Local Development Framework

Barnet's Core Strategy Development Plan Document - **Legal Compliance Soundness Tool**

August 2011

Core Strategy Soundness tool (Legal Compliance)

Key question	Possible evidence	Evidence provided for Core Strategy
Justified		
Participation		
1. Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement	"Barnet's Core Strategy and Development Management Policies Documents Consultation Statement - Regulations 30d (1) (d) and (e) August 2011" outlines Regulation 25 engagement in 2009 and identifies earlier major LDF engagement exercises that took place in 2008 to 2010. The Regulation 27 consultation in 2010 on the publication stage and 2011 (Pre – submission amendments) was in accordance with Regulations and the council's Statement of Community Involvement in Planning.
Research/ fact finding		

2. Is the content of the development plan document justified by the evidence?
 3. What is the source of the evidence?
 4. How up to date and convincing is it?
	i. Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals
	 ii. Sections of the pre-submission proposals documents
	 iii. Sections of the preferred strategy report
	 iv. Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document
	 v. Sections of the consultation statement
	 OR
	 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
	     ○ any other information on community views and preferences
	 vi. The studies, reports and technical papers that
		Barnet's published evidence base for the Core Strategy is extensive and links to all documents set out at section 4.1.2 - 4.1.4 (page 12) of the Direction of Travel (Preferred Approach) document and section 3.2.2 (page 13) of the Publication stage document that shows how this evidence base has emerged since. Each key references section at the end of each chapter in the Submission document (May 2011) also shows a wide range of references lists/documents which have been used to devise emerging policies.
		
		 This evidence is from both commissioned studies and in-house research. There are also additional studies produced by other bodies such as GLA and Natural England which we have utilised.
		
		 The evidence is considered to be up to date and fit for purpose. Many areas are the subject of ongoing evidence gathering as reported through the AMR.

Key question	Possible evidence	Evidence provided for Core Strategy
	the	provide the evidence for the policies set out in the development plan document. The date of preparation and who they were produced by should be signposted OR For each policy (or group of policies dealing with 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 development plan document)	
5. What assumptions had to be made in preparing the development plan document? 6. Are the assumptions reasonable and justified?	i. Sections of the development plan documents setting out the assumptions ii. Sections of the sustainability appraisal report setting out the assumptions iii. A very brief statement for each assumption as to how the evidence led to the assumption iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions	Assumptions include: There will not be any material changes in national or London Plan policy that will impact on the council's vision for the borough and the strategic policies required to achieve this vision. • We have assumed, in line with the draft Replacement London Plan 2009 that London and this borough will experience a cyclical recovery following the current economic slowdown within the timescale of this plan, and the strategy has therefore been written to plan for future growth. The Core Strategy has been prepared to be flexible enough to cope with a changing world, while ensuring our vision and objectives for the borough are delivered. • We have assumed that house builders will build all housing identified in the trajectory, thus enabling us to meet the housing target. This is a reasonable assumption given that the borough has traditionally met targets and is in an area where there is high demand for housing. In addition, there are a number of major developments in regeneration areas that are at an advanced stage in master planning exercises and the council is working closely with developers on these schemes. • We have assumed Infrastructure providers have identified all known needs. The council has endeavoured to involve infrastructure providers in the LDF process. The Delivery Plan is a living piece of

Key question	Possible evidence	Evidence provided for Core Strategy
		evidence which will continue to be monitored and updated. A key step that will enable this ongoing amendment and improvement of infrastructure planning is that the IDP will be transformed into a 10 year Capital Programme for all investment across public services in Barnet.
Alternatives		
7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives? 8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at? 9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?	i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options ii. Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised iv. Sections of the preferred strategy report explaining: • how alternatives were developed and evaluated, and • why alternatives were rejected in favour of the preferred strategy v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed vi. Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions viii. Sections of the representations statement OR A brief statement of the influence upon decisions of:	The Core Strategy is considered the most appropriate strategy and policies for the future of Barnet. Pre-engagement work began in 2007 with workshops on 'are you planning for Barnet ?'. See Section 2 of the Consultation Statement. A total of 80 options were explored at Issues and Options (Reg.25) over 12 weeks of consultation which commenced in June 2008. See Section 3 of the Consultation Statement. Reasonable alternatives for evaluation in arriving at the preferred options in Direction of Travel have been assessed in the "Draft Sustainability Appraisal of Barnet's Core Strategy Direction of Travel November 2009". http://www.barnet.gov.uk/ldf-core-strategy-sustainability-appraisal-nov09.pdf Alternatives considered at the Issues and Options stage are summarised in the Direction of Travel document along with our reason for not choosing them. Our justification is based on the Sustainability Appraisal of the Direction of Travel together with feedback on the Issues and Options document. See Section 3 of the Consultation Statement. http://www.barnet.gov.uk/ldf-core-strategy-direction-travel-nov09.pdf Through meetings of the LDF Members Steering Group cross party contributions were made to the development

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	the issues raised during stakeholder and community engagement, and how they have been addressed ix. Any other documentation showing how alternatives were developed and evaluated x. A very brief statement and any other supporting documentation of the way decisions have been taken	of the Core Strategy. The main issues raised in representations and our responses to them are set out in the Appendices A, B and D to the Consultation Statement
10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?	i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies	The Sustainability Appraisal for the Core Strategy includes an appendix (Appendix 1) that summarises the Regulation 27 SA/SEA. Most of the changes proposed by the Sustainability Appraisal that were relevant to the Core Strategy were incorporated. However a number of recommendations were more appropriate for the Development Management DPD and have been incorporated into this DPD. SA/SEAs at all stages for the Development Management Policies DPD were separately available.
11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it? 12. Does the strategy take forward the regional context reflecting the local issues and objectives?	i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy iii. Representations received from the regional development agency/regional planning body iv. Representations from the Government Office v. Reports or copies of correspondence as to how the representations have been considered and dealt with	The Core Strategy has taken account of the London Plan (Feb 2008) and the draft Replacement London Plan (Oct 2009) and expanded on it where appropriate to reflect the specific circumstances of Barnet. The spatial policies expand upon the London Plan policies, for example there is detailed guidance provided on Opportunity Areas and on housing provision. These policies have been developed to reflect local issues and are supported by local plans and studies including the area action plans for Colindale and Mill Hill East, the development framework for Brent Cross – Cricklewood and the SHMA. Representations from the Mayor of London confirmed general conformity of the Core Strategy with the London Plan and the draft Replacement London Plan. The London Plan was published in July 2011. Representations from the former Government Office for

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		London raised no fundamental issues affecting the Core Strategy. Through GOL we received advice in April 2010 from the Planning Inspectorate on how to proceed with a policy approach on Brent Cross- Cricklewood. On the basis of this advice we created a new policy CS2 which provides a hook for saved UDP policies on Brent Cross-Cricklewood and the Development Framework produced in 2005.

Representations reports of all stages set out how responses to the Core Strategy have been addressed. |

Effective		
Deliverable		
13. Has the council clearly identified what the issues are that the development plan document is seeking to address? 14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?	i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy iii. A core strategy vision which is framed to set out the outcomes which are sought for the future iv. Sections of the development plan document which identify the main issues addressed v. Sections of the development plan document which indicate the priority outcomes	Section 5 of the Core Strategy outlines the challenges facing the borough, referring to background documents where necessary. Sections 5 and 6 set out the council's Spatial Vision and Strategic Objectives, thus identifying what the Core Strategy is trying to achieve over the next 15 years. The objectives clearly identify priorities and expected outcomes. Sections 2 and 3 of the Consultation Statement outline the main concerns of stakeholders at the pre-engagement stages in 2007 and 2008.
15. Are there any cross-boundary	i. Sections of the regional special strategy which identify cross-boundary	Section 20.11 of the Core Strategy highlights work on the strategic North London Luton corridor with Transport for London, Brent, Camden, and Harrow council's and the continuation of this work in future.

issues that should be addressed and, if so, have they been adequately addressed?	issues. ii. Sections of the development plan document setting out cross-boundary issues and the response to them iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance	Section 20.12 highlights that we are working with neighbouring boroughs in relation to growth areas and town centres with adjoining and cross borough boundaries. As highlighted in section 12.1 (page 146) of the " Barnet's Core Strategy and Development Management Policies Documents Consultation Statement Regulation 30(1) (d) and (e) August 2011" Liaison Meetings took place with Enfield, Haringey and Camden.
16. Does the development plan document contain clear objectives?	i. A spatial portrait which identifies the key issues facing the area ii. A core strategy vision which is framed to set out the outcomes which are sought for the future iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision	Section 4 sets out what makes Barnet distinctive as a place. This is followed by a section which sets out the challenges Barnet faces. There is a clear Spatial Vision (section 6), derived from our Sustainable Community Strategy and a sub section on Strategic Objectives in the same chapter. Our place shaping strategy at Section 7 amplifies the Three Strands Approach and sets out the regeneration / development areas and the priority housing estates where we are delivering housing growth. It also sets out how **consolidated growth** will be complemented by : **protection** of Green Belt / Metropolitan Open Land, heritage and open spaces; **enhancement** of priority town centres, historic suburban environment and high quality suburbs. Map 2 is the Key Diagram and reflects these objectives.
17. Are the objectives specific to the place; as opposed to	i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it	The objectives set out in Section 6 of the Core Strategy are specific to Barnet and flow from the Sustainable Community Strategy. Table 2 links the themes and ambitions of the Sustainable Community Strategy with Core Strategy objectives and policies.

being general and applicable to anywhere? 18. Is there a direct relationship between the identified issues and the objectives?	ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place	Our public sector partners including NHS Barnet and Middlesex University have contributed to the formulation of the objectives.
19. Is it clear how the policies will meet the objectives? 20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?	i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them ii. Relevant sections of the sustainable community strategy which identify its objectives iii. Confirmation from the local strategic partnership and partner organisations that they believe the polices will achieve the agreed objectives iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed v. Sections of the development plan document, reports or other documents which discuss the matters which should be	Table 2 in the Core Strategy highlights linkages to Barnet's Sustainable Community Strategy and the Core Strategy Policy framework. The Core Strategy and the London Plan provides a comprehensive development plan for the borough. More detailed development management policies are included in a separate DPD, and there is further detailed guidance and policies in two of the adopted Area Action Plans and Brent Cross, Cricklewood and West Hendon Development Framework. Metropolitan Police, NHS Barnet and Middlesex University have contributed to the development of the Core Strategy and Infrastructure Delivery Plan A series of presentations were made to the Local Strategic Partnership Executive meetings and LSP Board Meetings of the Adult Strategy Group, Safer Communities Board and Children and Young Peoples Groups in 2009 (see Consultation Statement 4.3.68 to 4.3.77). Feedback from the LSP is set out at 4.3.67 in the Consultation Statement.

		addressed in the development plan document.	
21. Are there realistic timescales related to the objectives?	i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery		The Core Strategy sets out a 15 year vision and sets out in CS 3, CS6 and CS8 the components of housing, town centre and jobs growth and the expected timescale for this delivery. CS 2 on Brent Cross Cricklewood sets milestones (as set out in Appendix B) towards the initiation of development under the hybrid planning consent of October 28 2010. The council is working closely with partners on regeneration initiatives and the timescales for achieving regeneration are considered to be realistic. Ongoing monitoring through the AMR, will highlight if changes to the timescales are required. The Infrastructure Delivery Plan (IDP) was prepared in collaboration with our public sector partners as well as other infrastructure providers. http://www.barnet.gov.uk/core-strategy-publication-stage-infrastructure-delivery-plan-oct.-2010.pdf
22. Are the policies internally consistent?	i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent ii. A very brief statement explaining how the council considers its objectives are consistent		The objectives flow from Barnet's Sustainable Community Strategy, Corporate Plan and the Three Strands Approach Document. http://www.barnet.gov.uk/one-barnet-a4booklet.pdf http://www.barnet.gov.uk/corporate-plan-june2011.pdf http://www.barnet.gov.uk/three-strands-strategy-summer08.pdf As part of the political approval process for LDF documents we ensure that the approach in the Core Strategy is consistent with other objectives as set out above. The delivery of a one public sector approach where we work together more efficiently to deliver better services. One Barnet is ingrained within the Core Strategy. Linkages are set out in Cabinet Reports for the Core Strategy in March 2011, September 2010, October 2009 and June 2008. http://committeepapers.barnet.gov.uk/democracy/reports/reportdetail.asp?ReportID=10226 http://committeepapers.barnet.gov.uk/democracy/reports/reportdetail.asp?ReportID=9548 http://committeepapers.barnet.gov.uk/democracy/reports/reportdetail.asp?ReportID=8581

		http://committeepapers.barnet.gov.uk/democracy/reports/reportdetail.asp?ReportID=6943
23. Does the development plan document contain material which: • is already in another plan • should be logically be in a different plan • should not be in a plan at all?	i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with	The Core Strategy policies will replace a number of existing saved UDP policies (183 in total). Appendix C of the Core Strategy shows existing UDP policies will be replaced by Core Strategy or Development Management polices. Appendix A sets out the suite of 'saved' UDP policies for Brent Cross- Cricklewood which are linked with Policy CS2 and the Development Framework for Brent Cross-Cricklewood. Through cross referencing the Core Strategy provides clear links with the London Plan (published July 2008), emerging North London Waste Plan DPD, Development Management Policies DPD and Site Allocations DPD as well as supporting SPDs. In addition, the council considers that there is no unnecessary overlap with London Plan or national policy and no unnecessary policies in the Core Strategy. Barnet published its 3rd LDS on 18 July 2011. http://www.barnet.gov.uk/index/council-democracy/unitary-authorities/statutory-development-plans/local-development-framework/local-development-scheme.htm
24. Does the development plan document explain how its key policy objectives will be achieved?	i. Sections of the development plan document that identify the key objectives and how they will be delivered upon ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the	Section 20 (Para 20.2) and appendix B of the Core Strategy sets out the council's approach to delivery and implementation of policies and monitoring and Section 2 (See Addendum of Further Pre Submission Amendments to the Core Strategy (Amendments 13 to 16)) sets out our public sector approach as shared with partners in Barnet. Support has been received from the main consultation bodies – the Environment Agency, Natural England and English Heritage. Their engagement is set out in the Consultation Statement and individual responses within the Representations Reports. In respect of achieving the policy objectives set out in the Core Strategy, the council is working closely with stakeholders and partner organisations. It is working with land owners and infrastructure providers, for example, in the regeneration areas on projects such as Granville Road, Dollis Valley, West Hendon and Stonegrove regeneration. Key partner organisations are also identified in section 20 of the Core Strategy and some of them have been involved in preparation of the infrastructure schedule.

	development plan document	
25. If there are development management policies, are they supportive of the strategy and objectives?	i. Sections of the development plan document that show how the development management policies: • will help to deliver the strategy 37. derive from, and elaborate on, the objectives and policies of the plan	The Core Strategy does not include detailed development management policies. However, borough-wide strategic policies included within the Core Strategy are supportive of the Vision and strategic objectives. Consultation on the Development Management Policies DPD has been in tandem with the Core Strategy and both will be examined at a joint EIP. Therefore it has been clear what policy areas are covered in this DPD and the DMP DPD. Cross references have been made through out the document. The relationship between DM Policies and the Core Strategy is clear and set out at Para 2.2.5 of the Core Strategy and Para 1.6 of the Development Management Policies Documents.
26. Have the infrastructure implications of the strategy/policies clearly been identified?	i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward ii. Representations in respect of infrastructure iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with	Section 20 of the Core Strategy identifies the physical, social and green infrastructure. All known infrastructure schemes are highlighted in the Infrastructure Delivery Plan (IDP) which provides a high risk assessment and cost analysis. The IDP is subject to revision and is now in the process of being transformed into a 10 year Capital Programme for all investment that will be taking place across public services in Barnet. was prepared in collaboration with the infrastructure providers. It sets out responsibilities for the delivery of each scheme, funding arrangements and likely timescales of delivery. Information is provided for infrastructure relating to children and education services; healthcare services; adult care services; leisure and community facilities; emergency services; strategic transport; utilities and physical infrastructure. Representations received at Regulation 27 consultation have led to some minor changes to the section on Infrastructure delivery to more clearly reflect these matters.
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	i. Sections of the development plan document setting out delivery mechanisms and timescale ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be	The Core Strategy will be implemented through a range of delivery mechanisms which are set out in section 20 of the Core Strategy and the initial Infrastructure Delivery Plan (IDP) approved by the council's Cabinet Resources Committee in October 2010. Delivery milestones for Brent Cross-Cricklewood are set out in Appendix B. Delivery milestones for Colindale and Mill Hill East are set out in their respective AAPs http://www.barnet.gov.uk/index/council-democracy/unitary-authorities/statutory-development-plans/colindale-area-action-plan-adopted-mar10.htm http://www.barnet.gov.uk/index/council-democracy/unitary-authorities/statutory-development-plans/local-development-framework/mill-hill-east-aap-adopted-jan-

	delivered	
	iii. Research or studies that address matters of delivery and the realistic timescales	2009.htm Delivery milestones for priority housing estates are set out at 7.2.12. Through the AMR we provide more detail on progress with regeneration and development areas, priority estates and town centre frameworks for our priority town centres.
	iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms	http://www.barnet.gov.uk/index/council-democracy/unitary-authorities/statutory-development-plans/local-development-framework/annual-monitoring-report.htm Core Strategy sets a framework for more detailed design work through the Development Management Policies DPD and subsequent SPDs.
	v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder	At Section 7.4.2 we set out how the Residential Design Guidance SPD will contribute to enhancement of the suburban environment. At Section 7.4.3 we set out how the Green Infrastructure SPD will set out a strategic approach for creation, protection and management of networks of green infrastructure.
	vi. Correspondence from stakeholders on delivery mechanisms and timescale	Reference to Site Allocations is made throughout the Core Strategy. Reference to the North London Waste Plan as the mechanism for meeting our waste apportionment is set out at CS14.
	vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with	
28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/polic	i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery ii. Representations in respect of infrastructure iii. Reports or copies of correspondence on how	As our lead LDF document, the Core Strategy identifies the main strategic infrastructure needs associated with planned future growth in Barnet, and sets out how Barnet and its partners will work to deliver additional infrastructure to meet these needs. The Infrastructure Delivery Plan (IDP) approved by the council's Cabinet Resources Committee in October 2010, identifies the social, transport and utilities infrastructure schemes required to meet needs associated with growth in Barnet. It sets out responsibilities for the delivery of each scheme, funding arrangements and likely timescales of delivery. Information is provided for infrastructure relating to children and education services; healthcare services; adult care services; leisure and community facilities; emergency services; strategic transport; utilities and physical infrastructure.

ies?	representations in relation to infrastructure and its timing have been considered and dealt with	
29. Is it clear who is intended to implement each part of the strategy/ development plan document? 30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?	i. Sections of the development plan document setting out responsibilities for delivery ii. Correspondence showing how other stakeholders intend to support the delivery of the policies iii. Reports by the council or the relevant stakeholder iv. Representations from stakeholders on implementation v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with	Core Strategy section 20, para 20.2.1 clearly emphases that "during the preparation of this Core Strategy we have worked with, and secured the involvement and commitment of, our delivery partners including the LSP and other key bodies. The LSP One Barnet Partnership Board recognises that it has an important role to play in relation to the delivery of this Core Strategy, in particular in bringing forward the infrastructure requirements that will be identified in Barnet's Infrastructure Delivery Plan (IDP). We are currently considering innovative ways to achieve this, in particular the financing aspects. Partnership working and the joint delivery of services are also being explored to optimise the delivery of Core Strategy objectives".
31. Does the development plan document reflect the concept of spatial planning? 32. Does it go beyond traditional	i. Sections of the development plan document that reflect the plans or strategies of other bodies ii. Expressions of support from bodies responsible for other strategies affecting the area iii. Representations in respect of services	The Core Strategy reflects the concept of spatial planning. The Draft NPPF highlights core planning principles that underpin plan-making and development management. It also makes clear that local planning authorities should set out the strategic priorities for the area in the Local Plan. That supports what we have been doing at Barnet with the Core Strategy and Development Management Policies a streamlined set of 33 policies reflecting this borough's priorities with the endorsement of partners and community representatives. These 33 policies replace the 183 policies of the UDP (adopted in 2006) which ironically replaced Local Plans. Subject to them being found sound these 33 priority policies will form our Local Plan. Any Neighbourhood Plans that come forward will have to be in conformity with our Local Plan.

land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?	provided by other agencies iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation	The Core Strategy goes beyond traditional land use planning by integrating the plans and programmes of a range of agencies in particular public sector partners under the One Barnet Programme. The plans, programmes and strategies of our partners including Middlesex University, Metropolitan Police, NHS Barnet and Transport for London are highlighted throughout the document.
33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?	i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy	The Core Strategy has a clear Vision and regeneration strategy which the council will pursue. A number of key strategic regeneration projects are at a stage whereby it is unlikely that they will not proceed at all. There may be a need to fine tune proposals overtime, but the spatial objectives and policies are considered robust, yet flexible enough, to allow for circumstances outside the control of the council to be accommodated in such a way as not to undermine the Core Strategy.
Flexible		
34. Is the development	i. Sections of the development plan	The Core Strategy Section 20 on delivery, implementation (funding mechanisms) and monitoring. This makes clear that the council will continue to prepare AMRs and will

plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: • the effectiveness of policies and what evidence is being collected to undertake this • changes affecting the baseline information and any information on trends on which the development plan document is based iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances	maintain existing evidence gathering and ongoing monitoring of policies. If a policy change is required for any particular topic, the council will consider preparing an additional document that is focussed on that particular issue. Section 12 of the Sustainability Appraisal for the Submission Core Strategy also makes clear that the AMRs will assess the impact of the Core Strategy policies and monitor baseline information in relation to sustainability issues.
35. Is the development plan document sufficiently	i. Sections within the development plan document dealing with possible change areas and how they would be	Section 20.13 of the Core Strategy monitors the effectiveness of the Core Strategy in delivering its objectives and sets out how the AMR will relatively need to assess and review any policies or approaches. The council has prepared the Core Strategy on the basis of the most up to date and

flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?	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 ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances	relevant evidence and information available and, where appropriate, supplied by other organisations. The policies have a level of inbuilt flexibility and so will be able to adapt to changing circumstances.
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	i. A section of the development plan document which expressly addresses flexibility ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing	Section 20 of the Core Strategy focuses on the delivery, implementation (funding mechanism) and monitoring of policies. It provides a list of key indicators (in Appendix B) that will be used to assess the effectiveness of policies. As a document that manages development, the Development Management Policies DPD (Appendix 2) sets out a suite of monitoring indicators to measure the implementation of policies. The Infrastructure Delivery Plan (IDP) is a living document and will be updated to support the Community Infrastructure Levy (CIL) charging schedule.
Monitoring		
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including	i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories	The Core Strategy sets targets for housing growth highlighting regeneration and development areas, priority estates and town centre sites. It breaks down housing growth into 5 year (Policy CS3) phases clearly identifying where the growth is expected. It also sets a target for affordable housing (Policy CS4) and sets targets for securing additional on-site open space in growth areas (Policy CS7). It sets a jobs target for the growth areas (Policy CS8). The Infrastructure Delivery Plan (IDP) is a living document and will be updated to support the Community Infrastructure Levy (CIL) charging schedule. The AMR will continue to monitor the 5 year housing delivery supply and the housing trajectory up to 2026.

housing trajectories where the plan contains housing allocations?	iii. Reference to any other reports or technical documents which contain information on the delivery of policies	http://www.barnet.gov.uk/index/council-democracy/unitary-authorities/statutory-development-plans/local-development-framework/annual-monitoring-report.htm
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators	Appendix B of the Core Strategy sets out monitoring indicators that will be used to monitor the policies in the plan. Section 12 of the Sustainability Appraisal for the Submission Core Strategy also makes clear that the AMRs will assess the impact of the Core Strategy policies and monitor baseline information in relation to sustainability issues http://www.barnet.gov.uk/core-strategy-submission-stage-dpd-may-2011.pdf
39. Are suitable targets and indicators present (by when, how and by whom)?	i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories	The sources of the monitoring indicators are clearly identified in a schedule Appendix B, page 137 of the "Core Strategy – Submission Stage May 2011". Following abolition of National Indicators in March 2011 some indicators have now been amended (as set out in the August 2011 Addendum to the Core Strategy – Amendment 161) http://www.barnet.gov.uk/core-strategy-submission-stage-dpd-may-2011.pdf Through the AMR we provide more detail on progress with regeneration and development areas, priority estates and town centre frameworks for our priority town centres. http://www.barnet.gov.uk/index/council-democracy/unitary-authorities/statutory-development-plans/local-development-framework/annual-monitoring-report.htm

National policy		
40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy? 41. If yes, is there a local justification?	i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement iv. Representations from the Government Office on the preferred strategy or the submitted development plan document v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with	All policies are considered consistent with the existing national policy as set out in the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance Notes (PPGs). We have submitted a general statement of conformity with the draft NPPF. As listed in section 12.1, (page 146) of "Barnet's Core Strategy and Development Management Policies Documents Consultation Statement – Regulation 30 (1) (d) and (e) August 2011" a number of meetings took place with GOL to discuss any emerging issues that might effect the soundness of the Core Strategy. We have addressed the points raised in the Advice Note produced following a Frontloading Visit by the Planning Inspectorate on October 22 2009 With regard to the policy approach on Brent Cross Cricklewood we sought the advice of the Planning Inspectorate via GOL. GOL advised in April 2010 that the proposal to use 2006 UDP Saved Policy as the development framework for this opportunity area is broadly acceptable, given that Barnet; • commits to a review of CS2 in the policy, setting out the triggers and/or timescales for such a review. Include any key infrastructure planning issues and requirements (and any necessary contingencies if this infrastructure is delayed/not forthcoming).
42. Does the development plan document contain policies that do not	i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons	This has not been raised as an issue with GOL nor at the Frontloading Visit.

add anything to existing national guidance? 43. If so, why have they been included?	ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with	