

Soundness Self-Assessment Checklist

This note was prepared by AMEC and URS 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, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

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2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

This means that the DPD should be based on a robust and credible evidence base involving:

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

4. Consistent with national policy: enabling the delivery of sustainable development

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy www.planningportal.gov.uk). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

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

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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. 	<p>Part A: The Plan and Its Context sets out very clearly the issues, priorities, vision and objectives of the AAP.</p> <p>Section 1 covers this, starting with an overall vision for Edmonton Leaside and detailing a series of objectives including:</p> <ul style="list-style-type: none"> • A sustainable urban neighbourhood at Meridian Water • Facilitating economic growth by transformation to new growth sectors at Meridian Water and intensification and upgrading of employment locations the wider Edmonton Leaside area. • Support sustainable regeneration by implementing the Meridian Water Heat Network to provide low-carbon energy - Edmonton Eco Park is set to be the main heat source. • Greatly improved transport and connectivity. Rail improvements include a new station at Meridian Water and a more frequent service. The Causeway will provide a central spine road running through Meridian Water to link with the Lee Valley Regional Park. The plan will facilitate the development and improvement of pedestrian and cycle facilities and better bus services, to connect Edmonton Leaside to the rest of the borough and beyond. <p>The vision is area specific and the objectives clearly flow from it. For example, the vision refers to building a new community at Meridian Water and 21st Century energy generation.</p> <p>Policies are aligned with the objectives and the ELAAP provides a comprehensive policy framework for the management of</p>

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		<p>development within this area.</p> <p>The exploration of options for the Plan has been informed by several stages of consultation and through the Sustainability Appraisal process.</p> <p>The Plan preparation process involved preparing a Sustainability Appraisal which was carried out in parallel with the preparation of the Plan. Appraisal at different stages of the plan production informed site options, policy direction and plan content.</p> <p>Policies are consistent, aligning with the vision of transformational change at Meridian Water, and the more detailed objectives. Area specific policies detailed in Part B and AAP-wide policies set out in Part C. Cross referencing is provided as required.</p> <p>Part D of the ELAAP addresses delivery and implementation, with table 14.1 showing priority projects. The need for engagement with stakeholders and landowners is a requirement in numerous policies within the document. The Council's ownership of significant land parcels within Meridian Water, the securing of funding such as for housing zones, and the planning permission for Phase 1, together show the Council's commitment and provides a good underpinning for delivery.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</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 	<p>The plan is area specific and takes account of existing evidence as well as evidence and analysis in the appendices which includes an assessment of consultation responses, a socio-economic analysis and a property market assessment. It is also supported by a Habitats Regulations Assessment a Sustainability Appraisal and Equalities Impact Assessment.</p> <p>The AAP seeks to meet objectively assessed needs as set out in</p>

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<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>	<p>development were arrived at.</p> <ul style="list-style-type: none"> Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area) 	<p>the Core Strategy and London Plan insofar as this relates to the Edmonton Leaside Area. Accommodating growth for housing principally within Meridian Water and for employment across the area is considered sustainable and its benefits would significantly outweigh any adverse impacts. Early evidence for the quantum of development includes the Core Strategy (2010). Successive London Plan versions have increased the housing target for the borough, from 560, to 798, to over 1,800 in the draft London Plan (2017). Modelling work carried out for the Submission ELAAP showed the level of development which could be achieved at Meridian Water, dependent on factors including the release of designated industrial land.</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.gov.uk) 	<p>The presumption in favour of sustainable development is enshrined within the plan. Objective 1 relates to building sustainable urban neighbourhoods and Objective 4 supports sustainable urban regeneration. There is a strong emphasis on delivery, including for housing, employment, transport infrastructure, and environmentally beneficial projects such as the Meridian Water Heat Network.</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>The economic, social and environmental aspects of the ELAAP area were assessed as through the Sustainability Scoping Report and final Sustainability Appraisal Report that supports this submission.</p> <p>A range of evidence base documents support the ELAAP, providing a basis for the policy framework. The modelling work undertaken sought to provide sufficient flexibility to reflect changing circumstances and site-specific issues.</p> <p>The plan takes into account wider geographic and strategic</p>

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		<p>issues, for example, supporting improvements for transport infrastructure and regeneration in the Upper Lee Valley Corridor. It incorporates principles of the Mayor's London Plan and Upper Lee Valley Area Action Plan, including policies related to housing densities, parking standards and sustainable transport.</p> <p>The plan preparation has involved discussion with the neighbouring authorities of Haringey and Waltham Forest and a number of statutory bodies and relevant cross-boundary issues have been incorporated as appropriate into the document. Please also see the ELAAP Duty to Co-operate Statement.</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, LEP Strategy and marine policy documents where appropriate. 	<p>The AAP aims in relation to employment growth and local economy are set out in Objective 2. Specific policies on jobs and the economy include EL2 Economy and Employment in Meridian Water and EL15 Improving Existing Industrial Areas.</p> <p>The Council's economic vision & strategy is established in other plan documents, including the Core Strategy.</p>
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<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 provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment 	<p>Objective 3, Connectivity, establishes the high-level requirements for transformational changes in transport and accessibility. ELAAP policies that underpin transport improvements within the area and beyond include EL6 The Causeway, EL7 Rail and Bus Improvements, EL21 Improving the Quality of the Pedestrian and Cycling Environment, EL22 Proposed Route - Improvement Principles, EL23 Enhancing the Bus Network and Services, EL24 Use of the Waterways for Transportation and EL25 Design of the</p>

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	<p>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>	<p>Road Network.</p> <p>The AAP policies support provision at Meridian Water of new and improved business space in mixed use areas (Policy EL2), along with a new local centre (Policy EL3). Revitalisation of industrial areas is supported by Policy EL15 and EL16.</p>
<p>2. Ensuring the vitality of town centres (paras 23-37)</p>		
<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>The AAP provides for a new town centre at Meridian Water (Policy EL3) to meet the local needs of the new community, and supports the development of a café and restaurant culture.</p> <p>At Ravenside Retail Park the focus is on improving the physical environment and integrating it with the surrounding area (Policy EL4).</p> <p>The hierarchy of town centres is established by Core Strategy Policy 17, which sets out the approach to retail distribution and growth and provides a hierarchy of centres in the borough.</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 centres (23)</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 identified and allocated. 	<p>The ELAAP supports the establishment of a new town centre at Meridian Water (Policy EL3). This will be supplemented by new community facilities (Policy EL5) such as a primary health centre and community centre.</p> <p>Core Strategy Policy 18 sets out proposals for the delivery of shopping provision across Enfield. It identifies floorspace by phase and location. Core Policies 37 and 38 indicate growth of</p>

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		town centre uses at Meridian Water as it is regenerated.
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 applicable.
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> <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</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. A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. Policy for major developments which 	<p>The AAP approaches sustainable transport comprehensively, seeking to connecting Meridian Water with existing communities and facilities, tackling severance created by the north south rail Line and east west A406 North Circular Road. Objective 3 addresses connectivity. The plan provides for the following matters through policy:</p> <ul style="list-style-type: none"> Enhancing connectivity between Edmonton Leaside and the surrounding areas (EL6, EL7, EL10, EL21 and EL22) Station improvements and upgrade to rail frequency (EL7) Better public transport (including buses) and easing vehicular movements on existing routes (EL23, EL25) Delivering a new spine road (The Causeway) to connect

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<p>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 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</p>	<p>promotes a mix of uses and access to key facilities by sustainable transport modes.</p> <ul style="list-style-type: none"> • 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>all parts of Meridian Water and act as a focal point for public life (EL6)</p> <ul style="list-style-type: none"> • Improving access for pedestrians and cyclists (EL10, EL21 and EL22)

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protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)		
5. Supporting high quality communications infrastructure (paras 42-46)		
<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. 	Objective 3 of the plan seeks to deliver state of the art IT networks and telecommunications.
6. Delivering a wide choice of high quality housing (paras 47-55)		
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	<ul style="list-style-type: none"> • Identification of: <ul style="list-style-type: none"> a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) • A SHLAA 	The Council prepares an annual Housing Trajectory and 5-year housing land supply to demonstrates provision of a rolling provision of specific deliverable sites. Meridian Water is a key element for housing delivery in the borough, and the ELAAP will provide the framework for enabling the Council to attain its housing targets.
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	<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 	The Council prepares an annual Housing Trajectory and 5-year housing land supply to demonstrates provision of a rolling provision of specific deliverable sites. Meridian Water is a key

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		element for housing delivery in the borough, and the ELAAP will provide the framework for enabling the Council to attain its housing targets. Enfield has commenced the stages of preparation of the Local Plan Review which will address the increasing borough-wide need for housing.
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	Enfield's Housing Trajectory is updated annually to demonstrate deliverable a 5-year supply of sites. The housing target is provided by the London Plan, which is based upon previous SHLAA work.
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. 	ELAAP Policy EL1 establishes the approach to housing capacity at Meridian Water, while EL10, EL11 and EL12 provide a design framework. The Draft London Plan (2017) removes the density matrix, but provides design polices to manage development appropriately to the local context. Local Plan density policy is as set out in the Core Strategy Policy 38, DMD6 and DMD8.
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) • 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, 	Through Policy EL1 the AAP provides an approach specific to the circumstances at Meridian Water in terms of housing mix. Early stages of development are required to provide a minimum 25% family housing.

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	<p>where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)</p>	
<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. 	Not Applicable
7. Requiring good design (paras 56-68)		
<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>A range of policy requirement establish the development quality, including the ELAAP design principle policies of EL10, EL11 and EL12. Core Strategy Policy 30 adopts overarching design principles for new development.</p>
8. Promoting healthy communities (paras 69-77)		
<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 	<p>Objective 1 of ELAAP is building a sustainable urban neighbourhood, requiring that people have access to health, leisure and community facilities. Objective 3 on connectivity promotes making Edmonton Leaside and integrated part of the surrounding area, providing for active forms of travel and good</p>

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	<p>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>	<p>public transport. Objective 5 Celebrating the Lee Valley Waterways and Open Spaces, promotes access to open spaces including the Lee Valley Regional Park. Numerous policies support improved provision of open spaces, contributing towards active and healthier lifestyles.</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>Policy EL5 establishes the Council’s approach to the provision of community facilities in Meridian with specific references to education and healthcare. Co-location and multi-functional uses are supported.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally</p>	<ul style="list-style-type: none"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and 	<p>Improvements in the provision and access to open space is covered though Objective 5 Celebrating the Lee Valley</p>

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derived standards to provide these (73).	<p>recreational facilities in the local area. (73)</p> <ul style="list-style-type: none"> • 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) 	Waterways and Open Spaces, along with policies EL9 Leisure Facilities and Open Space at Meridian Water, EL12 Public Realm at Meridian Water, EL19 Revitalising Developed Areas at Picketts Lock, EL20 Revitalising Open Space at Picketts Lock, EL27 Watercourses at Edmonton Leaside and EL28 New and Existing Green Spaces.
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) 	Not applicable.
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</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 	Policy EL20 provides supports the revitalisation of open space at Picketts Lock. This is consistent with national policies on green belt as set out in the National Planning Policy Framework. Paragraph 10.1.6 states that “Delivering a step change in leisure, sport and recreational uses at Pickett’s Lock while ensuring proposals conform fully to Green Belt policy and ecological assets including Sites of Metropolitan Importance for Nature (SMINs) and the nearby Site of Special Scientific Interest (SSSI) at Chingford reservoirs, will require developers to work closely with the Council and the LVRPA to strike an appropriate balance between the scale of new facilities while also maintaining the

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<p>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>	<p>development should not be approved except in very special circumstances. (87)</p> <ul style="list-style-type: none"> ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	<p>openness and ecological value of the site.”</p> <p>The Core Strategy (2010) and Development Management Document (2014) provide the Local Plan policy approach.</p>
<p>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>		
<p>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)</p>	<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>Policy EL8 Managing flood risk in Meridian Water, supports a structured and systematic approach to assessing and dealing with flood risk.</p> <p>Enfield’s Core Strategy sets out how the 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. Core Policy 32 sets out the Council’s commitment to work with partners to minimise air, water, noise and light pollution and address risks arising from contaminated land and hazardous substances. The DMD includes numerous policies on climate change mitigation and adaption, including DMD 52 (Decentralised Energy Networks).</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<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 and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97) 	<p>ELAAP Policy EL26 supports the development of the Lee Valley Energy Network to provide a low carbon energy source within the Edmonton Leaside area. This approach sits within the Local Plan policy framework which includes DMD 52 (Decentralised Energy Networks) and Core Policy 20 (Sustainable energy Use and Energy Infrastructure), which supports the retrofitting of existing developments addressing NPPF climate change matters including inclusion in Local Plans to support for energy efficiency improvements to existing building and promote and maximise energy from renewable and low carbon sources.</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<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>Policy EL8 Managing flood risk in Meridian Water, supports a structured and systematic approach to assessing and dealing with flood risk.</p> <p>Enfield’s Core Strategy sets out how the 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. Core Policy 32 sets out the Council’s commitment to work with partners to minimise air, water, noise and light pollution and address risks arising from contaminated land and hazardous substances. The DMD includes numerous policies on climate change mitigation and adaption, including DMD 52 (Decentralised Energy Networks).</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Take account of marine planning (105)	<ul style="list-style-type: none"> • Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation • Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development • Integrate as appropriate marine policy objectives into emerging policy • Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	Not Applicable
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. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	Not Applicable
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	<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 	Policy EL12 Public Realm at Meridian Water sets out that the new and existing characteristics and features of Meridian Water must be optimised to create a coherent public realm across the site and into the wider surrounding area. This policy also requires that demonstrate an understanding of the industrial heritage and

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.</p>	<p>archaeology of the area.</p> <p>Objective 5 Celebrating in Lee Valley Waterways and Open Spaces is supported by numerous policies including EL9 Leisure Facilities and Open Space at Meridian Water, EL27 Watercourses at Edmonton Leaside, EL28 <i>New and Existing Green Spaces</i>.</p> <p>The borough-wide Local Plan framework includes Core Policy 36: 'Biodiversity', which supports protecting, enhancing and restoring biodiversity interests in accordance with NPPF policy objectives.</p>
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<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>Policy EL18: Deephams Sewage Treatment Works (STW), supports the t upgrade project which will reduce odours and minimise noise from the site.</p> <p>The borough-wide Local Plan framework includes Core Policy 32 which seeks to minimise air, water, noise and light pollution and to address the risks arising from contaminated land and hazardous substances. DMD chapter 11 addresses environmental protection, including policies on pollution control, air quality, land contamination and instability, hazardous installations and water quality.</p>
<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>The Plan includes policies that seek to create, protect, enhance and manage networks of biodiversity and green infrastructure.</p> <p>Objective 5 Celebrating in Lee Valley Waterways and Open Spaces is supported by numerous policies including EL9 Leisure Facilities and Open Space at Meridian Water, EL27 <i>Watercourses at Edmonton Leaside</i>, EL28 <i>New and Existing Green Spaces</i>.</p> <p>The borough-wide Local Plan framework includes Core Policy 36:</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		'Biodiversity', which supports protecting, enhancing and restoring biodiversity interests in accordance with NPPF policy objectives.
12. Conserving and enhancing the historic environment (paras 126-141)		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	<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>Paragraph 2.1.5 of the ELAAP references the rich industrial heritage of the area, evident in the form and structures of the waterways. It also contains an Area of Archaeological Importance, while the Montagu Road Cemeteries Conservation Area is directly adjacent to the west of the AAP boundary.</p> <p>Policy EL12 Public Realm at Meridian Water sets out that the new and existing characteristics and features of Meridian Water must be optimised to create a coherent public realm across the site and into the wider surrounding area. This policy also requires that demonstrate an understanding of the industrial heritage and archaeology of the area.</p> <p>The borough-wide Local Plan framework includes Core Policy 30: <i>Maintaining and Improving the Quality of the Built and Open Environment</i>; Core Policy 31 <i>Built and Landscape Heritage</i>, which outlines how working with partners the Council will proactively preserve and enhance the borough's heritage assets; and DMD 44 <i>Conserving and Enhancing Heritage Assets</i>.</p>
13. Facilitating the sustainable use of minerals (paras 142-149)		
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked	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	Not applicable

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>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>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>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. 		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>A Regulation 22 Consultation Statement has been prepared to support the submission, setting out the various stages of consultation, how the consultation process has met the relevant Regulations and the Council's adopted Statement of Community Involvement (SCI). It also details of the issues and responses and indicates how these have been taken into account in the Plan's preparation. This document also includes the 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</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>	<p>Enfield Council considers that the content of the ELAAP is justified by the evidence. A large evidence base has been prepared to support the Plan, updating the position from the previous version. It positively reflects the objectives of the NPPF and Enfield's Core Strategy which are underpinned by a range of supporting evidence.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>DPD? Were they reasonable and justified?</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 style="text-align: center;">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 style="text-align: center;">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>The Plan has also been informed by Sustainability Appraisal and responses to consultation. The Consultation Statement highlights how consultation has helped to support the Plan’s preparation.</p> <p>A Document Library listing supporting documentation and evidence base has been prepared as part of the submission.</p> <p>There is a high level of confidence in delivery given the Council’s proactive approach on implementing proposals, approval of the Phase 1 planning application, a significant site acquisition programme, and the successful housing zones bid.</p>
<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>	<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 	<p>The Consultation Statement on the Edmonton Leaside Enfield Area Action Plan sets out the methods used for consultation at each stage of plan making, report on the consultation undertaken and a summary of representations received. It also includes the Council’s response to the representations showing how consultation has influenced the Plan.</p> <p>This process has allowed for the alternatives to be raised and considered.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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>	<p>management policies.</p> <ul style="list-style-type: none"> • 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>To comply with the Strategic Environmental Assessment (SEA) Directive and Regulations, and to follow best practice in Sustainability Appraisal (SA), the SA compares the sustainability impacts of the AAP.</p>
<p><i>Effective:</i> <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 		

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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 and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	<p>Part A: The Plan and Its Context sets out clearly the issues, priorities, vision and objectives of the AAP.</p> <p>Section 1 covers this in detail starting with an overall vision for Edmonton Leaside. The vision is area specific and can be linked directly to the objectives. The policies are aligned with the objectives and, together with other Local Plan documents – in particular the Core Strategy and DMD - provides a policy comprehensive framework for the detailed management of development and advancement of proposals within its boundary.</p> <p>The exploration of options for the Plan has been informed by an extensive evidence base and several stages of consultation.</p> <p>The Plan preparation process has involved preparation a Sustainability Appraisal. Appraisal at different stages of the plan production informed site options, policy direction and plan content.</p> <p>Area Specific Policies are detailed in Part B and Theme related matters in Part C. The policies are internally consistent, with cross referencing provided where it is needed to ensure that related sections are considered together.</p> <p>Phasing is addressed in Chapter 14, section 14.4 and Table 14.1. At Meridian Water the initial elements are coming forward at the western side - around the new station – planning permission for phase 1 was granted in 2017. The timing of further phases of delivery will be scheduled following more detailed infrastructure studies and masterplanning work.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the 	<ul style="list-style-type: none"> • A section or sections of the DPD where infrastructure needs are identified and 	<p>The AAP includes policies that support improvements to transport infrastructure and services within the Edmonton</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>policies clearly been identified?</p> <ul style="list-style-type: none"> • 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? 	<p>the proposed solutions put forward.</p> <ul style="list-style-type: none"> • 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. 	<p>Leaside area and beyond. Key policies in relation to transport infrastructure include EL6 The Causeway, EL7 <i>Rail and Bus Improvements</i>, EL23 <i>Enhancing the Bus Network and Services</i>, and EL25 Design of the Road Network.</p> <p>The Plan includes policies that seek to provide new and improved business space within a new local centre and revitalised industrial areas, as well as policies that would look to improve conditions more generally and make the area more attractive for businesses. Key policies include: EL15 Improving Existing Industrial Areas, EL16 Angel Road Retail Park, EL17 Redevelopment of the Eco Park site, EL18 Deephams Sewage Treatment Works, EL19 Revitalising Developed Areas at Picketts Lock and EL26 Lee Valley Heat Network.</p> <p>The ELAAP sets out land use and design principles to guide development in the area and identifies opportunities to provide open space and public realm improvements having regard to the issues raised during plan preparation by stakeholders and from public consultation.</p>
<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 the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</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 	<p>The Edmonton Leaside AAP sets out vision and objectives for Central Leaside and seeks to implement these through area-wide policies and site-specific policies whilst having regard to other plans and programmes relevant to the area.</p> <p>The ELAAP will, together with the London Plan, Enfield's Core Strategy, DMD and other AAP documents, constitute the Local Plan for the Borough. The ELAAP will help deliver the borough's vision and objectives. These policy documents reflect the concept of spatial planning as defined in legislation and national planning policy, containing both strategic and detailed site management policies to achieve sustainable development in the borough over the next 20 years. The ELAAP, together with the Core Strategy</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>and Development Management Document will be key planning documents used both by developers and Council planning officers to guide long-term investment into the area.</p> <p>The preparation of the Plan has involved consultation with stakeholders involved in its delivery and taken into account their plans and programmes.</p>
<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 that would impact on 	<p>The AAP has been prepared to be sufficiently flexible to allow for changing circumstances, while ensuring the vision and objectives for the area are delivered.</p> <p>The Council recognises that being too prescriptive in requirements for development of sites may deter development of which may otherwise be encouraged to take place, therefore the Plan has been drafted with design principles to guide more specific masterplan proposals as they come forward at Meridian Water.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>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><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 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>Enfield Council has demonstrated effective co-operation through constructive, active and on-going engagement with relevant authorities and bodies that have an interest in the Plan, and that the Plan reflects the various views and outcomes of these different processes and activities. The Council is of the view that the duty to co-operate has been fulfilled and has not received any objections to the Plan regarding the Duty to co-operate.</p> <p>The Duty to Co-operate Statement sets out how the relevant bodies have been involved in the evolution of the AAP, and how this involvement has helped shape the proposals as they have emerged.</p>
<p><i>Monitoring</i></p>	<ul style="list-style-type: none"> Sections of the DPD setting out indicators, targets and milestones 	<p>Part D, Delivery and Implementation, includes targets and milestones for the development sites and policies contained</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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 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 	<p>within the AAP.</p> <p>The Council will monitor the effectiveness of this Plan and the delivery of its objectives by regularly assessing their performance against a series of indicators and publishing the results annually. Enfield Council will assess planning outcomes in the AAP 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.</p>
<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. • Where appropriate, evidence of consistency with national marine policy 	<p>The policies and principles contained within the Edmonton Leaside Area Action Plan are consistent with National Policy.</p> <p>National guidance has not been duplicated in this plan.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>as articulated in the UK Marine Policy Statement</p> <ul style="list-style-type: none">• Reports or copies of correspondence as to how representations have been considered and dealt with.	

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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

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Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement with both settled and traveller communities.	<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. 	The Edmonton Leaside Area Action Plan does not include a specific site allocation for traveller accommodation. Should a need for this be identified, this will be addressed through additional plans and/or review of the Local Plan as appropriate in recognition of any requirements.
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.	<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. 	The Edmonton Leaside Area Action Plan does not include a specific site allocation for traveller accommodation. Should a need for this be identified, this will be addressed through additional plans and/or review of the Local Plan as appropriate in recognition of any requirements.
Policy B: Planning for traveller sites (paras 7-11)		
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with	<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, 	The Edmonton Leaside Area Action Plan does not include a specific site allocation for traveller accommodation. Should a need for this be identified, this will be addressed through additional plans and/or review of the Local Plan as appropriate in recognition of any

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Policy Expectations	Possible Evidence	Evidence Provided
<p>neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<p>and, where possible, for years 11-15.</p> <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>requirements.</p>
<p>Policy C: Sites in rural areas and the countryside (para 12)</p>		
<p>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.</p>		<p>Not applicable.</p>
<p>Policy D: Rural exception sites (para 13)</p>		
<p>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.</p>	<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. 	<p>Not applicable.</p>
<p>Policy E: Traveller sites in Green Belt (paras 14-15)</p>		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p>	<ul style="list-style-type: none"> • Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process. 	<p>Not applicable, see above.</p>

Edmonton Leaside Area Action Plan Submission

Policy Expectations	Possible Evidence	Evidence Provided
<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>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 	<p>The Edmonton Leaside Area Action Plan does not include a specific site allocation for traveller accommodation. Should a need for this be identified, this will be addressed through additional plans and/or review of the Local Plan as appropriate in recognition of any requirements.</p>
<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>Not applicable, see above.</p>