in the Camden Annual Monitoring Report. Therefore the AMR will provide the ability to assess the sustainability effects of development in the Euston area.</p> <ul style="list-style-type: none"> The GLA will monitor the delivery of homes and employment growth in the Euston area, in order to assess performance against London Plan targets, in particular Opportunity Area targets
<p><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>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.</p>		
<ul style="list-style-type: none"> 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? 	<ul style="list-style-type: none"> 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. Reports or copies of correspondence as to how representations have been considered and dealt with. 	<ul style="list-style-type: none"> It is considered that the policies in the EAP are consistent with the NPPF, and are tailored to address the issues and opportunities relating to development and change in the Euston area. The EAP provides a positive strategy for growth that seeks to balance significant new development in the Euston area with the principles of sustainable development. The Background Report summarises various elements of policy in the NPPF, which have helped to inform the Euston-specific approach taken in the EAP. Text that reflects the principles of the presumption in favour of sustainable development is included in section 3.1 of the EAP The Consultation Statement and Sustainability Appraisal Report set out how the results of

Soundness Self-Assessment Checklist (January 2014)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		community involvement and the sustainability appraisal process have helped to inform the production of the EAP.

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Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

Soundness Self-Assessment Checklist (January 2014)

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
<p>Early and effective community engagement with both settled and traveller communities.</p>	<ul style="list-style-type: none"> • Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups. 	<ul style="list-style-type: none"> • Gypsies and Traveller Site Allocations is identified in the Camden Local Development scheme, with work beginning in 2013/14 and adoption in winter 2015/16. • The Council is being pro-active in identifying local needs with ongoing work to consider site/sites and identify need, through its undertakings through separate local plan review work to tackle immediate short term needs on a borough-wide basis. • Camden Council is engaging with local gypsies and travellers and the London Gypsy and Traveller Unit to identify sites, who have been involved in commissioning the brief for consultants to carry out needs assessment which is still being finalised (at January 2014). • Council officers meet the London Gypsy and Traveller Unit every 3-4 months to discuss ongoing work. • Options are being identified and considered through this ongoing engagement process, which will continue until appropriate options to meet needs are identified. • This action is also included in Camden's Housing Implementation Strategy. • In the meantime, an assessment has been carried out regarding the potential of the sites identified in this Euston Area Plan, in order to assess their potential suitability for Gypsy and Traveller provision. It highlights significant constraints that would affect the potential to provide traveller's accommodation at Euston, given the built up nature of the area, viability constraints of developing above the station and railtracks and existing

Soundness Self-Assessment Checklist (January 2014)

Policy Expectations	Possible Evidence	Evidence Provided
		and future pressures in the area. The assessment is provided in appendix 9 to the EAP Background Report.
<p>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.</p>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Camden has commissioned an assessment of traveller needs, which is currently being carried out and will help to inform the approach taken to the location and form of sites for additional provision in the borough. It is intended that traveller needs in Camden will be identified through this separate piece of work. • Engagement continues with existing pitch residents in Camden as part of this work. • As part of this work Camden has also contacted neighbouring authorities to identify sub-regional need and potential provision • The Euston Area Plan does not include a specific site allocation and this will need to be addressed through additional plans and/or review of the Local Plan as appropriate in recognition of the requirements.
<p>Policy B: Planning for traveller sites (paras 7-11)</p>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable</p>	<ul style="list-style-type: none"> • Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. 	<ul style="list-style-type: none"> • The 2008 Regional Needs Assessment identified a need for up to five additional pitches. Camden is currently in the process of updating its objectively assessed needs in line with the requirements of the Planning Policy for Travellers Sites. This will inform the pitch and plot targets for the borough. In addition to this, funding has been obtained from the HCA to support new provision. • An assessment has been carried out regarding the potential of the sites identified in this Euston Area Plan, in order to assess their potential suitability for Gypsy and Traveller provision. It highlights significant constraints that

Soundness Self-Assessment Checklist (January 2014)

Policy Expectations	Possible Evidence	Evidence Provided
economically, socially and environmentally.	<ul style="list-style-type: none"> • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 11 	<p>would affect the potential to provide traveller's accommodation at Euston, given the built up nature of the area, viability constraints of developing above the station and railtracks and existing and future pressures in the area (in particular associated with HS2 and required open space and housing mitigation). The assessment is provided in appendix 9 to the EAP Background Report.</p> <ul style="list-style-type: none"> • This plan does not include a specific site allocation and this will need to be addressed through additional plans and/or review of the Local Plan as appropriate in recognition of the requirements.
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 relevant to Euston.
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.	<ul style="list-style-type: none"> • 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 relevant to Euston
Policy E: Traveller sites in Green Belt (paras 14-15)		
Traveller sites (both permanent and temporary)	<ul style="list-style-type: none"> • Green Belt boundary revisions 	The National Planning Policy Framework and Camden Core

Soundness Self-Assessment Checklist (January 2014)

Policy Expectations	Possible Evidence	Evidence Provided
<p>in the Green Belt are inappropriate development.</p> <p>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.</p>	<p>made in response to a specific identified need for a traveller site, undertaken through the plan making process.</p>	<p>Strategy sufficiently identify the issues to take into account for provision. There are no plans to alter MOL boundaries.</p>
<p>Policy F: Mixed planning use traveller sites (paras 16-18)</p>		
<p>Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.</p>	<ul style="list-style-type: none"> • Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. • N.B. Mixed use should not be permitted on rural exception sites 	<ul style="list-style-type: none"> • Camden Core Strategy Policy CS12 sets out Camden’s approach to sites for gypsies and travellers. The Submitted Site Allocations Plan highlights that the Council is being pro-active in identifying local needs and has obtained funding from the HCA to directly meet such needs, but a site/sites are still being considered and need to be identified. • An assessment has been carried out regarding the potential of the sites identified in this Euston Area Plan, in order to assess their potential suitability for Gypsy and Traveller provision. It highlights significant constraints that would affect the potential to provide traveller’s accommodation at Euston, given the built up nature of the area, viability constraints of developing above the station and railtracks, and existing and, in particular future disruption, pressures and uncertainties in the area associated with HS2 and the redevelopment of Euston Station. The need to relocate residents from homes that will be lost as a result of HS2 (as well as re-provision of

Soundness Self-Assessment Checklist (January 2014)

Policy Expectations	Possible Evidence	Evidence Provided
		<p>open spaces) means that there would be significant scarcity of land in the short to medium term for other uses, including to meet any short term needs for land to provide accommodation for travellers. The assessment is provided in appendix 9 to the EAP Background Report.</p> <ul style="list-style-type: none"> • Site identification to-date indicates that appropriate locations for traveller sites would be located away from the Euston area, in order to meet needs. • The Euston Area Plan does not include a specific site allocation as this is being addressed through separate Local Plan review work, as appropriate in recognition of the requirements.
<p>Policy G: Major development projects (para 19)</p>		
<p>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.</p>	<ul style="list-style-type: none"> • 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. 	<p>Camden Core Strategy Policy CS12 sets out Camden’s approach to sites for gypsies and travellers which states that the redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, plots and/or pitches in suitable locations.</p>

End



Local Plan Legal Compliance Checklist (April 2013)

This checklist has been updated for PAS by SNR Denton. It supersedes the previous checklist and is based on **Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012**. It should be used with the Soundness Self Assessment Checklist (also updated January 2013).

Remember that the evidence you provide to support your plan should be relevant and proportionate. Please don't use this checklist as a reason to assemble more than is needed.

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**

Stage one: The early stages

Where the 'possible evidence' column refers to a document that will not be complete until a later stage (for example, the sustainability appraisal report), 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 tool, the term 'consultation statement' 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.



Stage one: The beginning

Activity	Legal requirement	Guidance reference	Notes and evidence provided
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	<ul style="list-style-type: none"> • Yes, the plan is identified in the Camden Local Development Scheme (LDS) 2012 and 2013. The 2013 LDS can be accessed via the following link: https://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-policy/local-development-framework--ldf/ • An indicative timescale for the production of the EAP is included in the LDS.
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	<ul style="list-style-type: none"> • Community engagement was carefully programmed into the EAP from the outset, in order to gather the views of local people and organisations throughout the plan preparation process. The project plan for the EAP identified key points at which community engagement would take place, with an additional community workshop followed by Stage 1 (initial consultation on objectives and key priorities) and Stage 2 (draft EAP) consultations, and finally the publication of the proposed submission EAP in Stage 3. • Consultation and engagement during the EAP process included a mix of methods, including internet based engagement as well as workshops, drop in sessions and bespoke meetings with particular groups. Care was taken at the start of the process to identify and engage hard to reach groups. • The Consultation Statement sets out further details regarding the approach taken to community engagement. • Please also see Camden Council's Statement for Community Involvement: http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/local-development-framework/revision-statement-of-community-involvement.en
3. Have you considered the appropriate bodies you	Regulation 18	NPPF paras 4.25 -	<ul style="list-style-type: none"> • Yes. A wide range of bodies were consulted, taking into account the 2012 Regulations (which specify specific and general consultation bodies) and the

Activity	Legal requirement	Guidance reference	Notes and evidence provided
should consult?		4.26	<p>range of organisations and communities that could be affected by the EAP.</p> <ul style="list-style-type: none"> • Please see the Proposed Submission Consultation Statement and the Duty to Co-operate Statement. • Please also see LB Camden Statement of Community Involvement: http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/local-development-framework/revised-statement-of-community-involvement.en
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?	<p>The Act section 33A(1)(a) and (b), section 33A(3)(d) (e) & (4)</p> <p>The Act Section 20(5)(c)</p> <p>Regulation 4</p>	<p>NPPF paras 178 to 181 (which comprise the guidance referred to in the Act section 33A(7))</p> <p>Under NPPF Para 182, to be 'Effective' a plan should be based on effective joint working on cross-boundary strategic priorities.</p> <p>Strategic priorities are listed at NPPF Para 156</p>	<p>The Duty to Cooperate Statement sets out how the EAP team co-operated with other local planning authorities during the production of the EAP.</p> <p>The Consultation Statement sets out how the EAP team engaged with a range of wider organizations and groups.</p>
5. How you will co-operate with	The Act section	NPPF paras 178 to	<ul style="list-style-type: none"> • The London LEP is administered through the Mayor of London. The Mayor

Activity	Legal requirement	Guidance reference	Notes and evidence provided
<p>any local enterprise partnerships (LEP) or local nature partnerships (LNP) to identify and address any issues or strategic priorities that will have a significant impact on at least two planning areas?</p>	<p>33A(1)(c) and section 33A(9), section 33A(3)(d) and (e)</p> <p>The Act section 20(5)(c).</p> <p>Regulation 4</p>	<p>181</p>	<p>of London (through the GLA and TfL) is jointly preparing the EAP along with Camden Council, and has therefore been fully involved in identifying strategic issues and priorities as part of the EAP.</p> <ul style="list-style-type: none"> The Local Nature Partnership for London is the All London Green Grid (ALGG) Partnership, which is coordinated and supported by the Greater London Authority, and includes London boroughs such as Camden Council. The GLA and LB Camden are jointly producing the EAP along with TfL.
<p>6. Is baseline information being collected and evidence being gathered to keep the matters which affect the development of the area under review?</p>	<p>The Act section 13</p>	<p>NPPF paras 158 - 177</p>	<p>Yes. An evidence base has been prepared and submitted as part of the submission documentation, and includes baseline information provided in the EAP Sustainability Appraisal Scoping Report, a range of existing Camden and London-wide evidence base documents, and a number of studies that were specifically commissioned to inform the preparation of the EAP, namely:</p> <ul style="list-style-type: none"> Updated EAP Economic Visioning, retail and viability report EAP Historic Area Assessment EAP Energy Masterplan Report EAP Strategic Transport Study <p>The baseline information and evidence base documentation that was used to inform the preparation of the EAP is summarised in the EAP Background Report. A full list of the evidence base documents that informed the EAP production include is provided in the EAP Core Documents List.</p> <p>Camden Council will continue to monitor issues affecting this Plan through its Annual Monitoring Report, whilst GLA will monitor progress against London</p>



Activity	Legal requirement	Guidance reference	Notes and evidence provided
			Plan targets. It is considered that there is sufficient flexibility within the Plan to respond to changing circumstances.
7. Is baseline information being collected and evidence being gathered to set the framework for the sustainability appraisal?	The Act section 19(5)	NPPF paras 165 and 167 Strategic Environmental Assessment Guide, chapter 5	Yes. See evidence outlined above, and also the submitted Background Report, Scoping Report and Sustainability Appraisal Report.
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	Yes. Letters sent to relevant consultation bodies regarding Scoping Report. Also see Sustainability Report. Responses were received from Natural England, the Environment Agency and English Heritage, and their suggestions were incorporated where appropriate into the final Scoping Report and subsequently the Sustainability Appraisal Report.



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	Notes and evidence provided
1. Have you notified: <ul style="list-style-type: none"> • the specific consultation bodies? • the general consultation bodies that have an interest in the subject of the DPD and invited them to make representations about its contents? 	Regulation 18(1) and (2)(a) (b)	NPPF paras 159 – 173	Yes. Please see the Consultation Statement, which sets out the specific and general consultation bodies that were consulted, and summarises the responses received. See also the EAP statement on the Duty to Co-operate, which forms part of the supporting documentation to this submission.
2. Are you inviting representations from people resident or carrying out business in your area about the content of the DPD?	Regulation 18(1) and (2)(c)	NPPF paras 159 – 173	Yes. Please see the Consultation Statement, which sets out how residents and local businesses were consulted during the preparation of the EAP, and summarises the responses received.
3. Are you engaging with stakeholders responsible for delivery of the strategy?	Regulation 18	NPPF para 155	Yes. The EAP team has engaged with a range of stakeholders that would be responsible for delivery of the strategy. Transport for London have been fully involved in the preparation of the EAP through their involvement in the project team. Network Rail and HS2 Ltd, those likely to be involved in the delivery of a redevelopment of the station and/or development above have also been fully and regularly involved through their attendance at Management Board and Strategic Board meetings. During the preparation of the Plan the EAP team worked closely with a range of key stakeholders, and held a number of meetings with key landowners and interests in the area, such as UCL and UCH. Community workshops have been held at key

Activity	Legal requirement	Guidance reference	Notes and evidence provided
			stages in plan preparation, which were aimed at community organisations in the area. Please also see the Statement on the Duty to Cooperate and the Consultation Statement, which provide further information regarding consultation and engagement during the production of the EAP.
4. Are you taking into account representations made?	Regulation 18(3)	NPPF para 155	Yes. See submitted Consultation Statement, which summarises the representations that have been received, and how the EAP team has taken those representations into account.
5. Does the consultation contribute to the development and sustainability appraisal of alternatives?	The Act section19(5) Regulations 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF paras 165 – 168 SEA Guide, chapter 3	Yes. Each version of the Sustainability Appraisal (and the EAP) has been updated to include the contribution of representations from preceding consultation exercises. See also the Sustainability Appraisal Report and the Consultation Statement.
6. Is the participation: <ul style="list-style-type: none"> • following the principles set out in your SCI? • integrating involvement with the sustainable community strategy? • proportionate to the scale of issues involved in the 	The Act section19(3)	NPPF para 155	Yes. The consultation follows the principles set out in the Statement of Community Involvement (see p.10): http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/local-development-framework/revised-statement-of-community-involvement.en See also the submitted Consultation Statement

Activity	Legal requirement	Guidance reference	Notes and evidence provided
DPD?			
<p>7. Are you keeping a record of:</p> <ul style="list-style-type: none"> • the individuals or bodies invited to make representations? • how this was done? • the main issues raised? 	<p>The Act section 20(3)</p> <p>Regulation 17</p>	<p>NPPF paras 158 - 171</p>	<p>Yes. We have a record of all the written representations made as well as the EAP Board notes. Please see the submitted Consultation Statement and the board notes on the EAP website: www.eustonareaplan.info. The Consultation Statement summarises the main issues raised and the consultation process.</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) & (e) section 33A(4) section 33A(9)</p> <p>The Act section 20 (5)(c)</p>	<p>NPPF paras 178 to 181</p>	<p>Yes. Please see the Statement on the Duty to Cooperate, which sets out how the EAP team has consulted other local planning authorities and affected bodies.</p> <p>The Consultation Statement also summarises wider consultation carried out during the preparation of the EAP.</p>
<p>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>	<p>The Act section 33A(1)(c) and Section 33A(9).</p> <p>The Act section 20(5) (c).</p>	<p>NPPF paras 178 to 181</p>	<ul style="list-style-type: none"> • The London LEP is administered through the Mayor of London. The Mayor of London (through the GLA and TfL) is jointly preparing the EAP along with Camden Council, and has therefore been fully involved in identifying strategic issues and priorities as part of the EAP. • The Local Nature Partnership for London is the All London Green Grid (ALGG) Partnership, which is coordinated and supported by the Greater London Authority, and includes London boroughs such as Camden Council. The GLA



Activity	Legal requirement	Guidance reference	Notes and evidence provided
	Regulation 4		and LB Camden are jointly producing the EAP along with TfL.
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>	Yes. Section 5 of the Area Action Plan sets out our approach to delivery and monitoring of the Plan. Monitoring as part of the Camden AMR provides a monitoring framework that covers a range of topics that are addressed by the EAP Sustainability Appraisal Framework, and therefore provides a mechanism for monitoring issues that are relevant to sustainability in the Euston area.



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 will not be a participation or consultation process. The publication stage is a formal opportunity for anyone to comment on an aspect of the DPD's soundness. 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	Notes and evidence provided
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	<ul style="list-style-type: none"> • Yes. The draft and proposed submission versions of the Sustainability Appraisal Report outlines the stages of preparation of the document, and includes an appraisal of the strategic alternatives and main policy alternatives that were considered. This appraisal has also been set out in the draft and proposed submission versions of the EAP Background Report. The assessment of reasonable alternatives is also addressed in the accompanying EAP Soundness Self-Assessment. • There were two sets of consultation on the EAP prior to the publication of the proposed submission EAP, on the vision and objectives and on the draft plan. These consultation stages included a range of community events and meetings with other stakeholders as well as online consultation, with hard copies of consultation documents also available at local libraries. These provided opportunities to raise and consider alternatives.
2. Have you assessed alternatives against: <ul style="list-style-type: none"> • consistency with national policy? • general conformity with the regional spatial strategy where still in force? 	The Act section 19 (2), section 24	NPPF para 151	Yes. The Area Action Plan is considered to be in general conformity with the Mayor of London's London Plan and is consistent with national policy in the National Planning Policy Framework (NPPF). The GLA forms part of the EAP project team and management structure and has therefore had a full and active part of the plan preparation process. It is hoped that eventually, the plan will also be adopted as part of the Mayor's suite of supplementary planning guidance.
3. Are you having regard to (where relevant): <ul style="list-style-type: none"> • adjoining regional spatial 	The Act sections 19 (2) and 24 (1) and (4)		Yes. See above.

Activity	Statutory requirement	Guidance reference	Notes and evidence provided
strategies? <ul style="list-style-type: none"> the spatial development strategy for London? Planning Policy for Wales? the National Planning Framework for Scotland? 	Regulation 10 and 21		
4. Are you co-operating with other local planning authorities including counties, to address significant cross boundary issues? Have you discussed doing joint local development documents?	The Act section 33A(2)(a) Section 33A(6)(a)(b) Section 20(5) (c)	NPPF paras 181 and 185	Yes. Please see the Statement on the Duty of cooperate, which sets out how the EAP team has cooperated with other local planning authorities.
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?	The Act section 33A(2)(a), section 33A(6)(a) The Act section 20 (5) (c) Regulation 4	NPPF paras 181 and 182	Yes. Please see the Statement on the Duty of cooperate.
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).	NPPF para 181 and 182	<ul style="list-style-type: none"> The London LEP is administered through the Mayor of London. The Mayor of London (through the GLA and TfL) is jointly preparing the EAP along with Camden Council, and has therefore been fully involved in

Activity	Statutory requirement	Guidance reference	Notes and evidence provided
	Regulation 4 (2)		<p>identifying strategic issues and priorities as part of the EAP.</p> <ul style="list-style-type: none"> The Local Nature Partnership for London is the All London Green Grid (ALGG) Partnership, which is coordinated and supported by the Greater London Authority, and includes London boroughs such as Camden Council. The GLA and LB Camden are jointly producing the EAP along with TfL.
<p>7. Are you having regard to:</p> <ul style="list-style-type: none"> your sustainable community strategy or of other authorities whose area comprises part of the area of the council? any other local development documents adopted by the council? 	The Act section19(2)		<ul style="list-style-type: none"> The Euston Area Plan will form part of Camden's Local Development Framework, and will be adopted as supplementary planning guidance by the GLA. The document will sit within the suite of documents that make up the Council's Local Plan, which includes the Camden Core Strategy 2010, Camden Development Policies 2010, Site Allocations 2013 and Fitzrovia Area Action Plan 2014. We have had regard to the Camden Plan 2012 - 2017, which has recently superseded the Camden Community Strategy.
<p>8. Do you have regard to other matters and relevant strategies relating to:</p> <ul style="list-style-type: none"> resources the local/regional economy the local transport plan and transport facilities and services waste strategies 	<p>The Act section19(2)</p> <p>Regulation 10</p>		<p>Yes. The EAP Background Report sets out the context for and evidence base that informed the production of the EAP, including in relation to these issues, where relevant.</p> <p>TfL and the GLA form part of the EAP project team and governance structure, and Network Rail and HS2 Ltd have also been regularly involved in the preparation of the EAP though attendance at the regular Management Board and Strategic Board meetings.</p> <p>We have also consulted other relevant bodies at each stage of the preparation of the EAP. This allowed them to provide relevant input in relation to their strategies and other matters of interest.</p> <p>See the Council's Consultation Statement for further details.</p>

Activity	Statutory requirement	Guidance reference	Notes and evidence provided
<ul style="list-style-type: none"> hazardous substances 			
<p>9. Are you having regard to the need to include policies on mitigating and adapting to climate change?</p>	<p>The Act section19(1A)</p>	<p>NPPF paras 93 -108</p>	<p>Yes. The Camden Core Strategy sets out how the Council tackles climate change through promoting higher environmental standards, including in relation to climate change (policy CS13) sustainable travel (policy CS11), flood prevention measures (CS13) and air pollution (policy CS16). Developments in the Euston area will be assessed against these policies. Strategic Principle EAP4 of the EAP gives Euston-specific guidance on sustainability in the Euston area including the potential for local energy networks, addressing surface flood risk, promoting green infrastructure, and proposing an ultra low emissions zone.</p>
<p>10. Have you undertaken the sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?</p>	<p>The Act section19(5) Regulation 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>	<p>NPPF para 182 SEA Guide, Chapter 5</p>	<p>Yes. See the submitted Sustainability Appraisal Report.</p>
<p>11. Are you setting out reasons for any preferences between alternatives?</p>	<p>Regulation 8(2)</p>	<p>NPPF para 182</p>	<p>Yes. See the submitted Sustainability Appraisal Report, and the EAP Background Report.</p>
<p>12. Have you taken into account any representations made on</p>	<p>Regulations 17, 18(3) and 22 (1) (c)</p>	<p>NPPF paras 150, 155, 157 and 159-171</p>	<p>Yes. Representations received at each stage of EAP preparation have been considered as an integral part of the plan making process. Summaries of the main issues raised at each stage are included within the Consultation</p>

Activity	Statutory requirement	Guidance reference	Notes and evidence provided
<p>the content of the DPD and the sustainability appraisal? Are you keeping a record?</p>	<p>(iv) Regulation 13(4) of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>		<p>Statement, along with a summary of how those representations have been taken into account. The Sustainability Appraisal Report also summarises how representations have been taken into account in the SA process (see paragraph 1.4.4). Where further detail is required, the full text / original copies of consultation responses and representations are available from our consultation databases on request.</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"> • enable you to amend the currently adopted policies map? • inform the community about the location of proposals? 	<p>Regulations 5 (1)(b) and 9</p>	<p>NPPF para 157</p>	<p>A Policies Map Changes report has been published together with the proposed submission version of the EAP. That report sets out changes to the adopted policies map as required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>
<p>14. Are the participation arrangements compliant with the SCI?</p>	<p>The Act, section 19(3) Regulation 18</p>	<p>NPPF paras 150 and 155</p>	<p>Yes. The consultation exercises, plus other informal consultation, meet the requirements of Regulation 22 of the Town and Country Planning (Local Development) (England) Regulations 2012 (and previous versions of these regulations) and the Council's Statement of Community Involvement (adopted 2011).</p>



Activity	Statutory requirement	Guidance reference	Notes and evidence provided
			Please also see the submitted Consultation Statement



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.

You should make it clear that publication of a DPD is not public participation, nor a consultation. 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.

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	Notes and evidence provided
1. Have you prepared the sustainability appraisal report?	The Act section 19(5) Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF paras 165 - 168 SEA Guide Chapter 5	Yes. See the Sustainability Appraisal Report.
2. Have you made clear where and within what period representations must be made?	Regulation 17, 19, 20 and 35		Yes. Please see the Consultation Statement. This information has been made clear in the consultation letters and emails, the public advertisement and on the EAP consultation website. This information has also been provided to the relevant libraries, where hard copies are available to view.
3. Have you made copies of the following available for inspection: <ul style="list-style-type: none"> • the proposed submission documents? • the statement of the representations procedure? 	Regulation 19(a)		Yes. All material under consultation was made available to the public for inspection, including an explanatory note that provides a statement of the representations procedure. The Consultation Statement submitted alongside the EAP details the consultation process undertaken.
4. Have you published on your website: <ul style="list-style-type: none"> • the proposed submission 	Regulations 19 and 35		Yes. Made available at: http://www.eustonareaplan.info/get-involved/ Requirements of Regulation 35 in relation to the statement of the



Activity	Statutory requirement	Guidance reference	Notes and evidence provided
documents? <ul style="list-style-type: none"> • the statement of the representations procedure? • statement and details of where and when documents can be inspected? 			representations procedure have been met through the consultation website, the public advertisement, an explanatory note accompanying the proposed submission documents in libraries, and the consultation letters/ e-mails.
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"> • A copy of each of the proposed submission documents • The statement of the representations procedure? 	Regulation 19(b)		Yes. For our approach to the statement of the representations procedure please see above.
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"> • the statement of the representations procedure? • where and when the documents can be inspected? 	Regulation 19(b)		Yes. As above.
7. Have you requested the	The Act section 24		Yes. The GLA is jointly preparing the EAP alongside LB Camden and



Activity	Statutory requirement	Guidance reference	Notes and evidence provided
opinion of the Mayor of London (if a London Borough or Mayoral DC) on the general conformity of the DPD spatial development strategy?	Regulation 21		TfL.



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
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)		<ul style="list-style-type: none"> • Yes. The Euston Area Plan has been prepared in accordance with the published LDS. • Yes. The EAP's listing and description in the local development scheme match the document • Yes. We have met the timescales set out in the published local development scheme.

Activity	Legal requirement	Guidance reference	Additional notes
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 EAP has had regard to the Camden Plan 2012 - 2017, which has recently superseded the Camden Community Strategy.
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)		<ul style="list-style-type: none"> • Yes, the Euston Area Plan is in compliance with Camden's Statement of Community Involvement. • Consultation has been carried out in accordance with the framework set out in the 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, county councils where they are not a planning authority, LEPs, LNPs and the prescribed bodies in identifying and addressing any strategic cross-boundary issues If you have not agreed on the approach is there a justification?	The Act section 33A(1) and section 20(5)	NPPF paras 181 and 182	Please see the Statement on the Duty to Cooperate, which addresses cooperation with other local planning authorities and other bodies.
5. Has the DPD been subject to sustainability appraisal? Has the council provided a final report of the findings of the appraisal?	The Act section 19(5) Regulation 22(1)(a)	NPPF para 165 SEA Practical Guide, chapter 5	Yes. Please see the submitted Sustainability Appraisal Report.
6. Is the DPD to be submitted	The Act section	NPPF para 151	<ul style="list-style-type: none"> • Yes, the EAP team considers the Plan to be consistent with



Activity	Legal requirement	Guidance reference	Additional notes
consistent with national policy?	19(2) and Schedule 8		national policy. <ul style="list-style-type: none"> The EAP team has undertaken a PAS Soundness Self- Assessment which has been produced as part of the submission documentation.
7. Does the DPD contain any policies or proposals that are not in general conformity with the regional strategy where it still exists? If yes, is there local justification? 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?	The Act section 24(1)(a) and 24(4) Regulation 21	NPPF para 218 footnote 41	<ul style="list-style-type: none"> No. We consider the Area Action Plan to be in general conformity with the Mayor of London's London Plan 2011. The GLA has jointly prepared the EAP alongside Camden and TfL, and has therefore ensured that the EAP reflects and helps to implement the policies of the London Plan.
8. Has the council published the prescribed documents, and made them available at their principal offices and their website? Has the council notified the relevant statutory and non-statutory bodies, and all persons invited to make representations on the plan? Does the DPD contain a list of	The Act section 20(2), 20(3) and 20(5)(b) Regulations 8 and 19	NPPF para 182	Yes, the proposed submission documents were made available on the EAP website and at St Pancras and Camden Town libraries. The relevant statutory and non-statutory bodies, and all persons invited to make representations on the plan were notified of the publication of the proposed submission documents. No saved policies have been superseded by the EAP.

Activity	Legal requirement	Guidance reference	Additional notes
superseded saved policies?			
9. Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted policies map? If yes, have you prepared a submission policies map?	Regulations 5(1) (b), 9 (1), 17 & 22(1)		Yes. A policies map changes report has been submitted.
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?	Regulation 8(3) and (4) Regulation 8(5)		Yes. Camden's Site Allocations DPD includes policies and guidance on allocated sites in the Euston area, which are identified in Section 4 (Places) of the EAP where appropriate. The EAP is not intended to supersede, but to complement the relevant policies and guidance set out in the Site Allocations DPD.
11. Have you prepared a statement setting out: <ul style="list-style-type: none"> • Which bodies and persons were invited to make representations under Regulation 18? • How they were invited? • A summary of the main issues raised? • How the representations have been taken into account? 	The Act section 20 (3) Regulation 22(1)(c)		Yes. Please see the submitted Consultation Statement.
12. Have you prepared a statement giving:	The Act section 20(3)		Yes. Please see the submitted Consultation Statement.



Activity	Legal requirement	Guidance reference	Additional notes
<ul style="list-style-type: none"> the number of representations made under Regulation 22? a summary of the main issues raised? OR <ul style="list-style-type: none"> that no representations were made? 	Regulation 22(1)(c)		
13. Have you collected together all the representations made under Regulation 28?	The Act section 20(3) Regulation 22(1)(e)		Representations made on the proposed submission EAP have been collected and submitted.
14. Have you assembled the relevant supporting documents?	The Act section 20(3) Regulation 22(1)(g)		Yes, the relevant supporting documents have been submitted.
15. Has your council approved the DPD for submission?	The Act section 20		Yes. Camden's Full Council approved the EAP for submission on 29 th January 2014.
16. Have you sent the Secretary of State (the Planning Inspectorate) both a paper copy and an email of the following: <ul style="list-style-type: none"> the DPD? the submission policies map (unless there are no site 	The Act section 20(1) and 20(3) Regulations 22(1) and 22(2)		Paper and electronic copies of the EAP, submission policies map, and the documents prescribed in Regulation 229(1) are being sent to the Secretary of State (the Planning Inspectorate)

Activity	Legal requirement	Guidance reference	Additional notes
allocation policies)? <ul style="list-style-type: none"> the documents prescribed in Regulation 22(1)? 			
17. Have you made the following available at the same places where the proposed submission documents were to be seen: <ul style="list-style-type: none"> The DPD? The documents prescribed in Regulation 22(1)? 	Regulation 22(3)		To be carried out as soon as reasonably practicable after submission.
18. On your website, have you published the: <ul style="list-style-type: none"> DPD? submission policies map? sustainability appraisal report? Regulation 22(1)(c) statement? supporting documents (where practicable) ? representations made under Regulation 20 (where practicable) ? statement as to where and when the DPD and the documents are available? 	Regulation 22(3) and 35(1)(b)		To be carried out as soon as reasonably practicable after submission.
19. For each general consultation body	Regulation 22(3)(b)		To be carried out as soon as reasonably practicable after submitting



Activity	Legal requirement	Guidance reference	Additional notes
<p>invited to make representations under Regulation 18(1), have you sent:</p> <ul style="list-style-type: none"> notification that the documents prescribed in Regulation 22(3)(a)(i)-(iii) are available for inspection where and when they can be inspected? 			to the Secretary of State.
<p>20. Have you given notice to persons who have requested to be notified that submission has taken place?</p>	Regulation 22(3)(c)		To be carried out as soon as reasonably practicable after submitting to the Secretary of State.
<p>21. If an examination is being held, at least six weeks before its opening has the Programme Officer:</p> <ul style="list-style-type: none"> published the time and place of the examination and the name of the person appointed to carry out the examination on your website? notified those who have made representations on the published DPD which have not been withdrawn of these details? 	<p>The Act section 20</p> <p>Regulations 24 and 35</p>		To be carried out at the appropriate point.