

**London Borough of Lewisham**

**Site Allocations Local Plan: Submission Version – September 2012**

**PAS Soundness Self Assessment Tool**



Key question	Evidence provided
<b>Justified</b>	
<b>Participation</b>	
<p>1. Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation process has engaged interested parties at each stage of the process of producing the Site Allocations Local Plan (the SALP).</p> <p>The Consultation Statement (See SALP1.11) for the SALP is an umbrella document that summarises the key points regarding each round of public consultation undertaken, including:</p> <ul style="list-style-type: none"> <li>• Who was consulted</li> <li>• Where and when they were involved</li> <li>• Representations made</li> <li>• How the representations have affected the production of the SALP</li> </ul>
<b>Research/ fact finding</b>	
<p>2. Is the content of the development plan document justified by the evidence?</p> <p>3. What is the source of the evidence?</p> <p>4. How up to date and convincing is it?</p>	<p>The submitted SALP (SALP1.1) is considered to be justified by the evidence provided.</p> <p>A wide ranging and comprehensive evidence base has been collated by the Council in support of the wider Local Plan. The Council has completed a number of the evidence base documents itself and has additionally commissioned consultants to complete others where applicable and appropriate. A complete set of evidence base documents has been provided for inspection. Key studies include:</p> <ul style="list-style-type: none"> <li>• London Strategic Housing Land Availability Assessment and Housing Capacity Study (London SHLAA/HCS) 2009 (See CSD3.24)</li> <li>• Lewisham Employment Land Study, November 2008 (See CSD2.6)</li> <li>• Lewisham Retail Capacity Study, November 2009 (CSD2.14)</li> <li>• Addendum to the Retail Capacity Study, September 2010 (CSD2.14a)</li> <li>• Lewisham Strategic Flood Risk Assessment, 2008 (CSD2.18)</li> <li>• Lewisham Sequential Test, 2009 (CSD2.19)</li> <li>• Lewisham Conservation Area Appraisals and Management Plans (CSD2.33)</li> </ul> <p>While the council accept that circumstances change, it is believed that the evidence base that supports the</p>

Key question	Evidence provided
	<p>submitted SALP is as up to date as is practically possible. The Council are continually reviewing the evidence base, when appropriate.</p> <p>Much of the evidence used to support the submitted SALP was also used to support the Core Strategy. This means that this evidence has already been through public consultation (at the pre-submission stage of the Core Strategy process) and has been found acceptable through the examination of the Core Strategy for Lewisham which was adopted in June 2011.</p>
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>Both the submitted SALP and the evidence base that supports it are, in some places, based upon data that is out of the control of Lewisham Council. There is an assumption that this data is accurate and appropriate for the production of a SALP. This data includes:</p> <ul style="list-style-type: none"> <li>• GLA population and economic projections</li> <li>• Census data</li> <li>• Indices of Multiple Deprivation</li> </ul> <p>The common use and continued reputation of these data sources in the production of planning documents across London boroughs supports Lewisham's view that they provide information that is both reasonable, justified and suitable for informing evidence base documents and Local Plans.</p> <p>There has been an assumption made that the current economic crisis will not last for the entire plan period. Standard economic cycles suggest that there will be some improvement before 2026 (the end of the plan period). This stance is consistent with the London Plan 2011 and is in support of the growth strategy of the wider Local Plan.</p>
Alternatives	
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p>	<p>It can be shown that the chosen approach has been considered alongside alternatives and is the most appropriate response to the circumstances. The method of choosing the selected approach can be clearly viewed through the various iterations of the SALP (Issues &amp; Options 2005, Preferred Options 2007, Further Options 2010, Proposed Submission 2011 and Submission 2012) and the accompanying Sustainability Appraisals.</p> <p>A number of surveys and reports were collated to form an evidence base prior to the publication of the issues and options documents. 12 Issues and Options Reports (CSD1.9 – CSD1.19) were then produced utilising the collected evidence to inform the issues affecting the borough. The 12 reports covered topics such as housing; waste management; open space; employment land; site allocations; retail and town centres; and education,</p>

Key question	Evidence provided
<p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>health and community services. Each of the 12 reports has a section that details the relevant evidence – For site allocations the most relevant papers are those relating to site allocations (CSD1.5 and CSD1.6).</p> <p>Three consultation summaries (SALP1.11) bring together the responses to the Issues and Options papers.</p> <p>The Preferred Options version of the SALP (SALP2.3) was produced to take account of the representations received. This document clearly highlights the preferred option, the alternative options available and provides firm justifications for the preferred options selected to take forward by the council.</p> <p>In 2007 the Council were advised by the Government Office for London (GOL) to pause working on the Site Allocations until the Core Strategy was progressed to examination. This meant that no further progress was made with the SALP until 2010. By this time the council felt that it would not be appropriate to move straight to a draft plan and therefore produced an interim Further Options Report 2010 (SALP2.5). This report uses a similar format as the Preferred Options in showing the available alternative options for any new topics that had arisen. For options that had been covered in the Preferred Options document, the same alternatives were assessed and if any amendments were required these were detailed in the report. A review of all consultation responses and the reasons for selecting the preferred option were detailed for all sites.</p> <p>For both the 2007 Preferred Options and 2010 Further Options versions of the SALP there are Sustainability Appraisals (SALP2.4 and SALP2.6) available to support the options process. For the 2007 version, Chapter 5 identifies the options considered and appraise the process in selecting the preferred options, whilst for the 2010 version this is located in Appendix 6. A Sustainability Appraisal also exists for the Proposed Submission version (SALP2.8).</p> <p>For further details on the processes across all three consultations for these documents, please refer to the Site Allocations Consultation Statement (SALP1.11).</p>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>The Sustainability Appraisal Scoping Report (SALP2.1) was prepared in May 2005. The report reviewed existing plans, using an appraisal framework to establish key sustainability issues and baseline information. This document was updated for Site Allocations in 2010 (SALP2.1a) to incorporate up-to-date baseline information, programmes and plans. Further, with consideration to the Scoping Report, a Sustainability Appraisal Report has been prepared for each version of the DPD (SALP2.4, 2.6 and 2.8).</p> <p>The Submission Stage Sustainability Appraisal can be located as SALP1.2.</p> <p>Each sustainability appraisal has analysed every current option to assess the performance against the sustainability framework in place. Subsequently the production of each version of the SALP has been</p>

Key question	Evidence provided
	influenced by the sustainability considerations that have emerged from the previous sustainability appraisal.
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>The London Plan 2011 has important implications for the SALP as it sets out the London-wide context and borough-wide targets and requirements. The SALP does not repeat this approach, but uses it to influence the process of allocating sites. Section 1 of the Submitted SALP (SALP1.1) demonstrates how the document works within the requirements of the London Plan and other London-wide guidance including the London SHLAA.</p> <p>Confirmation of conformity with the London Plan has been received from the Mayor of London. This is included in the supporting information submitted alongside the SALP as SALP2.9.</p>

Effective		
Deliverable		
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there</li> <li>ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the</li> <li>iii. 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</li> <li>iv. A core strategy vision which is framed to set out the outcomes which are sought for the future</li> <li>v. Sections of the development plan document which identify the main issues addressed</li> <li>vi. Sections of the development</li> </ul>	<p>The SALP will implement relevant Core Strategy objectives and policy priorities, which need to be developed further through the allocation of appropriate sites. As an implementation tool used by the Core Strategy to deliver its vision and objectives, the SALP is seeking to address the issues identified in the Core Strategy (CSD1.5) Section 3 – Drivers for Change. Section 2.2 of the submitted SALP details the approach taken to deliver the Core Strategy objectives and spatial policies.</p> <p>Establishing the issues for the borough was an early part of the plan preparation process, i.e. the Issues and Options stage. The resulting issues formed the basis of the vision and strategic objectives of each subsequent document. The Core Strategy issues, vision and objectives were approved through an Examination in Public and adopted in June 2011.</p>

	<p>plan document which indicate the priority outcomes</p>	
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<ul style="list-style-type: none"> <li>i. Sections of the regional special strategy which identify cross-boundary issues.</li> <li>ii. Sections of the development plan document setting out cross-boundary issues and the response to them</li> <li>iii. Reports on relevant studies which over wider areas than the local authority and how the development plan document addresses their findings or recommendations</li> <li>iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance</li> </ul>	<p>It is acknowledged that sites within Lewisham may have cross-boundary influence and therefore a number of measures have been taken to ensure that issues are identified and either absolved or mitigated against.</p> <p>The production of the LDF has been influenced by key sub regional documents, reports and evidence base. Specific measures to address issues include:</p> <ul style="list-style-type: none"> <li>• The Infrastructure Delivery Plan which contains a chapter that reflects influencing elements of development and infrastructure in adjoining boroughs.</li> <li>• The Strategic Flood Risk Assessment involving LB Lewisham and Southwark</li> <li>• The South East London Boroughs' Joint Waste Technical Apportionment Strategy (LB Bexley, Bromley, Greenwich, Lewisham and Southwark)</li> <li>• The Sub-regional Strategic Housing Market Assessment (LB Bexley, Bromley, Greenwich, Lewisham and Southwark)</li> <li>• The sharing of evidence between LB Lewisham, Greenwich and Southwark to account for the cumulative impacts of proposed development upon transport.</li> </ul> <p>Further, neighbouring boroughs have been regarded as specific consultation bodies at every stage of the document production process and have therefore been consulted regularly. Any responses can be located in the Site Allocations Consultation Statement (SALP1.11) and for any final responses pre-submission see SALP1.10 (Folder of all representations).</p>
<p>16. Does the development plan document contain clear objectives?</p>	<ul style="list-style-type: none"> <li>i. A spatial portrait which identifies the key issues facing the area</li> <li>ii. A core strategy vision which is framed to set out the outcomes which are sought for the future</li> <li>iii. The strategic object the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision</li> </ul>	<p>The SALP will implement relevant Core Strategy objectives and policy priorities, which need to be developed further through the allocation of appropriate sites. Section 2.2 of the SALP details the approach taken to deliver the Core Strategy objectives and spatial policies.</p> <p>The objective of the SALP to deliver the Core Strategy is expanded in Section 1 to form five sub-objectives as follows:</p> <ul style="list-style-type: none"> <li>• To facilitate development by allocating sites to meet the Core Strategy's strategic objectives and priorities and implement its spatial strategies</li> <li>• To facilitate development which protects and enhances the amenity of the local area, identifying key environmental, historic and cultural features</li> <li>• To ensure a high standard of design from new developments</li> <li>• To create safe and attractive environments</li> </ul>

<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>	<p>i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it</p> <p>ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place</p>	<ul style="list-style-type: none"> <li>• To secure development that helps create a more sustainable Lewisham</li> </ul> <p>Section 2.2 of the submitted SALP details the approach taken to deliver the Core Strategy objectives and spatial policies.</p> <p>As previously identified in Test 16, the objectives are directly related to the Core Strategy, which established its issues and drivers for change through the study of the local evidence base (CSD1.9 – CSD1.19). As such, the Core Strategy objectives have local influence integral to their creation and are specific to Lewisham and therefore so are the objectives of the submitted SALP.</p> <p>Further, the objectives have been subject to consultation and public engagement at each stage of the Core Strategy and Site Allocations development process. This has affected the development of the vision and the strategic and spatial objectives of the borough and input an inexorable element of locality.</p> <p>The relationship between the identified local issues in the Core Strategy and the objectives in the submitted SALP is clearly apparent. Section 2.2 identifies how the submitted SALP will deliver the Core Strategy objectives and spatial policies and hence meet the issues identified.</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 development plan document?</p>	<p>i. Relevant sections of the development plan documents which explain how policies derive from the objective and are designed to meet them</p> <p>ii. Relevant sections of the sustainable community strategy which identify its objectives</p> <p>iii. Confirmation from the local strategic partnership and partner organisations that they believe the policies will achieve the agreed objectives</p> <p>iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate should succeed</p>	<p>The submitted SALP does not use policies to deliver the objectives identified, but rather uses site allocations to provide locations where the wider Local Plan policies are implemented. It is however, made clear how the allocations will deliver the objectives of both the submitted SALP and the Core Strategy in Section 2.2.</p> <p>Each site allocation has an identified implementation body and expected development timescale and progress will be monitored through the AMR. This process will ensure that the allocations are meeting the objectives or else influence the future review of the Local Plan documents.</p> <p>Given the above, the council feel that there are no obvious gaps in the policies (site allocations). The approach as identified in Section 2.1 is considered comprehensive and appropriate to deliver the objectives identified.</p>

	v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document	
21. Are there realistic timescales related to the objectives?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives</li> <li>ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery</li> </ul>	<p>The submitted DPD has a timescale that aligns with the wider Local Plan timetable. This means that the site allocations are encompassed within the adopted Core Strategy plan period which runs until 2026.</p> <p>Within this timescale, each site allocation has an identified implementation body and expected development timescale. Progress will be monitored through the AMR and will ensure that the allocations are delivering the objectives or else influence the future review of the Local Plan documents.</p>
22. Are the policies internally consistent?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent</li> <li>ii. A very brief statement explaining how the council considers its objectives are consistent</li> </ul>	<p>The council considers that the policies in the submitted SALP are internally consistent both with the wider Local Plan policy framework and other council strategies.</p> <p>The SALP will implement relevant Core Strategy objectives and policy priorities, which need to be developed further through the allocation of appropriate sites. Section 2.2 of the submitted SALP details the approach taken to deliver the Core Strategy objectives and spatial policies.</p> <p>This clear link is proof that the submitted SALP is consistent with other borough-wide Local Plan documents. There are also two town centre Area Action Plans (AAPs) which contain policies and site allocations within a defined boundary. The SALP does not deal with sites or allocations within these boundaries to ensure there are no inconsistencies.</p> <p>No consultation representations have been received that suggest there is a conflict between allocations within the SALP or with other Local Plan documents.</p>
23. Does the development plan document contain material which:	<ul style="list-style-type: none"> <li>i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development</li> </ul>	<p>The submitted SALP is not repetitious or in conflict with any other local, regional or national policy.</p> <p>The planning context for the SALP is set out in Section 1 of the submitted</p>

<ul style="list-style-type: none"> <li>• is already in another plan</li> <li>• should be logically be in a different plan</li> <li>• should not be in a plan at all?</li> </ul>	<p>plan document. This should show how they combine to provide a coherent policy structure</p> <ul style="list-style-type: none"> <li>ii. Representations from the Government Office</li> <li>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</li> </ul>	<p>document. For further detail, the LDS (2010) brought into effect on the 23 September 2010 (CSD1.4) details the scope and expected content of each of the Local Plan documents. Specifically for the SALP it states that:</p> <ul style="list-style-type: none"> <li>• The Site Allocations DPD will set out the allocated sites except for those set out in the Core Strategy and Area Action Plans. It will identify the locations and sites for specific types of development in order to ensure the vision, objectives and spatial strategy of the Core Strategy are implemented. The broad parameters for development of each site will be listed covering land use and development criteria.</li> </ul> <p>As previously stated, the council considers that the policies in the submitted SALP are internally consistent both with the wider Local Plan policy framework and other council strategies.</p> <p>No consultation representations have been received that suggest there is a conflict between allocations within the SALP or with other Local Plan documents.</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that identify the key objectives and how they will be delivered upon</li> <li>ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery</li> <li>iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document</li> </ul>	<p>The submitted SALP does not use policies to deliver the objectives identified, but rather uses site allocations to provide locations where the wider Local Plan policies are implemented. It is however, made clear how the allocations will deliver the objectives of both the submitted SALP and the Core Strategy in Section 2.2.</p> <p>Each site allocation has an identified implementation body and expected development timescale and progress will be monitored through the AMR. This process will ensure that the allocations are meeting the objectives or else influence the future review of the Local Plan documents.</p> <p>Given the above, the council feel that there are no obvious gaps in the policies (site allocations). The approach as identified in Section 2.1 is considered comprehensive and appropriate to deliver the objectives identified.</p>
<p>25. If there are development management policies, are they supportive of the strategy and</p>	<ul style="list-style-type: none"> <li>i. Sections of the plan document that show how the development management policies: <ul style="list-style-type: none"> <li>• will help to deliver the strategy derive from, and elaborate on,</li> </ul> </li> </ul>	<p>In the early stages of development site allocations and development management were dealt with in the same document, however since the Further options stage they have been separated into two distinct Local Plan documents. This means that the submitted SALP does not contain development management policies and this question is not directly relevant.</p>

objectives?	the objectives and policies of the plan	
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<ul style="list-style-type: none"> <li>i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward</li> <li>ii. Representations in respect of infrastructure</li> <li>iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with</li> </ul>	<p>The infrastructure implications of the Core Strategy (CSD1.5) have been identified. The submitted SALP is an implementation tool of the Core Strategy spatial policies and therefore has identified infrastructure implications also and to include them in the submitted SALP would be needlessly repetitious. Instead, Section 1.25 of the submitted SALP briefly describes the process which the Local Plan in general uses to tackle infrastructure need.</p> <p>The Core Strategy spatial strategy contains paragraphs relating to the delivery of each spatial policy. This introduces infrastructural elements under the headings sustainable movement and community well-being.</p> <p>Section 9.3 of the Core Strategy details the input made by the Infrastructure Delivery Plan (IDP) (CSD2.17). The IDP is a live document that will be used to support the delivery of infrastructure required to implement the Core Strategy. Each of the infrastructure requirements identified in the spatial strategy are included in the IDP to support their implementation. Core Strategy details a table of essential infrastructure required to implement the Core Strategy spatial policies.</p> <p>The approach of the IDP was influenced by the preceding Social Infrastructure Framework Study (2008). The study assessed existing social infrastructure provision as well as the infrastructure requirements of Lewisham Borough over a 15 year period (to tie in with the Core Strategy timeline).</p> <p>Given the above paragraphs, the council feel that the infrastructure implications of the submitted SALP have clearly been identified.</p>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out delivery mechanisms and timescale</li> <li>ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered</li> <li>iii. Research or studies that</li> </ul>	<p>The submitted SALP does not use policies to deliver the objectives identified, but rather uses site allocations to provide locations where the wider Local Plan policies are implemented. It is however, made clear how the allocations will deliver the objectives of both the submitted SALP and the Core Strategy in Section 2.2.</p> <p>The submitted SALP has a timescale that aligns with the wider Local Plan timetable. This means that the site allocations are encompassed within the adopted Core Strategy plan period which runs until 2026.</p>

	<p>address matters of delivery and the realistic timescales</p> <ul style="list-style-type: none"> <li>iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms</li> <li>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</li> <li>vi. Correspondence from stakeholders on delivery mechanisms and timescale</li> <li>vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</li> </ul>	<p>Within this timescale, each site allocation has an identified implementation body and expected development timescale. Progress will be monitored through the AMR and will ensure that the allocations are delivering the objectives or else influence the future review of the Local Plan documents.</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"> <li>i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery</li> <li>ii. Representations in respect of infrastructure</li> <li>iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with</li> </ul>	<p>The infrastructure implications of the Core Strategy (CSD1.5) have been identified. The submitted SALP is an implementation tool of the Core Strategy spatial policies and therefore has identified infrastructure implications also and to include them in the submitted SALP would be needlessly repetitious. Instead, Section 1.2 of the submitted SALP briefly describes the process which the Local Plan in general uses to tackle infrastructure need.</p> <p>The Core Strategy spatial strategy contains paragraphs relating to the delivery of each spatial policy. This introduces infrastructural elements under the headings sustainable movement and community well-being.</p> <p>Section 9.3 of the Core Strategy details the input made by the Infrastructure Delivery Plan (IDP) (CSD2.17). The IDP is a live document that will be used to support the delivery of infrastructure required to implement the Core Strategy. Each of the infrastructure requirements identified in the spatial strategy are included in the IDP to support their implementation. The Core Strategy details a table of essential infrastructure required to implement the Core Strategy spatial</p>

		<p>policies.</p> <p>The table in Appendix 7 includes a responsible agency and supporting agencies for the delivery of each detailed infrastructure scheme and thus it is clear who will deliver the required infrastructure.</p>
<p>29. Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out responsibilities for delivery</li> <li>ii. Correspondence showing how other stakeholders intend to support the delivery of the policies</li> <li>iii. Reports by the council or the relevant stakeholder</li> <li>iv. Representations from stakeholders on implementation</li> <li>v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</li> </ul>	<p>The submitted SALP does not use policies to deliver the objectives identified, but rather uses site allocations to provide locations where the wider Local Plan policies are implemented. It is however, made clear how the allocations will deliver the objectives of both the submitted SALP and the Core Strategy in Section 2.2.</p> <p>Each site allocation has an identified implementation body and expected development timescale. Progress will be monitored through the AMR and will ensure that the allocations are delivering the objectives or else influence the future review of the Local Plan documents.</p> <p>Some sites are identified for delivery by sources out of council control, such as private developers. With this comes a level of uncertainty, however the council has taken many steps to ensure that delivery is as certain as possible. Through the housing trajectory process the council engage regularly with developers and landowners to understand their expected delivery timescales for each site. This process is also supported by the Major Developers Forum, which is council led and includes a number of developers active within the borough.</p>
<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that reflect the plans or strategies of other bodies</li> <li>ii. Expressions of support from bodies responsible for other strategies affecting the area</li> <li>iii. Representations in respect of services provided by other agencies</li> <li>iv. Reports or copies of correspondence as to how the representations have been considered and dealt with.</li> <li>v. These should either clarify the</li> </ul>	<p>The submitted SALP is a site allocations document that will help implement relevant objectives and policy priorities that are contained in the Core Strategy and which need to be developed further through the allocation of appropriate sites. As an implementation tool used by the Core Strategy to deliver it's vision, objectives and spatial strategy, the SALP adopts the spatial approach to planning laid out in the Core Strategy, but does not contain spatial policies itself. Section 2.2 of the submitted SALP details the approach taken to deliver the Core Strategy objectives and spatial policies.</p> <p>The vision and objectives of the Core Strategy and the SALP have been established to complement the Sustainable Community Strategy for Lewisham. To ensure a spatial and integrated approach to planning, the both Local Plan documents:</p>

<p>organisations that influence the nature of places and how they function?</p>	<p>issues raised in the representation, or include a copy of the substance of the representation</p>	<ul style="list-style-type: none"> <li>• embrace the plans and opinion of a wide range of bodies including partners within and external to the Council, including neighbouring boroughs and other stakeholders beyond geographical boundaries.</li> <li>• are based upon a comprehensive set of evidence base documents, that have been produced to provide the factual basis upon which the spatial strategy is founded. The full list of plans, reports and evidence base documents considered can be seen in the submission library.</li> <li>• have been developed through consultation to ensure that the influence of external plans and programmes has been monitored by the organisations to which they belong. Copies of the representations from all consultees at all stages of the submitted SALP development are available via the council and summarised in the consultation statement submitted (SALP1.11).</li> <li>• Identify the expected delivery agencies and the Core Strategy implementation section identifies key delivery partners</li> <li>• was governed by the Local Strategic Partnership for Lewisham which incorporates representatives from a wide range of sectors across the borough</li> <li>• was supported by the LDF steering group which incorporates council officers from many sectors including housing, transport, development control, economic development and corporate departments.</li> </ul>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<p>i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them</p> <p>ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</p>	<p>At the current time the Council is unaware of any impending matters of circumstance, however it recognises that it must anticipate future changes in order to effectively deliver the aims of the SALP. In the event of such changes, the SALP is generally considered to contain sufficient flexibility to adapt where required. As is explained in further detail in points 34 - 36, Chapter 9.10 of the Core Strategy assesses the risk of key factors including those outside Council control such as climate change and the economic recession.</p>
<p><b>Flexible</b></p>		
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected</p>	<p>i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be</p>	<p>The Council recognises that in order to be sure that a Local Plan is effectively delivering its aims, we need to be able to check on whether the objectives and policies are being achieved. The SALP will therefore be monitored yearly as a minimum using the Annual Monitoring Report. Where new indicators / targets or sources of information have been identified through the Sustainability Appraisal</p>

<p>changes in, circumstances?</p>	<p>reviewed</p> <ul style="list-style-type: none"> <li>ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:</li> <li>iii. the effectiveness of policies and what evidence is being collected to undertake this changes affecting the baseline information and any information on trends on which the development plan document is based</li> <li>iv. 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</li> <li>v. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> </ul>	<p>process, these will also be incorporated into subsequent iterations of the Annual Monitoring Report to ensure that it remains consistent with the. The monitoring framework is detailed in Section 3 of the SALP. Failure to meet the delivery targets or timescales will be cause for review of the associated allocations and objectives and the surrounding circumstances.</p> <p>Changes to the baseline information that forms the foundation upon which the Local Plan is built will be monitored by the Annual Monitoring Report and where appropriate the refreshing of the baseline data and reports themselves. As an example, the Housing Trajectory and the Infrastructure Delivery Schedule will be refreshed on an annual basis, where appropriate.</p> <p>Additionally, monitoring on baseline information from external sources will be sought on an annual basis where applicable to ensure the foundation of the Core Strategy and the wider Local Plan remains current and justifiable.</p> <p>Whilst the Council acknowledges that change occurs and there are associated risks to the feasibility of the delivery of individual site allocations in the SALP, the quantity and range of site allocations in the document ensure that the risk of non delivery of the spatial strategy is improbable. Chapter 9.10 of the Core Strategy assesses the risk of key change factors including alterations to over-arching policy, climate change and the economic recession. Additionally Section 9.10 address the flexibility required within the SALP to adapt to such change and suggest where appropriate, potential mitigation measures in conjunction with the wider Council and other local and regional bodies. In general, the Council will look to work with stakeholders and partners to deliver the Core Strategy and in the event of change to identify such matters and where required adapt to alternative methods of implementation.</p>
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?</p>	<ul style="list-style-type: none"> <li>i. Sections with the development plan document dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</li> <li>ii. Risk analysis of the strategy</li> </ul>	<p>Through the monitoring approach set out above and in the Annual Monitoring Report (for both the Site Allocations and the wider Local Plan) the council believes it will be able to identify risk and issues and then adapt to changes when required. The delivery targets for each site allocation and the implementation plan set out in Section 9 of the Core Strategy are supported by the Infrastructure Delivery Plan and contain the flexibility to meet the objectives of the SALP.</p> <p>Whilst the Council acknowledges that change occurs and there are associated risks to the feasibility of the delivery of individual site allocations in the SALP, the quantity and range of site allocations in the document ensure that the risk of non</p>

	<p>and policies to demonstrate robustness and how the plan could cope with changing circumstances</p>	<p>delivery of the spatial strategy is improbable. Chapter 9.10 of the Core Strategy assesses the risk of key change factors including alterations to over-arching policy, climate change and the economic recession. Additionally Section 9.10 address the flexibility required within the SALP to adapt to such change and suggest where appropriate, potential mitigation measures in conjunction with the wider Council and other local and regional bodies. In general, the Council will look to work with stakeholders and partners to deliver the Core Strategy and in the event of change to identify such matters and where required adapt to alternative methods of implementation.</p> <p>The specific example of changing housing targets is dealt with in Section 9 of the Core Strategy. Briefly, the flexibility across Lewisham and the abundance of allocations made through the Site Allocations, Core Strategy and Area Action Plan Local Plans means this is not an issue as a borough-wide target.</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<ul style="list-style-type: none"> <li>i. A section of the development plan document which expressly addresses flexibility</li> <li>ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing</li> </ul>	<p>Whilst the council believe that the submitted SALP is, on the whole, flexible to changing circumstances as identified in questions 34 and 35 above, it will ensure through the monitoring framework that any issues are identified in order that appropriate action can be taken in suitable timescales.</p> <p>Chapter 9.10 of the Core Strategy assesses the risk of key change factors including alterations to over-arching policy, climate change and the economic recession. Additionally Section 9.10 address the flexibility required within the Local Plan to adapt to such change and suggest where appropriate, potential mitigation measures in conjunction with the wider Council and other local and regional bodies. This approach affords confidence to the deliverability of both the Core Strategy and the associated implementation of the site allocations in the submitted SALP. In general, the Council will look to work with stakeholders and partners to deliver the Local Plan and in the event of change to identify such matters and where required adapt to alternative methods of implementation.</p>
<b>Monitoring</b>		
<p>37. Does the development plan document contain targets and milestones that relate to the delivery of the policies,</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report which report</li> </ul>	<p>The submitted SALP does not use policies to deliver the objectives identified, but rather uses site allocations to provide locations where the wider Local Plan policies are implemented.</p> <p>Each site allocation has an identified implementation body and expected development timescale and progress will be monitored through the AMR. This process will ensure that the allocations are meeting the objectives or else</p>

<p>including housing trajectories where the plan contains housing allocations?</p>	<p>on indicators, targets, milestones and trajectories</p> <p>iii. Reference to any other reports or technical documents which contain information on the delivery of policies</p>	<p>influence the future review of the LDF documents.</p> <p>Changes to the baseline information that forms the foundation upon which the Local Plan is built will be monitored by the Annual Monitoring Report and where appropriate the refreshing of the baseline data and reports themselves. As an example, the Housing Trajectory and the Infrastructure Delivery Schedule will be refreshed on an annual basis, where appropriate.</p> <p>Additionally, monitoring on baseline information from external sources will be sought on an annual basis where applicable to ensure the foundation of the Core Strategy and the wider Local Plan remains current and justifiable</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>	<p>i. Sections of the development plan document setting out indicators, targets and milestones</p> <p>ii. Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal</p> <p>iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators</p>	<p>Yes. The monitoring framework is detailed in Section 3 of the SALP. The monitoring for the SALP is to be completed through the Annual Monitoring Report.</p> <p>Changes to the baseline information that forms the foundation upon which the Local Plan is built will be monitored by the Annual Monitoring Report and where appropriate the refreshing of the baseline data and reports themselves. As an example, the Housing Trajectory and the Infrastructure Delivery Schedule will be refreshed on an annual basis, where appropriate.</p> <p>Additionally, monitoring on baseline information from external sources will be sought on an annual basis where applicable to ensure the foundation of the Core Strategy and the wider Local Plan remains current and justifiable.</p>
<p>39. Are suitable targets and indicators present (by when, how and by whom)?</p>	<p>i. Sections of the development plan document setting out indicators, targets and milestones</p> <p>ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories</p>	<p>Yes. The monitoring framework is detailed in Section 3 of the SALP. Failure to meet the delivery targets or other indicators will be cause for review of the associated allocations and objectives and the surrounding circumstances.</p> <p>Changes to the baseline information that forms the foundation upon which the Local Plan is built will be monitored by the Annual Monitoring Report and where appropriate the refreshing of the baseline data and reports themselves. As an example, the Housing Trajectory and the Infrastructure Delivery Schedule will be refreshed on an annual basis, where appropriate.</p>

		Additionally, monitoring on baseline information from external sources will be sought on an annual basis where applicable to ensure the foundation of the Core Strategy and the wider Local Plan remains current and justifiable.
<b>National policy</b>		
<p>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<p>i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy</p> <p>ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy</p> <p>iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement</p> <p>iv. Representations from the Government Office on the preferred strategy or the submitted development plan document</p> <p>v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with</p>	<p>The SALP has been produced to take account of both national and regional policy and where appropriate complement it through accounting for locally significant circumstances. The council considers that throughout the DPD the policies are consistent with national and regional policy.</p> <p>The National Planning Policy Framework (NPPF) came in to effect after the SALP was sent to public consultation on the Proposed Submission Version, i.e. once it was too late to make any significant adjustments. Since then, the SALP has been reviewed and a small number of changes are considered to be required to reflect and compliment the NPPF. These minor additions and amendments have been included in the Schedule of proposed amendments (SALP1.8 and 1.8a) submitted with the SALP.</p>
<p>42. Does the development plan document contain policies that do not add anything to existing national</p>	<p>i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons</p> <p>ii. Representations from the</p>	<p>The SALP has been produced to take account of both national and regional policy and where appropriate complement it through accounting for locally significant circumstances. The council considers that throughout the SALP the policies (site allocations) are consistent with national and regional policy without being needlessly repetitious.</p>

<p>guidance? 43. If so, why have they been included?</p>	<p>Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>The National Planning Policy Framework (NPPF) came in to effect after the SALP was sent to public consultation on the Proposed Submission Version, i.e. once it was too late to make any significant adjustments. Since then, the SALP has been reviewed and a small number of changes are considered to be required to reflect and compliment the NPPF. These minor additions and amendments have been included in the Schedule of proposed amendments (SALP1.8 and 1.8a) submitted with the SALP.</p>
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