

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY

ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a ‘mock’ examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 ‘key questions’ in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policy update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the ‘tests’ as follows. Is the draft local plan update:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#) and other statements of national planning policy, where relevant.

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear, and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

| | KEY QUESTIONS | <p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> |
|------------------------|---|--|
| Growth Strategy | | |
| A | <p>In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area</p> | <p>Good growth will be delivered in the Borough by directing new development to Growth Nodes, Regeneration Nodes, Growth Corridors, and well-connected sites, including in Lewisham’s Opportunity Areas of New Cross/ Lewisham/Catford and Deptford Creek/ Greenwich Riverside, and carefully managing growth in these locations in response to local character. This will be enabled by optimising the capacity of site allocations located in these areas.</p> <p>Elsewhere in the Borough, the sensitive intensification of established residential neighbourhoods and commercial areas will be supported. This will be enabled mainly by the redevelopment of small sites.</p> |
| B | <p>In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update</p> | <p>The London Plan has been a key influencer by setting out key areas where growth and regeneration will be directed in Lewisham, which includes town centres, out-of-centre retail parks and spatial designations such as Opportunity Areas (New Cross/Lewisham/Catford and Deptford Creek/Greenwich Riverside). The London Plan has also set Lewisham’s housing target, which is 1,667 homes per year.</p> <p>The character of neighbourhoods is highly valued in Lewisham and has informed the growth strategy to ensure character-led growth. For example, The Lewisham Characterisation Study (2019) indicates where the existing character of areas may be reinforced, re-examined, or reimagined.</p> |

| | KEY QUESTIONS | <p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> |
|----------|---|--|
| C | List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery | <p><u>Opportunity Areas:</u> New Cross/Lewisham/Catford corridor and the area at Deptford Creek/Greenwich Riverside</p> <p><u>Regeneration node:</u> Lewisham Major Centre - 800m buffer around town centre boundary Catford Major Centre - 800m buffer around town centre boundary Deptford District Centre - 800m buffer around town centre boundary Bell Green Local Centre - 400m buffer around the following site allocation boundaries: Former Bell Green, Gas Holders, Bell Green Retail Park, and Sainsbury's Bell Green.</p> <p><u>Growth Node</u> Forest Hill District Centre - 800m buffer around town centre boundary New Cross District Centre - 800m buffer around town centre boundary Lee Green District Centre - 800m buffer around town centre boundary Bellingham Local Centre - 400m buffer around town centre boundary Grove Park Local Centre - 400m buffer around town centre boundary Surrey Canal Triangle - Surrey Canal Mixed-use Employment Location Site Allocation Boundaries Evelyn - 400m buffer around town centre boundary</p> <p><u>Growth Corridor</u> A2 - Frontages along New Cross Road A20 - Frontages along Lee High Road A21 - Frontages along Lewisham High St, Rushey Green and Bromley Road A205 - Frontages London Rd, Devonshire Road, Waldram Park Road, Stanstead Rd, Catford Road, Brownhill Road and Westhorpe Avenue A212 - Frontages along Sydenham Road, Stanton Way, and Southend Lane.</p> <p>The nature of development means that large strategic sites that are fundamental to the council's growth plans and their dependence on infrastructure investment do not exist in the same way as they do elsewhere in the country. Further investment in public transport provision, such as the Bakerloo Line Extension, will enhance the business case for many potential development sites, but sites are not dependent on such infrastructure to unlock them.</p> |

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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 1. | Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, the Plan clearly articulates the strategy for where and how development will be delivered. It is positively prepared, aiming to meet housing, employment, and retail needs. The Plan is well structured, being broken down into five parts. Part three of the Plan - Lewisham’s Neighbourhood and Places – is organised around five-character areas which establish ‘place-based’ priorities for guiding investment and sensitively managing new development. This makes the Plan more relevant and understandable for local communities. Each character area contains a vision, key spatial objectives and site allocations. Other than growth corridors, growth nodes, regeneration nodes and opportunity areas and site allocations, the Plan directs development to town centres and high PTAL areas to encourage sustainable development. | | | | |
| | | The policies to this effect have been assessed throughout the Plan process via the Integrated Impact Assessment; an iterative process intended to draw out the most sustainable policy outcomes. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |
| 2. | Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The plan includes more than seventy site allocations, which are considered to have the potential to make positive contribution to the Borough’s housing and employment needs and are likely come to forward for development during the Local Plan period. Part three of the Plan includes associated site allocation policies which provide further detail on the opportunities for development along with indicative capacities and timeframes. The methodology used for assessing site capacity is based on the London SHLAA to ensure consistency across sites. Some strategic sites will be subject to further detailed master planning. Further details can be found in the Site Allocations Background Paper (2023). | | | | |
| | | Implications of taking no further action: none | | | | |
| Mitigation / Action required (if necessary) to move scale to right: none | | | | | | |

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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Reviewer Comments: none | | | | |
| 3. | <p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: The Local Plan uses the London Plan target, in accordance with that document. The Lewisham SHMA (2022) considered figures from the standard method. The Local Plan identifies specific site allocations which have the potential capacity to deliver 25,131 net new homes over the lifetime of the Plan. When combined with other large, consented sites and the trend-based windfall delivery rates in the Borough, there will be sufficient capacity to exceed the NPPF housing target over a five and 15-year period.</p> <p>The SHMA has considered future housing need over the period to 2040. It has reviewed the annual housing need expressed in the London Plan and considered an alternative scenario using the government's standard approach to identifying housing need, drawing upon the latest available household projection data from the DLUHC.</p> <p>The London Plan 2021 has already considered housing need across London and established a target for 1,667 net dwellings each year across the borough. This aligns with PPG that clearly states the London Plan is responsible for establishing London-wide need and disaggregating this to individual Boroughs.</p> <p>By using the standard method, the impact of household growth affordability pressures results in a very substantial need for housing of 3,336 per year. The final figure is 2,334 when the need is capped at 40% above the Plan. The lower housing figure was established through the London Plan examination as the quantum of housing which is considered deliverable by the development industry.</p> | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |
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| 4. | <p>Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |

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| | KEY QUESTIONS | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release? | <p>Reason for score: Lewisham has no green belt and therefore Green Belt release is not matter for Lewisham’s Local Plan.</p> <p>Although the Borough has no designated Green Belt land, it does include Metropolitan Open Land, which performs a similar function in policy terms. The very special circumstances for release that apply to Green Belt land also apply to land designated as Metropolitan Open Land. The Council considered the possibility of releasing Metropolitan Open Land, under very special circumstances through a suite of technical evidence documents. The conclusion was that there are no very special circumstances that justify the release of Metropolitan Open Land in order to meet the Borough’s housing requirement. The Council can demonstrate, through technical evidence that the Borough’s housing requirement can be met without this being necessary.</p> <p>The Council, working in partnership with the Greater London Authority and Transport for London considered the very special circumstances for releasing Metropolitan Open Land to secure transport improvements associated with the proposed re-alignment of the South Circular Road A205 at Catford. This was undertaken through the suite of technical evidence documents (referenced above). The conclusion was that a limited release could be accommodated without harming the quality and purpose of the Metropolitan Open Land. The proposed release will be entirely limited to land necessary to secure the on-the-ground highway re-alignment and transport (inclusive of sustainable modes) improvements. The benefits secured through the improvements met the requirement of being very special circumstances.</p> <p>Implications of taking no further action: none</p> <p>Mitigation / Action required (if necessary) to move scale to right: none</p> <p>Reviewer Comments: none</p> | | | | |
| 5. | Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: This is set out within the Site Allocations Background Paper (2023). The document set out that an initial long list of potential development sites was identified from various sources including: The London-wide Strategic Housing Land Availability Assessment (2017), ‘Call for Sites’, Existing site allocations, Development pipeline, Evidence Base which includes an employment land study and officer review. The integrated Impact Assessment (IIA) of Lewisham Local Plan (2022) appraises the site allocations (collectively by sub-area) against a framework for</p> | | | | |

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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | <p>delivery of sustainable development. The Lewisham Local Plan Viability Assessment (2019) appraises the site allocations for viability.</p> <p>The Regulation 19 Plan also clearly identifies how and where changes were made following the Regulation 18 Consultation on the Local Plan.</p> <p>Implications of taking no further action: none</p> <p>Mitigation / Action required (if necessary) to move scale to right: none</p> <p>Reviewer Comments: none</p> | | | | |
| 6. | Does the local plan policies update identify a housing requirement for designated neighbourhood areas? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: The Council considers that strategic borough wide policies which it has identified in Appendix 6 of the Plan for the purposes of neighbourhood planning, such as growth areas, site allocations and intensification corridors provide a sufficient positive framework for ensuring that neighbourhood areas support the delivery of homes.</p> <p>Grove Park Neighbourhood Plan is the only adopted neighbourhood plan in the borough and it does not request housing targets. Furthermore, in a complex inner city urban environment which has strong record of housing delivery it is considered inappropriate to identify housing targets for neighbourhood plan areas.</p> | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| Reviewer Comments: None | | | | | | |
| 7. | Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Each site allocation proposal sets out the site address; site size; setting, PTAL, ownership; existing use; proposed use; how the site was identified; planning designations and site considerations; planning status; | | | | |

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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | timeframe for delivery; indicative development capacity (net residential units and non-residential floorspace, opportunities, development requirements and developer guidelines. Combined, these proformas provide sufficient flexibility along with prescriptive detail on what the Council would like to see delivered. The planning designations and site considerations helps prospective developers understand which matters require specific attention on site. The proposed use, indicative development capacity, development requirements and development guidelines and delivery timeframes outline what is required to bring forward the site sustainably. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |
| D | <p>What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?</p> <p>List these targets and the evidence source for this 'need' target?</p> | <p>Policy EC2 – Protecting employment land and delivering new workspace - sets out a forecast need for 21,800 sqm of net additional floorspace in the Borough up to 2038. This figure is derived from the Employment Land Study (2019).</p> <p>Policy EC12 – Town centre network and hierarchy – sets out the Borough’s future need for 8,400 additional gross square metres of retail floorspace up to 2035. Accordingly, site allocations identify provision for main town centre floorspace.</p> | | | | |
| 8. | <p>Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: As already states above, the local plan site allocations contain a range of homes for site allocated for residential and non-residential floorspace based on market intelligence, planning application or pre-app consultation and site assessments. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |

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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 9. | Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: An Infrastructure Delivery Plan has been produced in support of the Local Plan. As far as practicable, it identifies what type of infrastructure/infrastructure projects are required, who will deliver them and when and how they will be funded. The IDP has informed relevant site allocation policies in terms of particular infrastructure requirements e.g. the re-routing of the south circular road at Catford Town Centre. The IDP is viewed very much as a rolling work in-progress, taking account of inputs from the various infrastructure providers over time, rather than a static document. This will inform and be informed by for example funding allocations/ spend such as CIL. | | | | |
| | | The site allocations identify where infrastructure is required in the development requirements where appropriate. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| Reviewer Comments: none | | | | | | |
| 10. | Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: This has been addressed in the Infrastructure Delivery Plan (2023). | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |
| Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed? | | | | | | |

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| | KEY QUESTIONS | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | Process and Outcomes (see also Toolkit Parts 2 and 3) | | | | | |
| E | What are the cross boundary strategic matters affecting your local plan policies update? List these. | <p>These matters are set out in detail in the Duty to Cooperate Statement (2023), further update forthcoming in support of submission, and the forthcoming Statements of Common Ground with Lewisham's neighbouring authorities and other bodies. The latest versions will be included as part of the documents submitted to the Planning Inspectorate. The main cross boundary issues include –</p> <ol style="list-style-type: none"> 1) Sustainable travel networks 2) Connectivity of green infrastructure networks 3) Impact on neighbouring heritage assets – for example, the Maritime Greenwich World Heritage Site Buffer Zone 4) Impact of planned-for growth/ tall new buildings on the visual character and appearance of neighbouring townscapes 5) Waste 6) Flood risk | | | | |
| 11. | Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: These matters are set out in detail in the Duty to Cooperate Statement (2023), further update forthcoming in support of submission, and the forthcoming Statements of Common Ground with Lewisham's neighbouring authorities and other bodies | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| Reviewer Comments: none | | | | | | |

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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| F | <p>Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</p> <p><i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i></p> | <p>The Local Plan does not derive the housing requirement by using the standard method for housing targets; instead using the London Plan targets (see policy HO1, which provides justification for this approach).</p> <p>The Local Plan protects certain sub-uses within Class E, which may be considered contrary to national policy. This is supported by robust evidence which demonstrates need (e.g. requiring the protection of industrial uses in existing industrial areas), and it is justified by paragraphs within the NPPF which require LPAs to meet this need; see paragraphs 82 (economic land) and 86 (town centre uses).</p> <p>The Local Plan also states application of the Vacant Building Credit (VBC) is not considered appropriate in Lewisham which is considered contrary to national policy. This is because brownfield sites are coming forward irrespective of the VBC and we do not consider that this additional incentive is necessary, particularly in an inner-London context where the relatively high land values help to support the viability of residential led schemes.</p> | | | | |
| | | 12. | <p>Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).</p> | -2 | -1 | 0 |
| No, we do not meet this requirement | No, we may not fully meet this requirement | | | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| Reason for score: The Mayor of London has raised concerns on the approach towards strategic industrial land through the regulation 19 consultation. Since then, the Council have been collaboratively working with GLA, which involves commissioning further evidence to understand the quantum of industrial land that has been lost and the capacity for compensatory site identified in the Plan to meet need. | | | | | | |
| Implications of taking no further action: none | | | | | | |
| Mitigation / Action required (if necessary) to move scale to right: Prepare additional evidence to accurately understand the quantum of industrial land that has been lost and the ability of compensatory site to meet need. | | | | | | |
| Reviewer Comments: none | | | | | | |
| Is the local plan policies update: | | -2 | -1 | 0 | +1 | +2 |

| | | Assessment | | | | |
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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 13. | <ul style="list-style-type: none"> in conformity with any 'higher level' plans prepared by the Council; and properly reflecting provisions of any made neighbourhood plan? | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The strategic objectives have been informed by and reflect many of the key documents prepared by the Council, including the Corporate Strategy 2018-2022, along with those published by our partners and other key stakeholders. | | | | |
| | | The Local Plan provides a strategic framework to guide future neighbourhood plans. Part one paragraph 1.24 clarifies the position on neighbourhood plans. | | | | |
| | | The Plan (Policy H02 encourages neighbourhood plans to identify sites for housing development including small sites. The Plan (policy DM2) also encourages neighbourhood forums to identify priorities for the use of neighbourhood CIL in neighbourhood plans. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| 14. | <p>Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: A Consultation Statement has been produced which demonstrates that the Council is in compliance with the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: none | | | | |
| | | -2 | -1 | 0 | +1 | +2 |

| | | Assessment | | | | |
|--|--|---|--|--|--|--|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 15. | Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected? | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The integrated impact assessment (IIA) identified the issues in Lewisham in the context of environmental, social and economic. It examined the strategic alternatives. This in turn influence and help identify growth areas and the policy direction of the plan. | | | | |
| | | The local plan was assessed against the objectives would be, used to assess the Local Plan. The IIA assessed the Local Plan at each stage using the SA decision framework, assessing the evidence/research. The submission set out the reasonable alternatives not taken forward. Through this process, we ensured that the policies constituted a positive and appropriate framework for the delivery of the objectives. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| Reviewer Comments: The scope for alternative is limited; the Local Plan is required to be in conformity with the London Plan. The London Plan (2021) was subject to a SA. | | | | | | |
| 16. | Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The IIA report covers these matters and received comments from the statutory bodies in general supporting the assessment of the policies and proposals. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| Reviewer Comments: None | | | | | | |
| | | -2 | -1 | 0 | +1 | +2 |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 17. | Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy? | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The findings of the IIA has influenced to help, define the most sustainable polices. In terms of, where the most growth will occur; the most sustainable ways in which to pursue growth in those locations; and guiding policy principles for ensuring sustainable development is at the heart of decisions relating to individual development proposals. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| | | Reviewer Comments: None | | | | |
| 18. | Is it clear how an Equalities Impact Assessment has influenced the local plan policies update? | -2 No, we do not meet this requirement | -1 No, we may not fully meet this requirement | 0 Unclear whether our plan meets this requirement or not | +1 Yes, we are likely to meet this requirement | +2 Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Council carried out Equality Impact Assessment (EqIA), which is undertaken to discharge the Public Sector Equality Duty. This formed part of the wider IIA process. The outputs of the EqIA are reported in the IIA. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| | | Reviewer Comments: None | | | | |
| 19. | Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects? | -2 No, we do not meet this requirement | -1 No, we may not fully meet this requirement | 0 Unclear whether our plan meets this requirement or not | +1 Yes, we are likely to meet this requirement | +2 Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Habitat Regulations Assessment considers the impact of the draft Local Plan in combination with other Plans including neighbouring boroughs. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | | | | | |

| | | Assessment | | | | |
|-------------------------|--|--|--|--|---|--|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| | | Reviewer Comments: None | | | | |
| 20. | If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The HRA screens out the need for a Full HRA (or Appropriate Assessment) and does not identify any mitigation measures. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| | | Reviewer Comments: None | | | | |
| 21. | Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The HRA concludes that the Local Plan would not adversely affect the integrity of the European sites, either alone or in combination with other plans and projects. It found it would not have 'no significant effect' on the European sites. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| | | Reviewer Comments: None | | | | |
| Housing Strategy | | -2 | -1 | 0 | +1 | +2 |

| | | Assessment | | | | |
|--------------------------------|---|--|--|--|---|--|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 22. | Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why? | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Local Plan demonstrates how the policies meet our requirement in full, and that this can be achieved as a minimum. Chapter 7 provides a range of housing policies that positively that seeks to deliver housing within the borough. Part 3 of the Plan contains 75 site allocations, majority of which seek to deliver housing as well as employment and main town centre uses. | | | | |
| | | Appendix 6 includes Lewisham's Housing Trajectory, which demonstrates that we have the housing capacity required and how the housing requirement will be delivered over the Plan Period. | | | | |
| | | Implications of taking no further action for local plan soundness and/or effectiveness: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| Reviewer Comments: None | | | | | | |
| G | Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area. | No LPA has asked Lewisham to accommodate some of their unmet need. | | | | |
| 23. | Does your local plan policies update accommodate any of this unmet need where you can sustainably do so? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: N/A | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| Reviewer Comments: None | | | | | | |

| KEY QUESTIONS | | Assessment | | | | |
|--------------------------------|--|---|--|---|---|--|
| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 24. | <p>Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period?</p> <p>Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Housing Trajectory (Appendix 6) demonstrates a 5-year supply and the expected rate of housing delivery. Policy HO1 (C) sets out the strategy for increasing housing supply in the borough. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| Reviewer Comments: | | | | | | |
| 25. | <p>Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Appendix 6 confirms there will be a 5-year supply of specific deliverable sites on adoption as well as range developable sites throughout the remainder of the Plan period. The housing supply in Appendix 6 has been assessed against London Plan Housing requirement of 1,667 p.a plus additional completions during the first five years to cater for the current backlog (579 p.a.) and the application of a 5% buffer (112 p.a.). | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| Reviewer Comments: none | | | | | | |
| 26. | <p>Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |

| | | Assessment | | | | |
|--------------------------------|---|--|--|--|---|--|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period? | Reason for score: Appendix 6 provides a baseline housing supply but also identifies that additional supply could come forward through the development of the Bell Green sites. In addition, the site capacities are indicative and maybe increased through the master planning and design led process. Some of the landowners have expressed an interest in increasing their site capacities, which would boost the supply further. These will be considered through the examination process. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: Some of the landowners have expressed an interest in increasing their site capacities, which would boost the supply further. These will be considered through the examination process. | | | | |
| | | Reviewer Comments: none | | | | |
| 27. | Is the Council reliant on the delivery of any 'windfall' sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Appendix 6 includes windfall figure 379 p.a in line with small sites requirement of the London Plan. We helped to establish the windfall figure during preparation of the London Plan. | | | | |
| | | Our Annual Monitoring Reports show that during 2017/18 to 2021/22, sites that have experienced small gains of less than 10 dwellings have amounted to 22.9% of the net units completed. Sites that can accommodate more than 10 dwellings but are less than 0.25 hectares in size add further to this supply of small sites. It is therefore reasonable to assume that the trend based historic delivery rates will continue to be met and exceeded in the future. | | | | |
| | | Table 7.1 and policy HO1 (H) specifies the target unit and size mix for affordable housing. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| Reviewer Comments: none | | | | | | |
| | | -2 | -1 | 0 | +1 | +2 |

| KEY QUESTIONS | | Assessment | | | | |
|----------------------|---|--|--|--|---|--|
| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 28. | Does the local plan policies update make it clear what size, type and tenure of housing is required? | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Policy HO1 sets out the requirement for dwelling size/tenure mix that should be created by development proposals, including with respect to market and affordable housing. Policy HO1 sets a strategic target of 50% of all new homes for genuinely affordable housing with the required mix of tenure types specified in policy HO3. Table 7.1 and policy HO1 (H) specifies the target unit and size mix for affordable housing. | | | | |
| | | Policy HO1 seeks a reasonable proportion of family units to be delivered on major developments on 10 or more dwellings and resist development comprising solely of studio and/or 1 bedroom, 1 person units. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |
| 29. | Does the local plan policies update specifically address the needs of different groups in the community? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Borough is comprised of a diverse mix of residents and communities and that the Council is committed to meeting their needs. | | | | |
| | | Part two, chapter 7 of the Plan has a range of policies which seeks to address the needs of different groups in the community. Firstly, this includes policy HO6 that sets out requirements concerning the provision of supported and specialised accommodation. Secondly, this includes policy HO5 that sets out the requirements concerning Older People Accommodation. Thirdly, this includes policy HO7 which sets requirements for purpose-built student accommodation. Fourthly, policy HO10 addresses provision of accommodation for Gypsies and Travellers. Lastly, policy QD2 sets out requirements for accessible and inclusive homes. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Reviewer Comments: none | | | | |
| 30. | <p>Can your affordable housing requirements, including any geographical variations, be justified?</p> <p>Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Policy HO3 Genuinely Affordable Housing seeks to maximise the delivery of affordable housing from new development across the borough to meet the identified need in the Council's Local Housing Need Assessment. There is a significant shortage of genuinely affordable housing, and an urgent need to boost supply to meet need of a diverse population. This means a greater variety of affordable housing products and well-designed homes of the right size, tenure, and a price that people can afford. Government policy requires a proportion of First Homes, and the London Plan requires that affordable housing provision is focused on genuinely affordable tenures including low cost rented products and intermediate products. The Council will seek to prioritise these tenures but recognises that genuinely affordable homes can cover a broad spectrum of affordable housing types, as defined in the NPPF. There are no geographical variations within policy.</p> <p>Policy HO7 Purpose Built Student Accommodation is also seeking an element of affordable housing from the loss PBSA as well as provision from PBSA.</p> <p>It is important to note affordable housing delivered via new development may not be sufficient by itself to meet the Borough's affordable housing needs in full. However, the Council Building for Lewisham programme is delivering new social homes for families on the housing waiting list.</p> | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |
| | | -2 | -1 | 0 | +1 | +2 |

| | | Assessment | | | | |
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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 31. | <p>Have the needs for travellers and travelling show people been adequately assessed in accordance with national policy and have they been based on robust evidence?</p> <p>Does the local plan policies update make adequate provision for the identified needs?</p> | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: The needs for travellers and travelling show people has been adequately assessed in accordance with national policy and has been based on robust evidence set out within Lewisham Gypsies and Traveller Accommodation Needs Assessment Update (2016). These needs will be met through the delivery of a new Gypsy & Traveller site providing six pitches. The site will be operated by the Council and will provide affordable pitch provision.</p> | | | | |
| | | <p>The new Local Plan provides a suitable framework for decision-takers to consider speculative proposals for further pitch provision being promoted by Members of the Gypsy and Traveller community, or by accommodation providers. The Council will consider such proposals against the demonstrable needs of the defined nomadic and settled communities.</p> | | | | |
| | | <p>Implications of taking no further action: None</p> | | | | |
| | | <p>Mitigation / Action required (if necessary) to move scale to right: None</p> | | | | |
| <p>Reviewer Comments: None</p> | | | | | | |
| 32. | <p>Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: The Gypsy and Traveller Accommodation Needs Assessment update (2016) identifies the need for 3 pitches during five years (2016 to 2021) and further 3 pitches thereafter.</p> | | | | |
| | | <p>Implications of taking no further action: None</p> | | | | |
| | | <p>Mitigation / Action required (if necessary) to move scale to right: We are currently progressing a planning application on the Land at Pool Court which makes provision for 6 pitches.</p> | | | | |
| <p>Reviewer Comments: None</p> | | | | | | |

| | | Assessment | | | | |
|--|--|--|--|--|---|--|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| H | List any travellers and travelling show people sites identified to meet need and the timescales for their delivery | Site Allocation SA8 Land at Pool Court makes provision for 6 pitches which is estimated to be delivered between 2024/25 and 2028/29. | | | | |
| Justified approaches to plan policy and content | | | | | | |
| 33. | Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text? [You may wish to check each policy setting a threshold] | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Various policies include thresholds which trigger certain policy requirements; however, these are justified by proportionate evidence and appropriately explained within the supporting text.</p> <ul style="list-style-type: none"> • Policy SD2 Sustainable design and Retrofitting • Policy SD3 Minimising greenhouse Gas Emissions. • Policy SD13 Design to support the circular economy • Policy QD2 Inclusive and safe design • Policy QD4 Building heights • Policy HO2 Optimising the use of small sites • Policy HO3 Genuinely Affordable Housing • Policy EC4 Low-cost and affordable work space • Policy EC12 Town centre network hierarchy • Policy EC14 Major and district centres • Policy EC16 Shopping parades, corner shops and other service points • Policy EC17 Concentration of uses • Policy GR3 Biodiversity and access to nature • Policy GR5 Urban Greening and trees | | | | |

| | | Assessment | | | | |
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| | KEY QUESTIONS | <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> | | | | |
| | | <ul style="list-style-type: none"> Policy TR2 Bakerloo Line Extension | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| | | Reviewer Comments: None | | | | |
| 34. | Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Plan clearly references within policies the potential for more detailed documents. such as area planning frameworks and SPDs which will be prepared to supplement policy. It does not defer detail on strategic matters to other documents, except the London Plan where this document is clearly setting the Mayor's strategic direction. References to the London Plan and SPDs are considered appropriate. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| | | Reviewer Comments: None | | | | |
| 35. | Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy? [For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.] | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Hierarchies are defined in the following policies: <ul style="list-style-type: none"> EC2 Protecting employment and delivering new work space EC12 Town centre network and hierarchy GR2 Open Space | | | | |
| | | All the above policies make clear their policy level relative to their status within the hierarchy and are consistent with national policy and the London Plan. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |

| | | Assessment | | | | |
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| | KEY QUESTIONS | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| | | Reviewer Comments: None | | | | |
| | | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: | | | | |
| | | Policies that limit certain uses do so based on the Council's evidence base and/or consistent with other development plan documents (such as the London Plan) or national policy. The justification for limitations on certain uses is clearly set out within the supporting text. Policies that place limitations on uses include: | | | | |
| | | <ul style="list-style-type: none"> • EC9 Railway arches • EC12 Town centre network hierarchy • EC14 Major and District Centres • EC15 Local Centres • EC17 Concentration of uses • EC18 Culture, creative industries, and the night-time economy | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |
| | | -2 | -1 | 0 | +1 | +2 |
| | 36. | <p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p> | | | | |

| | | Assessment | | | | |
|--------------------------------|--|---|--|--|---|--|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 37. | <p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development? Where relevant, are they consistent with the principles set out in the National Design Code and National Model Design Code?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p> | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, where policies propose standards, these are justified and deliverable, taking into account the scale of development. Lewisham's Local Plan Viability Study (2022) tested the draft policies including provision for the application of standards and concluded that Lewisham's policies were generally viable over the lifetime of the local plan. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |
| Deliverability | | | | | | |
| 38. | <p>Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Lewisham's Viability Study (2022) thoroughly, tested residential viability, including proposals for mixed use, proposals with different size and tenure types, considering provisions for infrastructure provision, play space, bike stores and other ancillary land take, Lewisham's and the Mayor of London's CIL, the costs of reaching the new proposed climate change initiatives and the proposed affordable housing targets for both large sites and small sites. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| Reviewer Comments: none | | | | | | |

| | | Assessment | | | | |
|--------------------------------|--|--|--|--|---|--|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | | | | | |
| 39. | <p>Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?</p> <p>Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: As above, Lewisham's policies reflect the conclusions of Lewisham's Viability Study (2022). Viability and delivery of development will not be put at risk by the requirements in the new Local Plan. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| Reviewer Comments: None | | | | | | |
| 40. | <p>Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: This is set out in Part Four of the Plan. The data required in table 19.1 is reasonably available. There are 58 indicators that we will monitor against. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| Reviewer Comments: None | | | | | | |
| | | -2 | -1 | 0 | +1 | +2 |

| | | Assessment | | | | |
|---|--|---|--|---|---|--|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 41. | Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u>? | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | Where triggers for plan review and/or update are identified are they justified and proportionate? | <p>Reason for score: There is a legal requirement to review Local Plans every five years. It seems unlikely that a trigger could be developed to require a review sooner than every five years due to the time it takes to establish development trends. Nevertheless, we prepare an authority monitoring report annually and this tracks the implementation of the Plan's policies.</p> <p>The potential circumstances/ strategic policy context that may generate the need for a trigger policy approach to a review, do not exist in Lewisham. This is primarily because the issues that would typically trigger such a review – most notably, the distribution of housing and employment needs figures – are strategic matters addressed through the London Plan. The Duty to Co-operate Process has not revealed any risk of there being a possible unmet need that would require a trigger for review. Furthermore, the Council considers that NPPF Para 33 provides sufficient policy context and guidance on this matter for Lewisham.</p> | | | | |
| | Implications of taking no further action: None | | | | | |
| | Mitigation / Action required (if necessary) to move scale to right: None | | | | | |
| | Reviewer Comments: None | | | | | |
| Plan effectiveness (and associated policy clarity) | | | | | | |
| 42. | Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years <u>from adoption</u>? Does the evidence relied on to support those policies correspond/cover this whole period? Where larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)? | -2 No, we do not meet this requirement | -1 No, we may not fully meet this requirement | 0 Unclear whether our plan meets this requirement or not | +1 Yes, we are likely to meet this requirement | +2 Yes, we are confident our plan will meet this requirement |
| | <p>Reason for score: Yes. The local plan policies update is clear which policies are strategic. In London, the London Plan is also part of the statutory development plan and provides several strategic policies; these will have a different timeframe to Lewisham's Local Plan as the London Plan was, published, already in March 2021. The substantial amount of evidence relied upon covers the Plan period, however it is recommended that any future local plan review (required within five years of adoption) should update this evidence as the further from its creation, the less reliable it will be (particularly for years 11-15 of the Plan period).</p> | | | | | |
| | Implications of taking no further action: None | | | | | |

| | | Assessment | | | | |
|----------------------|---|--|--|--|---|--|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: None | | | | |
| | | Reviewer Comments: None | | | | |
| 43. | Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Paragraph 1.9 clearly sets out once adopted Lewisham's new Local Plan 2020 – 2040 will replace the Core Strategy (2011), Site Allocations Local Plan (2013), Development Management Local Plan (2014) and Lewisham Town Centre Local Plan (2014). | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |
| 44. | Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, the plan's objectives are clear, and the policies can be easily, used and understood for decision-making. The council's development management team contributed to the drafting of the local plan policies. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |
| 45. | For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; <u>and</u> (ii) clearly defined on the Policies Map? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Council has also submitted a Policies Map that clearly defines the policy areas. The glossary at the back of the Local Plan assists with consistency between terminology in policies and on the Policies Map. | | | | |

| | | Assessment | | | | |
|----------------------|---|--|--|--|---|--|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making? | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 46. | Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, policies are phrased positively and make clear the types of development that will be acceptable. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: none | | | | |
| 47. | Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed. [Note: If you have said 'all development' this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable] | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, policies make clear where they are intending to be, applied differently for the purposes of decision-making. For example, the policies listed in Question 33 above that contain thresholds are clear how these are applied. The policies that relate within town centre boundaries, strategic industrial locations, and flood risk areas for example are clear from the policy text, the glossary, the Policies Map where these apply, and the scale and land use to which they apply. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |

| | | Assessment | | | | |
|----------------------|--|--|--|---|---|---|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| I | <p>State how many policies are in your local plan update?</p> <p>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</p> | <p>There are 105 policies in the Local Plan, consisting of 1 spatial strategy policy, 78 development management policies, 19 place principles and 7 delivery and monitoring policies.</p> <p>The Local Plan has been checked to remove, as much as possible, repetition of wording between multiple policies; however, this is deliberate as it considered to help sign post prospective applicants to key related policies (notwithstanding the expectation that the Local Plan should be read in whole) and is also used to clarify the applications of expectation without the need to repeat criteria.</p> <p>The following the policies include referencing to other policies: QD2, QD6, QD8, QD9, QD10, HE3, HO1, HO2, HO3, HO5, EC6, EC8, EC9, EC14, EC15, EC16, EC17, EC18, CI1, CI2, GR2, GR4, GR5, SD12, TR2, TR3, LCA1, LNA3, LNA4, LEA1, LEA3, LEA4, LSA1, LSA3, LWA1, LWA3.</p> | | | | |
| 48. | <p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: There is significant cross-referencing in the Local Plan both to other policies within the document as well as to policies within the London Plan. However, generally these do not repeat wording or criteria and are considered necessary to clarify the application of policy or helpful for purposes of signposting. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: The LPA is happy to remove any cross-referencing that is unnecessary or repetitious. | | | | |

| | | Assessment | | | | |
|----------------------|--|--|--|--|--|--|
| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Reviewer Comments: none | | | | |
| 49. | Do policies avoid duplicating other regulatory requirements (for example, building regulations)? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: In some cases, policies refer to Building Regulations. For example, policy QD2 Inclusive Design refers to the London Plan and building regulations requirements for wheelchair accessible housing. Policy SD3 in the supporting text makes extensive reference to building regulations to explain the significant gap between the current Building Regulations Part L 2013 standards and the standards required to become net zero by 2050. | | | | |
| | | Implications of taking no further action: none | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: none | | | | |
| | | Reviewer Comments: none | | | | |
| 50. | Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker? [For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.] | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Council considers that the Plan’s policies are clear and unambiguous. They provide sufficient direction and detail for decision-making. Where terms such as ‘appropriate’ are used, they are qualified with further description that helps to clarify the way in which the planning proposal is to be assessed. | | | | |
| | | Implications of taking no further action: None | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: Policy wording can be improved in response to well-considered comments on alternative policy wording that improves clarity and ability to implement. | | | | |
| | | Reviewer Comments: None | | | | |

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| Date of assessment: | 23.10.2023 |
| Assessed by: | Kenan Hassan |
| Checked by: | Karol Jakubczyk |
| Overall Score: | 87 |
| Comments: | |