London Borough of Lewisham

LDF Core Strategy: Submission Version – September 2010

PAS Soundness Self Assessment Tool

Key question	Evidence provided
Justified	
Participation	
1. Has the consultation process allowed for effective engagement of all interested parties?	The consultation process has engaged with interested parties across all occurrences of consultation. As an over-arching document, the Consultation Statement (See Appendix 5) provides detail regarding who was consulted, where and when they were involved. It goes on to provide a summary of the representations made in each consultation period and links to appropriate sections of other documents where the representations have been considered in the continued preparation of the Core Strategy.
Research/ fact finding	
2. Is the content of the development plan document justified by the evidence? 3. What is the source of the evidence? 4. How up to date and convincing is it?	A wide ranging and comprehensive evidence base has been collated by the Council in support of the Core Strategy. The submitted DPD (Core Strategy Submission Version, 2010) is therefore considered to be justified by the evidence provided. The Council has completed a number of the evidence base documents itself, but has additionally commissioned consultants to complete others where applicable and appropriate. The evidence base reports that have been produced are listed in Appendix 1 of the submitted DPD and a complete set of documents has been provided for inspection. Key studies include: • Lewisham Infrastructure Delivery Plan, 2009 • Lewisham Housing Market Assessment, 2008 • South East London Boroughs' Strategic Housing Market Assessment, 2009 • Lewisham Affordable Housing Viability Assessment, 2009 • Lewisham Employment Land Study, 2008 • Lewisham Retail Needs Study, 2009 • Lewisham Strategic Flood Risk Assessment, 2008 • Lewisham Sequential Test, 2009 • Lewisham Leisure and Open Space Study, 2009 • Lewisham Borough-wide Transport Study, 2010 • Lewisham Town Centre Transport Study, 2010

Key question	Evidence provided
	• Deptford and New Cross Transport Infrastructure Study, 2009
	• Lewisham Renewables Evidence Base Study, 2010
	• Lewisham Tall Buildings Study, 2010
	• Lewisham Borough Wide Character Study, 2010
	• Southeast London Boroughs' Joint Waste Apportionment Technical Paper: Lewisham version for Core Strategy EIP, 2010
	• Lewisham Annual Monitoring Reports and Housing Trajectory
	• Lewisham Housing Implementation Strategy
	The Council feel that despite the current rapidly changing nature of the economy, the evidence base remains as up to date as is practically possible. It also takes account of the changing circumstances within the DPD (paragraph 9.45).
	The Submitted Core Strategy DPD contains multiple references to the evidence base throughout. Each policy is supported by a 'policy justification' section that references the relevant evidence base to justify the approach taken. Additionally, each policy is followed by a 'signposts and evidence base' box which clearly highlights relevant documents at local, regional and national level. (e.g. for Core Strategy Policy 1: Housing provision, mix and affordability – See pages 79 and 81)
	As part of the document development process, much of the evidence base has been subject to public consultation. The Consultation Statement (See Appendix 5) provides a summary of representations made in each consultation period and links to appropriate sections of other documents (in particular Sustainability Appraisals) where the representations have been considered in the continued preparation of the Core Strategy. The evidence base reports were released as part of the consultation of the Core Strategy Pre-Submission version. In some instances these were draft reports and have since been finalised to reflect the current situation and representations received.
	The representation received from GOL (26 March 2010) as a result of consultation on the Core Strategy Proposed Submission version contains the following section:
	"It is important that there are clear links between evidence base and policy. In this respect, GOL notes that at the end of each policy you include a helpful text box referring to relevant evidence base and policy, from international to local. Consequently, it is considered that, provided the evidence base is up to date and accurate, the policies would appear to be supported by evidence."
5. What assumptions had to be	There is an assumption that the supporting data outside of Lewisham's control is accurate and appropriate for

Key question	Evidence provided
made in preparing the development plan document? 6. Are the assumptions reasonable and justified?	the production of a Core Strategy. This data includes: - GLA population and economic projections - Census data - Indices of Multiple Deprivation The common use and continued reputation of these data sources in the production of planning documents across London boroughs supports Lewisham's view that they provide information that is both reasonable and justified. There are additionally a number of evidence base documents upon which the Core Strategy is based. Each of these documents will contain a number of assumptions based on projections such as current population and population growth. This is standard procedure and the use of robust and proven sources assures Lewisham that they are reasonable and justified. As is detailed in paragraph 9.45 of the submitted DPD, the document takes account of the current economic downturn. There is an assumption (in agreement with the draft replacement London Plan 2009) that the economy will experience a recovery over the plan period. This has resulted in the retention of the strategy for growth in the DPD.
Alternatives	
7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives? 8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at? 9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were	It can be shown that the chosen approach has been considered alongside alternatives and is the most appropriate response to the circumstances. The method of choosing the selected approach can be clearly viewed through the various iterations of the DPD (Issues & Options, Preferred Options, Options, Proposed Submission and Submission) and the accompanying Sustainability Appraisals. A number of surveys and reports were collated to form an evidence base prior to the publication of the issues and options documents. 12 Issues and Options Reports (See Appendices 15a to 15o) were then produced utilising the collected evidence to inform the issues affecting the borough. Each of the 12 reports has a section that details the relevant evidence – For example, for housing, see pages 4-8 of Housing Issues and Options Paper (See Appendix 15b). Three consultation summaries (Appendices 15a, 15f and 15l) bring together the responses to the Issues and Options papers. The effect of these responses can be seen in the Preferred Options Document produced in 2007 (See Appendix 21) in a number of ways:

Key question	Evidence provided
made?	• Para 3.9 details the drivers for change informed by the initial evidence gathering exercise and used to inform the vision and key objectives. • The spatial vision (through the growth scenarios) and the core policies are shown with a number of alternatives. Each section clearly identifies the options available, the preferred option, a number of draft policies and the reasons for the preferred option. A similar process is utilised in the 2009 Options version of the DPD allowing both the spatial and policy preferred options to be analysed against the alternatives. For both the 2007 Preferred Options and 2009 Options versions of the Core Strategy there are Sustainability Appraisals (See Appendices 22 and 29) available to support the options process. For the 2007 version, Chapter 5 identifies the options considered and appraises the process in selecting the preferred options, whilst the for the 2009 version this is located in Chapter 9. A Sustainability Appraisal also exists for the Proposed Submission version (see Appx ???). For further details on the processes across all three consultations for these documents, please refer to the Consultation Statement in Appendix 5.
10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?	The Sustainability Appraisal Scoping Report (See Appendix 8) was prepared in May 2005. The report reviewed existing plans, using an appraisal framework to establish key sustainability issues and baseline information. This document was updated in 2009 to incorporate up-to-date baseline information, programmes and plans. Further, with consideration to the Scoping Report, a Sustainability Appraisal Report has been prepared for each version of the Core Strategy, as follows: • The Sustainability Appraisal of the Core Strategy Issues and Options 2005 is located as part of the Sustainability Appraisal of the Preferred Options Core Strategy 2007 document (See Appendix 22). • The Sustainability Appraisal of the Core Strategy Preferred Options 2009 report can be found in Appendix 29. • A Sustainability Appraisal and strategic environmental assessment was undertaken on the Core Strategy Proposed Submission Version and published in February 2010 (See Appendix 41) • For the Core Strategy Submission Stage document the Sustainability Appraisal can be located in Appendix 51.
11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it? 12. Does the strategy take forward	Pages 5 and 6 of the submitted DPD contain details of how Lewisham fits within the wider London context and highlight the requirements of the London Plan as it relates specifically to Lewisham. Additionally, if the London Plan has influenced a Core Strategy policy it will be included in the relevant 'evidence base and signposts' section. Within each policy itself, the London Plan is only mentioned if it has

Key question	Evidence provided
the regional context reflecting the local issues and objectives?	been expanded, adjusted, or there is need to reflect the local vision or objectives of the Core Strategy. For example, Core Strategy Policies 7 and 8 (updated in the Schedule of Amendments – see Appendix ??) have expanded upon the energy hierarchy from the London Plan to support the local environmental vision. Confirmation of conformity with the London Plan has been received from the Mayor of London. This is included in the supporting information submitted alongside the Core Strategy as Appendix ??

Effective	
Deliverable	
13. Has the council clearly identified what the issues are that the development plan document is seeking to address? 14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?	The Council has identified the requirements for the Core Strategy Submission version. The DPD sets out the issues and vision through the following process: • Chapter 2 presents the key evidence that identifies the issues within the Borough of Lewisham • Chapter 3 details the issues that the DPD will then aim to address, called 'drivers for change' • Chapter 4 uses this basis to establish the vision for the borough • Chapter 5 expands upon the vision to create strategic objectives Establishing the issues of the borough was an early part of the plan preparation process, i.e. the Issues and Options stage. The resulting issues formed the basis of the vision and strategic objectives of each subsequent document. Priorities are identified within the DPD in order to clearly set out the key requirements for the borough through: • The identification of a vision (Chapter 4) that is directly related to the over-arching vision of the Sustainable Community Strategy • 11 strategic objectives (Chapter 5) support the vision statement and represent the key delivery outcomes that the DPD should achieve
15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?	Section 9.9 of the submitted DPD identifies the process that the Council has undertaken to ensure that cross-borough issues have been successfully addressed. This includes identifying the key sub regional documents, reports and evidence base. Specific measures to address issues include: • The Infrastructure Delivery Plan which contains a chapter that reflects influencing elements of development and infrastructure in adjoining boroughs. • The Strategic Flood Risk Assessment involving LB Lewisham and Southwark • The South East London Boroughs' Joint Waste Technical Apportionment Strategy (LB Bexley, Bromley, Greenwich, Lewisham and Southwark) • The Sub-regional Strategic Housing Market Assessment (LB Bexley, Bromley, Greenwich, Lewisham and Southwark) • The sharing of evidence between LB Lewisham, Greenwich and Southwark to account for the cumulative impacts of proposed development upon transport.

	Neighbouring Boroughs have been regarded as specific consultation bodies at every stage of the document production process and have therefore been consulted regularly. Responses can be located in the Consultation Statement (Appendix 5) and for final responses pre-submission see Appendix 50b (Folder of all representations).
16. Does the development plan document contain clear objectives?	Chapter 5 of the submitted DPD contains 11 strategic objectives which support the vision statement and represent the key delivery outcomes that the DPD should achieve. Evidence collected at the beginning of the Core Strategy production process was used to determine the issues and challenges facing the borough. These issues, referred to as 'Drivers for Change' were then utilised to create a vision and a set of objectives for Lewisham. Both the vision and the objectives for the borough have been developed to mitigate the issues established at the start of the document production process.
17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere? 18. Is there a direct relationship between the identified issues and the objectives?	Chapter 5 of the submitted DPD contains 11 strategic objectives which support the vision statement and represent the key delivery outcomes that the DPD should achieve. As previously identified in Test 16, the objectives are directly related to the local evidence collected to support the Issues and Options Core Strategy, 2005 (Appendix 15a – 15o). this process has been continued and reinforced through the Preferred Options Core Strategy, 2007 and the Options Core Strategy, 2009. As such, the objectives have local influence integral to their creation and are specific to Lewisham. Further, the objectives have been subject to consultation and public engagement at each stage of the DPD process. This has affected the development of the vision and the strategic and spatial objectives of the borough and input an inexorable element of locality. The relationship between the identified issues and the objectives in the Core Strategy is both clear and direct. The issues were established using the evidence base and detailed in the Core Strategy Issues and Options, 2005 (Appendix 15a – 15o). The identified issues can be seen to be comprehensively covered by the stated objectives in the submitted DPD. The Council has identified the requirements for the Core Strategy Submission version. The DPD sets out the issues and vision through the following process: • Chapter 2 presents the key evidence that identifies the issues within the Borough of Lewisham • Chapter 3 details the issues that the DPD will then aim to address, called 'drivers for change' • Chapter 4 uses this basis to establish the vision for the borough • Chapter 5 expands upon the vision to create strategic objectives
19. Is it clear how the policies will meet the objectives?	In the submitted DPD, Chapter 6 - The Spatial Strategy – utilises the grouping of policies to relate them to the strategic objectives and additionally every spatial policy is followed by a section that details how the strategic

20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?	objectives will be delivered as a result of the policies in place. For Chapter 7 – Cross Cutting and Thematic Policies - the link to the strategic objectives is indicated through the groupings. i.e. strategic objectives 9 to 11 are grouped under the heading 'building a sustainable community', while core strategy policies 14 to 21 which respond to the needs of these objectives are also grouped under 'building a sustainable community'. For clarity, the linkages between the strategic objectives and every policy that contributes towards meeting it are detailed in Table 6.1 located in Appendix 6 of the submitted DPD. All of the strategic objectives can be related to at least one of the spatial policies and multiple cross cutting and thematic polices which will deliver the objective through their successful implementation. Additionally, the monitoring framework is detailed in Appendix 6 of the DPD including the indicators, targets and the key indicator source (such as the AMR, LAA and national sources). Therefore it is considered that there are no obvious gaps regarding the objectives of the DPD.
21. Are there realistic timescales related to the objectives?	Chapter 9 of the Core Strategy – Delivery, Implementation and Monitoring – demonstrates that the DPD is accountable to realistic timetables. Key points of note include: • The Infrastructure Delivery Plan, 2010 (section 9.3) which will be managed through the LSPs Sustainable Development Partnership • The housing trajectory (section 9.6) details projected housing completions and the performance against housing targets until 2026.This is reviewed annually as part of the Annual Monitoring Report procedure • Housing is also supported using the Housing Implementation Strategy which is monitored and updated annually • Section 9.8 reflects the key milestones that have been prepared to help monitor the progress of the Core Strategy • Further measures are detailed in the table of monitoring indicators located in Appendix 6. In a representation to the proposed submission version of the Core Strategy, GOL stated in relation to the delivery of infrastructure that "The Core Strategy would be made more robust by clarifying which schemes are essential to deliver its vision and objectives". Specifically, it was not known which of the infrastructure projects highlighted in the Core Strategy were essential to facilitate the proposed redevelopment of strategic sites. In response to this and to support the IDP, the Schedule of Amendments contains a proposed additional Appendix 8 to the Core Strategy. The appendix contains a table from the IDP detailing the essential infrastructure required, approximate costs, funding sources, delivery responsibility and risk / contingency planning.
22. Are the policies internally consistent?	The policies of the Core Strategy are internally consistent. Each policy is related to an objective, while groups of policies combine to fulfil the objectives as demonstrated in question 19 above. Policies throughout the submitted DPD cross-reference each other where relevant, but avoid repetition or conflicting points of view.

	No objections have been received that suggest there is a conflict between policies within the DPD.
23. Does the development plan document contain material which: • is already in another plan • should logically be in a different plan • should not be in a plan at all?	As the first DPD produced for the Borough of Lewisham, the Core Strategy can not repeat information contained within other DPDs. While stating that we will use the London Plan where relevant and to emphasise a crucial point, the Core Strategy does not repeat its policies. The LDS (2010) brought into effect on the 23 September 2010 details the scope and expected content of the Core Strategy and it is felt that the submitted DPD reflects these requirements. The LDS (2010) sets out all DPDs proposed by Lewisham and demonstrates that they combine to provide a coherent policy framework. Briefly: • **The Core Strategy** will set out the long term spatial vision for the borough, covering a 15 year period from the date of adoption. The Core Strategy includes a strategic vision, objectives and spatial strategy for the borough as well as core policies and strategic site allocations to achieve the objectives. It will also include a monitoring and implementation framework. The Core Strategy will reflect the spatial aspirations of the Sustainable Community Strategy. • **The Site Allocations DPD** will set out the allocated sites except for those set out in the Core Strategy and Area Action Plans. It will identify the locations and sites for specific types of development in order to ensure the vision, objectives and spatial strategy of the Core Strategy are implemented. The broad parameters for development of each site will be listed covering land use and development criteria. • **The Development Management DPD** will set out the main policies and the reasoned justification that will be used to consider planning applications for development or change of use. The policies will generally be criteria based and will focus on issues such as protecting residential amenity; protection of the landscape and natural resources; nature conservation; addressing highway and transport issues; protecting the viability and vitality of town centres and addressing visual impact issues. Guidance states it is not necessary to repeat or attempt to re-interpret national and regional policy for planning, development and conservation which is expressed in higher level plans. • **The Lewisham Town Centre Area Action Plan AAP** will set out a comprehensive set of policies and proposals for development in the Lewisham Town Centre. It will include major redevelopment opportunities and major traffic and transport infrastructure changes. It will set out the planning framework for significant change and conservation, and where applicable detailed development policies. It should be noted that the Lewisham Gateway site is allocated in the Site Allocations DPD and will be referred to within the AAP. • **The Catford Town Centre AAP** will set out a comprehensive set of policies and proposals for the on-going redevelopment and regeneration of Catford Town Centre. It will provide for major redevelopment opportunities, including significant housing development and traffic / transport infrastructure changes. The context for the Core Strategy is set out in section 1.3 of the submitted document, while each DPD and

| | their arrangement within the LDF Framework is demonstrated in Figure 1.1. Individual policies within the Core Strategy detail where information is located in another DPD. For Example, Core Strategy Policy 2: Gypsies and Travellers refers to the Site Allocations DPD.

Consultation with GOL regarding the pre-submission version of the DPD did not lead to any representations suggesting that material within the Core Strategy is either repetitious, wrongly located or inappropriate for a DPD. |
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| 24. Does the development plan document explain how its key policy objectives will be achieved? | In the submitted DPD, Chapter 6 - The Spatial Strategy – utilises the grouping of policies to relate them to the strategic objectives and additionally every spatial policy is followed by a section that details how the strategic objectives will be delivered as a result of the policies in place. For Chapter 7 – Cross Cutting and Thematic Policies - the link to the strategic objectives is indicated through the groupings. i.e. strategic objectives 9 to 11 are grouped under the heading 'building a sustainable community', while core strategy policies 14 to 21 which respond to the needs of these objectives are also grouped under 'building a sustainable community'.

For clarity, the linkages between the strategic objectives and every policy that contributes towards meeting it are detailed in Appendix 6, Table 6.1 located in the submitted DPD. The table also details further indicators, the associated targets and the sources. This includes, the Local Area Agreement National Indicators and the LDF Annual Monitoring Report.

All of the strategic objectives can be related to at least one of the spatial policies and multiple cross cutting and thematic polices which will deliver the objective through their successful implementation. Therefore it is considered that there are no obvious gaps regarding the objectives of the DPD. |
| 25. If there are development management policies, are they supportive of the strategy and objectives? | The LDS (2010) brought into effect on the 23 September 2010 details the scope and expected content of the Core Strategy and it is felt that the submitted DPD reflects these requirements. Further, a separate Development Management DPD will set out the main policies and the reasoned justification that will be used to consider planning applications for development or change of use. However, some policies within the Core Strategy inevitably have links to development management and are supportive of the strategic objectives and the spatial strategy, as detailed in Section 6 of the DPD.

In Chapter 7 – Cross Cutting and Thematic Policies – policies are linked to strategic objectives through the groupings. i.e. strategic objectives 9 to 11 are grouped under the heading 'building a sustainable community', while core strategy policies 14 to 21 which respond to the needs of these objectives are also grouped under 'building a sustainable community'.

For clarity, the linkages between the strategic objectives and every policy that contributes towards meeting it are detailed in Table 6.1 located in Appendix 6 of the submitted DPD. |
| 26. Have the infrastructure | Section 6 – The Spatial Strategy – contains paragraphs relating to the delivery of each spatial policy. This |

implications of the strategy/policies clearly been identified?	introduces infrastructural elements under the headings sustainable movement and community well-being. Additionally, the Strategic Site Allocations in Section 8 of the Core Strategy detail the essential infrastructure that needs to be delivered to support the implementation of each site. Section 9.3 of the Core Strategy details the input made by the Infrastructure Delivery Plan (IDP) (see Appendix 58). The IDP is a live document that will be used to support the delivery of infrastructure required to implement the Core Strategy. Each of the infrastructure requirements identified in the spatial strategy and strategic site allocations are included in the IDP to support their implementation. In accordance with paragraph 4.8 of PPS12, Appendix 8 in the Schedule of Amendments inserts a table of essential infrastructure. The approach of the IDP was influenced by the preceding Social Infrastructure Framework Study (2008). The study assessed existing social infrastructure provision as well as the infrastructure requirements of Lewisham Borough over a 15 year period (to tie in with the Core Strategy timeline).
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	Chapter 9 of the Core Strategy – Delivery, Implementation and Monitoring – details the aspects required to secure the comprehensive delivery of the core strategy policies. A number of sub sections of Chapter 9 demonstrate the actions and strategy in place to ensure implementation of the strategy and make it accountable to realistic timescales. Key points of note include: - The commitment to partnership working (section 9.2) to promote policy delivery. - The Infrastructure Delivery Plan (section 9.3) completed in 2010 which will be managed through the LSPs Sustainable Development Partnership. - Where appropriate, the use of compulsory purchase powers to ensure delivery of the Core Strategy's wider regeneration objectives (section 9.4). - The use of planning obligations to secure developer contributions to support the delivery of environmental and infrastructure improvements and community facilities required as a result of development (section 9.5) - The housing trajectory (section 9.6) details projected housing completions and the performance against housing targets until 2026. This is reviewed annually as part of the Annual Monitoring Report procedure. - Section 9.8 reflects the key milestones that have been prepared to help monitor the progress of the Core Strategy. Supporting text for spatial policies 1 – 5 in Chapter 6 include information regarding the delivery of each of the strategic objectives. As an example, housing provision is supported by the projected housing completions which apportions housing delivery across the spatial policy locations and the timescale of the plan.
28. Is it clear who is going to deliver the required infrastructure and does the	Chapter 9 of the Core Strategy – Delivery, Implementation and Monitoring – demonstrates the aspects required to secure the comprehensive delivery of the core strategy policies. In particular, section 9.3 introduces the Infrastructure Delivery Plan (IDP) which details what infrastructure is required, how it will be

timing of the provision complement the timescale of the strategy/policies?	delivered and by whom. In particular, the IDP reflects the investment and corporate plans of those responsible for delivering the essential infrastructure requirements. Figure 9.1 highlights the key partnerships identified in the governance structure for managing the implementation of the IDP. In accordance with paragraph 4.8 of PPS12, Appendix 8 in the Schedule of Amendments inserts a table of essential infrastructure. The Core Strategy has been supported by the Lewisham Local Strategic Partnership.
29. Is it clear who is intended to implement each part of the strategy / development plan document? 30. Where actions are required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?	Where it is possible and appropriate, the Core Strategy details the responsible body/bodies for the delivery of sections of the strategy. For example: • The sections named – How will the strategic objectives be delivered? – within Chapter 6 – The Spatial Strategy – identify a number of partners to the Council who will assist in the delivery of infrastructure and development. These include, SELCHP, Network Rail, TfL, the Sustainable Development Partnership, land owners and NHS Lewisham. • The same partners are identified where relevant throughout the cross cutting and thematic policies section (section 7), e.g. Core Strategy Policy 14 – sustainable movement and transport – which discusses the input of NHS Lewisham and TfL. Chapter 9 of the Core Strategy – Delivery, Implementation and Monitoring – details the aspects required to secure the comprehensive delivery of the core strategy policies. Figure 9.1 (page 154) highlights the key partnerships identified in the governance structure for managing the implementation of the IDP. The IDP reflects the investment and corporate plans of those responsible for delivering the essential infrastructure requirements. Section 9.6 details the housing trajectory and it's influence on the timescales for delivery. The housing trajectory is based upon developer and landowner input and therefore an understanding of who will be implementing housing schemes is apparent. Alongside this, the Housing Implementation Strategy identifies those responsible for the delivery of housing in the plan period.
31. Does the development plan document reflect the concept of spatial planning? 32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other	The Core Strategy integrates elements of land use planning with a number of spatial policies, supported by core thematic policies, strategic site allocations and a delivery, implementation and monitoring framework. Within the document, the vision, strategic objectives and spatial strategy exhibit the framework for the delivery of development across the borough and demonstrate the spatial nature of the DPD. Specifically, the spatial strategy addresses the key drivers for change and establishes where and how development should take place. The vision and objectives have been established to complement the Sustainable Community Strategy for

policies and programmes from a variety of organisations that influence the nature of places and how they function?	Lewisham.

To ensure a spatial and integrated approach to planning, the Core Strategy:

- embraces the plans and opinion of a wide range of bodies including partners within and external to the Council, including neighbouring boroughs and other stakeholders beyond geographical boundaries. This is particularly the case through strategic objectives 6, 9 and 11 and core strategy policies 11, 12, 19 and 20.
- is based upon a comprehensive set of evidence base documents, that have been produced to provide the factual basis upon which the spatial strategy is founded. The full list of plans, reports and evidence base documents considered can be seen in the Core Strategy and Sustainability Appraisal appendices and additionally is provided in a variety of formats in support of the Core Strategy submission.
- has been developed through consultation to ensure that the influence of external plans and programmes has been monitored by the organisations to which they belong. Copies of the representations from all consultees at all stages of the DPD development are available via the council and summarised in the consultation statement submitted.
- Section 6 – The Spatial Strategy – contains paragraphs relating to the delivery of each spatial policy. This introduces infrastructural elements under the headings sustainable movement and community well-being. Additionally, the Strategic Site Allocations in Section 8 of the Core Strategy detail the essential infrastructure that needs to be delivered to support the implementation of each site.
- in Chapter 9 (Delivery, implementation and monitoring) reflects the findings of the Infrastructure Delivery Plan. The IDP reports on how and when infrastructure will be delivered to support the planned growth in the borough. It has been developed in collaboration with council departments including education, leisure and open space and external bodies such as the PCT and development agencies. Chapter 9 also contains a section that explains the Council commitment to partnership working in relation to other public, private and voluntary sector organisations.
- was governed by the Local Strategic Partnership for Lewisham which incorporates representatives from a wide range of sectors across the borough
- was supported by the LDF steering group which incorporates council officers from many sectors including housing, transport, development control, economic development and corporate departments.

The effect of the various plans and strategies of other bodies can be seen throughout the Core Strategy in a number of objectives, strategies, policies and the accompanying justification detail. |
| 33. Does the development plan document take into account matters which may be imposed by circumstance, | At the current time the Council is unaware of any impending matters of circumstance, however it recognises that it must anticipate future changes in order to effectively deliver the aims of the DPD. In the event of such changes, the Core Strategy is generally considered to contain sufficient flexibility to adapt where required. As is explained in further detail in points 34 - 36, Chapter 9 of the submitted DPD contains a section on risk |

notwithstanding the council's views about the matter?	assessment to support adaptation to change by covering a number of key potential alterations to circumstance.
Flexible	
34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	The Council recognises that in order to be sure that the DPD is effectively delivering the aims of the document, we need to be able to check on whether the objectives and policies are being achieved. The Core Strategy will be monitored yearly as a minimum using the Annual Monitoring Report. Where new indicators / targets or sources of information have been identified through the Sustainability Appraisal process, these will be incorporated into subsequent iterations of the Annual Monitoring Report to ensure that it remains consistent with the Core Strategy. The monitoring framework is detailed in Appendix 6 of the DPD including the indicators, targets and the key indicator source (such as the AMR, LAA and national sources). Failure to meet the proposed targets will be cause for review of the associated policies and objectives. Section 9 of the Core Strategy details the monitoring process and establishes key milestones across the chronological stages of the report. Changes to the baseline information that forms the foundation upon which the Core Strategy is built will be monitored by the Annual Monitoring Report and where appropriate the refreshing of the baseline data and reports themselves. As an example, the Housing Trajectory and 5 Year Supply of Available Land reports will be refreshed on an annual basis. The Housing Implementation Strategy provides further support to the resilience of housing delivery by assessing risk factors to implementation and providing potential methods of mitigation. Additionally and directly related to the implementation of the DPD, the Infrastructure Delivery Plan will be reviewed with key stakeholders and delivery agents bi-annually with the report updated on a yearly basis. Additionally, monitoring on baseline information from external sources will be sought on an annual basis where applicable to ensure the foundation of the Core Strategy remains current and justifiable. Whilst the policies within the DPD are considered flexible, the Council acknowledges that change occurs and the associated risks to the feasibility of the document must be considered. Chapter 9.10 of the Core Strategy assesses the risk of key change factors including alterations to over-arching policy, climate change and the economic recession. Additionally Section 9.10 address the flexibility required within the DPD to adapt to such change and suggest where appropriate, potential mitigation measures in conjunction with the wider Council and other local and regional bodies. In general, the Council will look to work with stakeholders and partners to deliver the Core Strategy and in the event of change to identify such matters and where required adapt to alternative methods of implementation.

35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?	Through the monitoring approach set out above and in Core Strategy Chapter 9 and the Annual Monitoring Report the council believes it will be able to identify risk and issues and then adapt to changes when required. The implementation plan set out in Chapter 9 is supported by the Infrastructure Delivery Plan and contains the flexibility to meet the objectives of the DPD. This is further reinforced through section 9.10 relating to risk assessment. The specific example of housing figures is covered in section 9.10: Risk assessment, which states that the range and number of sites planned for development provides resilience in the delivery strategy of residential development. Further, the borough has had input into the London Strategic Housing Land Availability Assessment on which regional housing targets are based and would look to continue this input in any future iterations of this report. The Housing Implementation Strategy provides further support to the resilience of housing delivery by assessing risk factors to implementation and providing potential methods of mitigation.
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	Whilst the council believe that the Core Strategy is flexible to changing circumstances, it will ensure through the monitoring framework that any issues are identified in order that appropriate action can be taken in suitable timescales. Chapter 9.10 of the Core Strategy assesses the risk of key change factors including alterations to over-arching policy, climate change and the economic recession. Additionally Section 9.10 address the flexibility required within the DPD to adapt to such change and suggest where appropriate, potential mitigation measures in conjunction with the wider Council and other local and regional bodies. The Housing Implementation Strategy provides further support to the resilience of housing delivery by assessing risk factors to implementation and providing potential methods of mitigation. In general, the Council will look to work with stakeholders and partners to deliver the Core Strategy and in the event of change to identify such matters and where required adapt to alternative methods of implementation.
Monitoring	
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	The Council recognises that in order to be sure that the DPD is effectively delivering the aims of the document, we need to be able to check on whether the objectives and policies are being achieved. The Core Strategy will be monitored yearly as a minimum using the Annual Monitoring Report. Where new indicators / targets or sources of information have been identified through the Sustainability Appraisal process, these will be incorporated into subsequent iterations of the Annual Monitoring Report to ensure that it remains consistent with the Core Strategy. The monitoring framework is detailed in Appendix 6 of the DPD and includes: • What is the strategic objective we will monitor? • What Core Strategy Po9licy does it deliver? • What indicators will we use for monitoring?

	• What is the target?
	• Indicator source
	Failure to meet the proposed targets will be cause for review of the associated policies and objectives. Section 9 of the Core Strategy details the monitoring process and establishes key milestones across the chronological stages of the report.
	Changes to the baseline information that forms the foundation upon which the Core Strategy is built will be monitored by the Annual Monitoring Report and where appropriate the refreshing of the baseline data and reports themselves. As an example, the Housing Trajectory and 5 Year Supply of Available Land reports will be refreshed on an annual basis. Additionally and directly related to the implementation of the DPD, the Infrastructure Delivery Plan will be reviewed with key stakeholders and delivery agents bi-annually with the report updated on a yearly basis.
	Additionally, monitoring on baseline information from external sources will be sought on an annual basis where applicable to ensure the foundation of the Core Strategy remains current and justifiable.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	The Council recognises that in order to be sure that the DPD is effectively delivering the aims of the document, we need to be able to check on whether the objectives and policies are being achieved. The Core Strategy will be monitored yearly as a minimum using the Annual Monitoring Report. Where new indicators / targets or sources of information have been identified through the Sustainability Appraisal process, these will be incorporated into subsequent iterations of the Annual Monitoring Report to ensure that it remains consistent with the Core Strategy.
	The monitoring framework is detailed in Appendix 6 of the DPD and includes:
	• What is the strategic objective we will monitor?
	• What Core Strategy Po9licy does it deliver?
	• What indicators will we use for monitoring?
	• What is the target?
	• Indicator source
	Failure to meet the proposed targets will be cause for review of the associated policies and objectives. Section 9 of the Core Strategy details the monitoring process and establishes key milestones across the chronological stages of the report.
	Changes to the baseline information that forms the foundation upon which the Core Strategy is built will be monitored by the Annual Monitoring Report and where appropriate the refreshing of the baseline data and

	reports themselves. As an example, the Housing Trajectory and 5 Year Supply of Available Land reports will be refreshed on an annual basis. Additionally and directly related to the implementation of the DPD, the Infrastructure Delivery Plan will be reviewed with key stakeholders and delivery agents bi-annually with the report updated on a yearly basis. Additionally, monitoring on baseline information from external sources will be sought on an annual basis where applicable to ensure the foundation of the Core Strategy remains current and justifiable.
39. Are suitable targets and indicators present (by when, how and by whom)?	The Council recognises that in order to be sure that the DPD is effectively delivering the aims of the document, we need to be able to check on whether the objectives and policies are being achieved. The Core Strategy will be monitored yearly as a minimum using the Annual Monitoring Report. Where new indicators / targets or sources of information have been identified through the Sustainability Appraisal process, these will be incorporated into subsequent iterations of the Annual Monitoring Report to ensure that it remains consistent with the Core Strategy. The monitoring framework is detailed in Appendix 6 of the DPD and includes: • What is the strategic objective we will monitor? • What Core Strategy Po9licy does it deliver? • What indicators will we use for monitoring? • What is the target? • Indicator source Failure to meet the proposed targets will be cause for review of the associated policies and objectives. Section 9 of the Core Strategy details the monitoring process and establishes key milestones across the chronological stages of the report. Changes to the baseline information that forms the foundation upon which the Core Strategy is built will be monitored by the Annual Monitoring Report and where appropriate the refreshing of the baseline data and reports themselves. As an example, the Housing Trajectory and 5 Year Supply of Available Land reports will be refreshed on an annual basis. Additionally and directly related to the implementation of the DPD, the Infrastructure Delivery Plan will be reviewed with key stakeholders and delivery agents bi-annually with the report updated on a yearly basis. Additionally, monitoring on baseline information from external sources will be sought on an annual basis where applicable to ensure the foundation of the Core Strategy remains current and justifiable.

National policy	
40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy? 41. If yes, is there a local justification?	The Core Strategy has been produced to take account of both national and regional policy and where appropriate complement it through accounting for locally significant circumstances. The council considers that throughout the DPD the policies are consistent with national and regional policy.
42. Does the development plan document contain policies that do not add anything to existing national guidance? 43. If so, why have they been included?	The Core Strategy has been produced to take account of both national and regional policy and where appropriate complement it through accounting for locally significant circumstances. The council considers that throughout the DPD the policies are consistent with national and regional policy without being needlessly repetitious.