



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

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



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flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

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

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

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

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



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i>		



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<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> • Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. • Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. • The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. 	<p>The Development Management Document seeks to provide the detailed criteria and standard based policies by which planning applications will be determined and to be a key vehicle in delivering the vision and objectives set out in the adopted Core Strategy (2010).</p> <p>Due to the nature of the relationship between the DMD and Core Strategy, the DMD vision and objectives can be considered to be the same as those of the Core Strategy.</p> <p>The DMD polices have been informed by the consultation and through the Sustainability Appraisal process.</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 policy direction.</p> <p>The policies within this Plan are consistent with Enfield's Local Plan, the Mayor's London Plan, emerging Area Action Plans, and the Council's approved Local Development Scheme 2013-2016.</p>



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<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 DMD 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 meeting housing quality requirements, protecting employment land, community facilities and green spaces for Enfield’s growing population.</p> <p>The policy guidance is based on robust evidence supporting the adopted Enfield Local 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 DMD is provided and is annexed to this report.</p> <p>The DMD will be monitored to ensure its effectiveness against a number of indicators via Enfield’s Local Plan Monitoring Report. Where necessary the Council will review and reassess principles, approaches and guidance.</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that</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 	<p>It is the Council’s view that the DMD policies collectively reflect a presumption in favour of sustainable development and how the presumption is to be applied</p>



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<p>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>	<p>www.planningportal.gov.uk.</p>	<p>locally, consistent with paragraph 15 of the NPPF. Enfield's Proposed Submission Development Management Document (DMD) includes text in reference to the presumption at paragraph 1.3.2.</p> <p>Policy DMD 30: 'Floorspace above commercial premises' encourages proposals for the re-use or refurbishment of the upper floors of shops and/ or commercial premises within Enfield's town centres. Appropriate uses include leisure, community, commercial or residential, while proposals involving employment-generating opportunities for small businesses, start-ups, and small workshops will be considered favourably. DMD 30 illustrates the Council's intent to support sustainable development.</p> <p>In applying the policies of Enfield's adopted Core Strategy; the DMD specifically supports and encourages mixed use development in appropriate locations. The Plan supports the effective and efficient use of land and buildings in Enfield.</p>



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<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 DMD 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 Enfield’s Core Strategy and the London Plan and is considered to be sufficiently flexible to respond to changing circumstances and site specific issues.</p> <p>Extensive consultation on the DMD has been carried out, including with adjoining boroughs – see the Duty to Co-operate Summary for further details.</p>
<p>NPPF Principles: Delivering sustainable development</p>		
<p>1. Building a strong, competitive economy (paras 18-22)</p>		
<p>Set out a clear economic vision and strategy for the area which positively and proactively</p>	<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 	<p>The Council’s economic vision and strategy is clearly set out in the Core Strategy. The latest evidence in the</p>



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encourages sustainable economic growth (21),	appropriate.	<p>Employment Land Review Update 2012 further demonstrates that the core policies are sound.</p> <p>The DMD supports the economic vision and strategy set out in the London Plan and the Core Strategy through Chapter 4 ‘Enfield’s Economy’, which includes policies to protect and enhance the borough’s designated industrial and employment sites.</p>
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> • A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22) 	<p>The DMD includes a range of policies which will support and encourage an improvement to the infrastructure and environment of the borough. These policies are key to ensuring sustainable development in Enfield. DMD policies address housing (Chapter 2), Enfield’s Economy (Chapter 4) and transportation (Chapter 7).</p> <p>The Infrastructure Delivery Plan (IDP) undertaken to support Enfield’s Core Strategy has been updated in 2013 as part of the evidence base for the Community Infrastructure Levy (CIL) and emerging Local Plan documents. The IDP examines and sets out the borough’s infrastructure requirements.</p> <p>The Council reviewed the evidence base specific to</p>



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		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>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.</p> <p>The DMD establishes detailed policies for the shopping centre hierarchy, setting out criteria for development and growth.</p> <p>A boundary review of all the town centres in the borough was carried out as part of the DMD process and this document forms part of DMD submitted evidence base. The boundary review work results in some town centre expansion and other centres where consolidation is deemed necessary.</p>
<p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial,</p>	<ul style="list-style-type: none"> An assessment of the need to expand (the) town centre(s), considering the needs of 	<p>In accordance with paragraphs 24-27 of the NPPF, Policy DMD 25 sets out the sequential approach to town centre</p>



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office, tourism, cultural, community services and residential development needed in town centres (23)	<p>town centre uses.</p> <ul style="list-style-type: none"> Primary and secondary shopping frontages identified and allocated. 	<p>uses, supporting appropriate development.</p> <p>The Policies Map prepared to support the DMD identifies primary and secondary shopping frontages.</p> <p>A boundary review of all the town centres in the borough was carried out as part of the DMD process and this document forms part of DMD submitted evidence base.</p>
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	<ul style="list-style-type: none"> Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities. 	<p>About one third of the borough is Green Belt land which supports rural and agricultural uses. DMD Policies in Chapter 11 address development and growth of the rural economy, for example DMD 85 <i>Land for Food and Other Agricultural Uses</i>; DMD 88 <i>Farm Diversification</i>, and DMD 90 <i>Appropriate uses in the Crews Hill Defined Area</i>.</p>
4. Promoting sustainable transport (paras 29-41)		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in favour of	<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 	<p>Strategic Objective 8 of Enfield's Core Strategy seeks to enhance traffic flow by the provision of appropriate infrastructure, as well as the promotion of sustainable methods of transport, and a pattern of development that</p>



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<p>sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with 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</p>	<p>particular regard to the facilities referred to in paragraph 31.</p> <ul style="list-style-type: none"> • Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. • A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. • If local (car parking) standards have been prepared, are they justified and necessary? (39) • Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan. 	<p>reduces the need to travel.</p> <p>The DMD provides more detailed policy direction to some of the Core Strategy transport policies, in particular through Chapter 7 Transport and Parking.</p> <p>DMD Policy 48 requires Transport Assessments to be carried out for major developments, encouraging alternatives to private vehicle use and more sustainable forms of transport. This DMD policy requires developments to provide cycle parking and proposals for car clubs.</p> <p>DMD 45 <i>Parking Standards</i> are based upon those of the London Plan, which should be referenced for new developments. The policy further recognises the need for flexibility in applying the adopted London Plan Standards.</p> <p>The DMD policies should also be read in conjunction with transport policies in the London Plan and other documents that compose Enfield’s Local Plan.</p>



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<p>sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		



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<p>5. Supporting high quality communications infrastructure (paras 42-46)</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>The DMD does not have specific policies on electronic communications including telecommunications and high speed broadband. 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>	<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) 	<p>Enfield’s Core Strategy set housing targets for the borough. The Council publishes a Housing Trajectory annually as part of the Monitoring Report to demonstrate provision of a rolling supply of specific deliverable sites sufficient to provide five years’ worth of housing, with figures for years 6-15 also provided on a rolling basis. As part of the Greater London Authority’s (GLA’s) work on Further Alterations to the London Plan, Enfield has</p>



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delivery of housing(47)	<ul style="list-style-type: none"> A SHLAA 	prepared a Strategic Housing Land Availability Assessment (SHLAA), with the housing targets expected to be published by the GLA early in 2014.
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 across the borough 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 Core Strategy and the Mayor's London Plan Policy.
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	<ul style="list-style-type: none"> Policy on planning for a mix of housing (including self-build, and housing for older people SHMA 	Core Strategy Policy 2: 'Housing Supply and Locations for New Homes' sets out planned housing delivery over a 15 year period. Core Strategy Policy 3:' Affordable Housing' sets out



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	<ul style="list-style-type: none"> • 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>requirements for affordable housing to meet housing needs. Core Strategy Policies Core Policy 4 & Core Policy 5 seek to ensure a mix of housing types and was based on evidence a Housing Market Assessment (2008).</p> <p>With reference to the Core Strategy, the DMD addresses affordable housing and housing mix in Chapter 1. Policies DMD 1: <i>Affordable Housing</i> and DMD 2: <i>Affordable Housing for Development of less than 10 units</i> set out affordable housing requirement. DMD 3: <i>Providing a Mix of Different Sized Homes</i> provides further direction to Core Policy 5 on housing mix.</p> <p>The DMD protects existing housing through DMD 4 <i>Loss of Existing Residential Units</i> and DMD 5 <i>Residential Conversions</i>.</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural</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) 	<p>The rural areas of the borough are designated Green Belt. The Local Plan meets housing need within existing areas of development.</p> <p>Policy DMD 7 <i>Development of Garden Land</i> seeks to protect and enhance the positive contribution gardens make to the character of the borough and establishes</p>



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communities.	<ul style="list-style-type: none"> Examples of special circumstances to allow new isolated homes listed at para 55. 	criteria which must be met if development on garden land is to be permitted.
7. Requiring good design (paras 56-68)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	<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>The DMD provides further detail through Chapter 6 <i>Design and Heritage</i>. The policies in this chapter set out a suite of guidance to achieve high quality development in the borough. Policy DMD 38 requires planning applications to include a Design and Access Statement.</p>
8. Promoting healthy communities (paras 69-77)		
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).	<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 	<p>Core Strategy Policy 30: <i>Maintaining and Managing the Built and Open Environment</i> adopts overarching design principles for new development.</p> <p>The DMD provides further detail for policy design to promote inclusive community interaction. In particular DMD 37 <i>Achieving High Quality and Design-Led Development</i> which establishes objectives for good urban</p>



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	<p>and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</p>	<p>design, for example quality of the public realm, safe and secure private and public spaces, and legibility. DMD 34 <i>Evening Economy</i> encourages a diverse evening economy and could lead to both a reduction in and a perceived improvement in crime and anti-social behaviour through a more mixed group of users. The DMD policies will play a role in ‘designing out’ crime in the borough and improving the public’s perception of safety and security.</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>DMD Chapter 3 ‘Community Facilities’ sets out how the Council will plan positively for the provision and integration of community facilities to achieve the Council's commitment to make Enfield a healthy, prosperous and cohesive community. The DMD policies 16 and 17 support the provision of new community facilities and protect existing facilities. A list of examples of community facilities is provided and criteria set out for proposed developments to meet.</p> <p>The DMD provides policy to promote the provision of shared space. DMD 37 <i>Achieving High Quality and Design-Led Development</i> establishes objectives for good urban design, for example the quality of the public realm, safe</p>



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		and secure private and public spaces, and legibility.
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).	<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' <i>Parks, Playing Fields and Other Open Spaces</i>' outlines the Council's approach on protecting and enhancing existing open spaces.</p> <p>DMD Chapter 10 '<i>Green Infrastructure</i>' provides policies on Enfield's green spaces. Policy DMD 71 <i>Protection and Enhancement of Open Space</i> provides for the protection and prevention of negative impacts associated with the loss of open space in accordance with the NPPF, London Plan and Core Strategy. DMD 72 <i>Open Space Provision</i> requires all new major residential development to be accompanied by proposals to improve open space provision.</p> <p>Children's play areas are addressed through DMD 73 while playing pitches are protected through policy DMD 74.</p>
Enable local communities, through local and neighbourhood plans, to identify special	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be 	Enfield's open spaces are protected through designations via the Core Strategy and Policies Map and have been



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<p>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>	<p>reviewed and updated via the DMD and accompanying Policies Map. The DMD submission is supported by the Open Space Policies Map Paper (2013).</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 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</p>	<ul style="list-style-type: none"> • Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> ○ Enhance the beneficial use of the Green Belt. (81) ○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) ○ Specify that inappropriate development should not be approved except in very special circumstances. (87) ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy 	<p>Core Strategy Policy 33 <i>Green Belt and Countryside</i> protects Enfield’s Green Belt.</p> <p>The Green Belt boundaries were reviewed through the DMD process with the proposed changes held in the evidence base document Detailed Green Belt Boundary Review (2013).</p> <p>DMD Chapter 11 ‘<i>Green Belt</i>’ addresses Enfield’s Green Belt, providing protection through DMD 82 and DMD 83. Criteria for appropriate development in the Green Belt are set out in DMD 82.</p> <p>Renewable energy generation in the Green Belt is considered under DMD 53 <i>Low and Zero Carbon</i></p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<p>development. (91)</p>	<p><i>Technology.</i> Developers will need to demonstrate very special circumstances that clearly outweigh any harm by reason of inappropriateness and that there are no overriding local impacts for an application to be approved.</p>
<p>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> • Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building’s sustainability which are consistent with the Government’s zero carbon buildings policy . (95)) 	<p>Enfield’s adopted Core Strategy sets out how the Council tackles climate change through promoting higher environmental standards. It encourages all developments to meet the highest feasible environmental standards that are financially viable and requires all developments to take measures to minimise the effects of, and adapt to, climate change.</p> <p>Core Policy 33: ‘Pollution’ sets out the Council’s commitment to work with partners to minimise air, water, noise and light pollution and address risks arising from contaminated land and hazardous substances.</p> <p>DMD Chapter 8 <i>Tackling Climate Change</i> contains specific policies to enable and support the growth of renewable and low carbon energy generation, along with adaptation</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>polices on heating and cooling, water efficiency and flooding.</p> <p>Policy DMD 49 requires all planning applications to be accompanied by a Sustainable Design and Construction Statement.</p> <p>DMD 50 <i>Environmental Assessment Methods</i> requires developers to demonstrate compliance with targets relating to the relevant adopted environmental assessment methods. This includes both new build and residential refurbishments and conversions.</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 	<p>Core Policy 20: ‘Sustainable Energy Use and Energy Infrastructure’ includes reference to the retrofiting of existing developments addressing NPPF climate change matters including inclusion in Local Plans to support for energy efficiency improvements to existing buildings and promote and maximise energy from renewable and low carbon sources.</p> <p>DMD Chapter 8 ‘Tackling Climate Change’ contains specific policies to enable and support the growth of renewable and low carbon energy generation.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>for co-locating potential heat customers and suppliers. (97)</p>	<p>DMD 53 supports low and zero carbon energy generation, once all possible savings through energy efficiency and decentralised energy networks have been gained and the proposed development still fails to achieve the specified carbon dioxide reductions targets</p> <p>DMD 52 <i>Decentralised Energy Network</i> supports the provision of infrastructure for new and expanding networks including safeguarding routes and land for such use where necessary. The Lee Valley Heat Network is planned for the eastern corridor in Enfield as significant low-carbon infrastructure using energy generated from Heat from Waste facilities.</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 DMD contains a range of policies which address the issue of flooding and minimise the risks from climate change.</p> <p>DMD 60 identifies which parts of the borough require a site specific Flood Risk Assessment for new development.</p> <p>DMD 61 looks to manage surface water, in particular through the use of Sustainable Drainage Systems.</p> <p>DMD 62 addresses flood control and mitigation methods</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>for new developments, while policy DMD 63 seeks to protect and improve watercourses and flood defences in the borough.</p> <p>Climate change adaptation is built-in to DMD policies throughout the document, for example DMD 55 <i>Use of Roof Space and Vertical Surfaces</i> requires the use of green roofs which help to moderate water flow from rainfall.</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 clarity on what development will be allowed in such areas. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	<p>Not applicable.</p>
<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 	<p>Core 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</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.</p>	<p>ecological networks that are more resilient to current and future pressures.</p> <p>DMD Chapter 11 ‘Green Belt’ provides policy protection to Enfield’s areas of designated Green Belt. Areas of Special Character in the borough, as identified in the Enfield Characterisation Study (2011), are provided with further protection through DMD 84.</p> <p>The protection, enhancement and management of biodiversity and green networks are supported through a number of DMD policies including: DMD 76 <i>Wildlife Corridor</i>; DMD 78 <i>Nature Conservation</i>; DMD 70 <i>Ecological Enhancements</i>; and DMD 80 <i>Trees on Development Sites</i>.</p>
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<ul style="list-style-type: none"> • Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity. 	<p>Pollution control is tackled through Core Strategy Policy 32, stating that the Council will work with its partners to minimise air, water, noise and light pollution and to address the risks arising from contaminated land and hazardous substances.</p> <p>DMD Chapter 9 <i>Environmental Protection</i> provides policies which control pollution and permits developments only if pollution and the risk of pollution is prevented, or minimised and mitigated during all phases of development.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Specific types of environmental protection are addressed through DMD 65 <i>Air Quality</i>, DMD 66 <i>Land Contamination and Instability</i>, DMD 67 <i>Hazardous Installations</i>, DMD 68 <i>Noise</i>, DMD 69 <i>Light Pollution</i> and DMD 70 <i>Water Quality</i>.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> • Identification and mapping of local ecological networks and geological conservation interests. • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species 	<p>Protection, enhancement and management of biodiversity and green networks is supported through a number of DMD policies including: DMD 76 <i>Wildlife Corridor</i>; DMD 78 <i>Nature Conservation</i>; DMD 70 <i>Ecological Enhancements</i>; and DMD 80 <i>Trees on Development Sites</i>.</p> <p>The document Review of Enfield’s Sites of Local and Borough Importance for Nature Conservation (2013) forms part of the DMD evidence base and supports the designation of these non-statutory sites because of their importance for nature conservation. The SINCS are part of the Policies Map which will be submitted along with the DMD.</p>
<p>12. Conserving and enhancing the historic environment (paras 126-141)</p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> • A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most 	<p>Core Policy 30: <i>Maintaining and Improving the Quality of the Built and Open Environment</i> – is one of a suite of adopted Core Strategy policies that aim to protect,</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>at risk.</p> <ul style="list-style-type: none"> • A map/register of historic assets • A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) 	<p>enhance, restore, improve or add to the natural environment / landscape. Core 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>DMD 44: <i>Preserving and Enhancing Heritage Assets</i> protects the borough’s heritage and requires a Heritage Statement for applications affecting heritage assets or their settings.</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, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>Not applicable.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<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>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 and indicates how these have been taken into account in the DMD's preparation. The Council has also prepared a statement on the Duty to Co-operate to support the submission.</p>
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the</p>	<ul style="list-style-type: none"> • The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. <p>AND</p> <ul style="list-style-type: none"> • Sections of the DPD (at various stages of 	<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.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>DPD? Were they reasonable and justified?</p>	<p>development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions.</p> <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>The Plan has also been informed by Sustainability Appraisal and responses to consultation. The Regulation 22 Consultation Statement highlights how consultation has helped to support the DMD’s preparation.</p> <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>This evidence base supports the DMD throughout key areas of the document, for example the Green Belt Boundary Review.</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA’s chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a</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 	<p>The Regulation 22 Consultation Statement for the Development Management Document sets out the methods used for consultation, reports on the consultation undertaken and provides a summary of representations received. It also includes the Council’s response to the</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>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>	<p>covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</p> <ul style="list-style-type: none"> • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies. 	<p>representations showing how consultation has influenced the DMD. 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 considers the sustainability impacts of the DMD.</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> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning 		



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • 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 	<p>The vision and objectives for the Local Plan are set out in the Core Strategy. The DMD provides the detailed criteria and standard based policies by which planning applications will be determined and will be a key vehicle in delivering the Core Strategy vision and objectives for Enfield.</p> <p>To ensure consistency with the Enfield Local Plan and other documents, the DMD has undergone internal scrutiny by officers and Councillors and has been agreed by Enfield’s Council prior to the publication of the document for consultation.</p> <p>The Plan has been prepared in accordance with the Council’s agreed project plan for preparing Enfield’s Local Plan. The latest publication is the Revised Local</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	through a matrix).	<p>Development Scheme (2013 – 2016).</p> <p>Like the adopted Core Strategy, the DMD will guide development in the borough until 2026, and will be a key consideration in development decision making.</p>
<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>Adopted Core Policy 46: <i>Infrastructure Contributions</i> 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 to secure S106 contributions. The Policy also lists infrastructure priorities. The adopted Core Policy 46 continues to reflect 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) Review 2013 update reflects the current position statement on the borough’s infrastructure requirements.</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for development and the use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> • Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area • 	<p>Together with the London Plan, Enfield’s Core Strategy and other documents, the DMD will comprise 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 DMD and the emerging Area Action Plans in particular will be key planning documents used both by developers and Council planning officers to guide long term investment into the area. The preparation of the DMD has involved consultation with stakeholders and taken into account their plans and programmes.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need 	<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: <ol style="list-style-type: none"> a. the effectiveness of policies and what 	<p>Flexibility has been built in to the DMD so that the policies are sensitive to the particular local circumstances around the borough and changes over time, while ensuring the vision and objectives Enfield are delivered.</p> <p>The DMD approach has also been informed by the</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>adjustment?</p>	<p>evidence is being collected to undertake this</p> <p>b. changes affecting the baseline information and any information on trends on which the DPD is based</p> <ul style="list-style-type: none"> • 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>Enfield Council – Economic Viability Assessment - CIL & Proposed Submission DMD (2013).</p> <p>An example of the Council’s commitment to flexibility and policy review is shown in the guidance for implementation for policy DMD 1, where the policy commits the Council to an annual review of the evidence for provision of affordable housing at a certain proportion of market rental rate.</p> <p>Policy indicators for the DMD will be monitored through the Monitoring Report, allowing an annual review of progress and the impact of implementation. The Monitoring Report will be reviewed following the adoption of the DMD to ensure that measures and indicators for the adopted policies are included.</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? 	<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 	<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 submitted DMD reflects the various views and</p>



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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? 	<p>plan-making arrangements have been considered, what decisions were reached and why.</p> <ul style="list-style-type: none"> The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate. 	<p>outcomes of these different processes and activities. The Council is of the view that the Duty to Co-operate has been fulfilled and has not received any objections to the DMD 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 DMD.</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 in the sustainability appraisal report will be 	<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 	<p>The DMD policies provide clear policy requirements and criteria by which development in the borough will be assessed, and as such are the key means by which the Enfield will meet the objectives set out in the Core Strategy.</p> <p>The Council will monitor the effectiveness of the Local Plan, which includes the DMD, 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</p>



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SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</p>	<p>monitoring the effects of the DPD against the sustainability appraisal</p>	<p>outcomes in the borough and the implementation of the DMD against these indicators, where they are relevant, and publish the results alongside the findings of borough-wide monitoring.</p>
<p><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<ul style="list-style-type: none"> • Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. • Reports or copies of correspondence as to how representations have been considered and dealt with. 	<p>The policies and principles contained within the Development Management Document are consistent with national policy.</p> <p>National guidance has not been duplicated in this Plan.</p>



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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.



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In addition local planning authorities should:

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

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement with both settled and traveller communities.	<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 DMD is in line with the Core Strategy on this area, which is addressed by Core Policy 6. It is not a requirement of the DMD to provide 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.



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Policy Expectations	Possible Evidence	Evidence Provided
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<ul style="list-style-type: none"> • Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions. 	<p>The DMD is in conformity with the Core Strategy on this area, which is addressed by Core Policy 6. It is not a requirement of the DMD to provide specific site allocation for traveller accommodation. Should a need for this be identified through additional evidence work, this will be appropriately addressed through the relevant local plan document and/or review of the Core Strategy in recognition of any new identified need.</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>	<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 	<p>The DMD is in conformity with the Core Strategy on this area, which is addressed by Core Policy 6. It is not a requirement of the DMD to provide specific site allocation for traveller accommodation. Should a need for this be identified through additional evidence work, this will be appropriately addressed through the relevant local plan document and/or</p>



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Policy Expectations	Possible Evidence	Evidence Provided
<p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<p>11-15.</p> <ul style="list-style-type: none"> • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 11 	<p>review of the Core Strategy in recognition of any new identified need.</p>
<p>Policy C: Sites in rural areas and the countryside (para 12)</p>		
<p>When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.</p>		<p>Not applicable, see above.</p>
<p>Policy D: Rural exception sites (para 13)</p>		
<p>If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable</p>	<ul style="list-style-type: none"> • If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity. 	<p>Not applicable, see above.</p>



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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 	The DMD is in conformity with the Core Strategy on this area, which is addressed by Core Policy 6. It is not a requirement of the DMD to provide specific site allocation for traveller accommodation. Should a need for this be identified through additional



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Policy Expectations	Possible Evidence	Evidence Provided
of the occupants and neighbouring residents.	close proximity to one another. <ul style="list-style-type: none"> • N.B. Mixed use should not be permitted on rural exception sites 	evidence work, this will be appropriately addressed through the relevant local plan document and/or review of the Core Strategy in recognition of any new identified need.
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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SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

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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SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

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) 2013-2016 .
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 (December 2013) submitted alongside the DMD has provided the detail 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 (December 2013) and Duty to Co-operate Statement (December 2013) that supports the submission of the DMD.



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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>A Duty to Co-operate Statement has been prepared to demonstrate how relevant local planning authorities and prescribed bodies have been involved in the evolution of the DMD and sets out how the Council has engaged constructively, actively and on an on-going basis with other bodies in the preparation of the document.</p> <p>Enfield Council is of the view that the Duty to Co-perate has been fulfilled and has not received any objections to the Plan regarding the Duty to Co-operate.</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 DMD. 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)	<p>NPPF paras 165 and 167</p> <p>Strategic</p>		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 DMD.



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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 DMD SA Scoping was undertaken in July and August 2011 with the three statutory consultation bodies: Natural England, the Environment Agency and English Heritage. Comments were received from all three statutory consultation bodies which 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"> Regulation 18 Consultation Draft Development Management Document (8th May to 3rd August 2012) Regulation 20 Proposed Submission Development Management Document (10th July and 27th September 2013). <p>The Regulation 22 Consultation Statement provide details of how the Council consulted organisations, residents, 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</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
				other local planning authorities and prescribed bodies have been involved in the evolution of the DMD.
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 Representations and LBE



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
				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 	The Act section19(3)	NPPF para 155		The consultation strategy for the DMD has followed the principles in the Council’s adopted SCI. See Regulation 22 Consultation Statement. 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



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
<p>of issues involved in the DPD?</p>				<p>were amended over the course of the Plan’s preparation and the various stages of consultation, and then superseded by new Regulations in April 2012¹. The 2006 SCI is in the process of being revised to take into account these changes.</p> <p>The publication of the Submission DMD is 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 DMD has been developed in conformity with the Core Strategy which was prepared in line with the objectives set out in Enfield’s Sustainable Community Strategy (updated in 2009).</p>
<p>7. Are you keeping a record of:</p> <ul style="list-style-type: none"> • the individuals or bodies 	<p>The Act section20(3)</p>	<p>NPPF paras 158 - 171</p>	<p>You will need to submit a statement of representations</p>	<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</p>

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>invited to make representations?</p> <ul style="list-style-type: none"> • how this was done? • the main issues raised? 	Regulation 17		<p>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>	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 county council that is not a planning authority? Or significant cross-boundary issues and strategic priorities of a body prescribed</p>	<p>The Act section 33A(1)(a) (b) and (c), section 33A(3)(d) & (e) section 33A(4) section 33A(9)</p> <p>The Act section 20 (5)(c)</p>	NPPF paras 178 to 181	<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</p>	<p>Yes. The Council invited prescribed bodies and adjoining authorities to make representations. Please see Regulation 22 Consultation Statement.</p>



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Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
under Section 33A(1)(c)?			engage constructively, actively and on an ongoing basis.	
9. Are you inviting representations on cross-boundary issues and strategic priorities from a local enterprise partnership (LEP) or a local nature partnership (LNP)?	The Act section 33A(1)(c) and Section 33A(9). The Act section 20(5) (c). Regulation 4	NPPF paras 178 to 181	Section 33A(3)(d) and (e) requires cooperation on significant cross-boundary issues before and during plan preparation. Section 33A(2) requires you to engage constructively, actively and on an ongoing basis.	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 DMD.
10. Are you developing a	The Act section	NPPF paras 165 -	It is a matter for	Yes. The Council's Monitoring Report currently monitors implementation of the Core Strategy



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SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Evidence provided
framework for monitoring the effects of the DPD?	35 Regulation 34 Regulation 17 of The Environmental Assessment of Plans and Programmes Regulations 2004 No1363	1687 SEA Guide, Chapter 5	each council to decide what to 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.	core policies. The Monitoring Report will be revised accordingly to allow monitoring of the adopted DMD policies once adopted.



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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:	The Act section 19 (2), section 24	NPPF para 151	For London boroughs and local authorities	Yes. The Plan is considered to be in general conformity with the Mayor's London Plan (2011)



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
<ul style="list-style-type: none"> • consistency with national policy? • general conformity with the regional spatial strategy where still in force? 			<p>where regional strategies are still in force general conformity is tested formally later but you need to consider it during preparation of the DPD.</p>	<p>and is consistent with the National Planning Policy Framework (NPPF). See Consultation Regulation 22 Statement (August 2013) for latest representation regarding conformity from the GLA.</p>
<p>3. Are you having regard to (where relevant):</p> <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? 	<p>The Act sections 19 (2) and 24 (1) and (4)</p> <p>Regulation 10 and 21</p>		<p>Where the regional strategy has been revoked you should record that fact.</p>	<p>See above.</p>



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
<p>4. Are you co-operating with other local planning authorities including counties, to address significant cross boundary issues?</p> <p>Have you discussed doing joint local development documents?</p>	<p>The Act section 33A(2)(a)</p> <p>Section 33A(6)(a)(b)</p> <p>Section 20(5) (c)</p>	<p>NPPF paras 181 and 185</p>		<p>Yes. See Statement on Duty to Co-operate.</p>
<p>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?</p>	<p>The Act section 33A(2)(a), section 33A(6)(a)</p> <p>The Act section 20 (5) (c)</p> <p>Regulation 4</p>	<p>NPPF paras 181 and 182</p>	<p>The bodies prescribed by The Act section 33A(1)(c) are set out at Regulation 4 (1).</p>	<p>Yes. See Statement on Duty to Co-operate.</p>
<p>6. Are you cooperating with</p>	<p>The Act section</p>	<p>NPPF para 181</p>		<p>Not applicable</p>



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
having regard to the activities of the LEP and LNP?	33A(2)(b) and section 33A(9). Regulation 4 (2)	and 182		
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)			Yes. The DMD 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. The DMD has been developed to align with the Core Strategy which was prepared in line with the objectives set out in Enfield’s Sustainable Community Strategy (updated in 2009).
8. Do you have regard to other matters and relevant strategies relating to: <ul style="list-style-type: none"> • resources • the local/regional economy 	The Act section19(2) Regulation 10		As well as the matters and strategies listed in the Act and Regulations there are likely to be other matters identified in planning policy	Enfield Council has consulted all relevant bodies during the Plan’s preparation, including; Transport for London, the Greater London Authority, Highways Agency, North London Waste Authority, the adjoining boroughs of Haringey, Barnet and Waltham Forest Councils. This has allowed for the consideration of their strategies to be considered in



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
<ul style="list-style-type: none"> the local transport plan and transport facilities and services waste strategies hazardous substances 			statements, regional and local strategies that you will need to have regard to in preparing the DPD.	DMD 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		This subject is addressed specifically in DMD Chapter 9 'Tackling Climate Change' which includes policies on sustainable design and construction, low carbon technologies, waste, water conservation and flooding. The DMD has a comprehensive approach to climate change which integrates environmental sustainability to policies throughout the document.
10. Have you undertaken the sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?	The Act section19(5) Regulation 12 and 13 of The Environmental	NPPF para 182 SEA Guide, Chapter 5	Regulation13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633 sets out the consultation	See final Sustainability Appraisal Report.



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
	Assessment of Plans and Programmes Regulations 2004 No 1633		procedures.	
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? Are you keeping a record?	Regulations 17, 18(3) and 22 (1) (c) (iv) Regulation 13(4) of The Environmental Assessment of Plans and Programmes	NPPF paras 150, 155, 157 and 159-171	Records on the sustainability appraisal should also include recording any assessment made under the Habitats Directive.	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. The representations received through consultation have been considered. Where further detail is required, the original copies of the consultation responses are available on request.



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
	Regulations 2004 No 1633			
<p>13. Where sites are to be identified or areas for the application of policy in the DPD, are you preparing sufficient illustrative material to:</p> <ul style="list-style-type: none"> • enable you to amend the currently adopted policies map? • inform the community about the location of proposals? 	Regulations 5 (1)(b) and 9	NPPF para 157	<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>	A Policies Map has been published together with the Proposed Submission DMD.
14. Are the participation arrangements compliant with the SCI?	The Act, section 19(3)	NPPF paras 150 and 155		The consultation on the DMD has followed the principles in the Council's adopted SCI. Please see Regulation 22 Consultation Statements.



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
	Regulation 18			<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 been revised to take into account these changes.</p> <p>The Proposed Submission DMD was carried out under the 2012 Regulations, and was carried out in line with the requirements of the 2012 Regulations.</p>

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



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

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.



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

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'.



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Stage four: Publication

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
1. Have you prepared the sustainability appraisal report?	The Act section 19(5) Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF paras 165 - 168 SEA Guide Chapter 5		Yes. 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 DMD consultation letters/emails/notices provided information on where and within what period representations must be made. The DMD was formally published for an eleven week consultation from 10 th July until 27 th September 2013.
3. Have you made copies of the following available for inspection: • the proposed	Regulation 19(a)		Regulation 17 gives definitions.	Yes. Both the DMD Proposed Submission Documents and the statement of representations procedure were available for public inspection in accordance with the details set out in the Statement of Fact.



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
submission documents? <ul style="list-style-type: none"> the statement of the representations procedure? 				
4. Have you published on your website: <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.	Yes. The DMD Proposed Submission documents, statement of representations and statement of fact have been published on the Council's website: http://www.enfield.gov.uk/info/1000000456/local_plan_planning_policy/1896/development_management_document_dmd
5. Have you sent to each of the specific consultation bodies invited to make	Regulation 19(b)		Regulations 2 and 17 give definitions.	The proposed submission documents and statement of representations procedure were made available for public inspection.



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
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? 				
6. Have you sent to each of the general consultation bodies invited to make representations under Regulation 18(1): <ul style="list-style-type: none"> • the statement of the representations procedure? • where and when the documents can be inspected? 	Regulation 19(b)		Regulations 2 and 17 give definitions.	As above.



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence provided
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 DMD.



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DEVELOPMENT MANAGEMENT DOCUMENT SUBMISSION

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

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



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

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 DMD has been identified in the Council's latest published LDS 2013-2016.
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 DMD has been developed in line with the Core Strategy which was itself prepared within the relevant objectives set out in Enfield's Sustainable Community Strategy (updated in 2009).
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	The consultation on the DMD has followed the principles in the adopted SCI. See Consultation Statements. The SCI was adopted in 2006 and aligned to the regulatory requirements in place at the



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
			that you carried out met the regulations (as amended).	<p>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 DMD was carried out under the 2012 Regulations, and the Regulation 22 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	The Act section	NPPF paras 181	Under NPPF para 182,	Preparation of the DMD commenced prior to

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



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>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, LNEs and the prescribed bodies in identifying and addressing any strategic cross-boundary issues</p> <p>If you have not agreed on the approach is there a justification?</p>	33A(1) and section 20(5)	and 182	the plan should be based on effective joint working on cross-boundary strategic priorities to be found 'Effective'.	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 DMD.
5. Has the DPD been subject to sustainability appraisal?	The Act section 19(5)	NPPF para 165		Yes. A Sustainability Appraisal has been prepared and forms part of this submission.



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
Has the council provided a final report of the findings of the appraisal?	Regulation 22(1)(a)	SEA Practical Guide, chapter 5		
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? If yes, is there local justification? If the LPA is a London	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).	The Plan is considered to be in general conformity with the Mayor's London Plan (2011). See Regulation 22 Consultation Statement (2013) for latest representation regarding conformity issues raised by the GLA on behalf of the Mayor of London. The Mayor has concluded the DMD is not in conformity with the London Plan in respect of affordable housing, in particular in relation to paragraphs 2.13 and 2.1.4.



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SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>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>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 relevant statutory and non-statutory bodies, and all persons invited to make representations on the plan?</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 Statement.</p> <p>The DMD sets out the relationship of the DMD policies to the saved UDP in Appendix 2.</p>



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SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
Does the DPD contain a list of superseded saved policies?				
<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 (2010).
10. Is the DPD consistent with any other adopted DPDs for the area? If the DPD is intended to supersede any adopted development plan	Regulation 8(3) and (4) Regulation 8(5)		Development Plan is defined in Section 38 of the Act.	The DMD 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



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SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
policies, does it state that fact and identify the superseded policies?				between the documents in Enfield's Local Plan. The DMD sets out the relationship of the DMD policies to the saved UDP in Appendix 2.
<p>11. Have you prepared a statement setting out:</p> <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? 	<p>The Act section 20 (3)</p> <p>Regulation 22(1)(c)</p>		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	The Act section			The Regulation 22 Consultation Statement



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SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
statement giving: <ul style="list-style-type: none"> the number of representations made under Regulation 22? a summary of the main issues raised? OR <ul style="list-style-type: none"> that no representations were made? 	20(3) Regulation 22(1)(c)			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, 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.



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SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
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 DMD was given on 27 th March 2013.
16. Have you sent the Secretary of State (the Planning Inspectorate) both a paper copy and an email of the following: <ul style="list-style-type: none"> • the DPD? • the submission policies map (unless there are no site allocation policies)? • the documents prescribed in Regulation 22(1)? 	The Act section 20(1) and 20(3) Regulations 22(1) and 22(2)		Regulation 35 deals with the availability of documents and the time of their removal. Electronic copies of some of the representations and supporting documents may not be practicable. Regulation 35 deals with the availability of documents and the time	Yes, paper copies and an email were sent to the Planning Inspectorate. Electronic copies of the submission documents are also available on the Council's website.



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Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
			of their removal.	
17. Have you made the following available at the same places where the proposed submission documents were to be seen: <ul style="list-style-type: none"> • The DPD? • The documents prescribed in Regulation 22(1)? 	Regulation 22(3)		You should do this as soon as reasonably practicable after submission.	To be completed following submission of the DMD.
18. On your website, have you published the: <ul style="list-style-type: none"> • DPD? • submission policies map? • sustainability appraisal 	Regulation 22(3) and 35(1)(b)		You should do this as soon as reasonably practicable after submission.	Electronic copies of these documents are available on the Council's website.



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>report?</p> <ul style="list-style-type: none"> • Regulation 22(1)(c) statement? • supporting documents (where practicable) ? • representations made under Regulation 20 (where practicable) ? • statement as to where and when the DPD and the documents are available? 				
<p>19. For each general consultation body invited to make representations under Regulation 18(1), have you sent:</p>	<p>Regulation 22(3)(b)</p>		<p>You should do this as soon as reasonably practicable after submitting to the Secretary of State.</p>	<p>Yes, specific consultation bodies have been notified and given information on where and when the documents are available for public inspection. The Regulation 22 Consultation Statements confirms the procedures</p>



DEVELOPMENT MANAGEMENT DOCUMENT SUBMISISON

SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<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? 				undertaken.
20. Have you given notice to persons who have requested to be notified that submission has taken place?	Regulation 22(3)(c)		You should do this as soon as reasonably practicable after submitting to the Secretary of State.	To be completed following submission of the DMD.
21. If an examination is being held, at least six weeks before its opening has the Programme Officer: <ul style="list-style-type: none"> published the time and 	The Act section 20 Regulations 24 and 35			To be completed following submission of the DMD.



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SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence
<p>place of the examination and the name of the person appointed to carry out the examination on your website?</p> <ul style="list-style-type: none">notified those who have made representations on the published DPD which have not been withdrawn of these details?				



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DEVELOPMENT MANAGEMENT DOCUMENT SUBMISSION SOUNDNESS SELF-ASSESSMENT (Pages 1-42) AND LEGAL COMPLIANCE (Pages 43-86)

ANNEX1: SUPPORTING EVIDENCE BASE

- Equalities Impact Assessment (2013)
- DMD Scoping Report (2011)
- Draft_Development Management Document (2012)
- Proposed Submission DMD Policies Map Booklet
- Enfield Core Strategy (2010)
- Adopted Statement of Community Involvement (2006)
- Enfield's Local Development Scheme (2013-2016)
- 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
- Report on Location of Tall Buildings and Important Local Views in Enfield (2013)
- Areas of Archaeological Importance Review (2012)
- Enfield Characterisation Study (2011)
- Areas of Special Character Review (2012)
- Town Centre Uses and Boundaries Review (2013)
- Surface Water Management Plan (2012)
- Enfield Open Space and Sports Assessment Update (2011)
- Open Space Policies Map Paper (2013)
- Metropolitan Open Land and Green Chain Associated Open Space Review (2013)
- Review of Enfield's Sites of Local and Borough Importance for Nature Conservation (2013)
- Enfield's Detailed Green Belt Boundary Review (2013)