

1. Introduction

- 1.1 This document uses the self-assessment toolkit published by the Planning Advisory Service (PAS) to assess the soundness of the Canada Water Area Action Plan (AAP). Whilst not an essential requirement for submission of the AAP, it is recommended that this exercise is undertaken to assist the Planning Inspector in the examination.

Soundness tool

Key question	Possible evidence	Evidence provided
Justified		
Participation		
<p>1. Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The Consultation Strategy The Consultation Plan The Consultation Report</p>	<p>During the initial stages of preparing the Canada Water AAP a Consultation Strategy (October 2008) was prepared to guide consultation through the course of the plan's preparation. The consultation strategy was based upon a thorough understanding of stakeholders and previous consultation that had been undertaken in the area. The strategy recognises that the methods of consultation need to respond to and effectively involve the diverse local population.</p> <p>The Consultation Report for the Canada Water Area Action Plan sets out who has been consulted, how they were consulted and a summary of the main issues raised during the consultation. The report also demonstrates compliance with the Council's adopted Statement of Community Involvement (SCI).</p> <p>This Consultation report summarises the methods of consultation which were used at each stage of the process of preparing the AAP (i.e. evidence gathering, Issues and Option, Preferred Options) in order to meet the objectives of the Consultation Strategy and comply with the Regulations and the SCI.</p> <p>At each stage, consultation was monitored and results fed into the planning of the following phases of consultation.</p>
Research/ fact finding		
<p>2. Is the content of the development plan document</p>	<p>i. Sections of the development plan document which show how the evidence points towards the selected</p>	<p>Evidence for policies is set out in each section of the Canada Water AAP and by a range of</p>

Key question	Possible evidence	Evidence provided
<p>justified by the evidence?</p> <p>3. What is the source of the evidence?</p> <p>4. How up to date and convincing is it?</p>	<p>strategy, policies or proposals</p> <p>ii. Sections of the pre-submission proposals documents</p> <p>iii. Sections of the preferred strategy report</p> <p>iv. Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document</p> <p>v. Sections of the consultation statement</p> <p>OR</p> <p>A very brief statement of how the main findings of consultation support the policies, with reference to:</p> <ul style="list-style-type: none"> ○ reports to the council on the issues raised during participation, covering both the front-loading and formulation phases ○ any other information on community views and preferences <p>vi. The studies, reports and technical papers that provide the evidence for the policies set out in the development plan document. The date of preparation and who they were produced by should be signposted</p> <p>OR</p> <p>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the development plan document)</p>	<p>background papers which explain the policies. The evidence base is recent and has been updated during the course of preparing the AAP.</p> <p>Section 1.5 of the AAP summarises the supporting documents for the AAP. This includes detail about the evidence base which has been referred to throughout the AAP in explaining the justification for the policies. The supporting documents prepared include: the Sustainability Appraisal; Equalities Impact Assessment, Consultation Plan and Strategy; Consultation Report and Officer Responses; Appropriate Assessment.</p> <p>Section 4 of the AAP sets out the policies and the justification for choosing them.</p> <p>The Consultation Report (section 3.2) sets out how the issues from consultation were taken into account in the preparation of the policies.</p> <p>The Sustainability Appraisal (SA) (sections 7 and 8) set out how sustainability has been considered in the development of the plan, and sets out the results of the issues and options SA and the preferred options SA. This process resulted in recommendations for the preferred options and submission/ publication report policies on sustainability grounds.</p> <p>The SA sets out what difference the appraisal process has made (page 10 and section 8). Information on the impacts of the policies is set out in Section 8 and Appendix 7 of the SA report.</p> <p>The following background papers set out the</p>

Key question	Possible evidence	Evidence provided
		<p>evidence which we have used to help prepare the draft policies in the AAP. They were prepared in 2009/2010 by the Council:</p> <ul style="list-style-type: none"> • Housing • Employment • Retail • Delivery of Proposals sites • Urban Design • Infrastructure • s106 planning obligations
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<ul style="list-style-type: none"> i. Sections of the development plan documents setting out the assumptions ii. Sections of the sustainability appraisal report setting out the assumptions iii. A very brief statement for each assumption as to how the evidence led to the assumption iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions 	<p>Assumptions are made about the child yield from the development proposal sites. This led to the quantum of, play spaces, education and pre-school requirements set out in the AAP policies. These assumptions are set out in the background paper on Infrastructure.</p> <p>In addition, the following background papers set out the assumptions made on different topics and the evidence that led to those assumptions:</p> <ul style="list-style-type: none"> • Housing • Employment • Retail • Delivery of Proposals sites • Urban Design • Infrastructure • s106 planning obligations <p>The AAP is consistent with the Core Strategy which conforms with national and regional policy. Section 1 of the Core Strategy and Appendices A and B refer to national, regional and local policy documents that have been used in the development of the DPD.</p> <p>The Consultation Report (section 3.2) sets out</p>

Key question	Possible evidence	Evidence provided
		<p>how the issues from consultation were taken into account in the preparation of the policies.</p> <p>The Sustainability Appraisal (SA) (sections 7 & 8) sets out the assumptions made in the selection of options including limitations of the information, setting out uncertain impacts, cumulative impacts, proposed mitigation and uncertainties and risks.</p> <p>Appendix 2 of the SA sets out the responses to the consultation throughout the SA process. Appendix 3 lists the plan, policies and programmes that have been used in the development of the AAP.</p>
Alternatives		
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options</p> <p>ii. Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered</p> <p>iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised</p> <p>iv. Sections of the preferred strategy report explaining:</p> <ul style="list-style-type: none"> • how alternatives were developed and evaluated, and • why alternatives were rejected in favour of the preferred strategy <p>v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed</p> <p>vi. Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document</p>	<p>The Consultation Report sections 2 and 3 set out the methods used for consultation at each stage of plan making, report on the consultation undertaken and summarise the representations received and the council's response to the representations showing how consultation has influenced the AAP.</p> <p>Section 3.2 of the Consultation Report sets out how consultation responses have been taken into account and influenced the preparation of policies in the submission AAP.</p> <p>The Issues and Options SA report (Nov 2008) and Preferred Options SA report (July 2009) were issued for consultation and show the alternatives that were considered for Canada Water. The options were subject to Sustainability Appraisal (SA) and the results set out in the Preferred Options SA Report, Appendices 4, 5 and 8. The appraisal concluded that the overall impact of Option 2 was more positive in terms of social, economic and environment impacts than for Option 1.</p> <p>Sections 2, 5 and 6 set out the methodology,</p>

Key question	Possible evidence	Evidence provided
	<p>vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions</p> <p>viii. Sections of the representations statement</p> <p>OR</p> <p>A brief statement of the influence upon decisions of: the issues raised during stakeholder and community engagement, and how they have been addressed</p> <p>ix. Any other documentation showing how alternatives were developed and evaluated</p> <p>x. A very brief statement and any other supporting documentation of the way decisions have been taken</p>	<p>issues, objectives and the framework used in the assessment</p> <p>The Submission Version SA report (March 2010) appraises the policies again to take into account amendments made as a result of the consultation process. (see sections 7 & 8 and appendices 5, 6 and 7)</p> <p>Sections 3.1 and 3.2 of the Consultation Report set out how consultation responses have been taken into account and influenced the preparation of policies in the submission version. The representations that relate specifically to the SAs are set out in Appendix 2 of the Final SA report.</p> <p>The range of background documents set out below show the evidence for selecting the final option for the submission AAP.</p> <ul style="list-style-type: none"> • Housing • Employment • Retail • Delivery of Proposals sites • Urban Design • Infrastructure • s106 planning obligations
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy</p> <p>ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings</p> <p>iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the</p>	<p>Sections 7 and 8 of the SA set out how sustainability has been in considered in developing the plan. Its sets out that areas of concern identified at the Issues and Options and Preferred Options stages have led to a refinement of the policies, objectives and indicators to address areas that had not been covered in sufficient detail. A final appraisal of the amended AAP has subsequently been undertaken (see section 8.3-8.9 and Appendix 7).</p>

Key question	Possible evidence	Evidence provided
	choice of strategy and the content of policies	Appendices 5 and 6 of the Sustainability Appraisal (SA) set out the scoring of the options from the Issues and Options and Preferred Options in a table along with scores against the sustainability objectives.
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy iii. Representations received from the regional development agency/regional planning body iv. Representations from the Government Office v. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p>The AAP is in general conformity with the London Plan and does not simply duplicate its policies.</p> <p>Table A3.1 (appendix 3) of the submission AAP shows the relationship between AAP policies and those in the London Plan, as well as consistency with Core Strategy policies. The reasons for the policies where relevant describe compliance with the London Plan. The background papers explain the relationship between the AAP policies and London Plan in more detail.</p> <p>The table of representations received, with officer responses, shows how representations have been considered and dealt with. This table includes representations from the Government Office and the GLA and how we have addressed these representations in the AAP. Appendix 2 of the SA provides the representations and officer comments that specifically relate to the SA.</p>

Effective		
Deliverable		
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy iii. A core strategy vision which is framed to set out the outcomes which are sought for the future iv. Sections of the development plan document which identify the main issues addressed v. Sections of the development plan document which indicate the priority outcomes 	<p>Section 3.1 of the submission AAP confirms that the vision and objectives have been derived from the Sustainable Community Strategy (Southwark 2016), the Southwark Plan, the Core Strategy, and what local people have told us in the past.</p> <p>Section 3.2 of the submission AAP sets out that the key themes and objectives of the AAP have been designed to help deliver key elements of the sustainable community strategy 'Southwark 2016'. The AAP objectives elaborate on the Sustainable Community Strategy objectives. This section sets out the strategic objectives which will help to establish a clear direction for future development.</p> <p>The Issues and Options report (Nov 2008) was prepared and consulted upon setting out the identified issues for the AAP to address.</p> <p>Section 2.1 and Appendix 1 of the AAP sets out the characteristics of the area, providing a 'spatial' portrait.</p> <p>Section 2.2 sets out the challenges and opportunities that the council will tackle in the AAP to achieve the vision of regenerating Canada Water.</p> <p>A SWOT analysis in appendix 2 of the AAP sets out a brief summary of the issues and opportunities.</p> <p>The priority outcomes are set out in section 6 (Delivering the AAP) and appendix 6 (phasing of</p>

		<p>infrastructure projects), and the background papers on delivering the proposal sites and s106 planning obligations.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<ul style="list-style-type: none"> i. Sections of the regional special strategy which identify cross-boundary issues. ii. Sections of the development plan document setting out cross-boundary issues and the response to them iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance 	<p>Section 6: Delivering the AAP, sets out cross boundary working with Lewisham council, particularly in relation to transport and energy.</p> <p>A comprehensive transport strategy has been prepared, following traffic modelling carried out, (the Development Impact Report 2010) which covers a wider area to the AAP area including parts of the adjoining borough of Lewisham.</p> <p>Section 4 of the AAP sets out how the council will address the impacts identified through the modelling to make improvements to the area.</p> <p>Para 6.3.7 sets out that the AAP has been informed by discussions with Lewisham council.</p> <p>The background papers report on studies that cover wider areas than the local authority that are relevant to the DPD</p> <p>We are working with Lewisham in relation to linking some of Southwark's housing estates into the South East London Combined Heat and Power (SELCHP) plant network. This has proven to be the most effective district heating option for the Canada Water area in terms of cost to amount of carbon saved.</p> <p>Lewisham Council have submitted a representation to the Core Strategy, outlining that there are no major cross-boundary issues of significance</p>
<p>16. Does the development plan document contain clear</p>	<ul style="list-style-type: none"> i. A spatial portrait which identifies the key issues facing the area 	<p>Appendix 2 provides a SWOT analysis which sets out the key issues facing the area.</p>

objectives?	<ul style="list-style-type: none"> ii. A core strategy vision which is framed to set out the outcomes which are sought for the future iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision 	Section 3, paragraph 3.2.1, sets out the vision and the strategic objectives. The objectives relate directly to the vision and are grouped into themes.
<ul style="list-style-type: none"> 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? 	<ul style="list-style-type: none"> i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place 	<p>The SWOT analysis (appendix 2) sets out the issues affecting the area, in particular the traffic congestion on Lower Road, difficulty of finding way around the area as a pedestrian or cyclist, few eating establishments, limited range of shops, area dominated by car borne users, several pockets of health and education deprivation.</p> <p>The issues are presented in detail in the Issues and Options Report (Nov 2008 – Section 5) and the Submission version of the Sustainability Appraisal (March 2010). See sections 4, and 5)</p> <p>The vision and objectives directly respond to these issues. They build on the strengths and opportunities identified in the SWOT analysis and the objectives respond to some of the threats and weaknesses identified.</p> <p>This vision is very specific to the AAP area and will not be applicable elsewhere.</p>
<ul style="list-style-type: none"> 19. Is it clear how the policies will meet the objectives? 20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document? 	<ul style="list-style-type: none"> i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them ii. Relevant sections of the sustainable community strategy which identify its objectives iii. Confirmation from the local strategic partnership and partner organisations that they believe the policies will achieve the agreed objectives iv. Research reports and studies which address the means to address objectives and conclude that the 	<p>The objectives are grouped under seven themes:</p> <ul style="list-style-type: none"> Shopping: A genuine town centre and neighbourhood hub; Transport: Improved connections; Leisure: A great place to visit, to relax in and have fun; Places: Better and safer streets, squares and parks; Housing: Providing more and better homes;

	<p>policies are appropriate and should succeed</p> <p>v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.</p>	<p>Community: Enhanced social and economic opportunities; Delivering the AAP.</p> <p>These themes correspond with the section headings relating to the main policies in the AAP. All the policies within these sections directly relate to delivering these objectives. The delivery objectives are linked with the place-making objectives but are addressed more directly in section 6: Delivery of the AAP.</p> <p>The AAP objectives elaborate on the Sustainable Community Strategy objectives.</p> <p>The range of background papers provide the evidence base concluding that the policies are appropriate.</p>
<p>21. Are there realistic timescales related to the objectives?</p>	<p>i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives</p> <p>ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery</p>	<p>Section 6 and appendix 6 of the AAP set out the delivery and phasing plan for the AAP. A more detailed report on delivery is set out in the background papers on delivery of the proposal sites, Infrastructure and S106 which support the AAP.</p> <p>The Council's development partner for the regeneration of the area (British Land Canada Quays) has commented that it continues to pursue the delivery of Canada Water and welcomes recognition given to its role in the AAP. They note that it will be important to maintain close liaison with the Planning Department as the AAP framework emerges, to seek to ensure the objectives are realistic and deliverable.</p>
<p>22. Are the policies internally consistent?</p>	<p>i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent</p> <p>ii. A very brief statement explaining how the council</p>	<p>Section 6 of the Submission Version SA report provides an internal comparison of the Sustainability Objectives. Appendix 4 of the SA provides a comparison of the sustainability objectives against the AAP objectives to check</p>

	considers its objectives are consistent	<p>the compatibility of the objectives.</p> <p>There are no policies in the AAP that are derived from objectives which were not compatible.</p>
<p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> • is already in another plan • should logically be in a different plan • should not be in a plan at all? 	<ul style="list-style-type: none"> i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p>The Council's Local Development Scheme sets out the content of each DPD and the relationship to other DPDs.</p> <p>The AAP is broadly consistent with the Southwark Plan and in general conformity with Core Strategy and the London Plan but does not repeat any of the policies in these plans.</p> <p>In the representations on the AAP, the Government Office for London has not raised any issues regarding the appropriateness of the AAP policies. The table of representations and officer responses sets out how we have considered representations and Appendix 2 of the SA.</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document that identify the key objectives and how they will be delivered upon ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document 	<p>Section 3 of the AAP sets out the objectives and Section 6.6 and Appendix 5 set out how the objectives will be monitored.</p> <p>Section 6 and appendix 6 of the AAP set out how the AAP policies and objectives will be delivered, including an infrastructure plan.</p> <p>Details on the delivery of sites are presented in the background paper on Delivery of Proposals Sites which supports the AAP.</p> <p>Representations received from relevant agencies:</p> <p>Environment Agency- Support the objectives and t England - Overall the Area Action Plan documents are acceptable compliant with relevant legislation and in line with the approach adopted by other London Boroughs, approach</p>

		<p>and methodology is also appropriate as are the monitoring and target criteria.</p> <p>The Theatres Trust: Consider the AAP to be sound. The document provides for a robust urban structure with well connected neighbourhoods giving safe and easy access to services and facilities, an attractive townscape that promotes walking, and an environmentally sustainable approach to design and infrastructure.</p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<p>i. Sections of the development plan document that show how the development management policies:</p> <ul style="list-style-type: none"> • will help to deliver the strategy • derive from, and elaborate on, the objectives and policies of the plan 	<p>The AAP has some development management policies i.e. Policy 10: Parking for residential development in the Core Area. These are directly related to the plan objectives i.e. objective T1, and will contribute towards meeting all of the objectives and delivering the strategy and vision.</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<p>i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward</p> <p>ii. Representations in respect of infrastructure</p> <p>iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with</p>	<p>The infrastructure needs are identified in the Infrastructure Plan section 6.4 of the AAP.</p> <p>The infrastructure implications of the AAP are set out in table A6.1 in appendix 6. Most projects have already been costed and will be funded through various sources.</p> <p>Details of infrastructure requirements are set out in the following background papers:</p> <ul style="list-style-type: none"> • Delivery of Proposal Sites • Infrastructure <p>The table of representations and officer responses (appended to the Consultation Report and Appendix 2 of the SA) sets out how comments in relation to infrastructure have been considered and dealt with.</p>

<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out delivery mechanisms and timescale ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered iii. Research or studies that address matters of delivery and the realistic timescales iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder vi. Correspondence from stakeholders on delivery mechanisms and timescale vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	<p>Section 6 and appendix 6 of the AAP set out the delivery and infrastructure phasing plan for the AAP.</p> <p>Details on delivery of the proposal sites are presented in the background paper Delivery of Proposal Sites Jan 2010 which supports the AAP.</p> <p>The Metropolitan Policy Authority Asset Management Plan (2007) has informed the AAP's designation of the Rotherhithe Police Station for housing. The Plan sets out a review of the future of Rotherhithe police station is to be carried out with a view to re-provide all of the facilities currently housed there in more specialised and more appropriate accommodation in order to bring the facilities up to date.</p> <p>The Switham Schools for the Future programme (2006) has informed the AAP designation of Rotherhithe Primary School as a site for a new secondary school, along with the report on assessment of potential school sites (2009). This assessment concluded that Rotherhithe primary school was the most suitable site for a new secondary school. Further information is provided in appendix 5 of the Infrastructure background paper.</p> <p>The table of representations and officer responses (appended to the Consultation Report and Appendix 2 of the SA) sets out the correspondence received in relation to delivery and implementation. These comments have been considered in the preparation of the AAP and addressed.</p>
<p>28. Is it clear who is going to</p>	<ul style="list-style-type: none"> i. Confirmation from infrastructure providers that they 	<p>See response to 26 and 27 above</p>

<p>deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<p>support the solutions proposed and the identified means and timescales for their delivery</p> <ul style="list-style-type: none"> ii. Representations in respect of infrastructure iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with 	
<p>29. Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out responsibilities for delivery ii. Correspondence showing how other stakeholders intend to support the delivery of the policies iii. Reports by the council or the relevant stakeholder iv. Representations from stakeholders on implementation v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	<p>Appendix 6 'Infrastructure Projects and Appendix 7 's106 Planning Obligations' outlines the overall approach as well as which kind of agencies will be involved in each phase of the plan.</p> <p>Part 6 of the AAP sets out the way in which important infrastructure such as open spaces and certain community facilities will be provided. This section includes working with our partners to implement the AAP and an infrastructure plan.</p> <p>The table of representations and officer responses (appended to the Consultation Report and Appendix 2 of the SA) sets out how comments in relation to infrastructure have been considered and dealt with.</p> <p>TfL are in agreement that investment in the network will be required to deliver growth. We meet regularly with TfL and we are confident that by using the model we will be able to agree improvements to the network.</p> <p>Lower Road is a strategic road and changes to Lower Road require the agreement of TfL. The preferred options and draft AAP have been prepared following discussions involving TfL and Lewisham council and we will continue to meet regularly with them.</p>
<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing</p>	<ul style="list-style-type: none"> i. Sections of the development plan document that reflect the plans or strategies of other bodies ii. Expressions of support from bodies responsible for other strategies affecting the area iii. Representations in respect of services provided by 	<p>The AAP has drawn on a whole range of plans, programmes and documents to devise a plan that takes a holistic view of the regeneration of the area.</p>

<p>together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<p>other agencies</p> <p>iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation</p>	<p>Para 3.1 of the AAP refers to the Sustainable Communities Strategy and the vision and objectives have been derived from the strategy</p> <p>The SA scoping report and review of baseline data (March 2008) analysed the wide ranging issues that the AAP has taken into account and sets out existing programmes and policies that are in place (for a range of areas including health, education and employment).</p> <p>Sustainability Appraisal Appendix 3 sets out the range of plans and programmes that have been considered during the planning process, and these documents have been referenced in the background evidence papers for the draft AAP. The Consultation Reports and Appendix 2 of the SA provide details of the representations from community groups and service providers and illustrates how they were taken into account, also within the table of representations and officer responses.</p>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<p>i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them</p> <p>ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</p>	<p>Section 6.7 of the AAP outlines key risks outside of council's control and associated actions to address these.</p> <p>The Sustainability Appraisal also considers such matters and identifies suitable mitigation measures for adverse impacts where appropriate. (See Section 8 and Appendices 5, 6 and 7 and Section 9 on future monitoring)</p> <p>(Also see response to 34. Below regarding building flexibility in the AAP. By building flexibility the AAP can take account of changing circumstances)</p>

Flexible		
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> • the effectiveness of policies and what evidence is being collected to undertake this • changes affecting the baseline information and any information on trends on which the development plan document is based iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	<p>Appendix 5 of the AAP sets out the framework to monitor every policy. The framework includes clear output indicators for every policy which would trigger a review of the policies (also see section 6.6 of the AAP). The framework has also drawn upon the sustainability indicators and targets provided in the sustainability appraisal report (section 6).</p> <p>Where possible, the quantitative impacts of the AAP policies will be considered in the Annual Monitoring Report. Where new indicators have been identified, through the SA process, these will be added to the AMR. Section 9 of the Submission SA explains the proposals for monitoring.</p> <p>The AAP builds flexibility in its policies to respond to changes beyond the council's control. By applying the monitoring framework in appendix 5 of the AAP this will ensure that actions can be taken to adjust or amend the AAP.</p> <p>The infrastructure plan set out in section 6.4 and Appendix 6 is flexible to allow to be adjusted in order to meet the AAP objectives.</p> <p>The AAP sets out in section 6.7 the main risks to achieving the policies in the AAP. These risks include: transport infrastructure and phasing of development. This section sets out how these risks could be addressed and potentially mitigated.</p>
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures</p>	<ul style="list-style-type: none"> i. Sections within the development plan document dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and 	<p>Through monitoring development in the area, the council anticipates that the delivery and phasing of development and infrastructure can be adjusted accordingly if necessary to ensure the</p>

<p>from an emerging regional special strategy?</p>	<p>how that would impact on other aspects of the strategy and on infrastructure provision</p> <ul style="list-style-type: none"> ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	<p>objectives of the AAP are achieved.</p> <p>The infrastructure plan set out in section 6.4 and Appendix 6 is flexible to allow to be adjusted in order to meet the AAP objectives.</p> <p>The monitoring framework set out in appendix 5 and Section 9 of the SA will be used to assess progress.</p> <p>Section 6.7 sets out the risks to achieving the policies in the AAP, primarily in relation to transport infrastructure and the phasing of development.</p> <p>Further details on phasing and its flexibility can be found in the evidence background papers on Infrastructure and the Delivery of the Proposal sites (Jan 2010)</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<ul style="list-style-type: none"> i. A section of the development plan document which expressly addresses flexibility ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing 	<p>See responses to 34 and 35 above.</p>
<p>Monitoring</p>		
<p>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?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories iii. Reference to any other reports or technical documents which contain information on the delivery of policies 	<p>Appendix 5 of the AAP sets out the framework to monitor the delivery of every policy. The framework includes clear output indicators for every policy which would trigger a review of the policies (also see section 6.6 of the AAP and Section 9 of the SA).</p> <p>The Delivery of Proposal Sites background paper sets out details of the sites, and the indicative</p>

		<p>phasing for the development of the sites.</p> <p>The Infrastructure background paper sets out the current provision in the area and outlines future plans. For each element of infrastructure, any implications are identified for the local development framework (LDF) and it is explained how these are dealt with.</p>
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators 	<p>Section 6.6 states that where possible the targets and indicators are the same as in the Annual Monitoring Report (AMR). The targets and indicators specifically related to the AAP will be also be reported in the AMR. See also Section 9 of the SA</p>
39. Are suitable targets and indicators present (by when, how and by whom)?	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories 	<p>Appendix 5 of the AAP sets out the monitoring framework. This includes targets and indicators.</p> <p>The infrastructure plan set out within Appendix 6 sets out who would be involved in the implementation of specific projects and the timescales for implementation.</p> <p>Section 9 of the Submission SA sets out the details for monitoring through the AMR.</p>

National policy		
<p>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy 	<p>All the policies in the AAP are consistent with national planning policy.</p> <p>The council has published its response to the Government Office for London (GOL) representation on the Preferred Options consultation, setting out how the comments and</p>

	<ul style="list-style-type: none"> iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement iv. Representations from the Government Office on the preferred strategy or the submitted development plan document v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with 	<p>suggestions have been considered and dealt with.</p> <p>GOL have not flagged inconsistency with national policies as in issue at either preferred options or publication stages.</p>
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p>The AAP does not repeat policies in National Guidance or other higher level planning policies.</p> <p>GOL have not flagged repetition of national policies as an issue at either preferred options or publication stages.</p>