



NORTH CIRCULAR AREA ACTION PLAN SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-54) AND LEGAL COMPLIANCE (Pages 54-99)

SOUNDNESS SELF-ASSESSMENT CHECKLIST

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 legal compliance checklist has been completed from pages 54-99

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:



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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:

- 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,



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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). 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.

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
<p><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></p>		



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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>Enfield’s adopted Core Strategy sets the strategic priorities for the North Circular Area Action Plan (NCAAP) following the identification of issues and challenges faced across the borough and opportunities to address these. The NCAAP builds on the objectives set by the Cores Strategy and provides additional detail for this local area.</p> <p>Section 1: ‘Introduction and Context’ of the North Circular Area Action Plan sets out the issues and the challenges considered when planning for area’s future and what the Plan is seeking to achieve.</p> <p>Section 2: ‘Vision and Spatial Strategy’ of the Plan outlines a clear vision and set of objectives to address the issues and challenges identified in Section 1.</p> <p>Section 3: ‘Our Approach – Building</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Sustainable Communities’ of the Plan establishes a clear link between the vision, the relevant objectives and the land use principles which will guide development along the North Circular Corridor. 20 Opportunity Sites are identified in this section where development is expected to take place in the period up to 2026.</p> <p>Section 5: ‘Infrastructure Priorities and Delivery Mechanisms’ explains our approach to the delivery and monitoring of the Area Action Plan’s vision and objectives, as well as the realistic phasing of the development and the way that important infrastructure will be provided.</p> <p>The selection of options for the Plan has been informed by several stages of consultation and through the Sustainability Appraisal process.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Page 7 of the Plan explains how it has reached the stage of formal submission. Two rounds of public consultation were undertaken in 2007 and 2008 before the Plan was halted to allow the Council to progress its Core Strategy. Work recommenced in 2011 and a Towards Pre-submission stage document was prepared for consultation in November 2011 to help inform the Proposed Submission version.</p> <p>The Plan preparation process also involved preparing a sustainability appraisal which was carried out simultaneously. Appraisal at different stages of the plan production informed option of the sites, policy direction and decision making.</p> <p>The policies within this Plan are consistent with Enfield's Local Plan, including Core Strategy, the Mayor's</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>London Plan, the Proposed Submission DMD, and supplementary planning guidance of the New Southgate Master Plan, Southgate Town Hall Planning Brief, and the Council’s approved Local Development Scheme 2011-2014.</p>
<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. 	<p>The North Circular Area Action Plan seeks to positively contribute towards implementing the vision and objectives of the Mayor’s London Plan and implement the spatial strategy and objectives of Enfield’s Core Strategy, in particular the regeneration priorities; including securing new housing, jobs and facilities for Enfield’s growing population and meeting local development needs.</p> <p>As part of the plan preparation process the Council objectively assessed the needs of the area as part</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>of the evidence base supporting the Core Strategy. The North Circular Area Action Plan contributes towards meeting evidenced regeneration priorities for Enfield through securing new housing and job growth targets.</p> <p>The policy guidance is based on robust evidence supporting the adopted Enfield Plan (Core Strategy 2010), updated where necessary. The evidence base is considered as sufficiently flexible to respond to changing circumstances and site specific issues. The evidence base supporting the Submission NCAAP is provided and is annexed to this report.</p> <p>The Area Action Plan will be monitored to ensure its effectiveness against a number of indicators via Enfield's Local Plan Monitoring Report. Where necessary the Council</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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>will review and reassess principles, approaches and guidance.</p> <p>Core Strategy Policy 1: ‘Strategic Growth Areas’ identifies the corridor around the North Circular Road and New Southgate as an area of focused growth and housing led regeneration. Core Strategy Policy 2: ‘Housing supply and location of new homes’ sets out the indicative housing growth targets and the projected supply of new homes within the Plan area.</p> <p>NCAAP Policy 1: ‘North Circular Area Action Plan Area’ reflects the principles of the presumption in favour of sustainable development as identified in the NPPF, with a specific focus on creating sustainable neighbourhoods. It is also in line with the model policy published by PINS.</p> <p>In applying the policies of Enfield’s adopted Core Strategy; the Area</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Action Plan specifically supports and encourages mixed use development in appropriate locations in the 3 Neighbourhood Places. The Plan supports the effective and efficient use of land and buildings in Enfield.</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 the Council objectively assessed the economic, social and environmental needs of the borough as part of the evidence base for the Core Strategy. Where appropriate this was updated for the North Circular Area Action Plan via the Sustainability Scoping Report 2011 and final Sustainability Appraisal Report that supports this submission.</p> <p>The policy guidance is based on evidence supporting the Mayor’s London Plan and Enfield’s Core Strategy and is considered to be sufficiently flexible to respond to changing circumstances and site</p>



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		<p>specific issues.</p> <p>The Plan provides guidance for a range of sites with different characteristics along the North Circular corridor, the majority of which do not raise any specific cross-borough or strategic issues. Where relevant, the Plan does take into account wider geographic and strategic issues, for example, in meeting local education needs. It incorporates the principles of the Mayor’s London Plan, including policies related to housing densities, parking standards and sustainable transport. The Plan has been prepared involving the neighbouring authorities of Barnet and Haringey and a number of statutory bodies and relevant cross-boundary issues have been incorporated as appropriate into the document. Please also refer the NCAAP Duty to Co-operate Statement.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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. 	<p>The Council’s economic vision & strategy is clearly set out in the Core Strategy. Latest evidence Employment Land Review Update 2012 further demonstrates that the core policies are sound.</p> <p>NCAAP Policy 3: ‘Creating and Protecting Local Jobs in the North Circular Area’ addresses these issues in a positive way. One of the objectives of the Plan is to ensure growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses and addresses the impact of growth on residential amenity whilst seeking to enhance the local economic role of the area.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Supported by updated evidence work the Plan promotes the continued protection of Regents Avenue Industrial Estate and the remaining portion of New Southgate Industrial Estate.
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 sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22) 	The Plan includes policies that would seek to provide new and improved business accommodation directly, as well as those that would look to improve conditions more generally and make the area more attractive for businesses. NCAAP Policy 3 would seek to help create and protect local jobs, and other policies, such as NCAAP Policy 13: ‘Ladderswood’, NCAAP Policy 14: ‘Western Gateway’ and NCAAP Policy 30; ‘Old Labour Exchange’, would contribute directly towards the provision of new commercial floorspace in specified locations.



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		<p>The local infrastructure requirements and their means of delivery across the North Circular area have been identified throughout the document, and pulled together in Section 5: 'Key Infrastructure Requirements'.</p> <p>The Council reviewed the evidence base specific to designated employment sites in the area through the Employment Land Review Update 2012 in order to assess long term viability and to better understand the issues.</p> <p>Through discussions with the developers and the community groups the submission Plan identifies a range of Opportunity Sites for development, which are available, realistic and with reasonable prospects of delivery.</p> <p>The Plan also sets out key land use and design principles which will guide</p>



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		development in the area and identifies opportunities to provide open space and public realm improvements having regard to the issues raised during steering group meetings and public consultations.
<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>Core Strategy Policy 17: Town Centres, establishes the hierarchy of Town, District, Local Shopping Centres and Parades. The policy sets out the approach to retail distribution and growth and provides a hierarchy of centres in the borough. The NCAAP area is supported by three Local Centres at Green Lanes, Bowes Road, and Arnos Grove.</p> <p>These town centres have formed the basis for establishing the three Neighbourhood Places identified in the Plan. The focus is on uplifting the vitality of all three centres so they can better support existing and new</p>



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		communities.
<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 small local centre of Arnos Grove and the large local centre at Green Lanes are supported by a mix of opportunity sites within and on the edge of the centre boundaries. These sites will bring forward new residential and commercial opportunities to support and complement the existing role these centres perform.</p> <p>The Plan has revised the town centre boundary of Bowes Road Large Local Centre (Fig 12, page 46-47) to strengthen commercial prospects and mixed use development opportunities. The Plan has consolidated (to the south of the North Circular Road, NCR) and expanded (to the north of the NCR) Bowes Road large local centre town centre boundary. This is in direct recognition to the particular viability</p>



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		issues this centre is facing and the development opportunities that could bring significant vitality back to the centre and extend its role as a Neighbourhood Place.
<p>3. Supporting a prosperous rural economy (para 28)</p>		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<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.
<p>4. Promoting sustainable transport (paras 29-41)</p>		
<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</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. 	<p>NCAAP Policy 8: 'Transport and Movement' affirms the close working relationship with Transport for London in the assessment of on assessing the strategic (A406) and secondary road network.</p> <p>Strategic Objective 8 of Enfield's Core Strategy seeks to enhance traffic flow</p>



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<p>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 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>	<ul style="list-style-type: none"> • 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>by the provision of appropriate infrastructure, as well as the promotion of sustainable methods of transport, and a pattern of development that reduces the need to travel.</p> <p>The North Circular Area Action Plan seeks to achieve this along the AAP corridor by:</p> <ul style="list-style-type: none"> • Improving the quality and attractiveness of the movement network / infrastructure; • Providing good access to shops, services and places of employment; • Identifying three neighbourhood places with defined 10 minute walking areas to serve their respective communities; • Strengthening the role of the 3 centres as sustainable locations for clusters of community, commercial activity and higher density new developments; and



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<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 protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<ul style="list-style-type: none"> • The greening of the North Circular Corridor and other improvements to this and the blue ribbon network. <p>The NCAAP policies also need to be read in conjunction with transport policies in the London Plan, the Proposed Submission DMD that also form part of Enfield’s Local Plan.</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</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</p>



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<p>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>		<p>high speed broadband as it is not identified as a specific issue for the area. London Plan Policy 4.11 which forms part of Enfield’s development plan supports and aims to facilitate the provision and delivery of the information and communications technology (ICT) infrastructure that a modern and developing economy needs.</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 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>	<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 	<p>In broad accordance with the targets set in Enfield’s Core Strategy, the NCAAP allocates a range of sites suitable for future to meet its housing delivery targets of some 1500 new homes up to 2026.</p> <p>Section 3, Figs 6 (page 25 of the AAP identifies 18 “Opportunity Sites’ as the locations where new housing development will take place in the period up to 2026. The Council’s</p>



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		2011/12 Housing Trajectory appended to the Enfield’s published Monitoring Report demonstrates provision of a rolling supply of specific deliverable sites sufficient to provide five years’ worth of housing.
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 	Enfield’s Monitoring Report and housing trajectory lists a supply of housing sites (including those identified within the Area Action Plan) up to 2026. This covers years 6-10 and 11-15 beyond the first five years.
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 includes assessment of planning 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. 	Making the most efficient and best use of Enfield’s limited land is promoted in locations well served by public transport as set out in Enfield’s



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		<p>Core Strategy and the Mayor’s London Plan Policy. The North Circular Area Action Plan applies the density ranges as set out in the London Plan. Fig 8 (page 28 -29) provides a capacity schedule for the Opportunity Sites based on the density matrix provided by the London Plan.</p>
<p>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)</p>	<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, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50) 	<p>Core Strategy Policy 2: ‘Housing Supply and Locations for New Homes’ sets out planned housing delivery over a 15 year period.</p> <p>Core Strategy Policy 3: ‘Affordable Housing’ sets out requirements for affordable housing to meet housing needs. Core Strategy Policies CP4 & CPS seek to ensure a mix of housing types and was based on evidence a Housing Market Assessment (2008).</p> <p>NCAAP Policy 2: ‘New & Refurbished Homes’ sets out the approach to housing and affordable housing. This principle is in line with Enfield’s Core</p>



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		<p>Strategy and Proposed Submission Development Management Policies. The Plan's objectives include supporting suburban residential communities that live alongside one of London's principal distributor roads. The area should continue to provide a wide range of choices in terms of living accommodation. The NCAAP area benefits from a wide spectrum of house types and prices and therefore provides the opportunities for families to grow and for future generations to continue to stay living close together.</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). 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 applicable.</p>
<p>7. Requiring good design (paras 56-68)</p>		



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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>Core Strategy Policy 30 adopts overarching design principles for new development.</p> <p>NCAAP Policy 6: ‘High Quality Design or New Development’ provides a design led approach to new development and public realm interventions. Particular focus is given to addressing the urban context of the North Circular corridor and reinforcing local distinctiveness.</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 vision and spatial strategy of the Plan (page 17) seek to provide a range of facilities, services and places that support sustainable local communities and the needs of residents along the road corridor. Section 3 of the Plan identifies the key principles required to create sustainable neighbourhoods and recognises that the corridor has a diverse mix of uses</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>including homes, shops, schools, local health facilities, employment opportunities, local libraries, leisure and open spaces. The Plan establishes Urban Design Principles to reflect the character of the area. Some of these principles include that the need to address the North Circular Road (A406) as a frontage, with windows, doors and balconies and appropriate design treatment that responds positively the road corridor.</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 North Circular Area Action Plan address these issues by identifying opportunities to improve publicly accessible open, and green spaces, including the waterways which benefit from towpaths and public routes.</p> <p>Fig 5 (page 24) of the Plan provides a Community Life Plan recognising the range of community infrastructure servicing the NCAAP area. Section 3.3: 'Community Infrastructure' addresses how the Plan and specific sites will</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>meet infrastructure priorities for the area.</p> <p>NCAAP Policy 4: Local Education ad NCAAP Policy 5: Provision of Modern Health Care considers how key infrastructure issues for the area can be addressed. NCAAP Policy 11: Three Neighbourhood Places outlines the key community priorities for each of them.</p>
<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>Core Strategy Policy 34 outlines the Council’s approach on protecting and enhancing existing open space.</p> <p>NCAAP Policy 10: ‘Open Spaces, Waterways and the Blue Ribbon Network’ highlights the deficiency of public open space in the Bowes area. The Plan aims to address this issue by identifying opportunities within each Neighbourhood Place as public realm and open space improvement priorities.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The urban analysis provided in Section 4: ‘Environmental Context and the Three Neighbourhood Places’ identifies the principal open spaces, public routes and access to waterways that present opportunities for protection and improvements.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<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) 	<p>All open spaces within the North Circular Area are protected through designations via the Core Strategy and Policies Map and reviewed and updated via the Proposed Submission DMD and accompanying Policies Map, and the submission NCAAP Policies Map.</p>
<p>9. Protecting Green Belt land (paras 79-92)</p>		
<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</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 	<p>Not applicable.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>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>	<p>clarity on the status of safeguarded land, in particular. (85)</p> <ul style="list-style-type: none"> ○ 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) 	
<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>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</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>and requires all developments to take measures to minimise the effects of, and adapt to, climate change.</p> <p>Core Strategy Policy 32 sets out 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.</p> <p>Detailed policies on this matter are to be included in the Proposed Submission DMD.</p>
<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>Core Policy 20: ‘Sustainable energy Use and Energy Infrastructure’ includes reference to 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>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>NCAAP Policy 9: ‘Environmental Mitigation – Air quality and Noise pollution’ and the ‘Climate Change and Renewable Energy’ paragraphs which follow on page 39 give recognition to environmental issues with further guidance and policies to be provided by the Proposed Submission DMD. The final paragraph under this heading confirms the commitment to further exploring a district heating network in the NCAAP Area. NCAAP Policy 13: ‘Ladderswood Estate’ requires a Combined Heat Power (CHP) as part of the scheme.</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>The ‘Climate Change and Renewable Energy’ and ‘Flooding’ paragraphs provided on page 39 give recognition to the surface flooding issues with further guidance and policies to be provided by the Proposed Submission DMD.</p>
<p>Manage risk from coastal change (106)</p>	<ul style="list-style-type: none"> • Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and 	<p>Not applicable.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>clarity on what development will be allowed in such areas.</p> <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. 	
<p>11. Conserving and enhancing the natural environment (paras 109-125)</p>		
<p>Protect valued landscapes (109)</p>	<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>Core Strategy Policy 36: ‘Biodiversity’, refers to the Council seeking to protect, enhance, restore or add to biodiversity interests in accordance with NPPF policy objectives to minimise impacts on biodiversity, provide net gains where possible, and halt the overall decline by establishing coherent ecological networks that are more resilient to current and future pressures.</p> <p>The Plan updates and refers to the Council’s biodiversity objectives on page 39 of the document and references the more detailed policies in the Proposed Submission Development Management Policies.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
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. 	NCAAP Policy 9: ‘Environmental Mitigation – Air quality and Noise pollution’ and the ‘Climate Change and Renewable Energy’ paragraphs which follow on page 39 give recognition to the these environmental issues, where they are relevant to the AAP, with further guidance and policies to be provided by the Proposed Submission DMD.
<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 	The Plan's objectives include identifying opportunities to improve publicly accessible open and green spaces and the blue ribbon network. The Plan establishes an approach to Greening the corridor in Section 3.6 (page 37).
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 	Core Strategy Policy 30: ‘Maintaining and Improving the Quality of the Built and Open Environment’ – is one of a suite of Core Strategy policies that aim



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) 	<p>to protect, enhance, restore, improve or add to the natural environment / landscape. Core Strategy Policy 31: Built and Landscape Heritage outlines how working with partners the Council will proactively preserve and enhance the borough’s heritage assets.</p> <p>Section 3.4: ‘A Design-led Approach’ (Page 33) does acknowledge that while the area covered by the Plan is largely suburban in character it does include prominent buildings of historical merit. Where such buildings are impacted by the Plan’s proposals, for example Opportunity Site 7 Policy 17: ‘Arnos Grove Station’, development principles within the policy provides specific guidance with regards to this issue.</p>
<p>13. Facilitating the sustainable use of minerals (paras 142-149)</p>		
<p>It is important that there is a sufficient supply of material to provide the infrastructure,</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international</p>	<p>Not applicable.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>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>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>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>Yes. The Council has prepared a Regulation 22 Consultation Statement to support the submission. This sets 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</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		and indicates how these have been taken into account in the Plan’s preparation. The Council has also prepared a statement on the Duty to Co-operate.to support the submission.
<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>Enfield 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 Mayor’s London Plan and Enfield’s Core Strategy which are underpinned by a range of supporting evidence. Where necessary the Plan has considered updated evidence since the adoption of those plans in 2011 and 2010 respectively.</p> <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>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>A list of supporting documentation and evidence base has been produced as part of the submission and annexed to this report, Annex 1.</p> <p>Assumptions:</p> <p>The Area Action Plan is based on the objectives of housing led regeneration and employment targets set out in the adopted Enfield Core Strategy (2010) and London Plan (2011). A detailed capacity study prepared for the Plan demonstrates that a target of 1300 units is a more deliverable target than the indicative 1500 set out in Core Strategy Policy 2. The revised target is considered achievable and relevant over the lifetime of the Core Strategy. Opportunity Sites identified in the AAP have all been assessed on their ownership, availability, capacity, viability and deliverability in order to ensure realistic assumptions are in</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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>place and that they can be successfully implemented.</p> <p>The Consultation Statement on the North Circular 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. This process has allowed for the alternatives to be raised and considered.</p> <p>In order 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>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>		



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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 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>Yes. Section 2 of the North Circular Area Action Plan sets out the overall vision and objectives of the Plan. Section 3 of the Plan sets out the approach and sustainable Neighbourhood Principles which will help the Council manage the activities in the area in order to achieve the vision and objectives of the Plan.</p> <p>The Area Action Plan translates the strategic objectives of the Core Strategy to the local level. On this basis there is a strong consistency</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>between the documents in Enfield’s Local Plan, including the adopted New Southgate Masterplan and Southgate Town Hall Planning Brief.</p> <p>To ensure consistency with the Enfield Local Plan and other documents, the Area Action Plan has undergone internal scrutiny and has been agreed prior to the publication of each iteration of the document.</p> <p>Like the adopted Core Strategy, the Area Action Plan will guide development in the borough until 2026, and a key consideration in the assessment of Opportunity Sites for inclusion in the document has been the likelihood of delivery within the period of the Plan.</p> <p>The Council will use the Phasing Plan (Fig 31 page 95) included in Section 5 of the AAP to implement and monitor</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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. 	<p>progress on the identified projects on a regular basis.</p> <p>Yes. Adopted Core Strategy Policy 46: Infrastructure Contributions outlines the Council’s policy for requiring contributions from developments towards infrastructure costs. It refers to the Council’s intention to introduce CIL and in the meantime to continue secure S106 contributions. The policy also lists infrastructure priorities. The adopted Core Strategy policy reflects NPPF advice regarding both the introduction of CIL and on assessing the quality and capacity of infrastructure and taking account of the need for strategic infrastructure.</p> <p>The Council’s Infrastructure Delivery Plan (IDP) 2013 update reflects the current position statement on the AAP’s community infrastructure requirements.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The local infrastructure requirements and their means of delivery across the North Circular area have been identified throughout the document, and pulled together in Section 5: 'Key Infrastructure Requirements'.</p>
<p><i>Co-ordinated Planning</i> 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 • 	<p>Together with the London Plan, Enfield's Core Strategy and other documents, the North Circular Area Action Plan will constitute the Local Plan for the Borough. It will help deliver the vision and objectives of the Core Strategy. 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 Core Strategy, the Area Action Plan and Enfield's emerging Development Management Document in particular will be key planning</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>documents used both by developers and Council planning officers to guide long term investment into the area. The preparation of the Plan has involved consultation with stakeholders involved in its delivery and taken into account their plans and programmes.</p> <p>The AAP goes beyond traditional land use planning and sets out vision and objectives for the North Circular corridor and seeks to implement these through sustainable neighbourhood principles and character areas, land use principles and Opportunity Sites whilst having regard to other plans and programmes relevant to the area.</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 	<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: 	<p>The AAP has been prepared to be flexible enough to cope with changing climates, while ensuring the vision and objectives for the area are delivered. Site specific policies found in Section 4 of the Plan are designed to be flexible.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>that will be taken if the policies need adjustment?</p>	<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 other aspects of the strategy and on infrastructure provision • Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. 	<p>The Council recognises that being too prescriptive in requirements for development of Opportunity Sites may deter development of which may otherwise be encouraged to take place, therefore the Plan has been drafted to incorporate a degree of flexibility within the guiding principles for each opportunity site to allow for different development scenarios.</p>
<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 	<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; 	<p>It is considered that 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</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>commitment from the relevant organisation to the implementation of the policies?</p>	<p>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>	<p>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 'Duty to co-operate' 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"> 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 	<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 	<p>The Plan identifies a range of principles, opportunities to provide open space and public realm improvements, and potential development sites (Opportunity Sites). These will help to deliver a range of benefits to the residents of the three wards within the AAP boundary (Bowes, Southgate Green and Palmers Green) and meet a number of the</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</p>		<p>objectives of Enfield’s Core Strategy.</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, 	<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 	<p>The policies and principles contained within the North Circular Area Action Plan are consistent with national policy.</p> <p>National guidance has not been</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
why have these been included?	reference to the sustainability report) and/or from the results of community involvement. <ul style="list-style-type: none"> • Reports or copies of correspondence as to how representations have been considered and dealt with. 	duplicated in this plan.



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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



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- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement with both settled and traveller communities.	<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 North Circular 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	<ul style="list-style-type: none"> • Demonstration of a clear understanding of the needs of the 	The North Circular Area Action



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Policy Expectations	Possible Evidence	Evidence Provided
<p>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>	<p>traveller community over the lifespan of your development plan.</p> <ul style="list-style-type: none"> • 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. 	<p>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 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. • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. 	<p>The North Circular 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>



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Policy Expectations	Possible Evidence	Evidence Provided
economically, socially and environmentally.	<ul style="list-style-type: none"> Policy which takes into account criteria a-h of para 11 	
Policy C: Sites in rural areas and the countryside (para 12)		
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		Not applicable, see above.
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	<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 applicable, see above.



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Policy Expectations	Possible Evidence	Evidence Provided
travellers sites.		
Policy E: Traveller sites in Green Belt (paras 14-15)		
<p>Traveller sites (both permanent and temporary) 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>	<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. 	Not applicable, see above.
Policy F: Mixed planning use traveller sites (paras 16-18)		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity	<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. 	The North Circular Area Action Plan does not include a specific site allocation for traveller accommodation. Should a need for this be identified, this will be



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Policy Expectations	Possible Evidence	Evidence Provided
of the occupants and neighbouring residents.	<ul style="list-style-type: none"> N.B. Mixed use should not be permitted on rural exception sites 	addressed through additional plans and/or review of the Local Plan as appropriate in recognition of any requirements.
Policy G: Major development projects (para 19)		
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.	<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. 	Not applicable, see above.



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LEGAL COMPLIANCE CHECK LIST

This checklist has been updated for PAS by SNR Denton (April 2013). 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**



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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.



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Stage one: The beginning

Activity	Legal requirement	Guidance reference	Additional notes	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		Yes, the Plan has been identified in the Local Development Scheme (LDS) 2011-2014 .
2. How will community engagement be programmed into the preparation of the DPD?	The Act section 19(3) Regulation 18	NPPF paras 150, 155 and 157	If the SCI is up-to-date, use that. If not set out any changes to community engagement as a result of changes in legislation.	The Regulation 22 Consultation Statement (August 2013) provide details of how the Council consulted organisations, residents, businesses and the community and voluntary sector as part of the preparation of the Plan.
3. Have you considered the appropriate bodies you should consult?	Regulation 18	NPPF paras 4.25 - 4.26	Regulation 2 defines the general and specific consultation bodies.	Please refer to Regulation 22 Consultation Statement (August 2013) and Duty to Co-operate Statement (August 2013) that supports the submission of the Action Plan.



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
			<p>The possible evidence may duplicate each other. Only use what you need to.</p>	
<p>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>	<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</p>	<p>Section 33A(4) defines a "strategic matter".</p> <p>Under section 33A(6) the required engagement includes considering joint approaches to the plan making activities (including the preparatory activities) and considering whether to agree</p>	<p>Preparation of the NCAAP commenced prior to the duty to co-operate coming into force in November 2011. However, a Duty to Co-operate Statement has been prepared to demonstrate how other local planning authorities and prescribed bodies have been involved in the evolution of the AAP, and how this involvement has helped shape the proposals as they emerged.</p> <p>Enfield 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 'Duty to co-operate' bodies have been involved in the evolution of the AAP, and how this involvement has helped shape the proposals as they have emerged.</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
		<p>priorities.</p> <p>Strategic priorities are listed at NPPF Para 156</p>	<p>joint local development documents under section 28.</p> <p>The bodies prescribed by section 33A(1)(c) are set out at Regulation 4(1).</p>	
<p>5. How you will co-operate with 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</p>	<p>The Act section 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>NPPF paras 178 to 181</p>	<p>Section 33A(4) defines a "strategic matter".</p> <p>Strategic priorities are listed at NPPF Para 156.</p> <p>Regulation 4(2) prescribes LEPs and LNPs for the purposes of section 33A(9).</p> <p>Under section 33A(6)</p>	<p>Not applicable.</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
two planning areas?			the required engagement includes consulting on joint approaches to relevant activities.	
6. Is baseline information being collected and evidence being gathered to keep the matters which affect the development of the area under review?	The Act section13	NPPF paras 158 - 177		<p>Yes. An evidence base has been prepared and reviewed, where appropriate. This forms part of the submission of the NCAAP. The list is annexed to this report.</p> <p>The Council will continue to monitor issues affecting this Plan through its Local Plan Monitoring Report, and it is considered that there is sufficient flexibility within the Plan to respond to changing circumstances.</p>
7. Is baseline information being collected and evidence being gathered to set the	The Act section19(5)	NPPF paras 165 and 167 Strategic		A Sustainability (SA) Scoping Report was completed, consulted on and updated in 2011. Following this, a full Sustainability Appraisal report has been prepared and forms part of the submission of the NCAAP.



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
framework for the sustainability appraisal?		Environmental Assessment Guide, chapter 5		
8. Have you consulted the statutory environment consultation bodies for five weeks on the scope and level of detail of the environmental information to be included in the sustainability appraisal report?	Regulations 9 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633.	NPPF paras 165 and 167 SEA Guide chapter 3	The Strategic Environmental Assessment consultation bodies are also amongst the 'specific consultation bodies' which are defined in Regulation 2).	Statutory consultation on the North Circular Area Action Plan SA Scoping was undertaken in August 2012 with the three statutory consultation bodies: Natural England, the Environment Agency and English Heritage, and other relevant non-statutory organisations. Comments were received from the Environment Agency and Natural England and informed the final Sustainability Appraisal.



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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.



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Stage two: Plan preparation

Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
<p>1. Have you notified:</p> <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? 	<p>Regulation 18(1) and (2)(a) (b)</p>	<p>NPPF paras 159 – 173</p>	<p>Specific and general consultation bodies are defined in Regulation 2.</p>	<p>Yes. Specific and general consultation bodies were invited to make representations:</p> <ul style="list-style-type: none"> • Issues and Options (2007) • Preferred Options (2008) • Towards Pre-Submission (2011) • Proposed Submission (2013) <p>The Regulation 22 Consultation Statement provide details of how the Council consulted organisations, residents,</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
				<p>businesses and the community and voluntary sector as part of the preparation of the Plan, summarises the representations received and how they have been taken into account in the preparation of the Plan.</p> <p>A Statement on the Duty to Co-operate has also been prepared separately to demonstrate how other local planning authorities and prescribed bodies have been involved in the evolution of the AAP, and how this involvement has helped</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
				shape the proposals as they emerged.
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. See Regulation 22 Consultation Statement.
3. Are you engaging with stakeholders responsible for delivery of the strategy?	Regulation 18	NPPF para 155	NPPF paras 160-171 4.29 give examples of relevant bodies which should be consulted.	Yes. See Regulation 22 Consultation Statement.
4. Are you taking into account representations made?	Regulation 18(3)	NPPF para 155	Evidence from participation is part of the justification. Show how you have taken representations into account.	Yes. See: <ul style="list-style-type: none"> - Regulation 22 Consultation Statement; - Schedule of Post-Publication Minor Changes; and - Schedule of



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
				Representations and LBE Response.
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. The Sustainability Appraisal has been updated to take into account representations received. See Regulation 22 Consultation statement and final Sustainability Appraisal report.
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 	The Act section19(3)	NPPF para 155		The consultation on the NCAAP has followed the principles in the Council’s adopted SCI. See Regulation 22 Consultation Statement. The SCI was adopted in



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
issues involved in the DPD?				2006 and aligned to the regulatory requirements in place at the time -the Town and Country Planning (Local Development) (England) Regulations 2004. The 2004 Regulations were amended over the course of the Plan's preparation and the various stages of consultation, and then replaced by new Regulations in April 2012 ¹ . The 2006 SCI is in the process of being revised to take into

¹ The Town and Country Planning (Local Development) (England) Regulations 2012.



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
				<p>account these changes.</p> <p>The publication of the Proposed Submission NCAAP is the only publication stage carried out under the 2012 Regulations. The Regulation 22 Consultation Statement demonstrates how this process has been carried out in line with the requirements of the 2012 Regulations.</p> <p>The NCAAP has been developed in line with relevant objectives set out in Enfield's Sustainable Community Strategy (updated in 2009) – see summary of</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
				how these have influenced the Plan in Section 3, page 23 of the NCAAP.
<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>	NPPF paras 158 - 171	<p>You will need to submit a statement of representations under Regulation 22 (1) (c): see Submission stage below.</p> <p>Regulation 35 deals with the availability of documents and the time of their removal.</p>	Yes. The Council has a record of who was invited to make representations, all of the representations made, and has summarised the main issues raised in the Consultation Statements.
<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</p>	<p>The Act section 33A(1)(a) (b) and (c), section 33A(3)(d) & (e)</p> <p>section 33A(4)</p>	NPPF paras 178 to 181	Section 33A(3)(d) and (e) requires cooperation on significant cross-boundary issues before and during plan preparation.	Yes. The Council invited prescribed bodies and adjoining authorities to make representations. Please see Regulation 22



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
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>section 33A(9)</p> <p>The Act section 20 (5)(c)</p>		<p>Section 33A(2) requires you to engage constructively, actively and on an ongoing basis.</p>	<p>Consultation Statement.</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>The Act section 33A(1)(c) and Section 33A(9).</p> <p>The Act section 20(5) (c).</p> <p>Regulation 4</p>	<p>NPPF paras 178 to 181</p>	<p>Section 33A(3)(d) and (e) requires cooperation on significant cross-boundary issues before and during plan preparation.</p> <p>Section 33A(2) requires you to engage constructively, actively and on an ongoing basis.</p>	<p>The Statement on the Duty to Co-operate sets out who and how the relevant ‘Duty to co-operate’ bodies have been involved in the evolution of the AAP, and how this involvement has addressed strategic issues relevant to the Plan area.</p>
10. Are you developing a framework for monitoring the effects of the	<p>The Act section 35</p>	<p>NPPF paras 165 - 1687</p>	<p>It is a matter for each council to decide what to</p>	<p>Yes. Section 5: ‘Infrastructure Priorities</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
DPD?	Regulation 34 Regulation 17 of The Environmental Assessment of Plans and Programmes Regulations 2004 No1363	SEA Guide, Chapter 5	include in their monitoring reports while ensuring they are prepared in accordance with relevant UK and EU legislation” Chief Planning Officer letter 30 March 2011 withdrawing ODPM guidance.	and Delivery Mechanisms’ will form the basis for monitoring the progress of the Plan and where appropriate these will be reported through the Council’s Monitoring Report.



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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.



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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	Additional notes	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	The sustainability appraisal report and supporting documents relevant to the preparation of the DPD are part of the proposed submission documents (see Regulation 17).	Yes. The stages of consultation allowed for alternatives to be raised and considered. The Sustainability Appraisal has assessed the sites against the SA objectives.
2. Have you assessed alternatives against: <ul style="list-style-type: none"> consistency with national policy? 	The Act section 19 (2), section 24	NPPF para 151	For London boroughs and local authorities where regional strategies are still in force general conformity is	Yes. The Plan is considered to be in general conformity with the Mayor's London Plan (2011) and is consistent with the National Planning Policy



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
<ul style="list-style-type: none"> general conformity with the regional spatial strategy where still in force? 			tested formally later but you need to consider it during preparation of the DPD.	Framework (NPPF). Please see Consultation Regulation 22 Statement (August 2013) for latest representation regarding conformity from the GLA.
3. Are you having regard to (where relevant): <ul style="list-style-type: none"> adjoining regional spatial strategies? the spatial development strategy for London? Planning Policy for Wales? the National Planning Framework for Scotland? 	The Act sections 19 (2) and 24 (1) and (4) Regulation 10 and 21		Where the regional strategy has been revoked you should record that fact.	See above.
4. Are you co-operating with other local planning authorities including counties, to address	The Act section 33A(2)(a)	NPPF paras 181 and 185	.	Yes. Please see Statement on Duty to Co-operate.



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
significant cross boundary issues? Have you discussed doing joint local development documents?	Section 33A(6)(a)(b) Section 20(5) (c)			
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	The bodies prescribed by The Act section 33A(1)(c) are set out at Regulation 4 (1).	Yes. Please see Duty to Co-operate Statement.
6. Are you cooperating with having regard to the activities of the LEP and LNP?	The Act section 33A(2)(b) and section 33A(9). Regulation 4 (2)	NPPF para 181 and 182		Not applicable



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
7. Are you having regard to: <ul style="list-style-type: none"> • 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)			<p>Yes.</p> <p>The NCAAP will form part of suite of documents that make up Enfield’s Local Plan. The Plan translates the strategic objectives of the adopted Core Strategy to the local level. On this basis there is a strong consistency between the documents in Enfield’s Local Plan, including the adopted New Southgate Masterplan and Southgate Town Hall Planning Brief.</p> <p>The NCAAP has been developed in line with relevant objectives set out in Enfield’s Sustainable Community Strategy (updated in 2009) – see summary of how these have influenced the Plan on page 23.</p>
8. Do you have regard to other matters and relevant	The Act section19(2)		As well as the matters and strategies listed in the Act and Regulations there are	Enfield Council has consulted all relevant bodies during the Plan’s preparation, including; Transport for



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
strategies relating to: <ul style="list-style-type: none"> • resources • the local/regional economy • the local transport plan and transport facilities and services • waste strategies • hazardous substances 	Regulation 10		likely to be other matters identified in planning policy statements, regional and local strategies that you will need to have regard to in preparing the DPD.	London, the Greater London Authority, Highways Agency, North London Waste Authority, the adjoining boroughs of Haringey and Barnet Councils. This has allowed for the consideration of their strategies to be considered in NCAAP preparation.
9. Are you having regard to the need to include policies on mitigating and adapting to climate change?	The Act section19(1A)	NPPF paras 93 -108		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,



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
				<p>climate change.</p> <p>Core Strategy Policy CP32 sets out 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.</p> <p>Detailed policies on all of these environmental matters are to be included in the Proposed Submission Development Management Document.</p> <p>NCAAP Policy 9: ‘Environmental Mitigation – Air quality and Noise pollution’ and the ‘Climate Change and Renewable Energy’ and ‘Flooding’ paragraphs which follow on page 39 give recognition to environmental</p>



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
				issues relevant to the AAP area.
10. Have you undertaken the sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?	The Act section 19(5) Regulation 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF para 182 SEA Guide, Chapter 5	Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633 sets out the consultation procedures.	See final Sustainability Appraisal Report.
11. Are you setting out reasons for any preferences between alternatives?	Regulation 8(2)	NPPF para 182	This will include Information from the sustainability appraisal.	See final Sustainability Appraisal Report.
12. Have you taken into account any representations made on the content of the DPD and the sustainability appraisal?	Regulations 17, 18(3) and 22 (1) (c) (iv)	NPPF paras 150, 155, 157 and 159-171	Records on the sustainability appraisal should also include recording any assessment made under the Habitats	Yes. The Council has a record of who was invited to make representations, all of the representations made, and has summarised the main issues raised



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
<p>Are you keeping a record?</p>	<p>Regulation 13(4) of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>		<p>Directive.</p>	<p>in the Consultation Statements. The representations received through consultation have been considered.</p> <p>Where further detail is required, the original copies of the consultation responses are available 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 	<p>Regulations 5 (1)(b) and 9</p>	<p>NPPF para 157</p>	<p>Regulation 2 defines the terms 'submission' and 'adopted' proposals map.</p> <p>A map showing changes to the adopted policies map is part of the proposed submission documents defined in Regulation 17.</p>	<p>A Policies Map has been published together with the Proposed Submission NCAAP. This illustrates changes to the adopted Policies Map.</p>



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
about the location of proposals?				
14. Are the participation arrangements compliant with the SCI?	The Act, section 19(3) Regulation 18	NPPF paras 150 and 155		<p>The consultation on the NCAAP has followed the principles in the SCI. Please see Regulation 22 Consultation Statements.</p> <p>The SCI was adopted in 2006 and aligned to the regulatory requirements in place at the time -the Town and Country Planning (Local Development) (England) Regulations 2004. The 2004 Regulations were amended over the course of the Plan’s preparation and the various stages of consultation, and then replaced by new Regulations in April 2012². The 2006 SCI has not yet</p>

² The Town and Country Planning (Local Development) (England) Regulations 2012.



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
				<p>been revised to take into account these changes.</p> <p>The Proposed Submission NCAAP is the only publication stage carried out under the 2012 Regulations, and this has been carried out in line with the requirements of the 2012 Regulations.</p>



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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.



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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'.



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Stage four: Publication

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
1. Have you prepared the sustainability appraisal report?	The Act section19(5) Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF paras 165 - 168 SEA Guide Chapter 5		Yes. A Sustainability Appraisal forms part of the Submission.
2. Have you made clear where and within what period representations must be made?	Regulation 17, 19, 20 and 35		The period must not be less than 6 weeks from when you publish under Regulations 19 and 35 (see below).	Yes. The Proposed Submission NCAAP consultation letters/emails/notices provided information on where and within what period representations must be made. The AAP was formally published for a seven week consultation from 10 th April until 29 th May 2013.
3. Have you made copies of the following available for inspection:	Regulation 19(a)		Regulation 17 gives definitions.	Yes. Both the NCAAP Proposed Submission Documents and the statement of representations procedure were available for



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
<ul style="list-style-type: none"> the proposed submission documents? the statement of the representations procedure? 				public inspection in accordance with the details set out in the Statement of Fact.
<p>4. Have you published on your website:</p> <ul style="list-style-type: none"> the proposed submission documents? the statement of the representations procedure? statement and details of where and when documents can be inspected? 	Regulations 19 and 35		Regulations 2 and 17 give definitions.	<p>Yes. The NCAAP Proposed Submission Documents, statement of representations and statement of fact have been published on the Council's website:</p> <p>http://www.enfield.gov.uk/info/1000000456/local_plan_planning_policy/506/north_circular_area_action_plan/6</p>
<p>5. Have you sent to each of the specific consultation</p>	Regulation 19(b)		Regulations 2 and 17 give definitions.	The proposed submission documents and statement of



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
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? 				representations procedure were made available for public inspection.
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 	Regulation 19(b)		Regulations 2 and 17 give definitions.	As above.



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Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
inspected?				
7. Have you requested the opinion of the Mayor of London (if a London Borough or Mayoral DC) on the general conformity of the DPD spatial development strategy?	The Act section 24 Regulation 21		The request must be made on the day you publish the documents under Regulation 19(a) and a response must be made within six weeks from the request (Regulation 21).	Yes. The Council formally requested the opinion of the Mayor of London on the general conformity of the NCAAP.



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Stage five: Submission

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

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

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

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

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

Stage five: Submission

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
1. Has the DPD been prepared in accordance with the LDS? Does the DPD's listing and description in the LDS match the document? Have the timescales set out in the LDS been met?	The Act section 19(1)		The Act section 15(2) sets out the matters specified in the LDS. As at January 2013, no further matters are prescribed in the Regulations.	Yes, the NCAAP has been identified in the Council's latest published LDS 2011-2014. The timescales have slipped marginally.
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		The NCAAP has been developed in line with relevant objectives set out in Enfield's Sustainable Community Strategy (updated in 2009) – see summary of how these have influenced the Plan on page 23.
3. Is the DPD in compliance with the SCI (where one exists)? Has the council carried out consultation as described in the SCI?	The Act section 19(3) Regulation 22(1)(c)		Before the SCI is formally amended to take into account the changes in the regulations, you may need to set out how the community engagement that you carried	The consultation on the NCAAP has followed the principles in the SCI. See Consultation Statements. The SCI was adopted in 2006 and



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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
			<p>out met the regulations (as amended).</p>	<p>aligned to the regulatory requirements in place at the time -the Town and Country Planning (Local Development) (England) Regulations 2004. The 2004 Regulations were amended over the course of the Plan’s preparation and the various stages of consultation, and then replaced by new Regulations in April 2012³. The 2006 SCI has not yet been revised to take into account these changes.</p> <p>The Proposed Submission NCAAP is the only publication stage carried out under the 2012 Regulations, and the</p>

³ The Town and Country Planning (Local Development) (England) Regulations 2012.



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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				Consultation Statement demonstrates how this process has been carried out in line with the requirements of the 2012 Regulations.
<p>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, LEAs, LNs and the prescribed bodies in identifying and addressing any strategic cross-boundary issues</p> <p>If you have not agreed on</p>	<p>The Act section 33A(1) and section 20(5)</p>	<p>NPPF paras 181 and 182</p>	<p>Under NPPF para 182, the plan should be based on effective joint working on cross-boundary strategic priorities to be found 'Effective'.</p>	<p>Preparation of the NCAAP commenced prior to the duty to co-operate coming into force in November 2011. However, a Duty to Co-operate Statement has been prepared to demonstrate how other local planning authorities and prescribed bodies have been involved in the evolution of the AAP, and how this involvement has helped shape the proposals.</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
the approach is there a justification?				
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. A Sustainability Appraisal has been prepared and forms part of this submission.
6. Is the DPD to be submitted consistent with national policy?	The Act section 19(2) and Schedule 8	NPPF para 151		Yes. The Council consider that the Plan is consistent with national policy and has undertaken the PAS Soundness self-assessment checklist which provides the necessary evidence of this.
7. Does the DPD contain any policies or proposals that are not in general conformity with the regional strategy where it still exists?	The Act section 24(1)(a) and 24(4) Regulation 21	NPPF para 218 footnote 41	In London the requirement is for general conformity with the spatial development strategy (The London Plan).	No. The Plan is considered to be in general conformity with the Mayor's London Plan (2011) Please see Consultation Statement (2013) for latest representation regarding



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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>If yes, is there local justification?</p> <p>If the LPA is a London borough or a mayoral development corporation has it requested an opinion from the Mayor of London on the general conformity of the plan with the spatial development strategy?</p>				<p>conformity from the GLA.</p>
<p>8. Has the council published the prescribed documents, and made them available at their principal offices and their website?</p> <p>Has the council notified the</p>	<p>The Act section 20(2), 20(3) and 20(5)(b)</p> <p>Regulations 8 and 19</p>	<p>NPPF para 182</p>	<p>Requirements relating to publication of the prescribed documents are listed later in this table.</p>	<p>The Council has published the proposed submission documents and has made them available in accordance with the statement of fact. Specific, general and other consultees have been notified and invited to make representations as outlined in the Consultation</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>relevant statutory and non-statutory bodies, and all persons invited to make representations on the plan?</p> <p>Does the DPD contain a list of superseded saved policies?</p>				<p>Statement.</p> <p>The NCAAP will not replace any saved UDP policies.</p>
<p>9. Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted policies map?</p> <p>If yes, have you prepared a submission policies map?</p>	Regulations 5(1) (b), 9 (1), 17 & 22(1)			A Policies Map forms part of this submission. This illustrates changes to the adopted Policies Map.
<p>10. Is the DPD consistent with any other adopted DPDs for</p>	Regulation 8(3) and		Development Plan is defined	The NCAAP will form part of suite of documents that make up Enfield's



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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>the area? If the DPD is intended to supersede any adopted development plan policies, does it state that fact and identify the superseded policies?</p>	<p>(4) Regulation 8(5)</p>		<p>in Section 38 of the Act.</p>	<p>Local Plan. The Plan translates the strategic objectives of the adopted Core Strategy to the local level. On this basis there is a strong consistency between the documents in Enfield’s Local Plan, including the adopted New Southgate Masterplan and Southgate Town Hall Planning Brief.</p> <p>The NCAAP will not replace any saved UDP policies. The NCAAP does not supersede other adopted policies in the Local Plan. However, the NCAAP is supported by more detailed site specific work, such as capacity studies, therefore it presents the most up to date information for this local area as it takes into account updates/changes since the adoption</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
				of other Local Plan documents.
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)		This will bring forward material from the Consultation statement (see Stage 2 above).	The Regulation 22 Consultation Statements provide details of how and which organisations, residents, businesses and the community and voluntary sector were consulted as part of the preparation of the Plan, summarises the representations received and how they have been taken into account.
12. Have you prepared a statement giving: <ul style="list-style-type: none"> • the number of representations made under Regulation 22? 	The Act section 20(3) Regulation 22(1)(c)			The Regulation 22 Consultation Statement provide details of how and which organisations, residents, businesses and the community and voluntary sector were consulted as part of the preparation of the Plan,



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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<ul style="list-style-type: none"> a summary of the main issues raised? OR <ul style="list-style-type: none"> that no representations were made? 				the number of representations made, a summary of the main issues, and how they have been taken into account.
13. Have you collected together all the representations made under Regulation 28?	The Act section 20(3) Regulation 22(1)(e)			Yes. Original copies of the representations are available on request.
14. Have you assembled the relevant supporting documents?	The Act section 20(3) Regulation 22(1)(g)			Yes. These documents are listed as part of the submission documents.
15. Has your council approved the DPD for submission?	The Act section 20		Check the LPA's constitution/standing orders for the authorisation process appropriate for the type of DPD.	Yes. Council approval for the submission of the NCAAP was given on 27 th February 2013.



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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>16. Have you sent the Secretary of State (the Planning Inspectorate) both a paper copy and an email of the following:</p> <ul style="list-style-type: none"> • the DPD? • the submission policies map (unless there are no site allocation policies)? • the documents prescribed in Regulation 22(1)? 	<p>The Act section 20(1) and 20(3)</p> <p>Regulations 22(1) and 22(2)</p>		<p>Regulation 35 deals with the availability of documents and the time of their removal.</p> <p>Electronic copies of some of the representations and supporting documents may not be practicable.</p> <p>Regulation 35 deals with the availability of documents and the time of their removal.</p>	<p>Yes, paper copies and an email were sent to the Planning Inspectorate on 30th August 2013. Electronic copies of the submission documents are also available on the Council's website:</p>
<p>17. Have you made the following available at the same places where the proposed submission documents were to be seen:</p> <ul style="list-style-type: none"> • The DPD? 	<p>Regulation 22(3)</p>		<p>You should do this as soon as reasonably practicable after submission.</p>	<p>To be completed following submission of the NCAAP.</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<ul style="list-style-type: none"> The documents prescribed in Regulation 22(1)? 				
<p>18. On your website, have you published the:</p> <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) ? 	<p>Regulation 22(3) and 35(1)(b)</p>		<p>You should do this as soon as reasonably practicable after submission.</p>	<p>Electronic copies of these documents are available on the Council’s website:</p>



NORTH CIRCULAR AREA ACTION PLAN SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-54) AND LEGAL COMPLIANCE (Pages 54-99)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<ul style="list-style-type: none"> statement as to where and when the DPD and the documents are available? 				
<p>19. For each general consultation body invited to make representations under Regulation 18(1), have you sent:</p> <ul style="list-style-type: none"> notification that the documents prescribed in Regulation 22(3)(a)(i)-(iii) are available for inspection where and when they can be inspected? 	Regulation 22(3)(b)		You should do this as soon as reasonably practicable after submitting to the Secretary of State.	Yes, specific consultation bodies have been notified and given information on where and when the documents are available for public inspection.
20. Have you given notice to persons who have requested	Regulation 22(3)(c)		You should do this as soon as reasonably practicable after	To be completed following submission of the NCAAP.



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SOUNDNESS SELF-ASSESSMENT (Pages 1-54) AND LEGAL COMPLIANCE (Pages 54-99)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
to be notified that submission has taken place?			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>			<p>To be completed following submission of the NCAAP.</p>

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planning advisory service

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ANNEX1: SUPPORTING EVIDENCE BASE

Equalities Impact Assessment (2013)

Sequential Test of Site 15: Green Lanes North (2013)

NCAAP Scoping Report (2013)

[North Circular Area Action Plan – Towards Pre-Submission Draft](#)

[Proposed Submission Development Management Document DMD \(2013\)](#)

[Proposed Submission DMD Policies Map Booklet](#)

[Enfield Core Strategy \(2010\)](#)

[Adopted Statement of Community Involvement \(2006\)](#)

[New Southgate Master Plan \(2010\)](#)

[Southgate Town Hall Planning Brief \(2011\)](#)

[Enfield's Local Development Scheme \(2011-2014\)](#)

[Enfield's Preliminary Draft Charging Schedule \(2013\)](#)

[Enfield's Draft Infrastructure Delivery Plan \(2013\)](#)

[Enfield's Monitoring Report \(2011\)](#)

[Enfield Employment Land Review \(2012\)](#)

[ULV Decentralised Energy Network Study](#)

[Final Report on the Location of Tall Buildings \(2013\)](#)