

Core Strategy

Soundness Self-Assessment for Submission Draft



Soundness Test 1: Justified

Participation

- 1. Has the consultation process allowed for effective engagement of all interested parties?**

The consultation statement

Regulation 27 and 30 Consultation Statements

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?**

Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals / Sections of the pre-submission proposals documents / Sections of the preferred strategy report / Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document / Sections of the consultation statement OR A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases / any other information on community views and preferences / 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 OR 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).

Submission Draft Core Strategy

References throughout the Submission Draft Core Strategy, which is indivisible from the evidence base it is built upon:

Part II: The Local Context

Part II: Westminster's Issues and Challenges e.g. long-term monitoring of land use in Core CAZ

Part II: Westminster's Spatial Strategy e.g. reference to regional assessments of growth in retail

Part III: Central Activities Zone e.g. studies relating to office use, Creative Industries, and specific uses such as wholesale showrooms/tailoring which informs one of the Special Policy Areas

Part III: Opportunity Areas e.g. land use information from the 2007/08 Annual Monitoring Report, study into high buildings

Part III: Core CAZ e.g. long-term monitoring of land use in Core CAZ

Part III: WESRPA e.g. ORB Action Plan

Part III: Marylebone and Fitzrovia e.g. Small Offices study

Part III: North Westminster Economic Development Area e.g. town centre health checks, Creative Industries study

Part III: Outside CAZ e.g. town centre health checks

Part III: All areas – land use survey

Part IV: Housing – various as referenced throughout

Part IV: Business and employment – various as referenced throughout

Part V: Heritage incl. views e.g. high buildings study

Part V: Design e.g. retro-fitting Soho study

Part V: Health, safety and security e.g. Public Health Annual Report 2006/07, Strategic Flood Risk Assessment, evidence relating to noise and air quality strategies

Part V: Infrastructure and development impacts e.g. Infrastructure Needs study, asset management plans, Local Implementation Plan, waste study, Strategic Flood Risk Assessment

References section at the end of the Submission Draft Core Strategy

Consultation Statements

Regulation 27 Consultation Statement Schedule 1 Section 1.6 and more generally

Core Strategy Consultation Documents

- References under 'Evidence Base' in the Preferred Options Document below each option

Sustainability Appraisal

- Tables Q, R, S and T, Overall Assessment of Core Strategy and conclusion on p171 of submission draft Sustainability Appraisal.

Evidence Base

All evidence base prepared at a local level is from 2007 or later and therefore very up-to-date, with the exception of the High Buildings Study which dates from 2002. However, as the high buildings study is predicated mainly on protecting Westminster's heritage assets and views within, to and from Westminster, this study remains up-to-date (i.e. the context has not changed significantly over the intervening period).

National and regional documents are often older, however they are the most up-to-date evidence available at this level and their limitations have been noted where necessary e.g. retail growth projections discussed in the background to Part II: Westminster's Spatial Strategy – Employment and the Economy.

5. What assumptions had to be made in preparing the development plan document?

6. Are the assumptions reasonable and justified?

Sections of the development plan documents setting out the assumptions / Sections of the sustainability appraisal report setting out the assumptions / A very brief statement for each assumption as to how the evidence led to the assumption / Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions

Submission Draft Core Strategy

Population change – paras 4.2, 4.12, 2.6

Housing delivery – paras 4.1 – 4.13, CS14 RJ

Housing delivery from windfalls – Appendix 4

Affordable housing delivery – paras 4.14 – 4.19, CS16 RJ

Gypsy and Traveller Pitch Provision – 4.20

Development land availability – Rolling Housing Land Supply published in the AMR based on discussions with developers

Crossrail delivery – last para Policy CS42 RJ

Employment growth – para 4.22 – 4.24

Continued pressure for office floorspace within central Westminster in favour of other land uses, and continued strategic business role of London and Westminster in particular, within a global economy – paras 2.20, 2.36, 4.25 - 4.29

Retail growth – para 2.38, 3.61, 4.23

Continuing need to address climate change – Government priority

Availability of finance for businesses, development and housing purchase, including viability of intermediate housing tenures – Government priority

Relative civic stability (including functions of Westminster within Central London, ability to avoid and address terrorism threat, functioning global economy, international tourism and lack of abrupt and extreme change as a result of climate change) – Part VI Risk and Review

Sustainability Appraisal

Table L page 58 Submission Draft Sustainability Appraisal

Technical Papers

Technical Paper 1: Waste

Technical Paper 3: Housing

Technical Paper 5: Hotels

Technical Paper 7: Views

Technical Paper 8: Draft Replacement London Plan

- 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 made?**

Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options / Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered / Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised / Sections of the preferred strategy report explaining: how alternatives were developed and evaluated, and why alternatives were rejected in favour of the preferred strategy / Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed / 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 / Sections of the consultation statement explaining how the main findings of consultation support the decisions / Sections of the representations statement OR A brief statement of the influence upon decisions of: the issues raised during stakeholder and community

engagement, and how they have been addressed / Any other documentation showing how alternatives were developed and evaluated / A very brief statement and any other supporting documentation of the way decisions have been taken

Core Strategy Consultation Documents

Alternatives were explored in considerable detail within the Preferred Options document published in July 2008, and the accompanying Sustainability Appraisal, Initial Health Impact Assessment and Initial Equalities Impact Assessment. This document included all reasonable alternatives identified. References under 'Reasons for Preferred Option' and "Reasons for not choosing as Preferred Option' in the Preferred Options Document below each option

Introduction section to the Preferred Options document

References under 'Stakeholder and community views' in the Preferred Options Document below each option

Identification of Alternative Options in the Preferred Options document, arising specifically out of consultation responses

Westminster Property Owners' Association Preferred Options published on website alongside council's documentation for consultation purposes at Preferred Options stage

Sustainability Appraisal

Section 5 Submission Draft Sustainability Appraisal

Preferred Options Sustainability Appraisal

Consultation Statements

Regulation 27 and 30 Consultation Statements setting out the consultation undertaken

Regulation 27 Consultation Statement Schedule 1 and Regulation 30 Consultation Statement Appendices 12 and 13 setting out the council's responses to the main issues raised.

Appendices to Regulation 27 Consultation Statement setting out the consultation documentation, including questionnaire for Issues and Options, questionnaire for Preferred Options, summary of meetings held at consultation stages.

Technical Papers

Technical Papers 1 – 7 setting out further explanation of the council's reasoning for specific issues

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?

A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy / 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 / Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies

Sustainability Appraisal

Section 5 Submission Draft Sustainability Appraisal

- 11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?**
- 12. Does the strategy take forward the regional context reflecting the local issues and objectives?**

Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons / The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy / Representations received from the regional development agency/regional planning body / Representations from the Government Office / Reports or copies of correspondence as to how the representations have been considered and dealt with

Submission Draft Core Strategy

Reference to The London Plan in Part I: Introduction - Westminster's Core Strategy.

Reference to The London Plan in Part I: Introduction - How to use this document.

Reference to The London Plan in Part I: Introduction – The Regional Context

Westminster's Issues and Challenges and subsequent sections relating to views.

Westminster's Issues and Challenges, Spatial Strategy and subsequent sections relating to waste,

Application of a policy framework for the Central Activities Zone in a locally appropriate way, set out in Part III.

Application of a policy framework for the Opportunity Areas in a locally appropriate way, set out in Part III.

Detailed policy approach to deliver London Plan housing targets, set out in Part IV: Housing section.

Consultation Statements

Regulation 30 Consultation Statement Appendices 8 and 9 Copies of representations received from the Government Office for London and Greater London Authority.

Evidence Base

Planning (LDF and Planning Briefs) Sub-Committee Reports June 2008 (of Issues and Options consultation); October 2008 (summary of Preferred Options consultation), June 2009 (response to informal letter from GOL commenting on initial draft Core Strategy)

Cabinet Member Report July 2008 (summarising the response at Issues and Options stage)

Technical Papers

Technical Paper 1: Waste

Technical Paper 2: Crossrail contributions

Technical Paper 3: Housing

Technical Paper 7: Views

Technical Paper 8: Draft Replacement London Plan

Soundness Test 2: 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?**
- 15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?**

Sections of the regional special strategy which identify cross-boundary issues / Sections of the development plan document setting out cross-boundary issues and the response to them / Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations / Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance

Submission Draft Core Strategy

Part II: Issues and Challenges

Part II: Spatial Strategy

Explicit references to cross-boundary working:

Part II: Key Diagram

Part III: Central Activities Zone (7 central London boroughs)

Part III: Tottenham Court Road (London Borough of Camden)

Part III: Core CAZ (London Borough of Camden and Royal Borough of Kensington and Chelsea)

Part III: West End Special Retail Policy Area (London Borough of Camden)

Part III: Knightsbridge (Royal Borough of Kensington and Chelsea)

Part III: Royal Parks (London Borough of Camden)

Part III: North Westminster Economic Development Area (London Borough of Brent, Royal Borough of Kensington and Chelsea)

Part IV: Housing Provision (London Borough of Camden)

Part IV: Arts and Culture (London Borough of Camden and Royal Borough of Kensington and Chelsea)

Part V: Views

Part VI: Partnership working and Appendix 4

Other sections which have specific relationship beyond the borough boundary:

Reference to The London Plan in Part I: Introduction - Westminster's Core Strategy.

Part V: Social and community infrastructure

Part V: Open Space Network

Part V: Blue Ribbon Network

Part V: The transport network

Part V: Flood-related infrastructure

Consultation Statements

Regulation 30 Consultation Statement Responses to the Publication Draft Core Strategy from London Boroughs of Camden and Wandsworth, Royal Borough of Kensington & Chelsea and the City of London Corporation

16. Does the development plan document contain clear objectives?

A spatial portrait which identifies the key issues facing the area / A core strategy vision which is framed to set out the outcomes which are sought for the future / 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

Submission Draft Core Strategy

Part II: Westminster's Issues and Challenges

Part II: Westminster's Spatial Strategy

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?

The spatial portrait and the commentary in the development plan document as to how the objectives derive from it / Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place

Submission Draft Core Strategy

Part II: Issues and Challenges

Part II: Westminster's Strategic Objectives

Part II: Westminster's Spatial Strategy

Endorsement of Submission Draft Core Strategy by Westminster City Partnership 4th March 2010

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?

Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them / Relevant sections of the sustainable community strategy which identify its objectives / Confirmation from the local strategic partnership and partner organisations that they believe the policies will achieve the agreed objectives / Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed / Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.

Submission Draft Core Strategy

Part II: Westminster's Issues and Challenges

Part II: Westminster's Spatial Strategy

Part VI: Monitoring Framework

Part VI: Westminster's Local Strategic Partnership

Endorsement of Submission Draft Core Strategy by Westminster City Partnership 4th March 2010

Evidence Base

Annual Monitoring Reports for 2007/08 and 2008/09

Consultation Statements

Regulation 30 Consultation Statement Appendix 8 Consultation responses from the Government Office for London at Issues and Options stage, Preferred Options and their comments on an internal draft dated 11th March 2009

21. Are there realistic timescales related to the objectives?

Sections of the development plan document which address delivery and the timescales for key developments and initiatives / Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery

Submission Draft Core Strategy

Part III: Paddington, Victoria and Tottenham Court Road Opportunity Areas

Part V: para 5.9

Part IV: Housing, including Policies CS14 and CS16

Part V: Social and Community Infrastructure

Part V: Major Transport Infrastructure

Part V: Waste Infrastructure

Endorsement of Submission Draft Core Strategy by Westminster City Partnership 4th March 2010

Technical Papers

Technical Paper 1: Waste

Technical Paper 3: Housing

Technical Paper 8: Draft Replacement London Plan

22. Are the policies internally consistent?

Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent / A very brief statement explaining how the council considers its objectives are consistent

Submission Draft Core Strategy

The policies are internally consistent as they respond to the Issues and Challenges and build on the Spatial Strategy. Therefore they work towards a common purpose and vision. Cross-references are given for each policy identify where a more specific or directly related policy must also be considered e.g. Policy CS21 Tourism, Arts and Culture is cross-referenced to the two area-based

policies that include the Strategic Cultural Areas referred to in the policy. There are two instances of policies with specific exceptions: Policy CS1 Mixed Use in the Central Activities Zone and Policy CS14 Optimising Housing Delivery. The exceptions are highlighted in the Reasoned Justification and have a clear hierarchy of application.

The change to Policy CS27 Design between Publication Draft and Submission Draft has ensured internal consistency.

Technical Papers

Technical Paper 3: Housing

23. Does the development plan document contain material which is already in another plan, should be logically be in a different plan or should not be in a plan at all?

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 / Representations from the Government Office / Reports or copies of correspondence as to how the representations have been considered and dealt with

Submission Draft Core Strategy

Strong relationship between objectives and policies (figure 57 Monitoring Framework)

Strong relationship between Westminster's Issues and Challenges (paras 2.20 – 2.35) and the policies needed to address these and therefore deliver the spatial strategy (paras 2.36 – 2.59). Loss of any one policy would jeopardise the policy framework as a whole. The document is locally specific and responds to Westminster's unique circumstances.

Consultation Statements

Regulation 27 Consultation Statement Schedule 1, Section 1.3.

Regulation 30 Consultation Statement Appendix 8 Consultation responses from the Government Office for London at Issues and Options, Preferred Options and Publication Draft stages, their comments on an internal draft dated 11th March 2009, and minutes of meetings.

24. Does the development plan document explain how its key policy objectives will be achieved?

Sections of the development plan document that identify the key objectives and how they will be delivered upon / Confirmation from the relevant agencies that they support the objectives and the identified means of delivery / Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document

Submission Draft Core Strategy

Part II: Issues and Challenges

Part II: Spatial Strategy

Part V: Sustainable and Inclusive Design

Part V: Social and Community Infrastructure

Part V: Major Transport Infrastructure

Part V: Flood-Related Infrastructure

Part VI: Implementation

Endorsement of Submission Draft Core Strategy by Westminster City Partnership 4th March 2010

Evidence Base

Relationship with other strategies e.g. Westminster's Local Implementation Plan (Transport) Westminster's Asset Management Plan and Property strategy, close links with the Joint Strategic Needs Assessment etc as documented in the References section at the end of the document

25. If there are development management policies, are they supportive of the strategy and objectives?

Sections of the development plan document that show how the development management policies will help to deliver the strategy and derive from, and elaborate on, the objectives and policies of the plan

Submission Draft Core Strategy

Part II: Issues and Challenges

Part II: Westminster's Spatial Strategy (including vision and strategic objectives)

Part VI: Monitoring Framework

Technical Papers

Technical Paper 9: Monitoring

26. Have the infrastructure implications of the strategy/policies clearly been identified?

A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward / Representations in respect of infrastructure / Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with

Submission Draft Core Strategy

Part II: Issues and challenges

Part II: Spatial Strategy, paragraphs 2.44 to 2.54

Part III: Paddington, Victoria and Tottenham Court Road Opportunity Areas, West End Special Retail Policy Area, North Westminster EDA, Outside the CAZ and NWEDA

Part V: Infrastructure and Development Impacts

Part VI: Risk and Review

Part VI: Monitoring Framework, particularly paragraph 6.19

Appendix 1: Proposals Sites

Appendix 3: Key Partnerships

Consultation Statements

Regulation 27 Consultation Statement Schedule 1, Section 8.

Technical Papers

Technical Paper 2: Crossrail Contributions

Evidence Base

Westminster Infrastructure Plan: Technical Assessment 2006 -2026

27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?

Sections of the development plan document setting out delivery mechanisms and timescale / Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered / Research or studies that address matters of delivery and the realistic timescales / Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms / 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 / Correspondence from stakeholders on delivery mechanisms and timescale / Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with

Submission Draft Core Strategy

Part III: Paddington, Victoria and Tottenham Court Road Opportunity Areas

Part V: para 5.9

Part IV: Housing, including Policies CS14 and CS16

Part V: Sustainable and Inclusive Design

Part V: Social and Community Infrastructure

Part V: Major Transport Infrastructure

Part V: Waste Infrastructure

Part VI: Implementation

Appendix 3: Key Partnerships

Technical Papers

Technical Paper 1: Waste

Technical Paper 2: Crossrail Contributions

Technical Paper 3: Housing

Technical Paper 9: Monitoring

See also Question 21 above

28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?

Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery / Representations in respect of infrastructure / Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and

dealt with

Submission Draft Core Strategy

Relevant references to infrastructure are accompanied by references as to how they will be provided. This is supported by Appendix 1: Proposals Sites and Appendix 3 outlining the key partnerships. It is also supported by Part VI: Risk and Review which identifies the key partners for delivery.

Consultation Statements

Regulation 27 Consultation Statement Schedule 1 Section 8.

29. *Is it clear who is intended to implement each part of the strategy/ development plan document?*

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?*

Sections of the development plan document setting out responsibilities for delivery / Correspondence showing how other stakeholders intend to support the delivery of the policies / Reports by the council or the relevant stakeholder / Representations from stakeholders on implementation / Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with

Submission Draft Core Strategy

Paras 3.44, 3.48, 3.54, 3.55, 3.64, 4.4, 4.5, 4.16, 4.19, 4.22, 4.38, 4.43, 5.17, 5.40, 5.44, 5.61, 5.75, 5.85

Part III: Policy CS7 RJ

Part III: Policy CS12 and RJ

Part IV: RJ for Policies CS15, CS16

Part VI: Partnerships

Part VI: Risk and Review

Appendix 1: Proposals Sites

Appendix 3: Key Partnerships

Technical Papers

Technical Paper 1: Waste

Evidence Base

Rolling Housing Land Supply published in the AMR

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

Sections of the development plan document that reflect the plans or strategies of other bodies / Expressions of support from bodies responsible for other strategies affecting the area / Representations in respect of services provided by other agencies / 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

Submission Draft Core Strategy

Paras 2.43-2.53, 2.583.10, 3.12, 3.18, 3.20, 3.21, 3.26, 3.34-3.36, 3.44, 3.47, 3.50-3.55, 3.63, 4.4, 4.19 last bullet, 4.43, CS30, CS31, 5.40, 5.41, 5.44-5.46, 5.57-5.59, 5.61, Transport (closely aligned with Westminster's LIP), 5.82, 5.85, 6.1-6.14

Policies CS6 bullets 1, 2 and 4, CS7, CS15, CS10, CS12 CS33, CS37, CS40, CS42

References Section sets out the documents that have informed development of the Core Strategy

Endorsement of Submission Draft Core Strategy by Westminster City Partnership 4th March 2010

Unconditional support for the Core Strategy from NHS Westminster (within the HUDU response: not duly made)

Support for specific policy areas from Metropolitan Police, Westminster City Council Premises Management Unit, The Royal Parks, City of London Corporation, Royal Borough of Kensington & Chelsea and University College London Hospitals NHS Foundation Trust.

33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?

Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them / Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy

Technical Papers

Technical Paper 8: Draft Replacement London Plan

Flexible

34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?

Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed / Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: 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 / 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 / Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances

Submission Draft Core Strategy

Part VI: Risk and Review, particularly para 6.17

Technical Papers

Technical Paper 9: Monitoring

Sustainability Appraisal

Section 6 Submission Draft Sustainability Appraisal

35. *Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?*

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 how that would impact on other aspects of the strategy and on infrastructure provision / Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances

Submission Draft Core Strategy

Para 4.10

Technical Papers

Technical Paper 3: Housing

Technical Paper 8: Draft Replacement London Plan

Technical Paper 9: Monitoring

36. *Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?*

A section of the development plan document which expressly addresses flexibility / 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

Submission Draft Core Strategy

Paras 5.38 and Policy CS42 last para

Technical Papers

Technical Paper 9: Monitoring

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?

Sections of the development plan document setting out indicators, targets and milestones / Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories / Reference to any other reports or technical documents which contain information on the delivery of policies

Submission Draft Core Strategy

See Question 27

For housing target includes total (para 4.9), annual (paras 4.9, 4.10 and Policy CS14 RJ), completions phased (figure 38), referencing (throughout document), trajectory (figure 12 and on page 161)

Technical Papers

Technical Paper 9: Monitoring

38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?

Sections of the development plan document setting out indicators, targets and milestones / 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 / Reference to any other reports or technical documents which contain information on the collection or measurement of indicators

Submission Draft Core Strategy

Part VI: Monitoring Framework

Technical Papers

Technical Paper 9: Monitoring

39. Are suitable targets and indicators present (by when, how and by whom)?

Sections of the development plan document setting out indicators, targets and milestones / Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories

Submission Draft Core Strategy

Part VI: Monitoring Framework

See also Questions 27 - 30

Technical Papers

Technical Paper 9: Monitoring

Soundness Test 3: 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??

Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy / Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy / Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement / Representations from the Government Office on the preferred strategy or the submitted development plan document / Reports or copies of correspondence as to how Government Office representations have been considered and dealt with

There are no policies that are inconsistent with national policy.

Regulation 30 Consultation Statement

Response from the Government Office for London at Publication Draft stage raised 3 issues under this section that they considered needed to be further addressed at EiP (paras 17, 18 and 19): waste, housing and the Thames Tideway Tunnel (Consultation Statement Regulation 30(1)(d)&(e) Appendix 8).

The housing targets referred to in para 17 of GOL's letter are already contained within the Core Strategy, as set out in Consultation Statement Regulation 30(1)(d)&(e) Appendix 13.

Technical Papers

Technical Paper 1: Waste

Technical Paper 3: Housing

Submission Draft Core Strategy

Minor amendment to Policy CS44 Flood-related Infrastructure to include Thames Tideway Tunnel.

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?

Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons / Representations from the Government Office / Reports or copies of correspondence as to how the representations have been considered and dealt with

Regulation 30 Consultation Statement

The Government Office for London at Publication Draft stage do not identify any policies that do not add anything to national guidance, and the council does not believe there are any. They have

indicated that the Council will need to be satisfied that all policies should in included in the document, which, for the reasons set out in Question 23 above, the Council is.

Translation Information

If you would like this document translated into another language or if you would like this information in another format please write to the address below giving your name, address, first language and the name of the document you are interested in.

Albanian

Nëse e doni këtë dokument të përkthyer në gjuhë tjetër apo e doni këtë informacion në një tjetër format, ju lutemi të shkruani tek adresa e mëposhtme duke dhënë emrin, adresën, gjuhën amtare dhe titullin e dokumentit për të cilin jeni të interesuar.

Arabic

إذا رغبت بترجمة هذه الوثيقة الى لغة اخرى او اذا رغبت في الحصول على هذه المعلومات بشكل اخر الرجاء الكتابة لنا على العنوان المدرج ادناه ذاكرا اسمك وعنوانك ولغتك الام واسم الوثيقة التي ترغب ترجمتها.

Bengali

এই ডকুমেন্ট বা দলিলটি যদি অন্য কোন ভাষায় পেতে চান অথবা এই তথ্যাদি যদি অন্য কোন ফরম্যাট বা আকারে পেতে চান তবে অনুগ্রহ করে আপনার নাম, ঠিকানা, প্রথম ভাষা এবং যে ডকুমেন্ট বা দলিলটি পেতে আগ্রহী তার নাম উল্লেখ করে নিচের ঠিকানায় লিখুন।

Chinese

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