



London Borough of Lewisham

Catford Town Centre Local Plan – Submission (November 2013)

Soundness Self-Assessment Checklist.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i>		

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<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. 	<p>The Catford Town Centre Local Plan (CTCLP) (CTCLP1.1) is a planning document key tool for regenerating the designated ‘Town Centre’ and surrounding area over period to 2026. The introductory chapters (chapter 1 and chapter 2) set out the vision and specific objectives for the on-going redevelopment of the area. Evidence base documents, local consultation and the Sustainability Appraisal have informed the Vision, Objectives and Policies for the area. Table 1.1 specifically identifies the key area-wide issues and opportunities.</p> <p>Chapter 2, sections 2.3 and 2.4 explain how the policies derive from the objectives and wider vision.</p> <p>The CTCLP contains a number of key development sites and proposals. Chapter 5 (page 115-112) and Appendix 2 explain the approach to the delivery, monitoring and risk. The Catford Town Centre infrastructure schedule, with phasing, is found at Appendix 3. The CTCLP implements the Core Strategy (CS) (CSD1.5) and the Council will continue to ensure it is delivered in accordance with Section 9 of the CS.</p> <p>The Council considers that policies in the plan are internally consistent both within the CTCLP itself and with the Core Strategy and wider LDF. The Local Development Scheme (2013) (CSD1.4a) contains up to date information on each of the local plans the Council intends to prepare and how they relate to each other. Section 1.4 and Figure 1.4 show how the CTCLP relates to other policy, including other local plans.</p>
<p><i>The presumption in favour of sustainable</i></p>	<ul style="list-style-type: none"> An evidence base which establishes 	<p>The CTCLP seeks to positively contribute towards implementing</p>

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<p><i>development (NPPF paras 6-17)</i></p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or —specific policies in this Framework indicate development should be restricted. 	<p>the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see ‘Section 3 Effective’, below).</p> <ul style="list-style-type: none"> • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. 	<p>the objectives and strategy of Lewisham’s Core Strategy.</p> <p>The policy guidance is based on a robust evidence, supporting the London Plan and Lewisham’s Core Strategy and is considered to be sufficiently flexible to respond to changing circumstances and site specific issues.</p> <p>Appendix 1 of the CTCLP sets out evidence based documents and the linkages between relevant documents. Section 1.4 (pg 19) makes clear that every Policy in the CTCLP is supported by evidence and has multiple links to other local plans, the London Plan and NPPF.</p> <p>The CTCLP will be monitored to ensure its effectiveness against a number of indicators, through the Annual Monitoring report .</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> • A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk). 	<p>CLP Policy 8 (page 68) specifically reflects the principles of the presumption in favour of sustainable development.</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject</p>	<ul style="list-style-type: none"> • Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with 	<p>In applying the policies of the adopted Core Strategy, Chapter 3 of the CTCLP sets out key development sites and specifically supports and encourages mixed use developments in appropriate locations.</p> <p>As part of the plan preparation process the Council objectively assessed the economic, social and environmental needs of the borough through the evidence base for the Core Strategy. The</p>

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to the caveats specified in Paragraph 14 of the NPPF (see above).	the Duty to Co-operate.	CTCLP contributes to meeting these needs. The policy guidance is based on robust evidence supporting the Core Strategy. The evidence based papers which have been used to shape the CTCLP are outlined in Appendix 1 of the CTCLP.
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	<ul style="list-style-type: none"> • Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy and LEP Strategy where appropriate. 	The CTCLP seeks to positively contribute towards implementing the vision and objectives of the London Plan and the objectives of Lewisham’s CS. The CTLCP and CS are positive growth plans that sets out a detailed strategy and policies to grow the local economy and link deprived areas with the employment benefits arising from the development of major sites and key locations in the borough.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> • A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated 	There are no specifically allocated employment sites within Catford town centre, however many of the key development sites seek mixed use development in order to support the local economy and existing civic office functions are supported. Details on economic growth for Catford are contained within CLP Policies 10, 11, 12, 13 and 14 and designation of key development sites, this is supported by the Catford Retail and Economic Impact Assessment (CSD2.15d).

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	site being used for that purpose) para (22)	
<p>2. Ensuring the vitality of town centres (paras 23-37)</p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres. 	<p>The plan addresses this in a positive way. The borough wide ‘Retail Capacity Study’, 2009 and 2010 addendum (CSD2.14 & CSD2.14a) provides the evidence base for major and town centres, including Lewisham and Catford. Further evidence specific to Catford town centre is contained within the Catford Retail and Economic Impact Assessment, 2013 (CSD2.15d). The evidence base also includes the annual town centres health check and an update of the local shopping parades survey (CSD2.15c).</p> <p>The Core Strategy Spatial Policy 2 reflects the evidence base by detailing the additional retail floor space that will be accommodated in the town centres located in the Regeneration and Growth Areas, this is supplemented and further assessed by the Catford Retail and Economic Impact Assessment, 2013 (CSD2.15d).</p> <p>The retail hierarchy, definition of town centre and management of centres is set out in Core Strategy Policy 6 and is supported by DMLP Policies 13, 14, 15 and 16.</p>
<p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)</p>	<ul style="list-style-type: none"> An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. Primary and secondary shopping frontages identified and allocated. 	<p>An assessment of the capacity of Catford town centre is contained within the Catford Retail and Economic Impact Assessment, 2013 (CSD2.15d).</p> <p>The Site Allocations Local Plan designates primary and secondary shopping frontages based on evidence from the Supplementary Report to the Lewisham Retail capacity Study 2009 (September 2010) and the annual Lewisham town centres health check</p>

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		surveys. The town centre boundary, primary shopping area and primary and secondary frontages are shown in Figures 4.1 (page78) and 4.2 (page80).
<p>3. Supporting a prosperous rural economy (para 28)</p>		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<ul style="list-style-type: none"> Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities. 	Not applicable
<p>4. Promoting sustainable transport (paras 29-41)</p>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p>	<ul style="list-style-type: none"> Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. 	<p>The CTCLP helps facilitate the wider Core Strategy objectives and promotes development whilst contributing to the wider sustainability and health objectives. Transport infrastructure was identified in the CS and key traffic and transport improvements including are outlined in CLP Policy 1 (page 33). The approach to sustainable transport is supported by Catford Gyratory Modelling Summary, Technical Note 2, 2013 (CSD2.29a) and the Catford Town Centre Parking Capacity Study, 2013 (CSD2.29b). This policy also provides support for extensions to strategic transport networks including London Underground Bakerloo Line and Docklands Light Rail.</p> <p>CLP Policy 1 supports Core Strategy Policy 14 Sustainable Movement and Transport and the Development Management Local Plan (Submission Version Nov 2013) (DMLP1.1) which has a managed and restrained approach to car parking standards. These are considered justified and were found sound at the</p>

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<p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p>	<ul style="list-style-type: none"> • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. • If local (car parking) standards have been prepared, are they justified and necessary? (39) • Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan. 	<p>London Plan EIP. The criteria in NPPF paragraph 35 are dealt with in the CS.</p> <p>Rural areas are not applicable to Lewisham</p> <p>The sustainable spatial strategy was set out within the CS, the CTCLP helps implement this strategy however the CTCLP recognises in paragraph 3.1 that the transport improvements need to be co-ordinated.</p>

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<p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		
<p>5. Supporting high quality communications infrastructure (paras 42-46)</p>		
<p>Support the expansion of the electronic communications networks, including telecommunications’ masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> • Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44. 	<p>The Development Management Local Plan (DMLP) (DMLP1.1) specifically deals with Telecommunication infrastructure and this has not been replicated in the CTCLP. The supplementary text in para 2.310 and 2.311 of the DMLP supports DM Policy 39 and highlights the importance of high speed broadband and in providing sustainable economic growth.</p>
<p>6. Delivering a wide choice of high quality housing (paras 47-55)</p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> • Identification of: <ul style="list-style-type: none"> a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of ‘compelling evidence’ to justify their inclusion (48) • A SHLAA 	<p>The Council publishes and updates the 5 year supply of housing sites in the annual monitoring report (AMR). The AMR 2011-12 (CSD1.7) shows the Council has met the London Plan housing targets over the past 5 years and identifies deliverable sites in excess of the 5 year buffer required by the NPPF. The Council has recently taken part in the London wide SHLAA coordinated by the GLA who expect to publish revised housing targets as part of the London Plan review in 2014.</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible,</p>	<ul style="list-style-type: none"> • Identification of a supply of developable sites or broad locations 	<p>This is published in the AMR 2011-12 (CSD1.7)</p>

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years 11-15 (47).	for: a) years 6-10; b) years 11-15	
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	<p>This is published in the AMR 2011-12 (CSD1.7)</p> <p>See above regarding London wide SHLAA</p>
Set out the authority’s approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> • Policy on the density of development. 	<p>CS policy 15 sets out the approach to density and signposts the evidence base used.</p>
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	<ul style="list-style-type: none"> • Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50) • Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50) 	<p>The CS sets out policies on all these topics and lists the evidence base used. The CTCLP policies use the same evidence base.</p>
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites	<ul style="list-style-type: none"> • Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local 	<p>Lewisham is not a rural area and this section is not relevant.</p>

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<p>where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<p>needs.</p> <ul style="list-style-type: none"> • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new isolated homes listed at para 55. 	
<p>7. Requiring good design (paras 56-68)</p>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<ul style="list-style-type: none"> • Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues 	<p>Core Strategy Policy 15 (120-122) and the Development Management Local Plan Policies 30 (pg 83) and 32 (pg 94) set out the central core principles for good design such as layout, form, safe design, local character and local distinctiveness, scale mass, materials, views and designated and non-designated heritage assets. CTCLP Policy 17 and Paragraph 4.5.1 of the CTCLP specifically deal with design and the public realm. As CS policy 15 provides the policy context for providing high quality building design it was not considered necessary to repeat these requirements in the CTCLP. Specific design requirements have been outlined for the Major sites in section 3, therefore CTCLP Policy 17 deals with the design and function of public spaces or the public realm in the town centre.</p>
<p>8. Promoting healthy communities (paras 69-77)</p>		
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).</p>	<ul style="list-style-type: none"> • Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, 	<p>The Core Strategy includes strategic objective 11 which promotes community well being. Several Development Management Local Plan policies promote healthy communities and these policies use the same evidence base as the CS. Additional evidence is provided in the Foresight report ‘Tackling Obesities: Future Choices (2007); Department of Health publication ‘Healthy Lives, Healthy People’</p>

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	<p>including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</p>	<p>, 2010; the Councils own reports 'Hot food takeaway shops: an evidence based study (2013); 'Pubs in Lewisham: an evidence based study (2013).</p> <p>CTCLP Policy 17 and para 4.5.1 deal specifically with design and the public realm. CTCLP 17 seeks to ensure the design and function of public spaces or the public realm in town centres is of the highest quality to create safe, accessible, healthy and attractive environment.</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> • Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure. 	<p>The borough-wide strategy towards social infrastructure is detailed in Core Strategy Policies 6, 12, 19 and 20.</p> <p>The CTCLP vision and objectives seek to promote the town centre as a place of population growth. CTCLP Policy 20 supports the implementation of the Catford Plan's objectives 2 and 9 and aims to deliver the necessary social infrastructure that the additional population will require.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally</p>	<ul style="list-style-type: none"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. 	<p>Core Strategy policy 12 protects open space in Lewisham and it is not therefore dealt with in the CTCLP.</p>

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<p>derived standards to provide these (73).</p>	<p>(73)</p> <ul style="list-style-type: none"> • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75) 	
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78) 	<p>The CTCLP does not include policy on Local Green Spaces as the Council considered this is best done through any future neighbourhood plans as stated in the NPPF.</p>
<p>9. Protecting Green Belt land (paras 79-92)</p>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement</p>	<ul style="list-style-type: none"> • Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> ○ Enhance the beneficial use of the Green Belt. (81) ○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) ○ Specify that inappropriate development should not be 	<p>As an inner London borough there are no Green Belt designations in Lewisham.</p>

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<p>policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<p>approved except in very special circumstances. (87)</p> <ul style="list-style-type: none"> ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	
<p>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> ● Planning of new development in locations and ways which reduce greenhouse gas emissions. ● Support for energy efficiency improvements to existing building. ● Local requirements for a building’s sustainability which are consistent with the Government’s zero carbon buildings policy . (95)) 	<p>The CTCLP supports the approach to delivering new development which reduces greenhouse gases and enhancing local air quality in line with the Core Strategy Policies 7 & 8. Key CTCLP policies that support this approach include CLP Policy 15.</p> <p>The CTCLP uses the same evidence base as that used for the CS in particular see pages 99-100 of the CS.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> ● A strategy and policies to promote and maximise energy from renewable and low carbon sources, ● Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also 	<p>The overarching position on the use and supply of renewable and low carbon energy is set out within the Core Strategy Policy 8. Further details regarding sustainable design and construction including heating and cooling networks are outlined within the Development Management Local Plan Policy 22. This is further supported by CLP Policy 15 of the CTCLP which promotes carbon dioxide emission reductions and decentralised energy networks.</p>

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	<p>NPPF footnote 17)</p> <ul style="list-style-type: none"> • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97) 	
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<ul style="list-style-type: none"> • Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures 	<p>The overarching position on climate change and adapting to the effects and adapting to the effects are outlined in Core Strategy Policy 7. CLP Policy 16 ensures measures are adopted to manage and reduce the risk of flooding and adequately deal with climate change. CLP Policy 16 looks at each of the key development sites identified in the CTCLP and summarises the relevant information from the Sequential Test document, July 2009 (CSD2.19), which is based on the SFRA, 2008 (CSD2.18). CLP Policy 16 helps ensure developments are environmentally sustainable and supports the wider strategic climate change and flood risk objectives set out within the CS. The CTCLP uses the same evidence base as that for the CS in particular see pages 99-100 of the CS.</p>
<p>Manage risk from coastal change (106)</p>	<ul style="list-style-type: none"> • Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	<p>Not applicable to Lewisham.</p>
<p>11. Conserving and enhancing the natural environment (paras 109-125)</p>		

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Protect valued landscapes (109)	<ul style="list-style-type: none"> • A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. • Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs. 	<p>The Development Management Local Plan Policy 24 specifically deals with protecting and enhancing biodiversity and green infrastructure. This policy implements Core Strategy Policy 11 and 12.</p> <p>There are no agricultural land, National Parks or AONBs in Lewisham.</p>
Prevent unacceptable risks from pollution and land instability (109)	<ul style="list-style-type: none"> • Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity. 	<p>The CTCLP seeks to support the CS and at a site specific level seeks to ensure that types of development are sited appropriately. The CTCLP uses the same evidence base as that for the CS.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> • Identification and mapping of local ecological networks and geological conservation interests. • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species 	<p>CLP Policy 16 encourages the provision of green infrastructure at roof level and supplements the CS and DMLP. The CTCLP uses the same evidence base as that for the CS.</p>
<p>12. Conserving and enhancing the historic environment (paras 126-141)</p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> • A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets • A policy or policies which promote new development that will make a positive contribution to character and 	<p>CTCLP Policy 19 supplements the DMLP and deals with the management and protection of Catford’s Heritage assets. These policies support the CS Policies 15-18. The CTCLP policy uses the same evidence base as the DMLP and CS.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	distinctiveness. (126)	
<p>13. Facilitating the sustainable use of minerals (paras 142-149)</p>		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>There are no mineral workings in Lewisham and this topic is therefore not addressed in the CTCLP.</p>
<p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be ‘justified’ a DPD needs to be:</p> <ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with who and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>Yes, the Council has prepared a Consultation Statement (CTCLP1.11) that sets out the various stages of consultation, details of the issues raised and how the Council has responded.</p> <p>Evidence includes the Council’s Statement of Community Involvement (2006) (CTCLP1.9)</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		The Council has also prepared a statement on the Duty to Co-operate. (CTCLP1.18)
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> • The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. <p>AND</p> <ul style="list-style-type: none"> • Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. <p>OR</p> <ul style="list-style-type: none"> • A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. <p>OR</p> <ul style="list-style-type: none"> • For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD). 	<p>Yes. The Council consider that the content of the plan is justified by the evidence. It is positively reflects the objectives of the NPPF and supports the boroughs Core Strategy. See Appendix 1 for background papers and list of supporting evidence.</p> <p>The CTCLP is accompanied by a sustainability appraisal that complies with all the necessary requirements. (CTCLP1.2)</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA’s chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> • Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies. 	<p>Reasonable alternatives were prepared and subjected to consultation and sustainable appraisal. The stages of preparation of the CTCLP are outlined in Figure 1.5 (page 22).</p> <p>Section 5 of the CTCLP Submission Suitability Appraisal (CTCLP1.2) summarises how the options and alternatives have been considered through the plan making process. Chapter 4 and Appendices D and E of the CTCLP Further Options Sustainability Appraisal (CTCLP2.6) provides a detailed discussion of the alternatives considered.</p>
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be ‘effective’ a DPD needs to:</p>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan’s vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<ul style="list-style-type: none"> • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	<p>The Catford Town Centre Local Plan (CTCLP) (CTCLP1.1) is a planning document key tool for regenerating the designated ‘Town Centre’ and surrounding area over period to 2026. The introductory chapters (chapter 1 and chapter 2) set out the vision and specific objectives for the on-going redevelopment of the area. Evidence base documents, local consultation and the Sustainability Appraisal have informed the Vision, Objectives and Policies for the area. Table 1.1 specifically identifies the key area-wide issues and opportunities.</p> <p>Chapter 2, sections 2.3 and 2.4 explain how the policies derive from the objectives and wider vision.</p> <p>The CTCLP contains a number of key development sites and proposals. Chapter 5 (page 115-112) and Appendix 2 explain the approach to the delivery, monitoring and risk. The Catford Town Centre infrastructure schedule, with phasing, is found at Appendix 3. The CTCLP implements the Core Strategy (CS) and the Council will continue to ensure it is delivered in accordance with Section 9 of the CS.</p> <p>The Council considers that policies in the plan are internally</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>consistent both within the CTCLP itself and with the Core Strategy and wider LDF. The Local Development Scheme (2013) (CSD1.4a) contains up to date information on each of the local plans the Council intends to prepare and how they relate to each other. Section 1.4 and Figure 1.4 show how the CTCLP relates to other policy, including other local plan.</p> <p>The comments and support from relevant agencies are set out in the consultation statement (CTCLP1.11).</p> <p>Section 1.4 of the CTCLP shows the linkages between the Local Plan and CS and DMLP.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<ul style="list-style-type: none"> • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	<p>The infrastructure needs were set out in the adopted Core Strategy and the Infrastructure Delivery Plan. The CS evidence includes Affordable Housing Viability Assessment.</p> <p>CTCLP Policy 21 and Section 5.1 of the Plan deals with implementation, delivery and monitoring. Page 109 and Appendix 3 of the CTCLP specifically refer to infrastructure and reference the Infrastructure Delivery Plan.</p>
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and</p>	<ul style="list-style-type: none"> • Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together 	<p>The CTCLP supports the Core Strategy. Sections 1 and 2 of the CTCLP set out the relationship between various plans.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>integrating policies for development and the use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<p>different policy objectives</p> <ul style="list-style-type: none"> • Expressions of support/representations from bodies responsible for other strategies affecting the area • 	<p>Each CTCLP policy includes an introduction and a justification text that set out the relationship to CS objectives and policies.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<ul style="list-style-type: none"> • Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed. • Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> a. the effectiveness of policies and what evidence is being collected to undertake this b. changes affecting the baseline information and any information on trends on which the DPD is based • Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances • Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on 	<p>The CTCLP contains a number of key development sites and proposals. Chapter 5 (page 115-112) and Appendix 2 explain the approach to the delivery, monitoring and risk. The Catford Town Centre infrastructure schedule, with phasing, is found at Appendix 3. The CTCLP implements the Core Strategy (CS) and the Council will continue to ensure it is delivered in accordance with Section 9 of the CS.</p> <p>Section 5.2 (page 111) specifically covers ‘risks and contingency’ and acknowledges that there are likely to be many changes to the wider circumstances surrounding the plan. A short risk assessment covering five main areas is included.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>infrastructure provision</p> <ul style="list-style-type: none"> Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. 	
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? 	<ul style="list-style-type: none"> A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A ‘tick box’ approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate. 	<p>Yes. The Council considers that it has demonstrated effective co-operating through constructive, active and on-going engagement with relevant authorities and bodies that have an interest in the Plan. It has produced a brief ‘Duty to cooperate’ statement that sets out how various public bodies have been involved in the plan (CLCLP1.18).</p>
<p><i>Monitoring</i></p>	<ul style="list-style-type: none"> Sections of the DPD setting out indicators, targets and milestones 	<p>CTCLP Section 5, Implementation, Monitoring and Risk.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<ul style="list-style-type: none"> • Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal 	<p>The Council will monitor the effectiveness of the plan through a series of indicators and publishing the results annually.</p>
<p><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p>		
<p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<ul style="list-style-type: none"> • Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community 	<p>The Council consider that the policies contained with the CTCLP are consistent with national policy.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	involvement. <ul style="list-style-type: none"> • Reports or copies of correspondence as to how representations have been considered and dealt with. 	

Planning policy for traveller sites

The Council is preparing a separate Gypsy and traveller local plan and this issue is not dealt with in the CTCLP.