



Local Plan Process Requirements Checklist
PAS Toolkit part 3

TOOLKIT PART 3: LOCAL PLAN PROCESS REQUIREMENTS CHECKLIST

Why you should use this part of the toolkit

The aim of this part of the toolkit is to assist you in ensuring that the relevant process requirements of specific legislation and policy have been met to enable you to proceed towards adoption of a local plan policies update.

The part of the Toolkit deals only with the process requirements for plan preparation set out in legislation and the NPPF associated with reviewing policies and updating local plan policies. Toolkit Part 1 provides more detail on carrying out a local plan policy review assessment. Toolkit Part 2 highlights the content that should be included in the local plan policies update as prescribed in the NPPF. Soundness and quality issues are dealt with in Toolkit Part 4.

How to use this part of the toolkit

The table below sets out key plan making process questions that you must consider when undertaking the stages of reviewing policies and updating your local plan policies. The rows marked:

- 'L' set out legal requirements included in legislation relevant for that stage of plan making; and
- 'PM' highlight project management reminders arising from these requirements.

For each requirement the table also highlights, where relevant, the supporting documents in which this information is typically recorded.

For each of the requirements listed indicate whether you have met the requirement with a *Yes* or *No*. You should ensure you can answer each question relevant to that plan stage with a 'Yes' before moving to the next stage of updating your plan. You can use the 'comments' section in the table to confirm the title and date of relevant documents and include hyperlinks to where they are published on your website (or file paths for documents not yet published).

The following abbreviations in the table are used:

P&CA - [Planning and Compulsory Purchase Act 2004 \(as amended\)](#)

T&CP - [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#)

The table does not make any reference to specific national planning policy guidance, case law or Ministerial Statements on the basis that this is not static and the degree to which it is relevant will vary depending upon particular circumstances. There is case law relevant to most plan making authorities; for example at the time of publication, when undertaking a screening assessment for a Habitats Regulation Assessment, of particular relevance is the '[People Over Wind judgement](#)' (Court of Justice of the European Union, 12 April 2018), the '[Dutch Nitrogen](#)' case (Court of Justice of the European Union, 7 November 2018) and other recent relevant Court of Justice judgements. Therefore, when developing your local plan update, you need to work with your legal team to ensure that you are familiar with relevant case law and Ministerial Statements and take account of these as and when appropriate.

You should also be aware that any reference to specific legislation includes any amendments to those instruments that are in force at the time of publication. Legislation relevant to England, including amendment regulations, can be accessed online at www.legislation.gov.uk. It is important that you check for any future amendments that may be brought into force following publication of this toolkit.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to ensure that requirements are met. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find it (or some elements) helpful to include with your supporting documents or to help you answer any questions from the Planning Inspector related to plan process.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		Stage A: Navigating the process of reviewing Local Plan policies				
1.	L	Have you consistently kept under review the matters which are likely to affect the development of your area and the planning of its development?	P&CPA Section 13 T&CP Regulation 34	Yes	<ul style="list-style-type: none"> • Authority Monitoring Report • Baseline technical data 	Annual Monitoring Report 2009-2019 <ul style="list-style-type: none"> • Online: AMR • Submission document 2018-19 ref: Core_Gen_013 Revisions to the Brent Local Plan from 2017 to date <ul style="list-style-type: none"> • Online: draft Brent Local Plans • Submission document ref: Core_08 and Core_09
2.	L	Have you prepared to undertake a review of your local plan policies and complete the review within 5 years of the date of adoption of the current local plan?	T&CP Regulation 10A NPPF para 33	Yes	<ul style="list-style-type: none"> • Local Development Scheme 	Local Development Scheme (October 2019) <ul style="list-style-type: none"> • Online: LDS 2019 • Submission document for 2019 ref: Core_02

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		(also see guidance within Part 1 of the Route Mapper and the 'Local Plan Review Assessment' within Part 1 of the Toolkit)				Note: The planning team prepared LDS in 2015 and LDS 2017.
3.	L	Have you prepared to review your Statement of Community Involvement and complete the review within 5 years of the date of adoption of the current Statement of Community Involvement?	P&CPA Section 18 and 19(3) T&CP Regulation 10A	Yes	<ul style="list-style-type: none"> ● Local Development Scheme ● Statement of Community Involvement 	<p>Local Development Scheme (October 2019)</p> <ul style="list-style-type: none"> ● Online: LDS 2019 ● Submission document for 2019 ref: Core_02 <p>Statement of Community Involvement adopted in 2017. It is planned to review it once the Local Plan has been adopted.</p> <ul style="list-style-type: none"> ● Online: Online: <ul style="list-style-type: none"> ▪ SoCI consultation draft March 2017 ▪ SoCI adoption July 2017 ● Submission document for 2020 ref: Core_Gen_05

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
4.	PM	Have you checked your scheme of delegation and engaged with the relevant person(s) who will make decisions on the outcome of any review(s) of the Local Plan policies and the Statement of Community Involvement?	The Council's scheme of delegation	Yes	<ul style="list-style-type: none"> The Council's scheme of delegation 	Yes, the need to review the Local Plan was subject to a Cabinet decision on 13 th February 2017 "Updating Brent Council's Planning Strategy (The Local Plan)" that set out the process of updating the Council's statutory planning policies. Cabinet delegated authority to the Strategic Director Regeneration and Environment in association with the Portfolio Holder Regeneration, Growth, Employment and Skills to approve Development Plan consultation material to be issued prior to pre-Publication (Regulation 19 of the The Town and Country Planning (Local Planning) (England) Regulations 2012) stage. Cabinet on the 14 th October 2019 considered the

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>Regulation 19 Local Plan and issued it for consultation. Full Council on 19th February 2020 considered representations received and resolved to submit the draft Local Plan for examination. Decision making in the Council.</p> <p>Constitution:</p> <ul style="list-style-type: none"> • Online: <u>Council Constitution</u> <p>General Powers delegated to Officers</p> <ul style="list-style-type: none"> • Online: <u>Part 3: Responsibility for functions</u>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
5.	L	<p>Have you prepared a report for the relevant person(s) deciding on the review of the local plan policies that takes into account the matters that are likely to affect the development of your area and the planning of its development to enable them to make a decision on whether:</p> <ol style="list-style-type: none"> 1. the policies do not need updating (publishing the reasons for this decision); and / or 2. that one or more strategic policies do need updating (moving to Stage B to update your Local Development Scheme to set out the timetable for this revision)? 	<p>T&CP Regulation 10A</p> <p>NPPF para 33</p>	Yes	<ul style="list-style-type: none"> ● Published report and decision ● 5 year plan review assessment (See Part 1 of this toolkit) ● Baseline technical data 	<p>Regulation 18 Cabinet Member Report and Regulation 19 Cabinet Member Report</p> <ul style="list-style-type: none"> ● Online: Public Reports Pack (February 2017), Public Reports Pack (October 2019) <p>Full Council Report Pack (February 2020)</p> <ul style="list-style-type: none"> ● Online: Agenda Reports Pack

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		Stage B: Scoping and preparing for your policies update				
6.	L	Where an update of the Statement of Community Involvement is required have you prepared, consulted and adopted a revised Statement in accordance with the procedures set out in Part 2 of the P&CPA? Have you ensured that the Statement is up to date and reflects who the relevant consultation bodies are - for all stages of the plan making process - and what actions will be undertaken to involve the community in any updates to the local plan policies?	P&CPA Part 2 T&CP Regulation 18 NPPF Para 16	Yes	<ul style="list-style-type: none"> Statement of Community Involvement 	<p>Statement of Community Involvement adopted in 2017.</p> <ul style="list-style-type: none"> Online: <ul style="list-style-type: none"> SoCI consultation draft March 2017 SoCI adoption July 2017 Submission document for 2020 ref: Core_Gen_05
7.	PM	Have you prepared a report for the relevant person(s) who will make a decision on the outcome of the review of the Statement of Community Involvement including where relevant details and justification of proposed changes?	P&CPA Section 18 T&CP Regulation 10A	Yes	<ul style="list-style-type: none"> Published report and decision Statement of Community Involvement 	<p>Statement of Community Involvement adopted in 2017.</p> <ul style="list-style-type: none"> Online: <ul style="list-style-type: none"> SoCI consultation draft March 2017 SoCI adoption July 2017

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		This should also consider the any practicalities of making documents available for inspection at the submission stage.				<ul style="list-style-type: none"> Submission document for 2020 ref: Core_Gen_05
8.	PM	Have you identified the proposed scope of the update of the local plan by setting out the principal policy areas that will be considered?		Yes	<ul style="list-style-type: none"> Published report and decision on review of local plan policies Baseline technical data 	<p>Brent Local Plan Preferred Options Consultation Statement October 2019</p> <ul style="list-style-type: none"> Online: Consultation statement Oct 2019 Appendix 5 of submission document ref: CONS_010 <p>See Consultation Summary 2020</p> <ul style="list-style-type: none"> Submission document ref: CORE_010
9.	PM	Have you drafted a project plan to manage and timetable the development and update of the local plan policies?		Yes	<ul style="list-style-type: none"> Local Development Scheme 	<p>Local Development Scheme (October 2019)</p> <ul style="list-style-type: none"> Online: LDS 2019 Submission document for 2019 ref: Core_02

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
					<ul style="list-style-type: none"> Authority Monitoring Report 	<p>Annual Monitoring Report 2009-2019</p> <ul style="list-style-type: none"> Online: AMR Submission document for 2018-19 ref: Core_Gen_013
10.	L	Have you prepared a new Local Development Scheme which identifies the local plan policies update document(s) and the Sustainability Appraisal and timescales for their production?	P&CPA Section 15(2) and Section 19(1)	Yes	<ul style="list-style-type: none"> Local Development Scheme Authority Monitoring Report 	<p>Updated Local Development Scheme (October 2019)</p> <ul style="list-style-type: none"> Online: LDS 2019 Submission document for 2019 ref: Core_02 <p>Annual Monitoring Report 2018- 2019</p> <ul style="list-style-type: none"> Online: AMR 2018-2019 Submission document for 2018-19 ref: Core_Gen_013 <p>Integrated Impact Assessment (IIA) also contains 'Sustainability context'</p> <ul style="list-style-type: none"> Online: IIA Scoping Report (Issues and Options stage)

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
11.	L	Does your Statement of Community Involvement and project plan identify the legally prescribed bodies you will engage with under the duty to cooperate? This should also include each Local Enterprise Partnership and each Local Nature Partnership in the area.	P&CPA Section 20 and Section 33A T&CP Regulation 4	Yes	<ul style="list-style-type: none"> Statement of Community Involvement Duty to Cooperate Statement(s) of Common Ground 	<p>Statement of Community Involvement (SoCI):</p> <ul style="list-style-type: none"> Online: SoCI adoption July 2017 Submission document ref: Core_Gen_05 <p>Duty to Cooperate (General letter)</p> <ul style="list-style-type: none"> Online: Duty to Cooperate Statement online Submission document ref: Core_Gen_06
12.	L	Have you identified the “strategic matters” that will be included in the updated local plan policies and which have / would have a significant impact on your area and at least one other planning area and on which you are required to engage constructively, actively and on an ongoing basis?	P&CPA Section 20 and Section 33A	Yes	<ul style="list-style-type: none"> Published report and decision on review of local plan policies 5 year plan review assessment (See Part 1 of this toolkit) 	<p>Statements of Common Ground with GLA and London Boroughs (unsigned version)</p> <ul style="list-style-type: none"> Online: SoCG GLA and London Boroughs <p>Note: Also see GLA Reg 19 representation</p> <ul style="list-style-type: none"> Submission documents ref: EB_SOCG_01

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
					<ul style="list-style-type: none"> Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	Duty to Cooperate (General letter) <ul style="list-style-type: none"> Online: Duty to Cooperate Statement online Submission document ref: Core_Gen_06
13.	L	In addition to the legally prescribed bodies does your Statement of Community Involvement and project plan identify any additional bodies / person(s) who you will engage with on strategic cross-boundary matters and who will be party to your Statement(s) of common ground?	NPPF para 27 and para 35	Yes	<ul style="list-style-type: none"> Statement of Community Involvement Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	In addition to the bodies listed in response to question 12 above, Statements of Common Ground have been prepared with: <ul style="list-style-type: none"> Online: <ol style="list-style-type: none"> Transport For London: (Online: SoCG TfL, Submission documents ref: EB_SOCCG_02) Canal and River Trust: (Online: SoCG CRT, Submission documents ref: EB_SOCCG_03)

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>c) Environment Agency: (Online: SoCG EA, Submission documents ref: EB_SO CG_04)</p> <p>d) Thames and Affinity Water: (Online: SoCG Thames and Affinity Water, Submission documents ref: EB_SO CG_05)</p> <p>Kindly note these are unsigned versions and the council is in dialogue with all bodies listed above.</p>
14.	PM	Have you designed a template to record the progress made with the above bodies / person(s). This should document where effective co-operation is and is not happening throughout the plan making process, and the outcomes from engagement. This will also be required as evidence to demonstrate that you have met the Duty to Cooperate.	<p>P&CPA Section 20 and Section 33A</p> <p>NPPF para 27 and para 35</p>	No	<ul style="list-style-type: none"> ● Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements ● Template documents 	This requirement came in February 2019 post the Regulation 18 consultation stages of the draft Local Plan. Draft Statements of Common Ground were placed on the Council's website as part of the Regulation 19 consultation to provide

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						transparency on duty to co-operate matters, together with a summary of representations received at Regulation 18 stage which for example set out the position of duty to co-operate bodies on strategic matters.
15.	PM	In line with your Local Development Scheme and project plan have you timetabled relevant meetings / briefings with the authorities senior management team and elected Members (including any relevant Cabinet / Committee) to ensure that there is support for the development of the local plan policies update and that any necessary permissions for publication are obtained?		Yes	<ul style="list-style-type: none"> Any relevant local authority reports and decisions 	<ul style="list-style-type: none"> Public meetings: Resources and Public Realm Scrutiny Committee (Scrutiny work programmes online), The Cabinet, Full Council Meetings Internal meetings: Local Plan Group Meetings with CMT and Lead Member for Regeneration, Property & Planning), Member meetings, Cabinet Member Meetings

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
16.	L	Have you prepared a Scoping Report for the development of your Sustainability Appraisal to inform the update of your plan policies? Have you included a proposed framework for testing local plan policies update options and alternatives using the baseline information and an identified set of sustainability objectives? Have you incorporated the requirements of the Strategic Environmental Assessment?	<p>P&CPA Section 19 and Section 39</p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)</p> <p>The European Directive 2001/42/EC</p> <p>NPPF Para 32</p>	Yes	<ul style="list-style-type: none"> ● Local Development Scheme ● Sustainability Appraisal Scoping document ● Sustainability Appraisal report 	<p>Integrated Impact Assessment (IIA): This report builds upon</p> <ul style="list-style-type: none"> a) Brent's IIA Scoping Report b) SEA objectives c) IIA framework d) The Sustainability Appraisal (SA) e) Strategic Environmental Appraisal (SEA) (Stage B of IIA) <ul style="list-style-type: none"> ● Online: IIA (Issues and Options stage, Feb 2018), IIA (Preferred Options Stage Nov 2018), IIA (Publication stage 2019) <p>Also see IIA 2020. Submission document ref: Core_Gen_02</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>The IIA Scoping Report contained a comprehensive review of policies, plans, programs and strategies. (Report summarized in Table 4 of IIA. More information about the plans, programmes and policies identified within Appendix 2).</p> <ul style="list-style-type: none"> • Online: IIA (Publication stage 2019) <p>Also see IIA 2020.</p> <ul style="list-style-type: none"> • Submission document ref: Core_Gen_02 <p>Environment Impact</p> <ul style="list-style-type: none"> • Online: EIA Screening and Scoping
17.	L	Have you consulted the statutory environment consultation bodies, and other interested parties, on the scope and level of detail of the environmental	The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)	Yes	<ul style="list-style-type: none"> • Statement of Community Involvement 	Consultation was carried out between 8 February to 22 March 2018 on the IIA Scoping Report which contained the baseline

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		information to be included in the Sustainability Appraisal report?			<ul style="list-style-type: none"> • Sustainability Appraisal report scoping document • Sustainability Appraisal report • Copies of the consultation letters sent to, and any responses from, the bodies 	<p>information used in assessing the draft Local Plan policies. Appendix II - 'Relevant Plans, Programmes and Policies Plan' of the IIA also refers to the consultation taken into account.</p> <ul style="list-style-type: none"> • Online: IIA (Issues and Options stage, Feb 2018), IIA (Publication stage 2019) <p>Also see IIA 2020.</p> <ul style="list-style-type: none"> • Submission document ref: Core_Gen_02
		Stage C: Developing the update to your local plan policies				
18.	L	Have you collected in a presentable format the relevant baseline information that will inform and evidence an update to your plan? This may include evidence commissioned by third parties.	P&CPA Section 13 and Section 20	Yes	<ul style="list-style-type: none"> • Baseline technical data • Commissioned reports and studies 	List of Local Evidence and Topic Papers at Local Evidence and Topics online

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
					<ul style="list-style-type: none"> Authority Monitoring Report 	
19.	L	<p>Have you undertaken early engagement with stakeholders to help develop spatial options, particularly on strategic cross-boundary matters?</p> <p>Have you ensured that you are keeping a continual log of engagement for your Duty to Cooperate Statement of Common Ground?</p>	<p>P&CPA Section 20 and Section 33A</p> <p>NPPF para 27 and para 35</p>	Yes	<ul style="list-style-type: none"> Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	<p>Consultation Statement October 2019</p> <ul style="list-style-type: none"> Online: February 2018 October 2019 November 2018 <p>See Consultation Summary 2020</p> <ul style="list-style-type: none"> Submission document ref: CORE_010 <p>Duty-to-cooperate Statement</p> <ul style="list-style-type: none"> Online: Duty to Cooperate Statement Submission document ref: Core_Gen_06

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>Series of Statements of Common Ground (unsigned version)</p> <ul style="list-style-type: none"> • Online: SoCG GLA and London Boroughs, SoCG TfL, SoCG CRT, SoCG EA, SoCG Thames and Affinity Water • Submission documents ref: EB_SO CG_01 to EB_SO CG_05
20.	L	Have you drafted policies / policy options and alternatives based on evidence and engagement? Do the options serve a clear purpose, have they been prepared positively and written in a clear manner and unambiguous?	NPPF para 15 to 34	Yes	<ul style="list-style-type: none"> • First draft plan • Sustainability Appraisal report • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	<p>Issues and Options Local Plan(Stage 1)</p> <ul style="list-style-type: none"> • Online: Issues and Options Local Plan (stage 1) • Submission document ref: Core _08 <p>Preferred Options Local Plan (stage 2)</p> <ul style="list-style-type: none"> • Online: Preferred Options Local Plan (stage 2)

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<ul style="list-style-type: none"> • Submission document ref: Core_09 <p>See Integrated Impact Assessment 2020</p> <ul style="list-style-type: none"> • Submission document ref: Core_Gen_02 <p>Also see IIA</p> <ul style="list-style-type: none"> • Online: IIA (Issues and Options stage, Feb 2018), IIA (Preferred Options Stage Nov 2018), IIA (Publication stage 2019) <p>Duty to Co-operate Statement</p> <ul style="list-style-type: none"> • Online: Duty to Cooperate Statement • Submission document ref: CORE_GEN_06 <p>Statements of Common Ground (unsigned version)</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<ul style="list-style-type: none"> • Online: SoCG GLA and London Boroughs, SoCG TfL, SoCG CRT, SoCG EA, SoCG Thames and Affinity Water • Submission documents ref: EB_SOCG_01 – EB_SOCG_05
21.	L	Have you taken account of the NPPF requirements for plan content and the Government's planning policy for traveller sites? At the time of publication this was included in the August 2015 DCLG Planning Policy for traveller sites. This policy must be taken into account in the preparation of development plans.	NPPF Planning policy for traveller sites, DCLG August 2015	Yes	<ul style="list-style-type: none"> • Evidence based documents • First draft plan • Consultation statement • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	Regulation 19 Publication Draft Brent Local Plan 2020-2041 <ul style="list-style-type: none"> • Online: Draft Brent Local Plan (Publication stage 3) • Submission document ref: Core_01 Housing Evidence-based <ul style="list-style-type: none"> • Online: WLA Gypsy and Traveller Accommodation Assessment • Submission document ref: EB_H_04

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>Consultation Statement October 2019</p> <ul style="list-style-type: none"> Online: <ul style="list-style-type: none"> February 2018 November 2018 October 2019 <p>See Consultation Summary 2020</p> <ul style="list-style-type: none"> Submission document ref: CORE_010
22.	L	<p>Have you considered plan production processes set out within the NPPF, including:</p> <ul style="list-style-type: none"> Plan making provisions set out in section 3 – para 15-37 Considering transport issues at the earliest stages of plan production – para 102 Aligning strategies and investments – para 104 Considering changes in the demand for land – para 120 	NPPF	Yes	<ul style="list-style-type: none"> Evidence based documents First draft plan Consultation statement Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	<p>Consultation Statement</p> <ul style="list-style-type: none"> Online: <ul style="list-style-type: none"> February 2018 November 2018 October 2019 <p>See Consultation Summary 2020</p> <ul style="list-style-type: none"> Submission document ref: CORE_010 <p>Integrated Impact Assessment</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		<ul style="list-style-type: none"> • Discussing the strategic location of housing growth and any proposed changes to Green Belt boundaries with neighbouring authorities – para 137 • Applying a sequential, risk-based approach to the location of development to avoid flood risk to people and property – para 157 • Allocating land with the least environmental value – para 171 				<ul style="list-style-type: none"> • Online: IIA (Issues and Options stage, Feb 2018), IIA (Preferred Options Stage Nov 2018), IIA (Publication stage 2019) <p>Duty to Co-operate Statement</p> <ul style="list-style-type: none"> • Online: Duty to Cooperate Statement • Submission document ref: CORE_GEN_06 <p>Statements of Common Ground (unsigned version)</p> <ul style="list-style-type: none"> • Online: SoCG GLA and London Boroughs, SoCG TfL, SoCG CRT, SoCG EA, SoCG Thames and Affinity Water • Submission documents ref: EB_SOCG_01 – EB_SOCG_05 <p>Housing</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<ul style="list-style-type: none"> • Online: Brent Strategic Housing Market Assessment • Submission documents ref: EB_H_01 Sustainable transport • Online: Brent Long Term Transport Strategy 2015 • Submission documents ref: EB_T_03 Economy • Online: Brent Workspace Study • Submission documents ref: EB_E_09 Employment • Online: Brent Employment Land Demand Study • Submission documents ref: EB_E_010

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>Sustainable Infrastructure</p> <ul style="list-style-type: none"> • Online: Strategic Flood Risk Assessment - Level 1, Strategic Flood Risk Assessment - Level 2 Mar 2020, Sequential and Exceptions Test Mar 2020 • Submission documents ref: EB_SI_01, EB_SI_02, EB_SI_03 <p>See ALL evidence based documents:</p> <ul style="list-style-type: none"> • Online: All Evidence Based Documents
23.	L	Have you developed a clear and robust framework that will allow you to consistently monitor the implementation and impact of the policies in the plan and to enable a review to be triggered where necessary?	<p>P&CPA Section 13 and Section 35</p> <p>T&CPA Regulation 34</p> <p>The Environmental Assessment of Plans and Programmes</p>	Yes	<ul style="list-style-type: none"> • Sustainability Appraisal • Authority Monitoring Report • Reports or documents setting out the appraisal and 	<p>Chapter 7: Delivery and Monitoring of the Local Plan</p> <ul style="list-style-type: none"> • Online: Chapter 7: Delivery and Monitoring • Submission document for 2018-19 ref: Core_01 <p>Infrastructure Delivery Plan</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
			<p>Regulations 2004 (as amended)</p> <p>NPPF Para 31, 33, 75, 120</p>		<p>monitoring framework</p>	<ul style="list-style-type: none"> • Online: Infrastructure Delivery Plan • Submission document for 2018-19 ref:EB_I_01 <p>Annual Monitoring Reports 2018- 2019</p> <ul style="list-style-type: none"> • Online: AMR 2018-2019 • Submission document for 2018-19 ref: Core_Gen_013 <p>Integrated Impact Assessment (2019)</p> <ul style="list-style-type: none"> • Online: IIA (Publication stage 2019) <p>IIA 2020</p> <ul style="list-style-type: none"> • Submission document ref: Core_Gen_02 <p>Local Development Scheme (October 2019)</p> <ul style="list-style-type: none"> • Online: LDS 2019 online

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<ul style="list-style-type: none"> Submission document for 2019 ref: Core_02
24.	L	Have you undertaken a Habitats Regulations Screening Assessment to determine whether the update to the local plan is likely to have a significant effect on a European site or a European offshore site (either alone or in combination with other plans or projects)?	<p>The Conservation of Habitats and Species Regulations 2017 (as amended)</p> <p>The European Directive 92/43/EEC</p>	Yes	<ul style="list-style-type: none"> Habitats Regulations Assessment screening report Habitats Regulations Assessment 	<p>Habitat Regulation Assessment in Appendix 3 – of Integrated Impact Assessment (2019).</p> <ul style="list-style-type: none"> Online: IIA (Publication stage 2019) <p>IIA 2020</p> <ul style="list-style-type: none"> Submission document ref: Core_Gen_02

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
25.	L	Have you consulted the relevant “nature conservation body” on your Habitats Regulations Screening Assessment and had regard to their representations? Have you also consulted, if considered appropriate, other relevant organisations?	The Conservation of Habitats and Species Regulations 2017 (as amended) The European Directive 92/43/EEC	Yes	<ul style="list-style-type: none"> • Habitats Regulations Assessment screening report • Habitats Regulations Assessment • Statement of Community Involvement • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	<p>See Habitats Regulations Assessment screening report 2015</p> <ul style="list-style-type: none"> • Online: HRA Screening <p>See Habitat Regulation Assessment Screening Opinion in Appendix 4 of IIA Feb 2018</p> <ul style="list-style-type: none"> • Online: HRA Screening Opinion <p>See Habitat Regulation Assessment in Appendix 3 of IIA Nov 2018</p> <ul style="list-style-type: none"> • Online: HRA <p>See Habitat Regulation Assessment in Appendix 3 – Integrated Impact Assessment 2019</p> <ul style="list-style-type: none"> • Online: IIA (Publication stage 2019) <p>IIA 2020</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>Submission document ref: Core_Gen_02</p> <p>Statements of Common Ground (unsigned version)</p> <ul style="list-style-type: none"> • Online: SoCG Canal and River Trust, SoCG Environment Agency, SoCG Thames and Affinity Water • Submission documents ref: EB_SOCG_03 – EB_SOCG_05

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
26.	L	<p>Did the Habitats Regulations Assessment screening assessment determine that the plan is likely to have a significant effect on a European site or a European offshore site?</p> <p>If so you <u>must</u> undertake an appropriate assessment of the implications of the plan (as part of your Habitats Regulatory Assessment (HRA)) for the Plan's policies and site(s) within the context of the European site's conservation objectives.</p>	<p>The Conservation of Habitats and Species Regulations 2017 (as amended)</p> <p>The European Directive 92/43/EEC</p>	No	<ul style="list-style-type: none"> Habitats Regulations Assessment screening report Habitats Regulations Assessment Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	<p>Habitat Regulation Assessment in Appendix 3 – of Integrated Impact Assessment (2019).</p> <p>It includes the HRA Screening of Local Plan Policies:</p> <ul style="list-style-type: none"> Online: IIA (Publication stage 2019) <p>IJA 2020</p> <ul style="list-style-type: none"> Submission document ref: Core_Gen_02
27.		Have you carried out an Equalities Impact Assessment?	Equality Act 2010	Yes	<ul style="list-style-type: none"> Equalities Impact Assessment 	<p>Equalities Impact Assessment</p> <ul style="list-style-type: none"> Online: EqIA (October 2019) Submission documents ref: Core_Gen_04

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
28.		Have you considered combining the Sustainability Appraisal, Equalities Impact Assessment and potentially Habitats Regulations Assessment as part of an Integrated Impact Assessment that is developed and updated alongside the plan in order to inform its options? This may not be appropriate in all instances.	Equality Act 2010	Yes	<ul style="list-style-type: none"> • Habitats Regulations Assessment screening report • Habitats Regulations Assessment • Equalities Impact Assessment 	<p>Sustainability Appraisal and Habitats Regulations Assessment are part of the Integrated Impact Assessment 2019.</p> <ul style="list-style-type: none"> • Online: IIA (Publication stage 2019) <p>Equalities Impact Assessment</p> <ul style="list-style-type: none"> • Online: Local Plan Equality Impact Assessment (October 2019) • Submission documents ref: Core_Gen_04
29.	L	Have you assessed the draft plan / policy options against relevant soundness and quality measures?	NPPF Para 35 to 36	Yes	<ul style="list-style-type: none"> • Draft plan / policy options • Duty to Cooperate Statement(s) of Common Ground • Local Plan Form and Content 	<p>Toolkit Part 4 Local Plan Soundness Quality Assessment was done in Oct 2019.</p> <p>Submission document ref: Core_Gen_016</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
					<p>Checklist (see Part 2 of this Toolkit)</p> <ul style="list-style-type: none"> Local Plan Soundness and Quality Assessment (see Part 4 of this Toolkit) 	
30.	L	<p>Are there any policies applying to sites or areas by reference to an Ordinance Survey map or to amend an adopted policies map?</p> <p>If yes, have you prepared a submission policies map?</p>	T&CPA Regulations 5(1) (b), 9 (1), 17 & 22(1)	Yes	<ul style="list-style-type: none"> Submission policies map Brief statement if a submission policies map is not required 	<p>Regulation 19 Policies Map</p> <ul style="list-style-type: none"> Online: Policy Map Submission document ref: Core_06 <p>Submission Policies Map will also be provided in print.</p> <p>Schedule of changes to the Policies Map (Appendix 4: Schedule of Modifications to the draft Brent Local Plan)</p> <ul style="list-style-type: none"> Online: Full Council Report Pack (February 2020) Agenda Reports Pack

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<ul style="list-style-type: none"> • Submission document ref: Core_04.
31.	L	Is the local plan policies update consistent with any other adopted Local Plan Documents for the area?	T&CPA Regulation 8(3) and (4)	Yes	<ul style="list-style-type: none"> • Local Plan and relevant background papers 	The Council has also considered the content of the adopted West London Waste Plan 2015 in relation to waste sites/ facilities. The draft Brent Local Plan will replace the adopted Core Strategy 2010, Site Allocations 2011, Wembley Area Action Plan 2015, Development Management Policies Plan adopted 2016.
32.	L	Is the local plan policies update intended to supersede any adopted development plan policies, does it state that fact and identify the superseded policies?	T&CPA Regulation 8(5)	Yes	<ul style="list-style-type: none"> • Local Plan 	Appendix 1 of the draft Brent Local Plan identifies the policies that will be replaced on the Plan is adopted.
33.	L	Is the local plan policies update (if a London Borough or Mayoral DC) in general conformity with the spatial development strategy?	P&CPA section 24	Yes/No	<ul style="list-style-type: none"> • Letter from Mayor of London/ Mayoral 	The London Plan has been going through a review process and is currently at Intend to Publish December

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
					<p>Development Corporate</p> <ul style="list-style-type: none"> • Local Plan and relevant background papers 	<p>2019 stage. The Council has sought to be in general conformity with the emerging London Plan. It has engaged extensively in the London Plan adoption process, appearing at Examination on a number of matters including housing targets, industrial policies and waste policies. In the Statement of Conformity to the Regulation 19 consultation the Mayor identified a non-conformity issue with regards to the Local Plan being inconsistent with the emerging London Plan’s industrial policies and the borough’s status within it as a ‘provide capacity’ borough. Whilst the Council has subsequently had constructive dialogue with the GLA on this issue at this stage it is not proposing to</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>make main modifications that would remove the non-conformity issue. The Council considers that policies and approach in the draft Brent Local Plan are justified on the basis of local circumstances and supporting evidence base. As such, it considers that it is in general conformity with the London Plan.</p> <p>The GLA identified in its Statement of Conformity issued in December 2019 that the statement would be updated as the London Plan progressed to adoption.</p>
		Stage D: Consulting and engaging on the policies update				
34.	PM	Have you obtained the relevant authority permissions to publish the first draft / options for public consultation?		Yes	<ul style="list-style-type: none"> Any relevant authority reports 	Cabinet Member Decision: Printed decisions February 2017

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
					to Cabinet / Committee	
35.	L	<p>Have you notified the following bodies or persons that you are preparing a local plan policies update and invited them to make representations on what the plan should contain?</p> <ul style="list-style-type: none"> • The specific consultation bodies that may have an interest; • The general consultation bodies that the authority consider appropriate; • Residents or other persons carrying on business in the area as considered appropriate; and • Any other stakeholders that you have engaged with in earlier stages on strategic matters and who will be party to your Duty to Cooperate Statement(s) of Common Ground and are relevant parties pursuant to your duty to cooperate 	<p>P&CPA Section 20 and Section 33A</p> <p>T&CP Regulation 18</p> <p>NPPF Para 16, 24-27, and 35</p>	Yes	<ul style="list-style-type: none"> • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements • Consultation Statement • Copies of consultation notifications • Records of discussion 	<p>Consultation process outlined in the Consultation Statements and Summary 2020</p> <p>Consultation Statement October 2019</p> <ul style="list-style-type: none"> • Online: <ul style="list-style-type: none"> February 2018 November 2018 October 2019 <p>See Consultation Summary 2020</p> <ul style="list-style-type: none"> • Submission document ref: CORE_010

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
36.	L	<p>Have you made sure that the consultation and invitation to make representations:</p> <ul style="list-style-type: none"> • Follows the principles set out in your adopted Statement of Community Involvement; • Integrates any involvement with the Duty to Cooperate Statement(s) of Common Ground; and • Is proportionate to the scale of issues involved in the local plan policies update. 	<p>P&CPA Section 19</p> <p>NPPF Para 27 and 35</p>	Yes	<ul style="list-style-type: none"> • Statement of Community Involvement • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements • Consultation Statement 	<p>Statement of Community Involvement adopted in 2017</p> <ul style="list-style-type: none"> • Online: <ul style="list-style-type: none"> ▪ SoCI consultation draft March 2017 ▪ SoCI adoption July 2017 • Submission document ref: Core_Gen_05 <p>Consultation Statement October 2019</p> <ul style="list-style-type: none"> • Online: October 2019 <p>See Consultation Summary 2020</p> <ul style="list-style-type: none"> • Submission document ref: CORE_010 <p>Duty-to-cooperate Statement</p> <ul style="list-style-type: none"> • Online: Duty to Cooperate Statement • Submission document ref: CORE_GEN_06

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>Series of Statements of Common Ground</p> <ul style="list-style-type: none"> Online: SoCG GLA and London Boroughs, SoCG TfL, SoCG CRT, SoCG EA, SoCG Thames and Affinity Water Submission documents ref: EB_SOCG_01 – EB_SOCG_05
37.	L	<p>Have you prepared a draft of your Consultation Statement (a “proposed submission document”) that includes 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; and In preparation of Stage E (and to be completed in Stage E as outline below) 	<p>P&CPA Section 19</p> <p>T&CPA Regulation 17, 18, 19 and 22</p> <p>NPPF Para 16, 24-27, and 35</p>	Yes	<ul style="list-style-type: none"> Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements Consultation Statement 	<p>The Consultation Statements describe how the consultation was carried out, main issues raised and how these issues will be addressed.</p> <ul style="list-style-type: none"> Online: October 2019 <p>See Consultation Summary 2020</p> <ul style="list-style-type: none"> Submission document ref: CORE_010

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		how the main issues have been addressed in the local plan policies update.				
38.	L / PM	<p>Have you consulted on the following emerging documents alongside your first draft plan so that they can be reviewed against representations and policy options and alternatives as they are developed?</p> <ul style="list-style-type: none"> ● Sustainability Appraisal; and ● Habitats Regulations Screening Assessment (or Habitats Regulations Assessment if one has been developed at this stage) 	<p>P&CPA Section 19 and Section 39</p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)</p> <p>The Conservation of Habitats and Species Regulations 2017 (as amended)</p> <p>The European Directive 2001/42/EC</p> <p>The European Directive 92/43/EEC</p>	Yes	<ul style="list-style-type: none"> ● Sustainability Appraisal (and any drafts) ● Habitats Regulations Assessment screening report ● Habitats Regulations Assessment ● Statement of Community Involvement ● Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	<p>Emerging documents consulted on:</p> <p>IIA Scoping Report (stage A) contains the Sustainability Appraisal (February 2018)</p> <ul style="list-style-type: none"> ● Online: IIA (Issues and Options stage, Feb 2018) <p>IIA (stage A) contains the Habitats Regulations Assessment Screening (Appendix 4)</p> <ul style="list-style-type: none"> ● Online: IIA (Issues and Options stage, Feb 2018)

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
			NPPF Para 32		<ul style="list-style-type: none"> • Consultation Statement 	
		Stage E: Developing the submission version of the policies update				
39.	PM	Taking account of the consultation have you considered whether there is a need for further evidence and / or evidence to be updated to support the policy options set out in your plan?	P&CPA Section 13 and Section 20	Yes	<ul style="list-style-type: none"> • Consultation statement • Baseline technical data • Commissioned reports and studies 	<p>Yes. The SFRA (Level 2) Sequential and Exceptions Test document was produced after the comments received by the Environment Agency.</p> <ul style="list-style-type: none"> • Submission document ref: EB_SI_03 <p>See the list of evidence used in support of the draft Local Plan:</p> <ul style="list-style-type: none"> • Online: All Evidence Based Documents

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>Consultation Statement</p> <ul style="list-style-type: none"> Online: Consultation statement Oct 2019 online <p>See Consultation Summary 2020</p> <ul style="list-style-type: none"> Submission document ref: CORE_010
40.	PM	<p>Have you considered whether further consultation and engagement is required depending on the nature and significance of any proposed changes to the preferred strategy following consultation and / or further evidence?</p> <p>Where further consultation and engagement is required prior to submission this should be undertaken, recorded and reported in line with the requirements set out above. This includes updating and consulting where necessary</p>	P&CPA Section 13 and Section 20	Yes	<ul style="list-style-type: none"> Consultation statement Baseline technical data Commissioned reports and studies Sustainability Appraisal (and any drafts) Habitats Regulations 	<p>The level of consultation and engagement carried out as part of the stages of the plan-making process is considered appropriate.</p> <p>As such, while further consultation was not considered necessary, we have had individual meetings with some of those that have raised objections to try and</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		on any corresponding amendments to the Sustainability Appraisal and Habitats Regulations Assessment.			Assessment screening report <ul style="list-style-type: none"> • Habitats Regulations Assessment • Statement of Community Involvement • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements 	resolve these matters, such as the GLA and landowners.
41.	L	Have you prepared the Sustainability Appraisal report on any revised draft of the local plan policies update? Is it clear how the sustainability appraisal has influenced the plan?	P&CPA Section19(5) Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	Yes	<ul style="list-style-type: none"> • Sustainability Appraisal 	Section 4 – Sustainability Context of the IIA sets out how the IIA Scoping Report influence the Local Plan, policies and programmes. Also see Appendix 2 <ul style="list-style-type: none"> • Online: IIA (Publication stage 2019)

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<ul style="list-style-type: none"> Submission document ref: Core_Gen_02
42.	L	Have you prepared an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 [HRA], or evidence to demonstrate that an Appropriate Assessment is not required and confirmation from Natural England that they concur?	<p>The Conservation of Habitats and Species Regulations 2017 (as amended)</p> <p>The European Directive 2001/42/EC</p> <p>The European Directive 92/43/EEC</p> <p>NPPF Para 32</p>	Yes	<ul style="list-style-type: none"> Habitats Regulations Assessment screening report Habitats Regulations Assessment 	<p>See Habitats Regulations Assessment Screening Opinion (Appendix 4) of the IIA (stage A)</p> <ul style="list-style-type: none"> Online: IIA (Issues and Options stage, Feb 2018) <p>Various statutory bodies recognised under Reg 12 (5) of the SEA Directive were consulted. Along with IIA workshops and formal consultation.</p>
43.	L	Have you updated your Equalities Impact Assessment?	Equality Act 2010	Yes	<ul style="list-style-type: none"> Equalities Impact Assessment 	<p>Equalities Impact Assessment</p> <ul style="list-style-type: none"> Online: Local Plan Equality Impact Assessment (October 2019) Submission documents ref: Core_Gen_04

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
44.	L	Have you taken account of all of the representations received from all person(s) in response to the consultation(s) in Stage D? Have you recorded how the main issues have/will be addressed in your draft consultation statement?	T&CPA Regulation 17, 18 and 22	Yes	<ul style="list-style-type: none"> • Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements • Consultation Statement • Local Plan • Relevant correspondence 	<p>Brent Local Plan Preferred Options Consultation Responses (October 2019) document contains summary of comments received, responses and proposed changes to the Draft Local Plan</p> <ul style="list-style-type: none"> • Online: Consultation responses received, officer comments and proposed changes <p>Consultation Statement</p> <ul style="list-style-type: none"> • Online: Consultation statement Oct 2019 <p>See Consultation Summary 2020</p> <ul style="list-style-type: none"> • Submission document ref: CORE_010 <p>Also see IIA 2020.</p> <ul style="list-style-type: none"> • Submission document ref: Core_Gen_02

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>Duty to Co-operate Statement</p> <ul style="list-style-type: none"> • Online: Duty to Cooperate Statement • Submission document ref: CORE_GEN_06 <p>Statements of Common Ground (unsigned version)</p> <ul style="list-style-type: none"> • Online: SoCG Canal and River Trust, SoCG Environment Agency, SoCG Thames and Affinity Water • Submission documents ref: EB_SOCG_03 – EB_SOCG_05
45.	PM	Have you considered whether or not you intend to confirm the housing land supply through the independent examination process? If so, have you clearly stated this within your Regulation 19 Submission local plan policies update and have you	NPPF para 74 T&CPA Regulation 17, 18 and 22	Yes	<ul style="list-style-type: none"> • Local Plan • Relevant correspondence 	The Council has a good history of housing delivery so does not feel it necessary pursue the Annual Position Statement approach currently. It considers that

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		ensured that you will engage appropriately with developers and others with an interest in housing delivery on the housing land supply?				the administration associated with the volume of sites/ developments in the borough will be a significant burden to sustain on an annual basis. It has indicated to the Planning Inspectorate that it will not seek to confirm the housing land supply to support an Annual Position Statement.
46.	PM	<p>Does your local plan policies update include a trajectory illustrating the expected rate of housing delivery over the plan period?</p> <p>Will your local plan policies update provide for a 5 year supply of deliverable housing sites (incorporating the appropriate buffer) on adoption against the housing requirement (which is informed by a local housing need assessment conducted using the standard method as a starting point)?</p>	NPPF paras 11, 73 and 74	Yes	<ul style="list-style-type: none"> Local Plan 	<p>Housing trajectory illustrating the expected rate of housing delivery over the plan period:</p> <ul style="list-style-type: none"> Online: Housing Trajectory October 2019 <p>Housing Trajectory 2020</p> <ul style="list-style-type: none"> Submission document ref: EB_H_06 <p>Brent's Strategic Housing Market Assessment</p> <ul style="list-style-type: none"> Online: SHMA

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<ul style="list-style-type: none"> • Submission document ref: EB_H_01 <p>Annual Monitoring Report 2018-19 (section 3.1 Housing and 3.9 Housing Delivery Test)</p> <ul style="list-style-type: none"> • Online: AMR online • Submission document ref: Core_Gen_013
		Stage F: Independent examination and adoption				
47.	PM	<p>Have you obtained the relevant authority permissions to publish the submission version of the local plan policies update?</p> <p>You may want to consider including approval to submit this to the Secretary of State (Planning Inspectorate)</p>		Yes	<ul style="list-style-type: none"> • Any relevant authority reports to Cabinet / Committee 	<p>Regulation 19 Cabinet Member Report</p> <ul style="list-style-type: none"> • Online: Public Reports Pack (October 2019) <p>Approval for Brent Local Plan Publication and Submission for Examination</p> <ul style="list-style-type: none"> • Online: Decision details

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
48.	L	Have you made clear where and within what period representations must be made?	T&CPA Regulation 17, 19, 20 and 35	Yes	<ul style="list-style-type: none"> Report or record of decisions 	<p>Details about when and how to make representations were published on our website Online: Shape Brent website</p> <p>Further information was sent by email. See:</p> <p>Consultation Statement</p> <ul style="list-style-type: none"> Online: Consultation statement Oct 2019 <p>Consultation summary 2020</p> <ul style="list-style-type: none"> Submission document ref: CORE_010
49.	L	<p>Have you published on your website and made copies of the following available for inspection:</p> <ul style="list-style-type: none"> the proposed submission documents the statement of the representations procedure statement and details of where and when documents can be inspected 	T&CPA Regulations 19 and 35	Yes	<ul style="list-style-type: none"> Statements and record of where and when documents were made available Consultation Statement 	<p>The proposed submission documents and the representations procedure was provided on our website (Shape Brent website). The document can be viewed:</p> <ul style="list-style-type: none"> Online: Consultation supporting document

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		Have you checked you have met all other requirements of your Statement of Community Involvement?				<p>Hard copies were also available to be viewed at all Brent libraries. See Consultation Statement for details</p> <ul style="list-style-type: none"> • Online: Consultation statement Oct 2019 <p>Consultation summary 2020</p> <ul style="list-style-type: none"> • Submission document ref: CORE_010
50.	L	<p>Have you sent to each of the specific consultation bodies invited to make representations under Regulation 18(1):</p> <ul style="list-style-type: none"> • A copy of each of the proposed submission documents; and • the statement of the representations procedure 	T&CPA Regulation 19(b)	Yes	<ul style="list-style-type: none"> • Consultation Statement • Evidence of notifications (email) 	<p>Hardcopies were not sent out but were made available to be viewed at all Brent libraries. Details about when and how to make representations were published on our website and information was also sent by email. We used the updated Planning Consultation Database which included contact details of people</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>consulted under Regulation 18.</p> <p>See Consultation Statement for details</p> <ul style="list-style-type: none"> • Online: <ul style="list-style-type: none"> <u>February 2018</u> <u>November 2018</u> <u>October 2019</u> <p>Consultation summary 2020</p> <ul style="list-style-type: none"> • Submission document ref: CORE_010
51.	L	<p>Have you sent to each of the general consultation bodies invited to make representations under Regulation 18(1):</p> <ul style="list-style-type: none"> • the statement of the representations procedure; and • where and when the documents can be inspected 	T&CPA Regulation 19(b)	Yes	<ul style="list-style-type: none"> • Consultation Statement • Evidence of notifications (email) 	<p>Details about when and how to make representations were published on our website. Information to general consultation bodies was sent by email using the updated Planning Consultation Database which included contact details of people consulted under Regulation 18).</p>

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<p>See Consultation Statement for details</p> <ul style="list-style-type: none"> • Online: <ul style="list-style-type: none"> <u>February 2018</u> <u>November 2018</u> <u>October 2019</u> <p>Consultation summary 2020</p> <ul style="list-style-type: none"> • Submission document ref: CORE_010
52.	L	Have you, on the day of publication, requested the opinion of the Mayor of London (if a London Borough or Mayoral DC) on the general conformity of the local plan update with the spatial development strategy?	<p>P&CPA Section 24</p> <p>T&CPA Regulation 21</p>	Yes	<ul style="list-style-type: none"> • Copy of letter 	<p>Email invite was sent to the Mayor of London to respond to Regulation 19 consultation.</p> <p>See Mayor of London Statement of Conformity response to Regulation 19 consultation</p> <ul style="list-style-type: none"> • Submission document Pack > Consultation documents > Reg 19 > Publication stage Full reps > 25 GLA

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		Getting ready for submission to PINS				
53.	PM	Get ready for submission and examination, this might mean starting the process of appointing a programme officer, securing rooms for a potential hearing and other practical arrangements. Refer to guidance from the Planning Inspectorate.	See PINS Procedure Guide for Local Plan Examinations 2019	-	-	-
54.	PM	Have you obtained the relevant authority permissions to submit the plan to the Secretary of State via the Planning Inspectorate (PINS)		Yes	<ul style="list-style-type: none"> Any relevant authority reports to Cabinet / Committee 	<p>Full Council on 19th February 2020 considered representations received and resolved to submit the draft Local Plan for examination.</p> <p>Full council approval: Decision Status: Approved</p>
55.	L	Have you collated all of the representations made to the publication draft plan policies update?	<p>P&CPA Section 20(3)</p> <p>T&CPA Regulation 22(1)(e)</p>	Yes		Reg 19 Schedule of Modifications contains all representations. See Full Council Report Pack (February 2020)

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
						<ul style="list-style-type: none"> • Online: Agenda Reports Pack • Submission doc pack: Consultation document > database of all reps.
56.	PM	<p>Does each representation made have a unique ID and contact details?</p> <p>PINs require that these are provided in an electronic database enabling the full text of each representation to be accessed easily in both policy and paragraph number order and representor order. The database should also clearly identify those who have made a request to be heard by the Inspector under section 20(6) of the PCPA</p>	See PINS Procedure Guide for Local Plan Examinations 2019	Yes		<p>Reg 19 Database has unique reference number and contact details.</p> <ul style="list-style-type: none"> • See Submission doc pack: Consultation document > database of all reps.
57.	L	Have you assembled the relevant supporting documents (documents relevant to the preparation of your plan	P&CPA Section 20(3)	Yes	<ul style="list-style-type: none"> • Submission documents / Examination library 	The relevant supporting documents will be provided to the inspector in a 'submission document pack'

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		which normally includes or comprises the evidence base)?	T&CPA Regulation 22(1)(g)			and to be accessed on the website. Shape Brent website
58.	PM	Do all of the documents that you will submit to the inspectorate have a unique reference listed in an 'Examination Library'?		Yes	<ul style="list-style-type: none"> Submission documents / Examination library 	Yes. See 'submission checklist'
59.	L/ PM	You may need to consider whether you need to redact certain personal details from representations for the website and inspection purposes. However, those who have made representations should be able to contact one another and documents should be provided without details redacted. See the guidance from the Planning Inspectorate.	<p>General Data Protection Regulation 2018</p> <p>See PINS Procedure Guide for Local Plan Examinations 2019</p>	Yes		<p>Original non-redacted responses have been submitted to the inspector only in compliance with the General Data Protection ACT 2018. Database of reps with details.</p> <ul style="list-style-type: none"> See Submission doc pack > Consultation document > database of all reps. <p>Redacted responses available in the:</p> <ul style="list-style-type: none"> Submission document pack> publication stage full reps (redacted).

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
60.	L	<p>Have you prepared a statement setting out:</p> <ul style="list-style-type: none"> • Which bodies and persons were invited to make representations under Regulation 18 • How they were invited • A summary of the main issues raised • How the representations have been taken into account 	<p>P&CPA Section 20 (3)</p> <p>T&CPA Regulation 22(1)(c)</p>	Yes	<ul style="list-style-type: none"> • Consultation statement 	<p>Consultation Statement</p> <ul style="list-style-type: none"> • Online: February 2018 November 2018 <p>See Consultation Summary 2020</p> <ul style="list-style-type: none"> • Submission document ref: CORE_010
61.	L	<p>Have you prepared a statement giving:</p> <ul style="list-style-type: none"> • the number of representations made under Regulation 22 • a summary of the main issues raised <p>OR</p> <ul style="list-style-type: none"> • Stating that no representations were made 	<p>P&CPA Section 20(3)</p> <p>T&CPA Regulation 22(1)(c)</p>	Yes	<ul style="list-style-type: none"> • Consultation Statement • The Statement as required in Regulation 22(1)(c) – this can be included in the Consultation statement 	<p>See Consultation Summary 2020</p> <ul style="list-style-type: none"> • Submission document ref: CORE_010

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
62.	PM	Consider what documents need printing to ensure that hard copies are available where necessary for inspection and for the examination library.	See PINS Procedure Guide for Local Plan Examinations 2019	Yes		The draft Local Plan, policies map, schedule of proposed modifications, consultation statement, integrated impact assessment and representations received will also be available in Brent local libraries, which have access to free internet to be able to view the other supporting documents.
Submission to PINS						
63.	L	<p>Have you sent the Secretary of State (the Planning Inspectorate) a hard copy and electronic version of:</p> <ul style="list-style-type: none"> • a copy of the local plan policies update • and (if prepared) policies map <p>Have you sent the Secretary of State (the Planning Inspectorate) an electronic version of:</p>	<p>P&CPA Section 20(1) and 20(3)</p> <p>T&CPA Regulations 22</p> <p>See PINS Procedure Guide for Local Plan Examinations 2019</p>	Y		<p>Hard copies of the Local Plan and Policies Map sent in the post.</p> <p>All submission documents uploaded through WeTransfer including:</p> <ul style="list-style-type: none"> • Local Plan • Integrated Impact Assessment

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		<ul style="list-style-type: none"> ● the Final ‘consultation statement’ supplemented by or incorporating the documents consultation required under Regulation 22(1) ● The Sustainability Appraisal ● Copies of representations ● ‘Supporting documents’ <p>Guidance from PINS also highlights other material necessary for the examination which includes:</p> <ul style="list-style-type: none"> ● An Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 [HRA], or evidence to demonstrate that an Appropriate Assessment is not required and confirmation from Natural England that they concur; ● The LPA’s current Local Development Scheme; ● In London, confirmation that the Mayor has indicated general conformity with the London Plan 				<ul style="list-style-type: none"> ● Local Development Scheme ● Equalities Impact Assessment ● Copies of representations

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
		<p>(note however that the Inspector is entitled to take his/her own view on conformity).</p> <ul style="list-style-type: none"> ● It is also helpful if the LPA provide an Equalities Impact Assessment 				
64.		<p>As soon as practical after submission, on your website, have you published:</p> <ul style="list-style-type: none"> ● The documents submitted to PINS (identified above) including representations made under Regulation 20 (where practicable) taking into account GDPR requirements? ● Statement as to where and when these documents are available for inspections (again this should be in line with any requirements in your Statement of Community Involvement)? 	T&CPA Regulation 22(3) and 35(1)(b)	-		To be published on examination website.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
65.	L	For each general consultation body invited to make representations under Regulation 18(1), have they been sent: <ul style="list-style-type: none"> notification that the documents submitted to PINS are available for inspection details of where and when they can be inspected 	T&CPA Regulation 22(3)(b)		<ul style="list-style-type: none"> Copies of correspondence 	Consultation email sent to all consultees.
66.	L	Have you given notice to persons who have requested to be notified that submission has taken place?	T&CPA Regulation 22(3)(c)		<ul style="list-style-type: none"> Copies of correspondence 	Consultation email sent to all consultees.
67.	L	If examination hearings are being held, at least six weeks before its opening has the Programme Officer: <ul style="list-style-type: none"> published the time and place of the examination and the name of the person appointed to carry out the examination on your website? notified those who have made representations on the published DPD which have not been withdrawn of these details? 	P&CPA Section 20 T&CPA Regulations 24 and 35	n/a	<ul style="list-style-type: none"> Website 	Time and Place of examination will be updated on the website.

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
68.	L	Have you asked the Inspector to recommend 'main modifications' (changes that materially affect the policies) to make a submitted local plan policies update sound and legally compliant? These modifications should be published for consultation.	See Section 6 of the PINS Procedure Guide for Local Plan Examinations 2019 P&CPA Section 20 (7C)		<ul style="list-style-type: none"> • Schedule of proposed main modifications 	
69.	L	Depending on the scope of the modifications, have you considered whether there is a need to undertake further Sustainability Appraisal, Habitats Regulations Assessment, and Equalities Impact Assessment on the modifications.	The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) The European Directive 2001/42/EC The Conservation of Habitats and Species Regulations 2017 (as amended)	Yes	<ul style="list-style-type: none"> • Sustainability Appraisal (and any drafts) • Equalities Impact Assessment • Habitats Regulations Assessment screening report 	

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
			The European Directive 92/43/EEC Equality Act 2010			
70.	L	If the plan policies update is sound, have you formally adopted the plan policies update in a full meeting of the local planning authority?	T&CPA Regulation 4(1) and (3) of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000).	n/a	<ul style="list-style-type: none"> Any relevant authority reports to Cabinet / Committee 	n/a
71.	L	On adopting a Local Plan policies update, have you made publicly available a copy of the plan, an Adoption Statement and Sustainability Appraisal?	T&CPA Regulations 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.	n/a	<ul style="list-style-type: none"> Adoption Statement 	n/a