



London Borough of Lewisham

LDF Lewisham town centre Area Action Plan: Submission Version – September 2012

PAS Soundness Self Assessment Tool

Key question	Evidence provided
Justified	
Participation	
<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 Lewisham town centre Area Action Plan (AAP).</p> <p>The Consultation Statement (LTCLP1.10) for the AAP is an umbrella document that summarises the key points regarding each round of public consultation undertaken, including:</p> <ul style="list-style-type: none"> • Who was consulted • Where and when they were involved • Representations made • How the representations have affected the production of the AAP
Research/ fact finding	
<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 DPD (LTCLP1.1) 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 Local development Framework (LDF). The Council has completed a number of the evidence base documents itself, but has additionally commissioned consultants to complete others where applicable and appropriate. The evidence base reports that have been produced and are considered relevant to the AAP are listed in Appendix 1 of the submitted DPD and a complete set of documents has been provided for inspection. Key studies include:</p> <ul style="list-style-type: none"> • Lewisham Housing Market Assessment, 2009 (CSD2.2) • South East London Boroughs' Strategic Housing Market Assessment, 2010 (CSD2.3) • Lewisham Employment Land Study, 2008 (CSD2.6) • Lewisham Retail Needs Study, 2009 (CSD2.14) • District and Major Centres Retail Survey (CSD2.15a) • Lewisham Renewables Evidence Base Study, 2009 (CSD2.22) • Lewisham Strategic Flood Risk Assessment, 2008 (CSD2.18) • Lewisham Sequential Test, 2009 (CSD2.19) • Lewisham Leisure and Open Space Study, 2009 (CSD2.9)

Key question	Evidence provided
	<ul style="list-style-type: none"> • Ravensbourne River Corridor Improvement Plan, 2009 (CSD2.12) • Lewisham Town Centre Transport Study, 2009 (CSD2.26) • Lewisham Town Centre Transport Study - Addendum, 2009 (CSD2.26a) • Lewisham Local Implementation Plan, 2009 (CSD2.28) • Lewisham Tall Buildings Study, 2009 (CSD2.31) • Lewisham Conservation Area Appraisals and Management Plans (CSD2.33) • Lewisham Borough Wide Character Study, 2010 (CSD2.30) • Lewisham Children and Young People's Plan, 2009 (CSD2.44) • North Lewisham Health Needs Assessment, 2010 (CSD2.45) <p>While the council accept that circumstances change, it is believed that the evidence base that supports the AAP is as up to date as is practically possible. The Council are continually reviewing the evidence base, an example of which is the 2012 review of the Lewisham town centre transport assessment which ensured that the local transport assumptions were accurate and supported the town centre strategy.</p> <p>The AAP itself is clearly linked to the evidence base through Appendix 1 of the submitted DPD which associates each policy and site with the evidence base, planning guidance and national, regional and local policy. Furthermore, each policy is linked, where relevant, to the associated local evidence base.</p> <p>Much of the evidence used to support the AAP 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 AAP 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 DPD. This data includes:</p> <ul style="list-style-type: none"> • GLA population and economic projections • Census data • Indices of Multiple Deprivation <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,</p>

Key question	Evidence provided
	<p>justified and suitable for informing evidence base documents and DPDs.</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 over the next 10 years. This stance is consistent with the London Plan, 2011 and is in support of the growth strategy of the wider LDF.</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>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>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 DPD (Issues & Options, Preferred Options, Options, Proposed Submission and Submission) 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. Each of the 12 reports has a section that details the relevant evidence – For example, for housing, see pages 4-8 of Housing Issues and Options Paper (CSD1.9). Of these 12 papers, the one relating to retail and town centres was most pertinent to the AAP, however all 12 papers are relevant in some way.</p> <p>The consultation summary (LTCLP1.10) brings together the responses to the Issues and Options papers.</p> <p>The Preferred Options version of the AAP (LTCLP2.3) was produced to take account of the representations received. This document clearly highlights 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 AAP until the Core Strategy was progressed to examination. This meant that no further progress was made with the AAP 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 2011 (LTCLP2.5). This report used the same 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.</p> <p>For both the 2007 Preferred Options and 2011 Further Options versions of the DPD there are Sustainability Appraisals (LTCLP2.4 and LTCLP2.6) available to support the options process. For the 2007 version, Chapter 6 and Annex C identifies the options considered and appraises the process in selecting the preferred options,</p>

Key question	Evidence provided
	<p>whilst for the 2011 version this is located in Chapter 8 and Annex C. A Sustainability Appraisal also exists for the Proposed Submission version (LTCLP2.8).</p> <p>For further details on the processes across all three consultations for these documents, please refer to the AAP Consultation Statement.</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 (LTCLP2.1) 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 in 2010 (LTCLP2.1a) 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 AAP (See LTCLP2.4, 2.6 and 2.8).</p> <p>The Submission Stage Sustainability Appraisal can be located as LTCLP1.2</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 AAP has been influenced by the sustainability considerations that have emerged from the previous sustainability appraisal.</p>
<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>Section 1 of the AAP Submission Version (LTCLP1.1) demonstrates how the AAP in general works within the requirements of the London Plan and other London-wide guidance.</p> <p>Additionally, Appendix 1 of the submitted DPD highlights the linkages between each area-wide and site policy and any relevant London Plan policies.</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 AAP as LTCLP2.9.</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"> i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy iii. A core strategy vision which is framed to set out the outcomes which are sought for the future iv. Sections of the development plan document which identify the main issues addressed v. Sections of the development plan document which indicate the priority outcomes 	<p>The council have recognised the key characteristics and issues for the town centre and subsequently created a vision and 9 objectives for the AAP which will tackle each of the identified issues. This clearly identifies what the AAP is seeking to achieve in Sections 1 and 2 of the DPD.</p> <p>Establishing the issues for the town centre 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 AAP vision and objectives are also carefully linked to those for the Core Strategy, as identified in Section 2, which shows the consistent approach of the DPDs across the LDF.</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"> i. Sections of the regional special strategy which identify cross-boundary issues. ii. Sections of the development plan document setting out 	<p>Lewisham town centre is located towards the centre of the borough from the east, west and south, however it borders a small section of the London Borough of Greenwich border at it's north-eastern edge. The production of the LDF has been influenced by key sub regional documents, reports and evidence base. Specific measures to address issues include:</p>

	<p>cross-boundary issues and the response to them</p> <p>iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations</p> <p>iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance</p>	<ul style="list-style-type: none"> • The Infrastructure Delivery Plan which contains a chapter that reflects influencing elements of development and infrastructure in adjoining boroughs. • The Strategic Flood Risk Assessment involving LB Lewisham and Southwark • The South East London Boroughs' Joint Waste Technical Apportionment Strategy (LB Bexley, Bromley, Greenwich, Lewisham and Southwark) • The Sub-regional Strategic Housing Market Assessment (LB Bexley, Bromley, Greenwich, Lewisham and Southwark) • The sharing of evidence between LB Lewisham, Greenwich and Southwark to account for the cumulative impacts of proposed development upon transport. <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 Consultation Statement (LTCLP1.10) and for any final responses pre-submission see LTCLP1.9 (Folder of all representations).</p>
<p>16. Does the development plan document contain clear objectives?</p>	<p>i. A spatial portrait which identifies the key issues facing the area</p> <p>ii. A core strategy vision which is framed to set out the outcomes which are sought for the future</p> <p>iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision</p>	<p>Chapter 2 of the submitted DPD contains 9 strategic objectives which support the AAP vision and represent the key delivery outcomes that the DPD should achieve.</p> <p>Evidence collected at the beginning of the LDF production process was used to determine the issues and challenges facing the borough. The issues that were relevant for the town centre and its environs were then utilised to create a vision and a set of objectives for Lewisham. Both the vision and the objectives for the town centre have been developed to both complement the Core Strategy and other LDF documents and to mitigate the issues established at the start of the document production process.</p>
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p>	<p>i. The spatial portrait and the commentary in the development plan document as to how the objectives</p>	<p>Chapter 2 of the submitted DPD contains 9 strategic objectives which support the AAP vision and represent the key delivery outcomes that the DPD should achieve.</p>

<p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<p>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>	<p>As previously identified in Test 16, the objectives are directly related to the local evidence collected to support the Issues and Options 2005 (CSD1.9 – CSD1.19). As such, the objectives have local influence integral to their creation and are specific to Lewisham as a borough firstly and then to the town centre.</p> <p>Further, the objectives have been subject to consultation and public engagement at each stage of the DPD 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 and the objectives in the AAP is clearly apparent. Section 2 identifies the issues, links them to the objectives and vision of the AAP and then also to the Core Strategy strategic objectives. The detail of the objectives are specific to Lewisham town centre and talk directly about required improvements.</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 document which explain how policies derive from the objectives 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 and should succeed</p> <p>v. Sections of the development</p>	<p>Section 4 contains site specific policies that provide assistance to delivery across many of the objectives in some part. It is made clear how the Town Centre Areas relate to the objectives at the start of Section 4. While the Town Centre Area focused objectives are identified at the beginning of each area sub-section of Section 4.</p> <p>Each of the area-wide policies identified in Section 5 are grouped by categories based upon the Core Strategy objective themes. Each sub-section of Section 5 also identifies which of the AAP objectives are met or assisted by the policies contained within.</p> <p>Section 6 contains the implementation and monitoring policies that establish a delivery strategy table that identifies how the council will ensure that the AAP policies are successfully implemented to meet the AAP objectives. The delivery strategy table (in Appendix 3) contains details of the each policy, it's relationship to the objectives, the responsible delivery bodies and monitoring indicators, targets and timescales. This table in total shows that each objective is delivered by multiple area-wide policies as well as the combined input of the Town Centre Area policies.</p> <p>Given the above it is considered that there are no obvious gaps regarding</p>

	<p>plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.</p>	<p>the objectives of the DPD.</p>
<p>21. Are there realistic timescales related to the objectives?</p>	<p>i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives</p> <p>ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery</p>	<p>Policies LAAP26 Implementation and LAAP27 Monitoring demonstrate that the AAP is clearly accountable to realistic timetables. LAAP26 shows how the council will facilitate and lead where appropriate to ensure that the timescales associated to the AAP objectives are met. Key highlights from LAAP26 include:</p> <ul style="list-style-type: none"> • The Infrastructure Delivery Plan, 2010 (section 9.3) (CSD2.17) which supports the Core Strategy and AAP and will be managed through the LSPs Sustainable Development Partnership • The Council using it's own land and compulsory purchase powers to assist in the delivery of schemes • Establishing early and good working relationships with prospective and existing developers, designers, partners and other stakeholders. <p>Further, Appendix 3 contains details of the implementation and monitoring framework which will manage the delivery targets and milestones in place and lead mitigatory actions should any issues occur, ensuring that timescales remain appropriate.</p> <p>Appendix 4 assists the process outlined above by highlighting the key infrastructure projects that are required to support the growth proposed in the town centre. Delivery of these essential elements will also be monitored.</p>
<p>22. Are the policies internally consistent?</p>	<p>i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent</p>	<p>The council considers that the policies in the AAP are internally consistent both within the AAP and the wider LDF.</p> <p>The vision for the AAP is taken directly from the Spatial Policies of the Core Strategy. Further, Figure 2.2 in the AAP demonstrates how the AAP strategic objectives link in to the strategic objective themes used in the Core Strategy. This shows a consistent approach to the development of</p>

	<p>ii. A very brief statement explaining how the council considers its objectives are consistent</p>	<p>the town centre across existing LDF documents.</p> <p>Within the AAP, each policy linked to one or more objectives while groups of policies combine to fulfil the objectives, as shown in response to question 19 above. Policies will reference each other (especially between area-wide policies and site-specific policies), but are not repetitious or contradictory at any time.</p> <p>No objections have been received that suggest there is a conflict between policies within the DPD.</p>
<p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? 	<p>i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure</p> <p>ii. Representations from the Government Office</p> <p>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>The AAP is not repetitious or in conflict with any other local, regional or national policy.</p> <p>The planning context for the AAP is set out in Figure 1.4 of the submitted 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 DPDs. Specifically for the AAP it states that:</p> <ul style="list-style-type: none"> • The Lewisham Town Centre Area Action Plan AAP will set out a comprehensive set of policies and proposals for development in the Lewisham Town Centre. It will include major redevelopment opportunities and major traffic and transport infrastructure changes. It will set out the planning framework for significant change and conservation, and where applicable detailed development policies. It should be noted that the Lewisham Gateway site is allocated in the Site Allocations DPD and will be referred to within the AAP. <p>As previously stated, the AAP takes it's vision largely from the Core Strategy and the objectives are consistent with the spatial policies laid out in the Core Strategy. However, the area-wide and site specific policies in place to deliver the objectives are not repetitious of any other DPD and are locally focussed on the town centre. Similarly, while the London Plan and national policy may be referenced within the AAP for reader clarity, it does not contain any repetition of policy.</p> <p>For clarity Appendix 1 of the AAP contains a table that displays the linkages between the AAP policies and other local, regional and national policies.</p>

<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document that identify the key objectives and how they will be delivered upon ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document 	<p>Section 4 contains site specific policies that provide assistance to delivery across many of the objectives in some part. It is made clear how the Town Centre Areas relate to the objectives at the start of Section 4. While the Town Centre Area focused objectives are identified at the beginning of each area sub-section of Section 4.</p> <p>Each of the area-wide policies identified in Section 5 are grouped by categories based upon the Core Strategy objective themes. Each sub-section of Section 5 also identifies which of the AAP objectives are met or assisted by the policies contained within.</p> <p>Section 6 contains the implementation and monitoring policies that establish a delivery strategy table that identifies how the council will ensure that the AAP policies are successfully implemented to meet the AAP objectives. The delivery strategy table (in Appendix 3) contains details of the each policy, it's relationship to the objectives, the responsible delivery bodies and monitoring indicators, targets and timescales. This table in total shows that each objective is delivered by multiple area-wide policies as well as the combined input of the Town Centre Area policies.</p> <p>Given the above it is considered that there are no obvious gaps regarding the delivery of the objectives of the DPD and also no gaps in explaining this situation.</p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document that show how the development management policies: <ul style="list-style-type: none"> • will help to deliver the strategy 37. derive from, and elaborate on, the objectives and policies of the plan 	<p>Some policies within the AAP are certainly related to development management and it is considered that they are supportive of the strategic objectives. The AAP development management policies are locally focussed on the town centre and are not repetitious of those policies being developed for the Lewisham-wide Development Management DPD. The borough-wide DPD will set out the main policies and the reasoned justification that will be used to consider planning applications for development or change of use.</p> <p>Section 4 contains site specific policies that provide assistance to delivery across many of the objectives in some part. It is made clear how the Town Centre Areas relate to the objectives at the start of Section 4. While the Town Centre Area focused objectives are identified at the beginning of each area sub-section of Section 4.</p>

		<p>Each of the area-wide policies identified in Section 5 are grouped by categories based upon the Core Strategy objective themes. Each sub-section of Section 5 also identifies which of the AAP objectives are met or assisted by the policies contained within.</p> <p>Section 6 contains the implementation and monitoring policies that establish a delivery strategy table that identifies how the council will ensure that the AAP policies are successfully implemented to meet the AAP objectives. The delivery strategy table (in Appendix 3) contains details of the each policy, it's relationship to the objectives, the responsible delivery bodies and monitoring indicators, targets and timescales. This table in total shows that each objective is delivered by multiple area-wide policies as well as the combined input of the Town Centre Area policies.</p> <p>Given the above it is considered that all the AAP policies are supportive of the strategy and objectives.</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<ul style="list-style-type: none"> i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward ii. Representations in respect of infrastructure iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with 	<p>The site specific policies in Section 4 of the AAP identify a number of infrastructure requirements within the policy text, the supporting text and the detail of planning contribution priorities. Section 5 – Area-wide policies – contains a policy specifically regarding social infrastructure (LAAP22) which details a set of general principles and requirements for the town centre. Other area-wide policies also encourage the development of infrastructure including LAAP18 Public realm, LAAP21 Encouraging cycling and walking and LAAP23 Heritage assets.</p> <p>Further, Appendix 4 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 wider LDF programme. Each of the infrastructure requirements identified in the IDP that are relevant to Lewisham town centre have been included in the appendix.</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 and Lewisham town centre over a 15 year period.</p>

<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out delivery mechanisms and timescale ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered iii. Research or studies that address matters of delivery and the realistic timescales iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder vi. Correspondence from stakeholders on delivery mechanisms and timescale vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	<p>Yes. Policies LAAP26 Implementation and LAAP27 Monitoring demonstrate that the AAP is clearly accountable to realistic timescales. LAAP26 also clearly details the delivery mechanisms that will be used to ensure the implementation of the policies and sites and hence objectives of the AAP, including how the council will facilitate delivery alongside a number of key partners and other stakeholders, whilst taking the lead where required and appropriate.</p> <p>Additionally, Appendix 3 contains details of the implementation and monitoring framework which will manage the delivery targets and milestones in place and lead mitigatory actions should any issues occur, ensuring that timescales are monitored and remain appropriate.</p> <p>Appendix 4 assists the process outlined above by highlighting the key infrastructure projects that are required to support the growth proposed in the town centre. Delivery of these essential elements will also be monitored.</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</p>	<ul style="list-style-type: none"> i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for 	<p>Section 6 of the AAP regarding implementation and monitoring demonstrates the aspects required to secure the comprehensive delivery of the AAP policies. In particular, section 6.2 introduces the Infrastructure Delivery Plan (IDP) (CSD2.17) which details what infrastructure is required, how it will be delivered and by whom. In particular this evidence</p>

<p>the strategy/policies?</p>	<p>their delivery</p> <ul style="list-style-type: none"> ii. Representations in respect of infrastructure iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with 	<p>base document reflects the investment and corporate plans of those responsible for delivering the essential infrastructure requirements. Appendix 4 of the AAP includes a summary of the IDP essential infrastructure requirements that are of key note to Lewisham town centre, including who is responsible for delivering the schemes and over what timescale.</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"> i. Sections of the development plan document setting out responsibilities for delivery ii. Correspondence showing how other stakeholders intend to support the delivery of the policies iii. Reports by the council or the relevant stakeholder iv. Representations from stakeholders on implementation v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	<p>Where it is possible and appropriate, the Core Strategy details the responsible body/bodies for the delivery of sections of the AAP, including throughout the policy sections 4 and 5.</p> <p>For more detail, Section 6 – Implementation and Monitoring – details the aspects required to secure the comprehensive delivery of the AAP policies. Section 6.2 highlights the key partnerships that will be used to deliver the AAP policies, sites and objectives.</p> <p>The AAP and wider LDF is supported by the Local Strategic Partnership (LSP) and progress is regularly reviewed by the sub-board, the Sustainable Development Partnership (SDP). The LSP incorporates representatives from a wide range of sectors across the borough who are key in delivering the AAP and hence this process ensures agreement to progress the DPD and the policies and sites within it.</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 organisations that influence the nature of places</p>	<ul style="list-style-type: none"> i. Sections of the development plan document that reflect the plans or strategies of other bodies ii. Expressions of support from bodies responsible for other strategies affecting the area iii. Representations in respect of services provided by other agencies iv. Reports or copies of 	<p>The AAP integrates elements of land use planning with a number of spatial policies, supported by core area-wide policies and an implementation and monitoring framework. Within the document, the vision, strategic objectives and spatial strategy exhibit the framework for the delivery of development across the town centre and demonstrate the spatial nature of the DPD. Specifically, the spatial strategy addresses the need to think about development holistically and not within ‘red line boundaries’. Further, Section 4 details a number of spatial areas of the town centre and specific sites, each of which have different requirements and hence different policies.</p>

<p>and how they function?</p>	<p>correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation</p>	<p>To ensure a spatial and integrated approach to planning, the AAP also:</p> <ul style="list-style-type: none"> • embraces the plans and opinion of a wide range of bodies including partners within and external to the Council, including stakeholders beyond the town centre boundary. • is based upon a comprehensive set of evidence base documents, that have been produced to provide the factual basis upon which the vision and objectives are founded. The full list of relevant plans, reports and evidence base documents considered can be seen in Appendix 1 of the AAP. • has 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 DPD development are available via the council and summarised in the consultation statement (LTCLP1.10) submitted. • Section 6 – Implementation and monitoring – details the essential infrastructure that needs to be delivered to support the implementation of each site and the town centre as a whole. This reflects the findings of the Infrastructure Delivery Plan which reports on how and when infrastructure will be delivered to support the planned growth in the town centre. It has been developed in collaboration with council departments including education, leisure and open space and external bodies such as the PCT and development agencies. Section 6 also contains a paragraph that explains the Council commitment to partnership working in relation to other public, private and voluntary sector organisations. • was governed by the Local Strategic Partnership for Lewisham which incorporates representatives from a wide range of sectors across the borough • is supported by the LDF steering group which incorporates council officers from many sectors including housing, transport, development control, economic development and corporate departments. <p>The effect of the various plans and strategies of other bodies can be seen throughout the AAP in a number of objectives, policies and the accompanying justification text.</p>
<p>33. Does the development plan</p>	<p>i. Explicit recognition within the</p>	<p>At the current time the Council is unaware of any impending matters of</p>

<p>document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<p>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>circumstance, however it recognises that it must anticipate future changes in order to effectively deliver the aims of the DPD. In the event of such changes, the AAP is generally considered to contain sufficient flexibility to adapt where required. As is explained in further detail in points 34 - 36, Section 6 of the submitted DPD contains a section on risk assessment to support adaptation to change by covering a number of key potential alterations to circumstance.</p>
Flexible		
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</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 reviewed</p> <p>ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:</p> <ul style="list-style-type: none"> • 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 <p>iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline</p> <p>iv. Risk analysis of the strategy</p>	<p>The Council recognises that in order to be sure that a DPD is effectively delivering it's aims, we need to be able to check on whether the objectives and policies are being achieved. The AAP will therefore be monitored yearly as a minimum using the Annual Monitoring Report (CSD1.7). Where new indicators / targets or sources of information have been identified through the Sustainability Appraisal process, these will also be incorporated into subsequent iterations of the Annual Monitoring Report to ensure that it remains consistent with the DPD. The monitoring framework is detailed in Appendix 3 of the AAP including the indicators, targets and the key indicator source. Failure to meet the proposed targets will be cause for review of the associated policies and objectives and the surrounding circumstances. In support of Appendix 3, Section 6.2 of the AAP details the monitoring process.</p> <p>Changes to the baseline information that forms the foundation upon which the AAP 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, whilst the Lewisham Town Centre Transport Assessment (CSD2.26a) has been recently reviewed.</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 remains current and justifiable.</p> <p>Whilst the policies within the DPD are considered flexible, the Council</p>

	and policies to demonstrate robustness and how the plan could cope with changing circumstances	acknowledges that change occurs and the associated risks to the feasibility of the document must be considered. Section 6.3 assesses the risk of key change factors including alterations to over-arching policy, climate change and the economic recession. Additionally Section 6.3 considers the flexibility required within the DPD to adapt to such change and suggest where appropriate, potential mitigation measures. In general, the Council will look to work with stakeholders and partners to deliver the AAP and in the event of change to adapt to alternative methods of implementation.
35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?	<ul style="list-style-type: none"> i. Sections within 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 ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	<p>Through the monitoring approach set out above and in the AAP Section 6 and the Annual Monitoring Report (for both the AAP and the wider LDF) the council believes it will be able to identify risk and issues and then adapt to changes when required. The implementation plan set out in Section 6 is supported by the Infrastructure Delivery Plan and contains the flexibility to meet the objectives of the DPD. This is further reinforced through section 6.3 relating to risk assessment.</p> <p>The specific example of changing housing targets is dealt with in Section 6.3 of the AAP. Briefly, the flexibility across Lewisham means this is not an issue as a borough-wide target.</p>
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	<ul style="list-style-type: none"> i. A section of the development plan document which expressly addresses flexibility ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing 	<p>The AAP is flexible and the council believe that it can cope with a considerable amount of change, however it will ensure through the monitoring framework previously discussed that any issues are identified in order that appropriate action can be taken in suitable timescales.</p> <p>Section 6.3 of the DPD identifies the flexibility of the AAP and the risks involved and suggests the general approach towards adapting to changing circumstances. In brief, the Council will look to work with stakeholders and partners to deliver the AAP and in the event of change this will continue, with partnership working the key to identify what is required to adapt to alternative methods of implementation.</p>
Monitoring		
37. Does the development plan	i. Sections of the development	Yes. The Council recognises that in order to be sure that the DPD is

<p>document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?</p>	<p>plan document setting out indicators, targets and milestones</p> <p>ii. Sections of the current annual monitoring report which report 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>effectively delivering the aims of the document, we need to be able to check whether the objectives and policies are being achieved. The AAP will be monitored yearly as a minimum using the Annual Monitoring Report (AMR). Where new indicators, targets or sources of information have been identified through the Sustainability Appraisal process, these will be incorporated into subsequent iterations of the AMR` to ensure that it remains consistent with the AAP.</p> <p>Policies LAAP26 Implementation and LAAP27 Monitoring demonstrate that the AAP is clearly accountable to targets and milestones. LAAP26 also clearly details the delivery mechanisms that will be used to ensure the implementation of the policies and sites and hence objectives of the AAP, including how the council will facilitate delivery alongside a number of key partners and other stakeholders, whilst taking the lead where required and appropriate.</p> <p>Additionally, Appendix 3 contains details of the implementation and monitoring framework which contains:</p> <ul style="list-style-type: none"> • Responsible agencies • Milestones • Indicators / actions • Indicator sources • Targets • Infrastructure needs • Risks • Flexibility <p>The AMR will also monitor the LDF evidence base and will therefore examine the baseline information that forms the foundation upon which the AAP is built. Where appropriate this baseline information will be refreshed regularly, for example the Housing Trajectory is refreshed annually, while the Lewisham Town Centre Transport Assessment has recently been reviewed.</p>
<p>38. Is it clear how these are to be measured and are these linked to the production of the annual</p>	<p>i. Sections of the development plan document setting out indicators, targets and</p>	<p>Yes. The Council recognises that in order to be sure that the DPD is effectively delivering the aims of the document, we need to be able to check whether the objectives and policies are being achieved. The AAP</p>

<p>monitoring report?</p>	<p>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>will be monitored yearly as a minimum using the Annual Monitoring Report (AMR). Where new indicators, targets or sources of information have been identified through the Sustainability Appraisal process, these will be incorporated into subsequent iterations of the AMR` to ensure that it remains consistent with the AAP.</p> <p>Policies LAAP26 Implementation and LAAP27 Monitoring demonstrate that the AAP is clearly accountable to targets and milestones. LAAP26 also clearly details the delivery mechanisms that will be used to ensure the implementation of the policies and sites and hence objectives of the AAP, including how the council will facilitate delivery alongside a number of key partners and other stakeholders, whilst taking the lead where required and appropriate.</p> <p>Additionally, Appendix 3 contains details of the implementation and monitoring framework which contains:</p> <ul style="list-style-type: none"> • Responsible agencies • Milestones • Indicators / actions • Indicator sources • Targets • Infrastructure needs • Risks • Flexibility <p>The AMR will also monitor the LDF evidence base and will therefore examine the baseline information that forms the foundation upon which the AAP is built. Where appropriate this baseline information will be refreshed regularly, for example the Housing Trajectory is refreshed annually, while the Lewisham Town Centre Transport Assessment has recently been reviewed.</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>Yes. The Council recognises that in order to be sure that the DPD is effectively delivering the aims of the document, we need to be able to check whether the objectives and policies are being achieved. The AAP will be monitored yearly as a minimum using the Annual Monitoring Report (AMR). Where new indicators, targets or sources of information</p>

	<p>ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories</p>	<p>have been identified through the Sustainability Appraisal process, these will be incorporated into subsequent iterations of the AMR` to ensure that it remains consistent with the AAP.</p> <p>Policies LAAP26 Implementation and LAAP27 Monitoring demonstrate that the AAP is clearly accountable to targets and milestones. LAAP26 also clearly details the delivery mechanisms that will be used to ensure the implementation of the policies and sites and hence objectives of the AAP, including how the council will facilitate delivery alongside a number of key partners and other stakeholders, whilst taking the lead where required and appropriate.</p> <p>Additionally, Appendix 3 contains details of the implementation and monitoring framework which contains:</p> <ul style="list-style-type: none"> • Responsible agencies • Milestones • Indicators / actions • Indicator sources • Targets • Infrastructure needs • Risks • Flexibility <p>The AMR will also monitor the LDF evidence base and will therefore examine the baseline information that forms the foundation upon which the AAP is built. Where appropriate this baseline information will be refreshed regularly, for example the Housing Trajectory is refreshed annually, while the Lewisham Town Centre Transport Assessment has recently been reviewed.</p>
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National policy		
<p>40. Does the development plan document contain any policies or proposals that are not</p>	<p>i. Sections of the development plan document which refer to planning policy statements</p>	<p>The AAP 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</p>

<p>consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<p>and justify why any policies are not consistent with national policy</p> <ul style="list-style-type: none"> ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement iv. Representations from the Government Office on the preferred strategy or the submitted development plan document v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with 	<p>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 AAP was sent to public consultation on the Proposed Submission Version, i.e. once it was too late to make any adjustments. Since then, the AAP has been reviewed and a small number of changes are considered to be required to reflect and compliment the NPPF. These minor additions and modifications have been included in the two Schedules of recommended modifications, one for main modifications and one for additional modifications (LTCLP1.7 and LTCLP1.7a) submitted with the DPD.</p>
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p>The AAP 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 without being needlessly repetitious.</p> <p>The National Planning Policy Framework (NPPF) came in to effect after the AAP was sent to public consultation on the Proposed Submission Version, i.e. once it was too late to make any adjustments. Since then, the AAP has been reviewed and a small number of changes are considered to be required to reflect and compliment the NPPF. These minor additions and modifications have been included in the two</p>

		Schedules of recommended modifications, one for main modifications and one for additional modifications (LTCLP1.7 and LTCLP1.7a) submitted with the DPD.
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