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Dear Brian

**PLANNING AND COMPULSORY PURCHASE ACT 2004 - TOWN AND COUNTRY
PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2004 (AS
AMENDED 2008)
LONDON BOROUGH OF LEWISHAM LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY PRE SUBMISSION (REGULATION 27) CONSULTATION**

1. I refer to your letter of 19 February 2010 enclosing the above document, which is on public consultation from 19 February 2010 until the 6 April 2010.
2. The Secretary of State's consideration of the Plans, set out below, is based on the Soundness tests set out in PPS12 (para. 4.52). Please note that this letter constitutes our formal publication (pre-submission) stage written representations, unless the examining Inspector considers there to be merit in the Government Office participating at the oral examination. Where possible, we suggest how any concerns may be overcome.

Justified

(a) Is the Plan founded on a robust and credible evidence base:

3. As you know, PPS12 paragraph 4.37 states that evidence gathered should be proportionate, relevant and up-to-date as practicable, having regard to what may have changed since the evidence was collected. We understand that the Lewisham Core Strategy is backed up by an extensive range of evidence listed at Appendix 1. It is clear from this list that much of the evidence base is of recent origin. However, there may be elements that were collected before the current economic downturn and you should ensure that the submitted Core Strategy is backed up by evidence that is as up to date as possible. GOL notes that the effect of the economic recession is considered from paragraph 9.45 of the Core Strategy.

4. 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.

(b) Is it the most appropriate strategy when considered against reasonable alternatives:

5. The Core Strategy's approach is to focus growth and larger scale development in Regeneration and Growth Areas (the localities of Lewisham, Catford, Deptford and New Cross/New Cross Gate). It is noted that this approach was one of the options set out in chapter 6 *Strategic Spatial Options* of your Core Strategy options report (February 2009).

Effective

(a) Is the Plan deliverable:

6. The Spatial strategy chapter sets out a range of planned infrastructure that is required to support development across the borough. However, it is not clear if the provision of any of these are essential for the development proposed and what the impact would be should any of be delayed or cancelled. For example, Strategic site allocation 3 *Surrey Canal Triangle* says that a future Masterplan for the area should make provision for the Surrey Canal Road Overground Station and a new pedestrian and cycle bridge adjacent to the East London Line Phase 2 extension. However, there is no reference as to whether this is essential to facilitate the proposed redevelopment of the site, including the provision of up to 2,500 new homes. The Core Strategy would be made more robust by clarifying which schemes are essential to deliver its vision and objectives.

7. The Delivery, implementation and monitoring chapter broadly sets out how the plan's vision and objectives are to be delivered. However, there is little information regarding the delivery of the 5 proposed strategic site allocations. This is particularly relevant in relation to the Lewisham Gateway, Oxestalls Road and Plough Lane sites which, according to the key milestones on page 157, would "*be under way*" during the period 2011 to 2016. Paragraph 31 of the Planning Inspectorate's Examining Development Plan Documents: Learning from Experience says that "*For a site anticipated in the early years of the plan there is an expectation that the delivery matters such as availability and infrastructure requirements will have been resolved*". This could be rectified by including some of the information contained within the Infrastructure delivery plan, which indicates where a proposed infrastructure project is linked to a growth area and/or strategic site, or by making the appropriate cross references. In relation to this, it would be helpful if the infrastructure delivery plan could be more specific as to which strategic site is being referred to.

8. The Infrastructure delivery plan and schedule are very comprehensive, and it is clear that a considerable amount of work has been undertaken in their production. To build upon this you may want to provide more detail on how any funding shortfalls will be overcome, contingency planning and highlight where any infrastructure is considered key to the plan's delivery. It would also be helpful if the delivery periods were in line with the key milestones set out at 9.8 of the Core Strategy.

(b) Is the Plan flexible;

9. In order for this Core Strategy to be flexible it needs to show some evidence of how it will deal with changes in circumstances that may occur during the plan period. This is particularly relevant in relation to infrastructure planning, which should indicate what work you have done or will be undertaking as regards to contingency planning should any of the planned infrastructure not proceed. The Infrastructure schedule that accompanies this plan

includes a column on risks and contingency planning. However, this appears to give more focus to possible future risks, rather than what work is/will be undertaken by your authority should any of the planned infrastructure not proceed.

(c) Is the Plan able to be monitored;

10. The Core Strategy sets out in Appendix 6 (Table 6.1) a monitoring framework, including targets and indicators, for the plan's objectives and Core Strategy policies. The table also usefully shows a range of indicators including national, AMR and LAA. To make this table more robust you may want to show how this relates to the plan's spatial and strategic site allocation policies.

Consistent with National Policy

11. **Core Strategy Policy 13 Addressing Lewisham's waste management requirements:** There is no reference, either within the policy or accompanying text, to all of the individual waste streams generated within your borough; also whether any waste is imported into the borough for processing. This could be rectified by expanding the information set out in the justification to this policy. You may also want to make reference as to how your borough will aim to process any future waste applications you may receive.

12. DEFRA's Water Strategy for England (February 2008) sets out Government support for the construction of the Thames Tideway Tunnel to limit pollution from sewer overflows. This was preceded by a Ministerial Statement by Ian Pearson, Minister for Climate Change and the Environment on 22 March 2007 on the decision to take the project forward. The Core Strategy should support the principle of the Thames Tideway Tunnel, ideally through policy. We note that the Thames Tideway Tunnel is referred to in the Infrastructure delivery plan (page 35) and infrastructure schedule (IDP project ref P2A).

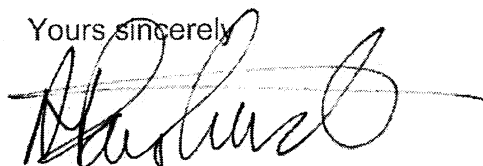
General

13. It would be helpful to make reference within the Core Strategy to the Housing Implementation Strategy (HIS) which we understand that you are currently undertaking. Paragraph 62 of Planning Policy Statement 3 sets out the requirements for the HIS.

14. To aid those that are not too familiar with specific areas within the borough, you may want to add references to major street names/significant locations to the figures depicting the location of the strategic site allocations.

15. It would be helpful to meet to discuss our comments prior to this plan being submitted for Examination. Please contact me with a convenient date.

Yours sincerely



Alison Fairhurst

