

The Enfield Plan – Core Strategy
Soundness Self Assessment Statement
March 2010



1 Introduction

- 1.1** Under the new planning system Local Development Framework (LDF) development plan documents (DPDs) will be considered at Public Examination. The Inspector will consider whether the DPD satisfies the requirements of the Act (The Planning & Compulsory Purchase Act 2004) and the Regulations (The Town and Country Planning (Local Development) (England) Regulations 2004) relating to the preparation of DPDs in terms of procedure and whether they are "sound".
- 1.2** Planning Policy Statement 12 'Creating Strong, Safe and Prosperous Communities through Local Spatial Planning' (PPS 12) states that "given the potential impact of core strategies on the lives of individuals, communities and the environment, it is vital that the plan is the most appropriate". Local planning authorities (LPAs) may find it useful to carry out an objective self assessment process having regard to the tests in PPS 12 to satisfy themselves that they have produced a sound DPD. Where they do this, their assessment can be used as part of their evidence for the Public Examination".
- 1.3** The Planning Inspectorate (PINS) has issued guidance which sets out how the Inspector will manage the examination to assess whether the DPD is sound. In addition to soundness the examination has to consider whether the authority has complied with all the statutory requirements.
- 1.4** This guidance has been taken forward by the Planning Advisory Service (PAS), with the support of the Department for Communities and Local Government (DCLG) and PINS through production of the 'LDF soundness self-assessment toolkit' (September 2006). The soundness toolkit provides a framework to assist LPAs to draw up an appropriate self assessment statement. It is in two parts, the first provides guidance to assist in the preparation of DPDs, and the second provides the basis for the self assessment statement.
- 1.5** The Planning Advisory Service (PAS) soundness toolkit has been used as the template for the Council's Soundness Self Assessment Statement for the LDF Core Strategy DPD.

Title of development plan document	The Enfield Plan – Submission Core Strategy		
Local authority(ies) preparing the DPD	London Borough of Enfield		
Submission date	16 th March 2010		
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Key question	Possible evidence	Evidence provided
Justified		
Participation		
1. Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement	The Issues and Options and Preferred Options: Statement of Consultation Volumes I and II sets out the how and which bodies were consulted throughout the DPD production process.
Research/ fact finding		
<p>2. Is the content of the development plan document justified by the evidence?</p> <p>3. What is the source of the evidence?</p> <p>4. How up to date and convincing is it?</p>	<p>i. Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals</p> <p>ii. Sections of the pre-submission proposals documents</p> <p>iii. Sections of the preferred strategy report</p> <p>iv. Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document</p> <p>v. Sections of the consultation statement</p> <p>OR</p> <p>A very brief statement of how the main findings of consultation support the policies, with reference to:</p> <ul style="list-style-type: none"> o reports to the council on the issues raised during participation, covering both the front-loading and formulation phases o any other information on community views and preferences <p>vi. The studies, reports and technical papers that provide the evidence for the policies set out in the development plan document. The date of preparation and who they were produced by should be signposted</p> <p>OR</p> <p>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence</p>	<p>The DPD is considered justified through the up to date and relevant evidence base commissioned and collected, including but not limited to the following:</p> <p>Enfield Sustainability Appraisal Report (2009) Enfield Strategic Flood Risk Assessment Stage 1 Enfield – A Study of Town Centres (2007) Enfield Retail Study Update (2009) Housing Study (2005); Affordable Housing Viability Study 2009 Enfield Strategic Housing Market Assessment (2010) Enfield Housing Trajectory Justification Report (2009) Enfield Employment Study 2006 Enfield Employment Land Update (2009); Enfield Employment Land Update (2009); Enfield Open Space, Sport Assessment Study 2006 Core Strategy Transport Assessment (2009) Enfield Heritage Study (2008) Enfield Characterisation Study (2008) Draft Enfield Renewable Energy and Low Carbon Study (2010) Enfield Annual Monitoring Reports.</p> <p>In relation to housing need and market evidence, work is currently nearing completion at the sub-regional level through preparation of the North London Strategic Housing Market Assessment.</p> <p>Referencing to relevant evidence base which has helped inform strategy approach is included</p>

Key question	Possible evidence	Evidence provided
	<p>documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the development plan document)</p>	<p>throughout the DPD. For example the town centres hierarchy established in the Core Strategy has been informed by the Town centre Study (2007) and the Retail Update Study (2009), paragraph 6.55, page 77. Supporting paragraphs 5.17 -5.23 of Core Policy 3 Affordable housing makes clear referencing to both the Strategic Housing Market Assessment (2008) and Affordable Housing Viability Study (2009).</p> <p>Appendix 4 provides a list of evidence base which informs the strategy/</p> <p>Representations on this matter from the Government Office for London state that: "From the references throughout the Plan and the list in Appendix 4, it would appear that the Enfield Core Strategy is backed up by an extensive range of appropriate evidence. It is clear also from these references that much of the evidence base is of recent origin".</p>
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<ul style="list-style-type: none"> i. Sections of the development plan documents setting out the assumptions ii. Sections of the sustainability appraisal report setting out the assumptions iii. A very brief statement for each assumption as to how the evidence led to the assumption iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions 	<p>The Core Strategy uses as a baseline the demographic projections produced by the Greater London Authority (GLA) for policy and service planning. GLA projections are produced on an annual basis in order to be refreshed with data, including fertility/mortality, migration and forecasts of planned development. GLA projections are used in preference to pure trend-based ONS Sub-national Population Projections and CLG Household Projections because they link population and household change to borough capacity to accommodate them.</p> <p>The population projections generated by the Greater London Authority (GLA), have been used as a starting point, to which planned housing growth in the Borough has been applied, to reflect strategic growth set out in the Core Strategy. The GLA figures are entirely driven by the increase in homes as seen annually since mid-2001 collected at borough level</p> <p>It is noted that the estimated Borough population projection of 309,500 to 2026 exceeds the GLA 2008 Round Demographic projections (March 2009) of 293,500-303,800, and GLA Demography Update (October 2009) of 300,100 for the following reasons:</p>

Key question	Possible evidence	Evidence provided
		<p>1. The GLA 2008 Round Demographic projections do not provide for revised London Plan targets, the strategic growth planned in the Borough and the nature of the long term phased development approach as set out in the Core Strategy, and</p> <p>2. Although the GLA Demography Update (October 2009) incorporates the Strategic Housing Land Availability Assessment (SHLAA) (2009) figures, the growth envisaged in the SHLAA is conservative as general site constraints are automatically applied to housing sites across the region. Furthermore, a significant proportion of housing growth in the Borough will occur beyond the SHLAA's ten year from 2010/11 to 2020/21.</p> <p>A number of technical studies prepared to support the Core Strategy approach, by their nature, make relevant assumptions with regards to market growth, retails expenditure etc. Please refer to individual studies.</p> <p>The Infrastructure Development Plan also sets out a number of assumptions with regards to the projected funding and phasing of programmes and projects.</p>
Alternatives		
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived</p>	<p>i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options</p> <p>ii. Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered</p> <p>iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and</p>	<p>The initial scoping exercise to kick-start the preparation of the Core Strategy began in 2006. This lead to an initial public consultation on the issues and options that will face Enfield over the next 15 -20 years. Following consultation on the Issues and Options report, a Preferred Options report for the Core Strategy was published for public consultation in February 2008, supported by a Sustainability Appraisal a. Further consultation on the preferred options for Strategic Growth Areas was undertaken in March 2009 has helped refine the Core Strategy.</p>

Key question	Possible evidence	Evidence provided
<p>at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>options raised</p> <p>iv. Sections of the preferred strategy report explaining:</p> <ul style="list-style-type: none"> • how alternatives were developed and evaluated, and • why alternatives were rejected in favour of the preferred strategy <p>v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed</p> <p>vi. Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document</p> <p>vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions</p> <p>viii. Sections of the representations statement</p> <p>OR</p> <p>A brief statement of the influence upon decisions of: the issues raised during stakeholder and community engagement, and how they have been addressed</p> <p>ix. Any other documentation showing how alternatives were developed and evaluated</p> <p>x. A very brief statement and any other supporting documentation of the way decisions have been taken</p>	<p>The Issues and Options and Preferred Options: Statement of Consultation Volumes I & II set out in sections 2 and 3 a summary of each consultation phase and outcomes.</p> <p>The Sustainability Appraisal process informed alternatives considered through various stages of assessment.</p>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy</p> <p>ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings</p> <p>iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies</p>	<p>SA baseline information gathered additionally informed by evidence base:</p> <p>(1) Sustainability Appraisal Scoping Report prepared in 2006 and submitted to the Environment Agency, Natural England, English Heritage and other stakeholders for comment before being finalised.</p> <p>(2) SA of Core Strategy Issues and Options and Scoping Report were consulted upon in 2007, alongside the Core Strategy.</p> <p>(3) A Sustainability Appraisal Report at Preferred Options (2008) stage was undertaken.</p>

Key question	Possible evidence	Evidence provided
		<p>(4) A Sustainability Appraisal Report of further Preferred Options on Strategic Growth Areas was undertaken in 2009.</p> <p>For a comprehensive account of the sustainability appraisal process please refer to the Pre-submission Sustainability Appraisal Report published December 2009. The report is structured to provide a detailed appraisal at each stage of preparation for the Core Policies.</p>
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy iii. Representations received from the regional development agency/regional planning body iv. Representations from the Government Office v. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p>Core Polices expand on regional policies to ensure the Core Strategy represents a local circumstances and reflects Enfield specific issues of need as well as local aspirations.</p> <p>The Mayor Of London finds the Plan in general conformity with the London Plan and has issued a statement under Section 24 (a) a of Planning and Compulsory Purchase Act 2004.</p> <p>Housing Supply, Core Policy 2 provides a clear example of where local circumstances , supported by evidence work have provide a justification for housing target higher than those established as a regional level for the Borough.</p> <p>Affordable Housing Core Policy 3 uses regional guidance as a starting point, but has provided local evidence to support a locally viable approach which has been accepted by the GLA.</p> <p>In bringing forward - Core Policy 14 -Safeguarding Strategic Industrial Land – the Council has worked closely with the GLA to identify on a local level the appropriate reconfiguration of SIL.</p>

Effective		
Deliverable		
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy iii. A core strategy vision which is framed to set out the outcomes which are sought for the future iv. Sections of the development plan document which identify the main issues addressed v. Sections of the development plan document which indicate the priority outcomes 	<p>Issues & Options - the initial stages of the preparation of the Core Strategy set out what we considered to be the key issues and challenges facing Enfield currently and in the future and sought views on them and any other issues that we may have missed. The outcomes from this exercise were taken into account in preparing the Preferred Development Report. For each policy section, the Report provided commentary from the issues and options feedback under 'What you told us' and a justification for the preferred option approach.</p> <p>Further preferred options consultation on Strategic Growth Areas represented a direct local response to the issues facing Enfield.</p> <p>Chapter 3 sets out the Core Strategy vision and lists 10 objectives, Chapter 4 provides the strategy approach through Core Policy 1 and the 4 Strategic Growth Areas.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<ul style="list-style-type: none"> i. Sections of the regional special strategy which identify cross-boundary issues. ii. Sections of the development plan document setting out cross-boundary issues and the response to them iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance 	<p>The growth strategy for Enfield recognises the proximity of adjoining boroughs, Barnet, Waltham Forest and Haringey. Strategic growth areas are being developed in consultation with the relevant boroughs, and as well as Lee Valley Regional Park with regards to Ponders End and Meridian Water.</p> <p>Paragraph 2.31 gives a clear reference to those cross boundary entities.</p> <p>Inter-borough relationships are already established, such as in respect of school places planning, and continued dialogue in the planning and delivery of physical and community infrastructure where there are</p>

cross borough implications.

Central Leaside, (Meridian Water) and North East Enfield, (Ponders End) are located within Mayor's emerging Upper Lee Valley Opportunity Area Planning Framework supports the Council's and the NLSA's vision for the Upper Lee Valley corridor as a whole, and for Meridian Water in particular.

Area Action Plans are being brought forward for each Strategic Growth Area, it is within the individual DPDs that cross boundary issues are being taken forward

Core Policies 14: Safeguarding Strategic Industrial Land, 37: Central Leaside and Core Policy 38: Meridian Water continue to raise further dialogue between the London Borough Haringey. Enfield continue to regard Haringey as a key stakeholder in the strategic planning of the area and invite Haringey officers will be part of the new Meridian Water Masterplan Steering Group.

GLA has given support to proposals for Meridian Water and the revised SIL designations in Core Policy 14.

Waltham Forest's recently published draft Core Strategy supports Enfield's approach recognising the opportunities development over the border in Central Leaside will bring to Waltham Forest residents in terms of new facilities and access to new jobs.

Section 7.3 and Core Policy 22 sets out how the Council is working with neighbouring boroughs to manage waste, this being necessary in order for the waste apportionment requirements set out in the London Plan to be met. This is being developed in the North London Joint Waste DPD.

Core Policy 24 on Transport and supporting text 7.50 – 7.60 refer to working with partners and North London boroughs within a wider Upper Lee Valley context.

Appendix 5: Adjoining Borough's Policies and

		Developments provides detailed recognition of the cross boundary issues and potential implications for the Core Strategy and visa versa.
16. Does the development plan document contain clear objectives?	<ul style="list-style-type: none"> i. A spatial portrait which identifies the key issues facing the area ii. A core strategy vision which is framed to set out the outcomes which are sought for the future iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision 	Chapter 2 provides a local context, providing a succinct portrait of the Borough, finishing on page 24 with the highlighted Key Issues. Chapter 3 begins with the longer term spatial vision followed by 10 strategic objectives on page 28 -30.
17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere? 18. Is there a direct relationship between the identified issues and the objectives?	<ul style="list-style-type: none"> i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place 	The 10 objectives are specific to Enfield and are directly related to the key issues facing the Borough. The objectives follow on from the Core Strategy vision statement (Core Strategy, page 27), which itself flows from the overarching vision of Enfield's Future – A Sustainable Community Strategy (paras 2.11 – 2.18). The vision statement looks to Enfield in 2026.
19. Is it clear how the policies will meet the objectives? 20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?	<ul style="list-style-type: none"> i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them ii. Relevant sections of the sustainable community strategy which identify its objectives iii. Confirmation from the local strategic partnership and partner organisations that they believe the policies will achieve the agreed objectives iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document. 	Core Policies and supporting text provide cross-referencing to strategic objectives. The relationship between the local issues and objectives are as follows: Key issues are identified on pages 24 and 25. Para 3.2 goes on to state how vision, objectives and the overall strategy is informed by the many local policies and programmes of the Council and its partners.
21. Are there realistic timescales related to the objectives?	<ul style="list-style-type: none"> i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic 	Chapter 10: Implementation and Monitoring sets out how, when and by whom the spatial strategy will be delivered. A Infrastructure Delivery Plan has been prepared as a

	<p>in terms of their contribution to delivery</p>	<p>living document that will continually updated to provide the information on the physical as well as social infrastructure needed to support delivery of the strategy.</p> <p>Appendix 1 Local Development Framework refers to the Local Development Scheme and the series of documents the Council is in the process of delivering or being programmed to support delivery. The 4 Area Actions Plans supplemented by detailed masterplanning work on the priority areas will continue to provide clarity on timescales.</p> <p>The Council's housing trajectory referenced in Appendix 3, and further supplemented by the Housing Trajectory Justification Report provides a running check of forecasted housing supply and anticipated performance.</p>
<p>22. Are the policies internally consistent?</p>	<p>i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent</p> <p>ii. A very brief statement explaining how the council considers its objectives are consistent</p>	<p>The Core Strategy is considered by the council as a fully inclusive internal document which brings together many service areas and aspirations of the Council, and those of the Enfield Strategic Partnership.</p>
<p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? 	<p>i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure</p> <p>ii. Representations from the Government Office</p> <p>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>The Council has taken on board advice from GoL from previous versions of the Core Strategy and has removed any duplication. Referencing is now duly made, where this is found to offer clarity and justification for the local approach of Core Policies. For example:</p> <p>Para 5.18 "The London Plan sets out a London-wide target for 50% of new housing to be affordable and an objective that 70% of new affordable homes should be social rented and 30% should be intermediate housing. What is affordable varies according to local circumstances and Enfield's affordability threshold for home ownership or market renting has been determined in Enfield's 2008 Housing Market Assessment. In addition, Enfield's affordable housing target is based on evidence in the Enfield Affordable Housing Economic Viability Study (2009), which</p>

		<p>assesses the capacity of development in Enfield to deliver affordable housing without adversely affecting the financial viability of development”.</p> <p>The variation in the Council’s approach to that in the London Plan is then further explained in paragraph 5.20:</p> <p>“What is affordable varies according to local circumstances and Enfield’s affordability threshold for home ownership or market renting has been determined in Enfield’s 2008 Housing Market Assessment. In addition, Enfield’s affordable housing target is based on evidence in the Enfield Affordable Housing Economic Viability Study (2009), which assesses the capacity of development in Enfield to deliver affordable housing without adversely affecting the financial viability of development”.</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document that identify the key objectives and how they will be delivered upon ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document 	<p>Chapter 3 identifies the vision and strategic objectives and the following chapters 5 – 9 provide the policy mechanisms of delivery.</p> <p>Policies will be further development through the identified Area Action Plans, Site Specific and Development Management Document.</p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document that show how the development management policies: <ul style="list-style-type: none"> • will help to deliver the strategy 37. derive from, and elaborate on, the objectives and policies of the plan 	
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<ul style="list-style-type: none"> i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward ii. Representations in respect of infrastructure iii. Reports or copies of correspondence as to how 	<p>The Infrastructure Delivery Plan provides the detailed account of the infrastructure implication of the Spatial strategy.</p>

	representations in relation to infrastructure have been considered and dealt with	
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	<ul style="list-style-type: none"> i. Sections of the development plan document setting out delivery mechanisms and timescale ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered iii. Research or studies that address matters of delivery and the realistic timescales iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder vi. Correspondence from stakeholders on delivery mechanisms and timescale vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	<p>Chapter 10: Implementation and Monitoring sets out how, when and by whom the spatial strategy will be delivered.</p> <p>A Infrastructure Delivery Plan (IDP) has been prepared as a living document that will continually updated to provide the information on the physical as well as social infrastructure needed to support delivery of the strategy.</p>
28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?	<ul style="list-style-type: none"> i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery ii. Representations in respect of infrastructure iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with 	<p>The Implementation Section under each policy references delivery partners, this has been detailed in the Infrastructure Delivery Plan.</p>
<p>29. Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out responsibilities for delivery ii. Correspondence showing how other stakeholders intend to support the delivery of the policies iii. Reports by the council or the relevant stakeholder iv. Representations from stakeholders on implementation v. Reports or copies of correspondence as to how representations on delivery and implementation have 	<p>Each policy is supplemented by an implementation section which identifies which of the LDF documents, other strategies and programmes will aid the Core Policies delivery.</p> <p>Where actions are outside the control of the Council, the Infrastructure Schedule appended to the IDP clearly identifies lead delivery agencies.</p>

policies?	been considered and dealt with	
<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. 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 organisations that influence the nature of places and how they function?</p>	<p>i. Sections of the development plan document that reflect the plans or strategies of other bodies</p> <p>ii. Expressions of support from bodies responsible for other strategies affecting the area</p> <p>iii. Representations in respect of services provided by other agencies</p> <p>iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation</p>	<p>In accordance with paragraph 32 of PPS1 the Core Strategy reflects spatial planning through the inclusion of:</p> <p>A clear vision and identified objectives, pages 26 -30.</p> <p>A spatial strategy based on the existing challenges and future needs of Enfield, pages 31-33.</p> <p>The Strategy is outcome based and seeks the delivery of physical, social and green infrastructure as stated in the penultimate paragraph of the Spatial Strategy, page 30.</p> <p>Clear indicators are provided for through the Monitoring table in Chapter10.</p>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<p>i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them</p> <p>ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</p>	<p>The Core Strategy puts forward a strategy a policy framework that recognises circumstance the Council is fully supportive of. Mechanisms are in place to allow for a review of the Strategy should circumstances be imposed.</p>
Flexible		
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed</p> <p>ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:</p> <ul style="list-style-type: none"> • the effectiveness of policies and what evidence is being collected to undertake this • changes affecting the baseline information and any information on trends on which the development plan document is based <p>iii. Statements or correspondence from stakeholders which commit to providing information to be used in</p>	<p>The Strategy and polices are sufficiently broad and strategic enough as to allow for unexpected changes. A review of individual policies or sections may be required as circumstances change. Forthcoming DPDs may also be the appropriate vehicles to act as a response mechanism to any changes in circumstance.</p>

	<p>monitoring the progress of the policies and changes in the baseline</p> <p>iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</p>	
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?</p>	<p>i. Sections within the development plan document 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</p> <p>ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</p>	<p>A regular review of the Housing Trajectory through the AMR and monitoring indicators allows the Council to continually and consistently review policies where targets have been established in the Core strategy.</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<p>i. A section of the development plan document which expressly addresses flexibility</p> <p>ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing</p>	<p>The IDP identifies risks as well as contingencies and is referenced in Chapter 10.</p> <p>Regular monitoring, through our Annual Monitoring Report, will be the key mechanism to make sure that remedial action will be taken if the strategy or policies are not being delivered. This will measure progress in delivery.</p>
<p>Monitoring</p>		
<p>37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?</p>	<p>i. Sections of the development plan document setting out indicators, targets and milestones</p> <p>ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</p> <p>iii. Reference to any other reports or technical documents which contain information on the delivery of policies</p>	<p>The Implementation and Monitoring & Targets sub sections at the end of each policy set out mechanisms for delivery of policies, including utilising Council decisions on planning applications and where outside agencies will provide assistance. Where outside commitment is necessary, this has been demonstrated by full inclusion of key partners throughout the preparation process of the DPD. The Council also has access to intelligence from the Enfield Observatory which is capable of providing a wide range of data.</p> <p>The monitoring arrangements of the Core Strategy is explained in Chapter 10. Overall there are 81 indicators across the 45 Core Policies.</p>

<p>38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators 	<p>The whole monitoring framework is brought together in the Annual Monitoring Report. These indicators include selected indicators drawn from the Sustainability Appraisal Framework.</p>
<p>39. Are suitable targets and indicators present (by when, how and by whom)?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories 	<p>A range of indicators required to be collected for each policy. The indicators identified are measured at either national (NI - National Indicators), regional or local (COI - Core Output Indicators, LI - Local Output Indicators, SE - Significant Effects Indicators, CX – Contextual Indicators) level, and the appropriate reference for each is provided in the supporting table.</p>

National policy		
<p>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement iv. Representations from the Government Office on the preferred strategy or the submitted development plan document v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with 	<p>GoL have raised some minor points regarding consistency with PPS3, and the methodology used to identify a 10 year housing supply. The Council has discussed this further with the Government Office and considers a justification can be to the Inspector should one be required. The Housing Trajectory Justification Report sets the Council's approach.</p> <p>All policies set out in the Core Strategy provide add tonality to national policies and guidance.</p> <p>Confirmation of the approach taken was sought from GoL and the GLA before and during consultation on Issues and Options, Preferred Options and Further Preferred Options stages. Comments and advice received from GoL and the GLA have also been taken into account when finalising the Pre-submission document and continue.</p>
<p>42. Does the development plan document contain policies that do not add anything to existing</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which explain where and how national policy has been 	<p>The Core Strategy DPD has been designed to provide a flexible policy framework and this is discussed in more detail in relation to each policy. The Core</p>

<p>national guidance? 43. If so, why have they been included?</p>	<p>elaborated upon and the reasons</p> <ul style="list-style-type: none"> ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p>Strategy sets out a strategic framework for the LDF giving a local dimension to reflect the development needs of Enfield.</p>
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