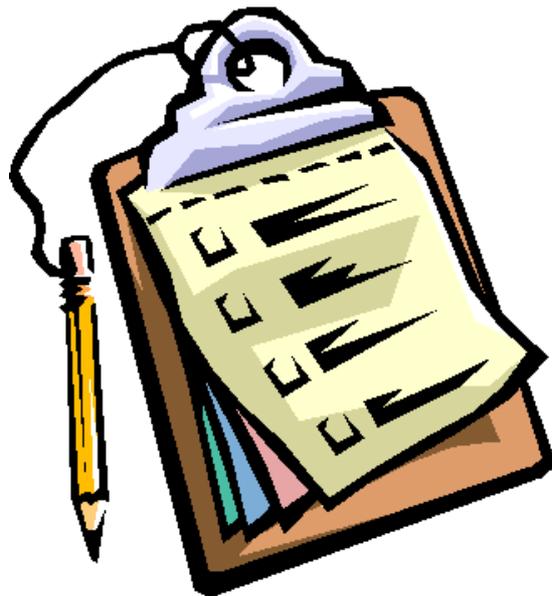




**Broxbourne Local Development Framework
Submission Core Strategy
Soundness Self-Assessment Statement**

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INTRODUCTION

1. The Core Strategy forms part of the Local Development Framework (LDF) for Broxbourne.
2. The Town & Country Planning (Local Development) (England) (Amendments) Regulations 2008 informs that development plan documents (DPDs) which form part of the LDF will be considered at a public examination to determine whether they are “sound” in that they are justified, effective and consistent with national policy.
3. To aid this process the Planning Advisory Service (PAS) has taken forward PPS12 guidance in the form of a “Soundness Self-Assessment Toolkit” to help authorities test a DPD prior to submission.
4. This Self-Assessment Statement therefore uses the PAS template as a way of reassuring the Council that it has complied with national legislation and national planning policy guidance to produce a “sound” DPD and to aid the Inspector as part of the public examination. It is also supported by a Legal Compliance Test which looks at how the Core Strategy meets legal compliance tests.

SOUNDNESS TOOL

Key Question	Possible Evidence	Evidence Provided
Justified		
Participation		
1. Has the consultation process allowed for effective engagement of all interested parties?	Statement of Community Involvement Regulation 27 Statement of Consultation Regulation 30 Statement of Representations	The Council's Reg 30 Statement of Consultation explains how all engagement has taken place during the production of the Core Strategy and how it complies with the requirements of the Council's Statement of Community Involvement. The Statement explains what methods were used, who was consulted and the feedback received.
Research / Fact Finding		
2. Is the content of the DPD 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 DPD which show how the evidence points towards the selected strategy, policies or proposals ii. Sections of the Pre-Submission documents iii. Sections of the Preferred Options document iv. Sections of the Sustainability Appraisal report which set out its main conclusions in relation to DPD policies v. Sections of the Reg 30 Statement of Consultation 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 and any other information on community views and preferences vi. 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 should be signposted OR 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)	The Council has evidence studies which have been used specifically to justify policies in the Core Strategy. For example the SHMA supports the housing requirement in the borough and the Council's housing trajectory. It therefore supports Policy CS2 Housing Development which looks at the delivery of housing over the plan period. Policy CS5 Employment has also been supported by various evidence studies including the Employment Land Review and Employment Opportunities Study. These studies examine opportunities for particular employment uses in the borough and assess requirements in the county as a whole. Evidence studies are reference in Core Strategy text. Other evidence studies help with context setting and will be more applicable at Site Allocation and Development Control Policies DPD stage. The DPD is justified by up-to-date evidence studies for climate change and environmental issues, housing, gypsies and travellers, employment, retail, town centres and infrastructure, all of which are available on the Council's website. The Council may, where necessary, prepare justification statements for the Examination where policies require greater explanation as to how they were derived from the evidence base e.g. Policy CS2 Housing Development states that provision will be made for 240 dwellings which is informed by the SHMA. The Scoping Reports, Sustainability Appraisals and Habitat Assessments undertaken at relevant Core Strategy stages have examined the completeness of the evidence base and recommended additions where necessary.

<p>5. What assumptions had to be made in preparing the DPD?</p>	<p>i. Sections of the DPD setting out the assumptions</p>	<p>The Sustainability Appraisal has made some assumptions concerning the Strategic Objectives and whether or not they impact upon the environment and whether their sustainable. This has been detailed more specifically in the policies themselves.</p>
<p>6. Are the assumptions reasonable and justified?</p>	<p>ii. Sections of the sustainability appraisal report setting out the assumptions</p>	
	<p>iii. A very brief statement for each assumption as to how the evidence led to the assumption</p>	
	<p>iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions</p>	
		<p>The Sustainability Appraisal also makes assumptions on Policy CS1 Sustainable Neighbourhoods that it will minimise pollution and Policy CS7 Greater Brookfield that it will encourage business start ups and innovation. The assumptions are reasonable but have not resulted in any major objections during the Pre-Submission publication. The Council has been required to make assumptions on future population projections and job creation rates that have then informed evidence studies and the Core Strategy.</p>
		<p>The Council has made some general assumptions on when sites may come forward for development in the SHLAA which has been discussed in detail with developers and site promoters. Assumptions have also been made that infrastructure providers will deliver their schemes during the time anticipated and will have the funding in place to deliver them. Detail on the assumptions can be found in the relevant evidence studies and the Sustainability Appraisal. The Council is able to defend these assumptions.</p>

Alternatives		
7.	Can it be shown that the Council's chosen approach is the most appropriate given the reasonable alternatives?	<p>The Core Strategy process began in early 2007 where information was collected on resident's views about the borough (this was also used to initially inform the Community Plan). Issues and Options (May 2007) identified the issues in the borough and the possible options to tackle them. Views were sought from residents and statutory bodies on this document. Preferred Options (Nov 2008) explained what comments were received under the 'what you have told us before' section. Preferred Option policies were then derived from these comments. Alternatives have therefore been explored before the Pre-Submission document was prepared.</p> <p>The Reg 30 Statement of Consultation shows how the comments inform the final document and how other consultation comments informed the final Pre-Submission document.</p> <p>Decisions were also made via the Planning & Licensing Committee, LDF Steering Group and other Member meetings that took on board the evidence produced and reports from officers which then helped inform policies in the Submission document. Agendas and minutes of these meetings are available on the Council's website.</p> <p>Several justification statements may be required by the Inspector to detail what reasonable alternatives have been investigated such as information to support the Council's annual housing target.</p>
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 DPD	
	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 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	

<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> i. A structure to the DPD 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 	<p>The Sustainability Appraisal has been used to inform the Submission document. It considers a plethora of issues including those relating to the economy, environment and social elements. Specific questions incorporated into the Sustainability Appraisal framework include: will the Core Strategy reduce levels of pollution?, will the Core Strategy provide for modal shift to sustainable transport systems?, will the Core Strategy encourage more sustainable consumption patterns and lifestyles? will the Core Strategy maintain or enhance the character of the built and historic environment?, etc.</p> <p>The Pre-Submission Core Strategy has been amended in light of comments and recommendations received from the Sustainability Appraisal and Habitats Assessment. For example the Core Strategy now considers in far greater detail the use of sustainable construction methods and the transport links between future housing and existing and future employment uses. A Sustainability Appraisal was also prepared to inform the Preferred Options document. Sustainability Appraisal findings have therefore informed the final policies from the beginning of the LDF process.</p>
<p>11. Does the DPD adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<ul style="list-style-type: none"> i. Sections of the DPD 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 DPD is in general conformity with the regional special strategy iii. Representations received from the regional development agency/regional planning body iv. Representations from the Government Office v. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p>During the preparation of the Pre-Submission Core Strategy, Regional Spatial Strategies and their policies were abolished by the coalition Government. The Pre-Submission document was produced in light of these Government changes although it is still informed by the regional evidence base to support policies and figures. The Core Strategy therefore does not directly duplicate the Regional Spatial Strategy and as a consequence the Council has agreed a change to the housing, gypsy and traveller and travelling showpeople figures for Broxbourne. The policies are flexible enough to respond to changes regionally and locally and will be monitored through the AMR process.</p> <p>The Government Office provided Broxbourne with general supporting comments at Preferred Options stage. There were no comments at Pre-Submission stage. General support was given at Preferred Options from EERA. The Council has summarised and provided a response to all representations made at Issues and Options and Preferred Options stages.</p>

Key question	Possible evidence	Evidence provided
Effective		
Deliverable		
<p>13. Has the Council clearly identified what the issues are that the DPD is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the DPD is seeking to achieve?</p>	<p>i. Sections of the DPD which refer to the vision and objectives of the Sustainable Community Strategy and the issues identified there</p> <p>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</p> <p>iii. A Core Strategy vision which is framed to set out the outcomes which are sought for the future</p> <p>iv. Sections of the DPD which identify the main issues addressed</p> <p>v. Sections of the DPD which indicate the priority outcomes</p>	<p>The document identifies the main challenges facing the Borough now and possibly in the future. This has been based upon the results of evidence studies, surveys and data collected during the preparation of the Core Strategy and evidence gathered to support the Broxbourne Sustainable Community Strategy. The Spatial Portrait also gives the context of Broxbourne and the borough's features.</p> <p>Based on evidence and the challenges set out, the Core Strategy has identified drivers of change which will help address the main challenges. The Spatial Vision and Strategic Objectives indicate how the borough will change to 2026 and beyond and what the Core Strategy seeks to achieve. The objectives are based on themes set out in the Sustainable Community Strategy which have informed the policies. Each policy sets out which objective it delivers which have been established based upon issues and challenges identified.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<p>i. Sections of the regional special strategy which identify cross-boundary issues.</p> <p>ii. Sections of the DPD setting out cross-boundary issues and the response to them</p> <p>iii. Reports on relevant studies which cover wider areas than the local authority and how the DPD addresses their findings or recommendations</p> <p>iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance</p>	<p>The Council has helped to commission several studies undertaken jointly with other councils. These includes the Rye Meads Water Cycle Strategy, the Strategic Housing Market Assessment, the London Arc Employment Land Review, the Low and Zero Carbon Energy Study and the Green Infrastructure Strategy. This shows that some issues have been deliberated and worked on in co-ordination with authorities both in the county and neighbouring counties. The Council will work closely with the Lee Valley Regional Park Authority to ensure the objectives of the Park's Plan are implemented. The Council will also work with Enfield Council and TfL specifically on an Upper Lee Valley Opportunity Study in order to tackle congestion in the surrounding area and to encourage extension of the Oyster Card into Waltham Cross. The Core Strategy recognises the importance of working with Herts County Council to provide education and highway provision and in delivering Greater Brookfield as a strategic site. Meetings have also been held with various statutory bodies in order to discuss the soundness of the DPD including the Highways Agency, Environment Agency, Thames Water, Herts and Middlesex Wildlife Trust, various Herts County Council Departments, the Showmen's Guild and the Broxbourne Local Strategic Partnership.</p>

<p>16. Does the DPD contain clear objectives?</p>	<ul style="list-style-type: none"> i. A spatial portrait which identifies the key issues facing the area ii. A Core Strategy vision which is framed to set out the outcomes which are sought for the future iii. The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision 	<p>The Core Strategy sets out a spatial portrait of Broxbourne and identifies the main challenges and drivers of change facing the borough. These are then responded to in a clear Spatial Vision. Based on this information, and particularly the Spatial Vision and Sustainable Community Strategy themes, the Strategic Objectives have been created. The objectives accord with the Spatial Vision and therefore the policies will deliver the objectives which in turn will deliver the Spatial Vision and future for Broxbourne. There are nine Strategic Objectives set out under four themes: 1 – Jobs, Prosperity & Skills; 2 – Places to live; 3 – Transport and Access and; 4 – The Environment. These themes directly relate to the themes in the Sustainable Community Strategy.</p>
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<ul style="list-style-type: none"> i. The spatial portrait and the commentary in the DPD as to how the objectives derive from it ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place 	<p>The objectives are considered specific to the borough and have been derived from the Spatial Vision. The Core Strategy has been informed by the Sustainable Community Strategy which has been approved by the Council's LSP and has been through consultation with the public. The objectives also reflect previous consultations held for the Core Strategy.</p> <p>The LSP has also been consulted during Pre-Submission publication and has been involved in all stages of Core Strategy preparation.</p>
<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the DPD?</p>	<ul style="list-style-type: none"> i. Relevant sections of the DPD 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 LSP 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 DPD, reports or other documents which discuss the matters which should be addressed in the development plan document. 	<p>The policies support and meet the nine Strategic Objectives. Each policy chapter begins with an introduction to the policy and background information that has been collated to inform the policy. The policy wording is then followed underneath by several boxes which indicate which Strategic Objectives the policy complies with. For example Policy CS2 Housing Development complies with SO1 (Prosperity), SO4 (Greater Brookfield), SO5 (Neighbourhoods), SO6 (Housing) and SO8 (Sustainability). These objectives are supported by the Sustainable Community Strategy themes which have been identified through community consultation. The objectives have been divided into themes that support the Sustainable Community Strategy.</p>

<p>21. Are there realistic timescales related to the objectives?</p>	<ul style="list-style-type: none"> i. Sections of the DPD 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 	<p>The Core Strategy includes a section on infrastructure provision in the borough and a monitoring and implementation section which looks at how, when and by whom policies and projects will be implemented. Pre-Submission publication and various meetings held during the course of the year suggest that the timescales and delivery are realistic. In some cases the delivery and provision of infrastructure has been provided directly from those planning to implement them e.g. Thames Water will provide future sewerage and water infrastructure. The Core Strategy monitoring table indicates who will deliver future provision. The Core Strategy has also identified alternative solutions to situations where projects, policies or proposals will be delayed or will not come forward as a result of unforeseen circumstances in the “What If...?” chapter.</p>
<p>22. Are the policies internally consistent?</p>	<ul style="list-style-type: none"> i. Sections of the DPD 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 	<p>The Reg 30 Statement of Consultation shows how the community have been involved in the preparation of the Core Strategy. The policies have been created in consultation with other internal sections and departments and with Herts County Council where appropriate. Members have also had direct involvement through the Planning and Licensing Committee, the LDF Steering Group and at neighbourhood forums. Agendas and minutes for these groups are available on the Council’s website.</p>
<p>23. Does the DPD contain material which: is already in another plan, should logically be in a different plan and/or should not be in a plan at all?</p>	<ul style="list-style-type: none"> i. Information in the LDS, or provided separately, about the scope and content (actual and intended) of each DPD. 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 	<p>It is considered that the information provided and the policies set out do not duplicate any other national or regional guidance/policy. Policies are considered to be specific to the Broxbourne area and therefore must be placed in the Core Strategy due to their strategic importance. Greater Brookfield has been allocated as a strategic site in the Core Strategy due to its importance in the borough for providing future retail, leisure and residential facilities. It also needs careful consideration as to its delivery and implementation including transport improvements and relocation of existing services and uses. Government Office representation to the Pre-Submission document gives no indication that the DPD contains material and information that is unnecessary.</p>

<p>24. Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> i. Sections of the DPD 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 DPD 	<p>The Core Strategy implementation table indicates how the policies will be delivered by whom and when and by what means. The policies will be monitored in the AMR. There are no objections from statutory bodies on infrastructure sections that give rise to concerns at this stage. The “What If...?” chapter provides alternative solutions in case of unexpected situations.</p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<ul style="list-style-type: none"> i. Sections of the DPD that show how the development management policies: will help to deliver the strategy and derive from, and elaborate on, the objectives and policies of the plan 	<p>Not applicable. Development management policies will be brought forward through a Development Control Policies DPD in 2011/2012.</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<ul style="list-style-type: none"> i. A section or sections of the DPD 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 	<p>The Core Strategy includes an Implementation and Monitoring table for each policy which looks at how infrastructure will be delivered and monitored and who will be responsible for it. The Core Strategy includes a “What If...?” chapter on the risk element of implementing particular objectives and what will be done if circumstances change. For example it explains what would happen and what the Council would do to resolve the situation if the provision of infrastructure did not come forward i.e. transport, utilities and social infrastructure. The Council has been and will continue to be in consultation with major utility bodies and other statutory consultees to discuss infrastructure such as roads, education, water and sewerage.</p>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<ul style="list-style-type: none"> i. Sections of the DPD setting out delivery mechanisms and timescale ii. Other DPD being prepared that develop the policies of the Core Strategy further and set out how they will be delivered iii. Research or studies that address matters of delivery and the realistic timescales iv. Documents that set out arrangements made or planned for LDVs or other delivery mechanisms v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder vi. Correspondence from stakeholders on delivery mechanisms and timescale vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	<p>Where appropriate, policies have been given timescales and mechanisms for delivery. For example Greater Brookfield phasing has been split into various yearly periods. Particular aspects of the development must be implemented within a particular time in order to ensure an appropriately phased development. Discussions with landowners and land agents suggest that this is achievable e.g. in the first year the link road will be constructed, the gypsy site will be relocated and housing development will begin north of the New River.</p> <p>The Council’s AMR will set out targets for policies and will monitor the phasing and effectiveness of them e.g. the affordable housing target and its feasibility and effectiveness for the following year. If the policy requires changing the AMR process will help to identify this.</p>

<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<ul style="list-style-type: none"> i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery ii. Representations in respect of infrastructure iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with 	<p>The Implementation and Monitoring tables outline those bodies that will be responsible for delivering elements within each policy. They presently are in line with policies, however the “What If...?” chapter indicates what measures will be put in place or undertaken if particular elements are not delivered within the timescales. The AMR will be an essential part of monitoring the implementation of these policies and the timescales. The Reg 30 Statement of Consultation indicates how the Council has discussed infrastructure with the relevant bodies.</p>
<p>29. Is it clear who is intended to implement each part of the strategy / DPD?</p> <p>30. Where actions require implementing policy outside the direct control of the Council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<ul style="list-style-type: none"> i. Sections of the DPD 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 	<p>As above.</p> <p>There have been no objections during the consultation period to suggest the way in which policy and infrastructure will be implemented is factually incorrect. Meetings with utility bodies or a close review of their respective business plans have informed the Implementation and Monitoring tables.</p>

<p>31. Does the DPD reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<p>i. Sections of the DPD that reflect the plans or strategies of other bodies</p> <p>ii. Expressions of support from bodies responsible for other strategies affecting the area</p> <p>iii. Representations in respect of services provided by other agencies</p> <p>iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation</p>	<p>The Council has been working closely with various partners in order to deliver an effective DPD. The Core Strategy lists various other documents that will help support and implement the Core strategy policies including: Lee Valley Regional Park Authority Park Development Framework, Hertfordshire Economic Development Strategy, Waltham Cross Renaissance programme, Hertfordshire Building Futures programme, Thames Water Resources Management Plan, Greater Anglia Route Utilisation Strategy, Upper Lee Catchment Abstraction Management Strategy, Hertfordshire Biodiversity Strategy, Hertfordshire Waste Strategy, etc. The Council has also been working closely with neighbouring authorities and Herts County Council regarding issues such as transport and education. The Strategy is consistent with other corporate documents such as the Sustainable Community Strategy and local economic development strategies.</p>
<p>33. Does the DPD take into account matters which may be imposed by circumstance, notwithstanding the Council's views about the matter?</p>	<p>i. Explicit recognition within the DPD that this may happen, and clear information about how the plan strategy can accommodate them</p> <p>ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</p>	<p>The Pre-Submission document was prepared shortly after the coalition Government were elected and had indicated their intention to revoke Regional Spatial Strategies. The Drivers of Change chapter recognises that Government is progressing its localism agenda and may seek to update national planning statements.</p>

Flexible		
<p>34. Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<ul style="list-style-type: none"> i. Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed ii. Sections of the AMR and sustainability appraisal report describing how the council will monitor: iii. the effectiveness of policies and what evidence is being collected to undertake this iv. changes affecting the baseline information and any information on trends on which the DPD is based v. 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 vi. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	<p>There are assumptions that developers will bring forward development sites when anticipated by the Council (i.e. through the SHLAA study). However circumstances may change unexpectedly which the Core Strategy is able to respond to i.e. by bringing other development sites forward sooner where other sites become undeliverable etc. A lot of detail on phasing sites will be incorporated into a Site Allocation DPD. There is also an expectation that utility providers will deliver schemes and projects when they state they will. The Core Strategy is flexible and will respond to any of these changes whether they are financially driven or otherwise. Meetings with utility providers before the Pre-Submission stage suggest this will not be the case at present.</p> <p>The AMR will provide a useful monitoring tool when assessing what changes have occurred throughout the year.</p>
<p>35. Is the DPD sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional spatial strategy?</p>	<ul style="list-style-type: none"> i. 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 ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	<p>Policies in the Core Strategy have been updated to reflect the revocation of the East of England Plan. They were produced flexibly to respond to this situation and used evidence studies to inform policies that were required to change as a result of the abolition. Monitoring of the policies through the AMR will ensure they remain flexible to change. Evidence has been brought up-to-date to reflect changing circumstances.</p>
<p>36. Does the DPD include the remedial actions that will be taken if the strategies/policies are failing?</p>	<ul style="list-style-type: none"> i. A section of the DPD which expressly addresses flexibility ii. Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing 	<p>The Core Strategy includes a “What If...?” chapter that explains what actions will be taken if particular proposals or policies fail to come forward within particular timescales or at all. It also provides flexibility to the document and the policies. The AMR will monitor the policies and recommend changes where necessary, using evidence collected throughout the monitoring year.</p>

Monitoring		
<p>37. Does the DPD contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?</p>	<ul style="list-style-type: none"> i. Sections of the DPD setting out indicators, targets and milestones ii. Sections of the current AMR which report on indicators, targets, milestones and trajectories iii. Reference to any other reports or technical documents which contain information on the delivery of policies 	<p>The Core Strategy includes both a housing trajectory (Table 2), an affordable housing trajectory (Table 3), an employment trajectory (Table 4) and a Greater Brookfield phasing table (Table 5). Deadlines and timescales have been applied where appropriate to the policy. The AMR will play a major part in monitoring the phasing and implementation of policies and will discuss what may be required in order to aid implementation of a policy. The Implementation and Monitoring chapter outlines targets for monitoring the policies set out in the DPD. For example Policy CS2 Housing Development will be monitored via the following indicators: Core Output Indicators H2(b) housing completions, H2(c) housing commitments, H2(d) housing trajectory of 5 and 15 years housing land supply, the Strategic Housing Market Assessment and the Strategic Housing Land Availability Assessment.</p>
<p>38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?</p>	<ul style="list-style-type: none"> i. Sections of the DPD 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 DPD against the sustainability appraisal iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators 	<p>The Sustainability Appraisal for the Pre-Submission Core Strategy highlights significant effects as a result of appraising the document. The AMR will highlight and monitor these effects in order to deliver a sustainable DPD. The Implementation and Monitoring chapter also highlights who will be responsible for delivering the policy and through which mechanism i.e. Network Rail through their Route Utilisation Strategy or the Council through various development briefs.</p>
<p>39. Are suitable targets and indicators present (by when, how and by whom)?</p>	<ul style="list-style-type: none"> i. Sections of the DPD setting out indicators, targets and milestones ii. Sections of the current AMR that report on indicators, targets, milestones and trajectories 	<p>The AMR reports on particular core and local indicators and will monitor the effectiveness of the policies and changes that may be required to the policy. The AMR also analyses trajectories for housing and employment and where appropriate gypsies and travellers etc. National indicators have also been included for monitoring in the Implementation and Monitoring Schedule at the end of the DPD.</p>

National policy		
<p>40. Does the DPD contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<ul style="list-style-type: none"> i. Sections of the DPD 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 DPD 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 DPD v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with 	<p>Representations to Policy CS7 Greater Brookfield in particular state that it is not consistent with national policy. However supporting local evidence has been gathered to justify the need for Greater Brookfield which then supports other national policies such as those relating to sustainability and transport. The Council considers all policies conform to national guidance and take account of the emerging localism agenda.</p>
<p>42. Does the DPD contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p>The DPD only elaborates on national guidance and does not repeat it. Policies are specific to the needs of the local area.</p>

LEGAL COMPLIANCE TEST

Activity	Legal Requirement	Guidance Reference	Evidence Provided
Stage 1: Inception			
1. Is the DPD identified in the adopted LDS and have you recorded the timetable for its production?	The Act Sections 15(2) and 19(1)	PPS12 Paras 4.50; 4.53-4.58	The Core Strategy has been identified in the LDS including each stage of its production and the timetable for its completion. Updates to the LDS timetable also include this DPD.
2. Have you considered how community engagement will be programmed into the preparation of the DPD?	The Act Section 19(3) Regulation 25	PPS12 Paras 4.19-4.29	The SCI sets out how the community will be involved throughout the production of the DPD.
3. Have you considered the appropriate bodies you should consult?	Regulation 25	PPS12 Paras 4.25-4.26 Plan Making Manual – Consultee list	A list of consultees has been established taking into account statutory bodies, organisations and community groups. This has been updated during the production of the DPD.
4. Is baseline information being collected and evidence being gathered to keep the matters which affect the development of the area under review?	The Act Section 13	PPS12 Paras 4.36-4.47	Evidence studies have been collected during the production period and updated where appropriate. They are available on the Council's website. The AMR will monitor the requirement for new evidence base.
5. Is baseline information being collected and evidence being gathered to set the framework for the sustainability appraisal?	The Act Section 19(5)	PPS12 Paras 4.50; 4.39-4.43 SEA Guide Chapter 5	Evidence studies were formulated during the period leading up to the Issues and Options although they were few at the time. This in turn informed the Sustainability Appraisal Scoping Report and then the Sustainability Appraisal objectives.
6. Have you consulted the statutory environmental 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 Regs 2004 No 1633	PPPS12 Para 4.40 SEA Guide Chapter 3	The statutory bodies were consulted in 2006. The consultation informed each stage of the Core Strategy.

Activity	Legal Requirement	Guidance Reference	Evidence Provided
Stage 2: Plan Preparation – Frontloading Phase			
1. Have you notified the specific consultation bodies that have an interest in the subject of the DPD and invited them to make representations about its contents?	Regulation 25(1) and (2)(a)	PPS12 Paras 4.24-4.29	The Council has informed statutory bodies of the Issues and Options consultation which ran for a six week period. Emails and letters were sent to inform them of the consultation.
2. Have you notified the general consultation bodies that you consider have an interest in the subject of the DPD and invited them to make representations about its contents?	Regulation 25(1) and (2)(b)	PPS12 Paras 4.24-4.29	General consultation bodies were also informed of the consultation. This was either directly through email or letter or indirectly by advertisements.
3. Are you inviting representations from people resident or carrying out business in your area about the content of the development plan document?	Regulation 25(3)	PPS12 Paras 4.24-4.29	Those who submitted an email or home address were informed of the consultation. The Council also advertised the consultation and its content via several methods as detailed in the Reg 30 Statement of Consultation.
4. Are you engaging with stakeholders responsible for delivery of the strategy?	Regulation 25	PPS12 Paras 4.4; 4.27-4.29; 4.45	Meetings have been held over the course of the Core Strategy period with stakeholders responsible for delivery including Herts County Council, Highways Agency, developers, etc
5. Are you taking into account representations made?	Regulation 25(5)	PPS12 Paras 4.19-4.29; 4.37	The Council has taken into account comments made during the Sustainable Community Strategy consultation and the Issues and Options consultation. All comments are available for inspection.
6. Does the consultation contribute to the development and sustainability appraisal of alternatives?	The Act Section 19(5) Regulations 12 and 13 of the Environmental Assessment of Plans and Programmes Regs 2004 No 1633.	PPS12 Paras 4.39-4.43 SEA Guide Chapter 3	The Sustainability Appraisal (2008) looks at alternatives and was informed by the evidence base and the Issues and Options consultation document.

<p>7. Is the participation:</p> <ul style="list-style-type: none"> • Following the principles set out in the statement of community involvement • Integrating involvement with the sustainable community strategy • Proportionate to the scale of issues involved in the development plan document? 	<p>The Act Section 19(3) Regulation 25</p>	<p>PPS12 Paras 4.19-4.26; 4.42</p>	<p>The consultation follows the stages set out in the SCI including consulting with hard-to-reach groups. The Reg 30 Statement of Consultation details how they were consulted. The LSP was also informed of the consultation and their feedback helped inform the Issues and Options. The findings of the Sustainable Community Strategy consultation informed the issues in the Issues and Options consultation. The Core Strategy highlights several spatial issues and therefore the level of participation was suitable. The level of interest was diverse and the consultation reflected this.</p>
<p>8. Are you keeping a record of:</p> <ul style="list-style-type: none"> • The individuals or bodies invited to make representations • How this was done • The main issues raised 	<p>Regulation 24</p>	<p>PPS12 Paras 4.24-4.29</p>	<p>A table was created detailing all those that responded to the Issues and Options, their comments and the Council's response. The Reg 30 Statement of Consultation sets out how the individual bodies and other organisations / consultees were consulted.</p>
<p>9. Are you developing a framework for monitoring the effects of the DPD?</p>	<p>The Act Section 35 Regulation 48 Reg 17 of The Environmental Assessment of Plans and Programmes Regs 2004 No 1363</p>	<p>PPS12 Paras 4.39-4.43 and 4.47 SEA Guide Chapter 5 Office of the Deputy Prime Minister monitoring guide</p>	<p>The Core Strategy Issues and Options did not include a monitoring table. This was included in the Pre-Submission document. The AMR's incorporated details on the monitoring of existing policies and other such issues.</p>
<p>10. Have you arranged to send copies of documents used in consultation to the Government Office and Planning Inspectorate?</p>	<p>Not statutory, but will assist in identifying issues leading towards a sound DPD</p>	<p>Plan Making Manual – New Regulation 25</p>	<p>The Government Office and Planning Inspector were updated as to the Issues and Options consultation. All other related documents were made available on the website.</p>

Activity	Legal Requirement	Guidance Reference	Evidence Provided
Stage 3: Plan Preparation – Formulation Phase			
1. Are you preparing reasonable alternatives for evaluation during the preparation of the DPD?	Regulation 12 of the Environmental Assessment of Plans and Programmes Regs 2004 No 1633	PPS12 Para 4.38 SEA Guide Chapter 5	The Preferred Options summarises the comments made during the Issues and Options consultation and how they have informed the Preferred Option. The Sustainability Appraisal (2008) also details reasonable alternatives. The evidence studies also informed the alternatives ensuring they are reasonable.
2. Have you assessed alternatives against: <ul style="list-style-type: none"> • Consistency with national policy • General conformity with the regional spatial strategy? 	The Act Sections 19(2) and 24	PPS12 Paras 4.30-33	The alternatives took into account and did not repeat national policy. They were generally in conformity with the RSS and where they did not conform were justified by local need and supporting evidence.
3. Are you having regard to: <ul style="list-style-type: none"> • Adjoining regional spatial strategies, the spatial development strategy for London, or Welsh Spatial Plan (as appropriate) • The National Planning Framework for Scotland? 	The Act Section 19(2) Regulation 15(1)(g)		It was only necessary to ensure that each stage of the Core Strategy was in general conformity with the East of England Plan. However consultations on the London Plan were also monitored.
4. Are you having regard to: <ul style="list-style-type: none"> • The sustainable community strategy of the authority or other authorities whose area comprises part of the area of the council • Any other LDDs adopted by the council? 	The Act Section 19(2)	PPS12 Paras 1.6; 4.22-4.23; 4.34-4.35	Preferred Options identifies priorities in the Sustainable Community Strategy for Broxbourne which then inform the options and the important community issues. It also takes account of the Hertfordshire Sustainable Community Strategy. No other LDDs have been produced to inform the Preferred Options document.
5. Do you have regard to other matters and strategies relating to: <ul style="list-style-type: none"> • Resources • The regional economic strategy • The local transport plan and transport facilities and services • Waste strategies • Hazardous substances and accidents? 	The Act Section 19(2) Regulation 15		The Core Strategy has been informed by various strategies and plans published locally, nationally, regionally and on a county scale. Their findings have been incorporated, where appropriate, into the final submission document.

6. Are you having regard to the need to include policies on mitigating and adapting to climate change?		Annex PPS1 on Climate Change	The Preferred Options document includes policies which aim to reduce the impact of climate change including sustainability policies, renewable energy and ways of reducing car usage.
7. Have you undertaken the necessary sustainability appraisal of alternatives including consultation on the sustainability appraisal report?	1. The Act Section 19(5) 2. Regulation 12 and 13 of the Environmental Assessment of Plans and Programmes Regs 2004 No 1633	PPS12 Paras 4.38-4.43 SEA Guide Chapter 5	The Sustainability Appraisal (2008) investigated and appraised alternatives. The Sustainability Appraisal was published for consultation in line with the Preferred Options document and the relevant statutory bodies were consulted i.e. Natural England, Environment Agency, etc.
8. Are you setting out clear reason for any preferences between alternatives?	Regulation 13(1)	PPS12 Paras 4.36 and 4.38	The Preferred Options document sets out what the previous consultation has told us about the policy and it then sets out what the policy must achieve. These combined have resulted in the preferred option and policy.
9. Have you taken into account any representations made on the content of the DPD and the sustainability appraisal? 10. Are you keeping a record?	Regulation 24, 25(5) and 30(1)(d)(iv) Regulation 13(4) of the Environmental Assessment of Plans and Programmes Regs 2004 No 1633	PPS12 Paras 4.19-4.29	All stages of the Core Strategy preparation have been informed by the representations received and the findings of the Sustainability Appraisal. The Council has kept a log of all representations made to the Preferred Options documents and the Council's response to those comments. The Reg 30 Statement of Consultation summarises how representations have been incorporated into the Pre-Submission document.
11. Where sites are to be identified or areas for the application of policy in the DPD, are you preparing sufficient illustrative material to: <ul style="list-style-type: none"> • Enable you to amend the currently adopted proposals map • Inform the community about the location of proposals 	Regulations 9 and 14	PPS12 Paras 4.6-4.7; 8.1-8.3	The Core Strategy includes a map identifying the boundaries of the Greater Brookfield strategic allocation and a Key Diagram identifying Areas of Search for future development. The Proposals Map and any specific site proposals will be detailed as part of a Site Allocation DPD.
12. Are the participation arrangements compliant with the SCI?	The Act Section 19(3) Regulation 25	PPS12 Paras 4.19-4.29	The consultation does conform to the SCI. The Reg 30 Statement of Consultation highlights the methods used and the consultation's conformity to the SCI.
13. Have you remained in close contact with the Government Office and discussed any emerging issues that might affect the soundness of the DPD?		Plan Making Manual – New Regulation 25	Meetings and discussions were held with the Government Office and they received the consultation document and the Sustainability Appraisal. Issues were discussed at the meetings.

Activity	Legal Requirement	Guidance Reference	Evidence Provided
Stage 4: Publication			
1. Have you prepared your sustainability appraisal?	The Act Section 19(5) Regulation 12 of the Environmental Assessment of Plans and Programmes Regs 2004 No 1633	PPS12 Paras 4.38-4.43 SEA Guide Chapter 5	Yes the Sustainability Appraisal was published alongside the Pre-Submission Core Strategy. It also included a scoping report of all new evidence studies.
2. Have you made clear where and within what period representations must be made?	Regulation 28(2) and (3)		The Statement of Representations Procedure sets out the timescales to which comments can be made and where the document is available from.
3. Have you made copies of the following available for inspection: <ul style="list-style-type: none"> • The proposed submission documents? • The statement of the reps procedure? 	Regulation 27(a)		The Pre-Submission Core Strategy was available for inspection at deposit points including One Stop Shops, libraries and the Council offices. The Sustainability Appraisal, Reg 28 Statement of Consultation and Statement of Representations Procedure were all available at the same points.
4. Have you published on your website the following: <ul style="list-style-type: none"> • The proposed submission documents? • The statement of the reps procedure? • Statement and details of where and when documents can be inspected? 	Regulation 27(b)		Yes, all proposed submission documents were available and inspection points clearly set out on the Council's website. The document itself plus the Sustainability Appraisal were also available on the Council's online consultation portal.
5. Have you sent to each of the specific consultation bodies invited to make representations under Regulation 25(1): <ul style="list-style-type: none"> • A copy of each of the proposed submission documents • The statement of reps procedure? 	Regulation 27(c)		Statutory bodies such as the Environment Agency, Highways Agency and Herts County Council were all sent a copy of the proposed submission documents, including the Sustainability Appraisal and accompanying Statements.
6. Have you sent to each of the general consultation bodies invited to make reps under Regulation 25(1): <ul style="list-style-type: none"> • The statement of the reps procedure? • Where and when the documents can be inspected? 	Regulation 27(d)		All those that submitted a representation who provided an email address or home address were sent an email/letter notifying them of the consultation, the period and where the statement of reps, statement of consultation and other proposed submission documents are available for inspection.

<p>7. Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> • The statement of reps procedure • Where and when the documents can be inspected? 	<p>Regulation 27(e)</p>		<p>An advertisement was placed in the local newspaper and via posters stating that the consultation was open and where all documents are available for inspection from.</p>
<p>8. Have you requested the opinion of the regional planning body on the general conformity of the development plan document with the regional spatial strategy?</p>	<p>The Act Section 24 Regulation 29</p>	<p>PPS12 Para 4.21</p>	<p>EERA was abolished as was the RSS during the preparation of the proposed submission document. They were therefore unavailable to comment on a regional basis. However EEDA supported the Core Strategy proposals for economic growth.</p>

Activity	Legal Requirement	Guidance Reference	Evidence Provided
Stage 5: Submission			
<p>1. Are you ready to submit the DPD?</p> <p>2. Are there any major issues revealed by the representations on publication?</p> <p>3. Are all the relevant documents in place?</p>	<p>The Act Sections 20(2)(b) and 20(1)</p> <p>Regulation 30(1)</p>		<p>The Council is ready to submit its DPD to the Secretary of State for testing. Appropriate changes have been made to the document to reflect the representations. It is not considered that further consultation is required due to the comments made. All the relevant documents are in place for publication and inspection including those for the appointed Inspector.</p>
<p>4. Has the development plan document been prepared in accordance with the local development scheme?</p> <p>5. Does the development plan document's listing and description in the local development scheme match the document?</p> <p>6. Have the timescales set out in the local development scheme been met?</p>	<p>The Act Section 19(1)</p>	<p>PPS12 Paras 4.50; 4.53-4.55</p>	<p>The Core Strategy has not met the timescales of the current LDS but it was felt unnecessary to keep updating the LDS to reflect new timescales. The description of the DPD matches that identified in the LDS. The timescales have not been met however it is felt that the Core Strategy will be in place before the policies in the Local Plan expire.</p>
<p>7. Has the DPD had regard to any Sustainable Community Strategy for its area (like a county or district)?</p>	<p>The Act Section 19(2)</p>	<p>PPS12 Paras 4.34-4.35; 4.50</p>	<p>The Core Strategy objectives have been based upon the themes identified in the up-to-date Sustainable Community Strategy 2010.</p>
<p>8. Is the DPD in compliance with the statement of community involvement?</p> <p>9. Has the council carried out consultation as described in the statement of community involvement?</p>	<p>The Act s19(3)</p> <p>Regulation 32(1)(c)</p>	<p>PPS12 Para 4.50 and box after Para 4.26</p>	<p>The DPD complies and conforms to the Council' Statement of Community Involvement. The Reg 30 Statement of Consultation sets out how the SCI was met during the consultation processes.</p>
<p>10. Has the DPD been subject to sustainability appraisal?</p> <p>11. Has the council provided a final report of the findings of the appraisal?</p>	<p>The Act Section 19(5)</p> <p>Regulation 32(1)(a)</p>	<p>PPS12 Paras 4.39-4.43;4.50</p> <p>SEA Practical Guide, chapter 5</p>	<p>The Core Strategy has been subject to a Sustainability Appraisal before its release for consultation. The Sustainability Appraisal was publicised for consultation alongside the Core Strategy and will be available for inspection at the submission stage.</p>
<p>12. Is the development plan document to be submitted consistent with national policy?</p>	<p>The Act Section 20(2) and Schedule 8</p>	<p>PPS12 Paras 4.30-33; 4.50</p>	<p>The Council considers that the Core Strategy is in conformity with the most recent national policy without repetition of the policies themselves.</p>

<p>13. Does the DPD contain any policies or proposals that are not in general conformity with the regional spatial strategy?</p> <p>14. If yes, is there local justification?</p> <p>15. Has the Council got confirmation from the regional planning body about the general conformity of the plan with the regional spatial strategy?</p>	<p>The Act Sections 24 (1)(a), 24(2) and 24(4)</p> <p>Regulation 29</p>	<p>PPS12 Paras 4.30-33;4.50</p>	<p>The Regional Spatial Strategy was abolished shortly before the publication of the Pre-Submission Core Strategy. The Council has agreed to alter the current regional housing figures for the borough; however the Council can provide evidence to justify this change. Any other differences have also been justified by local evidence and the supporting evidence base.</p>
<p>16. Does the DPD comply with the 2004 regulations?</p> <p>17. Specifically has the council published the prescribed documents and made them available at their principle offices and their website?</p> <p>18. Has the council placed local advertisements?</p> <p>19. Has the council notified the DPD bodies?</p> <p>20. Does the DPD contain a list of superseded saved policies?</p>	<p>The Act Sections 20(2), 20(3), and 20(5)(b)</p> <p>Regulations 13(1), 13(2), 13(5) and 30(1)</p>	<p>PPS12 Paras 4.36; 4.50</p>	<p>Yes. The Core Strategy has complied with both the 2004 and 2008 Regulations. All documents have been made publically available on the website and at the Council offices. This includes all statements, the submission document and all evidence and supporting documents.</p> <p>The Council has informed the relevant bodies either via email, letter or by advertisement where they are general consultees.</p> <p>The Submission Core Strategy includes a list of deleted Local Plan policies at the back.</p>
<p>21. Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted proposals map?</p> <p>22. If yes have you prepared a submission proposals map?</p>	<p>Regulations 13(4) 14 and 30(1)(b)</p>	<p>PPS12 Paras 4.6-4.7; 8.1-8.3</p>	<p>The Council has included a Key Diagram in its Core Strategy.</p> <p>The Greater Brookfield strategic allocation is based on an Ordnance Survey map.</p>
<p>23. If the DPD is not a Core Strategy, is it in conformity with the CS?</p>	<p>Regulation 13(6)</p>		<p>DPD is a Core Strategy, so not applicable.</p>
<p>24. Have you prepared a statement setting out: which bodies and persons were invited to make representations under Regulation 25, how were they invited, a summary of the main issues raised and how the representations have been taken into account?</p>	<p>The Act Section 20(3)</p> <p>Regulation 30(1)(d)</p>		<p>The Reg 30 Statement of Consultation has been updated to take into account representations made at Pre-Submission stage, how they were consulted, their comments and how they have informed the Submission Core Strategy.</p>

25. Have you prepared a statement giving: the number of representations made under Regulation 28(2), a summary of the main issues raised or that no representations were made?	The Act Section 20(3) Regulation 30(2)(e)		This detail is included in the Reg 30 Statement of Consultation.
26. Have you collected together all the representations made under Regulation 28?	The Act Section 20(3) Regulation 30(1)(f)		A table setting out all representations made under Regulation 28 has been made available.
27. Have you assembled the relevant supporting documents?	The Act Section 20(3) Regulations 30(1) and 30(2)(a)		Yes. These are available on the Council's website, at the Council offices and will be submitted to the Inspector.
28. Has your council approved the DPD for submission?	The Act Section 20		The Core Strategy has been approved by Members for submission at Planning and Licensing Committee on 7 December 2010
29. Have you sent the Secretary of State a paper copy of: the DPD, the submission proposals map (unless no site specific) and the documents prescribed in Regulation 30(1)?	The Act Sections 20(1) and 20(3) Regulations 30(1) and 30(2)(a)		Yes, copies of all supporting documents and those stated here have been submitted. A submission proposals map exists within the Core Strategy in relation to Greater Brookfield strategic allocation. A Key Diagram has been included in the Submission Core Strategy.
30. Have you sent the Secretary of State an electronic copy of: the DPD, the submission proposals map (unless no site specific) and the documents prescribed in Regulation 30(1)?	The Act Section 20(1) and 20(3) Regulations 30(1) and 30(2)(b)		Yes, as above electronic copies have also been sent to the Secretary of State.
31. Have you made the following available at the same places where the proposed submission documents were to be seen: the DPD and the documents prescribed in Regulation 30(1)?	Regulation 30(3)(a)		Main deposit points will include a copy of all documents including those supporting the submission Core Strategy. This includes the Council's website and the Council offices. These will also be available from the Programme Officer when practicable to do so.

<p>32. On your website have you published the: DPD, proposals map, Sustainability Appraisal report, Regulation 30(1)(d) Statement, Regulation 30(1)(e) Statement, supporting documents (where practicable), representations made under Regulation 28 (where practicable), a statement as to where and when the development plan document and the documents are available?</p>	<p>Regulation 30(3)(b)</p>		<p>Yes, these have all been placed on the Council's website.</p>
<p>33. For each specific consultation body invited to make representations under Regulation 25(1), have you sent: DPD, proposals map, Sustainability Appraisal report, Regulation 30(1)(d) Statement, Regulation 30(1)(e) Statement, supporting documents (where practicable), representations made under Regulation 28 (where practicable), a statement as to where and when the development plan document and the documents are available?</p>	<p>Regulation 30(3)(c)</p>		<p>Notification of where to inspect copies of supporting documents was sent to specific consultation bodies.</p>
<p>34. For each general consultation body invited to make representations under Regulation 25(1), have you sent: notification that the documents prescribed in Regulation 30(1) are available for inspection and where and when they can be inspected?</p>	<p>Regulation 30(3)(d)</p>		<p>Notification of where to inspect copies of all documents was sent either by letter or electronically to those who made representations and any other body who wished to be notified.</p>
<p>35. Have you given notice by local advertisement setting out: the title of the DPD, the subject and area covered by the development plan document, notification that the documents prescribed in Regulation 30(1) are available for inspection and where and when they can be inspected?</p>	<p>Regulation 30(3)(e)</p>		<p>Yes. Notification of submission was advertised by local newspaper.</p>
<p>36. Have you given notice to persons who have requested to be notified that submission has taken place?</p>	<p>Regulation 30(3)(f)</p>		<p>Yes, please see No 34.</p>

<p>37. If an examination is being held at least six weeks before its opening has the Programme Officer: published the time and place of the examination and the name of the person appointed to carry out the examination on your website, notified those who have made representations on the published development plan document which have not been withdrawn of these details and advertised those details?</p>	<p>The Act Section 20 Regulation 34</p>		<p>To be arranged when examination date confirmed.</p>
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