



Core Strategy Soundness Tool

This document demonstrates that the Council considers that its Core Strategy is sound.

Soundness is defined by the government in Planning Policy Statement 12 (2008). This states that the plan should be 'JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY'. In this context:

JUSTIFIED means that the plan:

- Is founded on a robust and credible evidence base
- Is the most appropriate strategy, when considered against other alternatives.

and EFFECTIVE means that the plan is:

- deliverable
- flexible
- able to be monitored.

The table below is designed to demonstrate that the Core Strategy meets these tests. It is based on a template prepared by the Planning Advisory Service and is divided into sections that reflect the above categorisation. The column on the left in the table lists the relevant requirements, the column in the middle shows how these requirements have been met and the column on the right gives details of any relevant documents. The relevant documents are listed at the end of this Soundness Tool, together with details of how they can be accessed. For the convenience of the Inspector, where possible electronic copies of documents have been included - although these do not form part of the formal submission. All the documents referred to will be included in the Examination Evidence Base Library.

Key question	Response	Documentation
Is the Plan Justified?		
<u>Participation</u>		
<p>1. Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>Yes - the Council has met all the relevant statutory requirements - as evidenced in the Legal Compliance Checklist. The consultation has conformed to the process and procedures set out in the Statement of Community Involvement (as amended).</p> <p>The Council maintains a database of over 1000 individuals or organisations that were consulted at each stage of the process.</p> <p>Details of the consultation are set out in the Council's Consultation Statement, all relevant correspondence sent by the Council is on the Correspondence file, and full details of the responses received are recorded on the Council's Engagement Log.</p> <p>The Council's approach to consultation is not to restrict it to formal statutory stages, but to treat it as an on-going process which also embraces consultations and engagement carried out across the Council. Various additional (non-statutory) consultations were also carried out - including a series of workshops to formulate the overall vision and direction for the strategy, and an additional public consultation on 'Choices for Core Strategy'. This sought views on the emerging policy choices, including neighbourhood spatial strategies and options for key strategic sites across the borough.</p>	<p>Also see Legal Compliance Checklist - sections 1.2, 1.3, 1.5 -1.14, 2.9 and 2.11.</p> <p><u>Relevant Documents:</u></p> <ul style="list-style-type: none"> • Statement of Community Involvement (As revised) • Section 30 (d) Consultation Statement • LDF Consultation Database • Correspondence Folder • Details of Stakeholder Event Feb 2010 • Engagement Log • Corporate Surveys • Developing the Spatial Vision

Key question	Response	Documentation
<u>Research / fact finding</u>		
<p>2. Is the content of the development plan document 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>In addition to using existing sources of information, the Council commissioned a series of research studies. These were:</p> <ul style="list-style-type: none"> • Newham's Biodiversity Resource • Employment Land Review • Strategic Flood Risk Assessment • Food Outlet Mapping • Newham Strategic Housing Market Assessment • Newham Affordable Housing Economic Viability Assessment • Community Infrastructure Study • Town Centre and Retail Study • Newham Character Study <p>These studies were intended to fill gaps in the Council's knowledge, and to form the basis for formulating Core Strategy policies. All the studies were completed in 2010 or 2011, providing the Council with a comprehensive and up-to-date information source on which to base the plan. Whilst some work was in-house, experienced consultants were commissioned to prepare the majority of the studies. Relevant stakeholders were involved in their preparation and a Stakeholders Event was held to publicise and discuss their findings. The studies were also published on the Council's website. Feed back has been positive and the Council believes that the studies provide convincing and comprehensive evidence in support of the Strategy.</p> <p>The timing of the studies meant that they were particularly influential in the preparation of the Choices Document in 2010. This document summarised the studies findings as they related to each of the main policy areas in the plan. This was then taken forward into the submission draft of the strategy.</p> <p>Other sources of information used in plan preparation included:</p>	<ul style="list-style-type: none"> • <u>Evidence Base Studies and list of other relevant research publications</u> • <u>Details of Stakeholder Event Feb 2010</u> • <u>Choices for the Core Strategy</u> • <u>Focus on Newham</u> • <u>Corporate Surveys</u> • <u>Annual Monitoring Reports</u> • <u>Economic Development Strategy 2010</u>

Key question	Response	Documentation
	<ul style="list-style-type: none"> • Focus on Newham - this brings together basic demographic, social and economic data for Newham - such as that provided by the Census and mid-year estimates. Unfortunately the Census is now is becoming out-of-date whilst the Council believes that (due to its social and economic problems) Newham was subject to considerable under-enumeration. Census information was therefore treated with caution. • The Annual Monitoring Report. This contains a range of generally comparable data on a wide range of data and indicators relevant to planning. Five AMRs have been prepared to date, providing some useful time-series data. • GLA Studies. The Greater London Authority carries out a considerable amount of research, which under-pins both the London Plan and policy development by the boroughs. • Other Newham Studies. Information about the opinions and characteristics of Newham residents is provided through a series of corporate studies - these are the Newham Annual Residents Survey, the Newham Household Panel Survey and the Newham Place and Liveability Surveys. Ad hoc studies are also used to help inform the preparation of the Council Strategies, such as the Sustainable Community Strategy and the Housing Strategy. Of particular relevance here is the Economic Development Strategy - which was prepared in tandem with the Core Strategy Choices Stage. The Council was very keen to ensure that these two documents had common aims and policies. A key source of information in the preparation of the EDU was the Local Economic Assessment, completed in 2010 <p>Justification for each of the Core Strategy policies is included in the Submission Draft which includes references to the evidence base when necessary.</p>	

Key question	Response	Documentation
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>Underlying assumptions for the strategy derive primarily from the London Plan and the research documents that support that plan. These cover such topics as population growth, employment, transport and infrastructure provision.</p> <p>GLA Demography prepares population projections on an annual basis. These are updated using the latest information on migration, fertility/mortality, and forecasts of planned development, and are therefore considered preferable to trend based ONS Sub-national Population Projections. GLA Projections produced in 2009 informed the Draft Replacement London Plan, and are therefore applicable to the Core Strategy.</p> <p>GLA Economics produce employment forecasts by borough up to 2031. This and other relevant employment data are usefully summarised in Economic Evidence Base (October 2009 version) prepared by the GLA for the London Plan EIP</p> <p>Housing projections for London and for individual boroughs are informed by the GLA's Strategic Housing Market Assessment (SHMA), which provides a need figure of 32,600 additional homes per annum in London, and the 2009 GLA Strategic Housing Land Availability Assessment/Housing Capacity Study (SHLAA/HCS) capacity based figure of 37,000 additional homes per year. The equivalent annual figure for Newham is 2500 dwellings.</p> <p>The most significant transport infrastructure relevant to the proposed spatial strategy is Crossrail - and despite current economic circumstances this seems almost certain to go ahead. Other proposed infrastructure improvements (such as a possible Thames Crossing) are not considered to be fundamental to the overall strategy.</p>	<p><u>Relevant Documents:</u></p> <ul style="list-style-type: none"> • Draft Replacement London Plan 2009 • London Plan Evidence Base <p><u>Additional Links:</u></p> <p>www.london.gov.uk www.crossrail.co.uk</p>

Key question	Response	Documentation
	<p>In preparing the Core Strategy the Council assumed, in line with the draft Replacement London Plan 2009, that London will experience a cyclical recovery following the current recession within the plan's timescale (up to 2027). The Council considers that the Core Strategy is flexible enough to cope with changing circumstances, whilst ensuring that our vision and objectives for the borough are delivered.</p>	
<u>Alternatives</u>		
<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>The Council considers that the Core Strategy is the right strategy for Newham. It has been formulated over a long period with extensive stakeholder involvement. It is consistent with national policy and is also consistent with Newham's Sustainable Community Strategy and Economic Development Strategy.</p> <p>Alternative options were explored throughout the plan preparation process. The first stage in the preparation of the Core Strategy was consideration of issues and options. An issues and options report was published for consultation in 2008. This looked at the characteristics of the borough and the key issues and challenges that need to be faced. It proposed three basic options - employment-led, housing-led, and mixed use. Public opinion clearly favoured the mixed-use option and this was taken forward in the further iterations of the strategy.</p> <p>An additional consultation period took place in 2010, with the publication of 'Choices for the Core Strategy'. This sought views on the emerging strategy and on choices for the future of a number of 'strategic sites', as these had not been considered at the Issues and Options stage. As well as seeking views on the identified choices, the public were also asked to suggest their own ideas and to propose further options. An audit trail of consultations can be found in the Consultation Report and in the Council's engagement log and the Council believes that it has considered all realistic alternatives.</p>	<ul style="list-style-type: none"> • Letter from Mayor of London 17th March 2011 • Newham's Sustainable Community Strategy • Newham's Economic Development Strategy • Issues and Options for the Core Strategy • Section 30 (d) Consultation Statement • Choices for the Core Strategy • Engagement Log • Developing the Spatial Vision

Key question	Response	Documentation
	<p>The preferred strategy emerged in response to the consultation, from a consideration of the evidence base, and from an assessment of environmental impacts carried out at each stage. These aspects are brought together in the reasoned justification for each policy.</p> <p>That being said, the Council's vision for Newham (as set out in the Sustainable Community Strategy) was the main influence in determining the preferred strategy. The vision to make Newham a place where people will want to live, work and stay was fleshed out in spatial terms through a separate focussed consultation. Key elements of this are:</p> <ul style="list-style-type: none"> • Ensuring a lasting legacy from the Olympic and Paralympic Games. • Increasing the number of jobs available, and improving the skills of the local workforce. • Attracting high quality development, by capitalising on Newham's transport accessibility and its supply of high quality development land. • Ensuring Stratford's success as a metropolitan shopping centre and as a centre for commercial and residential development. • Completing the transformation of Canning Town and Custom House. • Building successful places and sustainable and healthy new communities across the borough. • Concentrating new development in an Arc of Opportunity from Stratford, south through the Lea Valley and east through the docks • Integrating new development with the existing communities in Urban Newham so that all benefit. • Strengthening the town centres and improving the quality of the residential communities in Urban Newham, building on the improved accessibility provided by Crossrail. 	

Key question	Response	Documentation
	<ul style="list-style-type: none"> Ensuring that living standards rise at a faster rate than in London overall, so that Newham achieves 'convergence' with the average for London by the end of the plan period. <p>This vision is followed through into the thematic and spatial policies set out in the plan, and was the basis for deciding between competing alternatives.</p> <p>As set out below (Q11 and 12) the Council has sought to ensure that the Core Strategy is consistent with the London Plan. However the Mayor of London has commented that the submission draft is not in conformity with the London Plan with respect to three issues:</p> <ul style="list-style-type: none"> Safeguarded wharves, strategic industrial land and industrial land, Off-site affordable housing or in lieu payments, Waste. <p>However the Council considers the Strategy is in general conformity with the spatial strategy and what it sees to be relatively minor differences between the strategy and the London Plan are justified by local circumstances. However further discussions are being held with the Greater London Authority.</p>	
<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>The Sustainability Appraisal is structured to provide a detailed appraisal at each stage of preparation for the Core Strategy and includes a commentary which describes areas in which each policy has either positive or negative sustainability impacts. Where these impacts were considered to be negative, options/policies were either discounted or mitigation measures suggested for inclusion in subsequent drafts of the document. The Sustainability Appraisal report contains a detailed table of the evolution of options, showing how they have been either incorporated or rejected at the draft submission stage.</p>	<ul style="list-style-type: none"> Sustainability Appraisal Report

Key question	Response	Documentation
<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>	<p>Yes. Regional Guidance in London is contained within the London Plan. This document contains clear steers to the boroughs on what their Development Plan Documents should contain, and this advice has been followed.</p> <p>A summary of key issues from the London Plan is included within the submission draft - this seeks to explain how the plan affects Newham, rather than duplicating policies or text from it. Examples of the relationship between the Core Strategy and the London Plan include:</p> <ul style="list-style-type: none"> • Housing - the London Plan provides a housing target for the borough - the Core Strategy sets out how this housing should be distributed and what form it should take. • Stratford - the London Plan identifies Stratford as a potential Metropolitan Centre, and the Core Strategy shows how this will be achieved. • Opportunity Areas - The London Plan identifies Opportunity Areas, whilst the Core Strategy identifies strategic sites within them and a spatial strategy for each area. <p>The Council used a checklist to ensure consistency between the Core Strategy and the London Plan and to show how the regional context was being taken forward. However as discussed above (Q9), the Mayor of London considers that the Core Strategy is not in conformity with the London Plan, in relation to three issues. Discussions are taking place with the GLA on this issue.</p>	<ul style="list-style-type: none"> • London Plan 2008 (Consolidated Version with Amendments) • Draft Replacement London Plan 2009 • Core Strategy / London Plan Checklist • Core Strategy Submission Draft (Particularly section A4) • Letter from Mayor of London (17/03/11)

Is the Plan Effective?		
<u>Deliverable</u>		
<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>	<p>Issues were identified through the initial consultation stages and through the preparation of the evidence base. This is in addition to London-wide issues relevant to Newham which are identified through the London Plan.</p> <p>Local issues were also discussed in the Choices Document, including a synthesis of issues affecting each of the borough's local neighbourhoods.</p> <p>The submission draft includes a description of Newham Today, but does not include a comprehensive list of issues. Instead the Council has adopted a Vision>Objective>Policy approach in drafting the document. Essentially this sets out a vision for Newham in 2027, and a set of operational objectives grouped together within a number of themes, which are:</p> <ul style="list-style-type: none"> • Successful Places • Jobs, Businesses and Skills • Homes • Sustainability and Climate Change • Infrastructure. <p>The Council believes that this approach makes it clear what issues the plan is seeking to address, and what the plan is hoping to achieve. The plan's priority is to achieve the Council's overall vision for Newham, and new development will be judged on how well it achieves these ends. The plan does not seek to balance or trade off one part of the plan against another, and the Council believes that it would be counter-productive to prioritise policies to do this.</p>	<ul style="list-style-type: none"> • London Plan 2008 (Consolidated Version with Amendments) • Core Strategy Submission Draft • Evidence Base Studies and list of other relevant research publications • Section 30 (d) Consultation Statement • Choices for the Core Strategy
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<p>The overall framework for the Core Strategy is set by the London Plan - and this addresses cross-boundary issues. Key boundary issues include the following:</p>	<ul style="list-style-type: none"> • Draft Replacement London Plan 2009 • Engagement Log

- The Olympics and its Legacy - the Olympic Park falls within 5 boroughs - although the largest portion is within Newham. Preparing the site for the Games has been carried out by the Olympic Delivery Authority, whilst the Mayor of London is preparing Supplementary Planning Guidance to guide the delivery of the Games legacy. The proposals within the Core Strategy for the Olympic Park have been prepared in liaison with the ODA and the GLA, and no significant conflicts have been identified. In addition the 5 Olympic Boroughs have joined together to prepare a Single Regeneration Framework which aims to secure economic and social convergence between the five boroughs and the rest of London.
- Town Centres - a hierarchy of Town Centres is set out in the London Plan and the Core Strategy is consistent with this. The plan does not include any proposals for large scale out-of-centre shopping that would undermine shopping provision in adjoining boroughs.
- Housing - the housing proposals in the Strategy are informed by joint borough discussions on housing need and supply.
- Waste - the East London boroughs have worked together to produce a Joint Waste DPD. (This is progressing to examination separately to the Core Strategy).
- The Thames and other waterways - policies for riparian boroughs are co-ordinated through the Blue Ribbon Network identified in the London Plan.
- Thames Gateway - Newham is within the Thames Gateway and the Council has liaised with the LTGDC in preparing the Strategy. Newham has adopted ambitious targets for housing and employment which reflect national and regional targets for the Gateway.
- Other Issues - Other issues with potential cross-boundary effects include transport, leisure, open space, nature conservation, land supply and the provision of infrastructure. These are generally coordinated through

	<p>the GLA (including Transport for London and the London Development Agency), the Lea Valley Regional Park, infrastructure providers and other agencies. All these relevant bodies have been involved in preparing the strategy. In addition discussions have been held on a regular basis with adjoining boroughs.</p>	
<p>16. Does the development plan document contain clear objectives?</p>	<p>Yes. The Core Strategy sets out a series of clear objectives, with the policies that contribute towards their delivery following each objective. The objectives follow on from the Core Strategy vision statement which itself flows from the overarching vision within Newham's Sustainable Community Strategy</p>	<ul style="list-style-type: none"> • Core Strategy Submission Draft • Newham's Sustainable Community Strategy • Developing the Spatial Vision
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<p>The Core Strategy provides a clear spatial strategy for the borough and strongly reflects the unique characteristics of Newham. This is particularly reflected in policies S1 to S6.</p> <p>As noted in 16 above the plan's objectives derive from the Council's vision for Newham, and set out clearly what the plan is seeking to achieve,</p> <p>The plan also includes thematic policies dealing with issues such as successful places, jobs and skills, homes, sustainability and infrastructure. These are locally distinctive where relevant (housing provision, town centres, industrial land release, areas of need etc). However it is recognised that some objectives are necessarily generic in character - in some cases these are critical to the plan (policies to combat climate change, for example) with more detailed and locally distinctive policies being devolved to other DPDs or SPDs.</p>	<ul style="list-style-type: none"> • Core Strategy Submission Draft • Developing the Spatial Vision
<p>19. Is it clear how the policies will meet the objectives?</p>	<p>Yes. Policies relate directly to each thematic objective.</p>	<ul style="list-style-type: none"> • Core Strategy Submission Draft

<p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<p>No. the format of the document ensures that all relevant issues have been covered - although in some cases more detailed policies will be needed. These will be covered in other DPDs and SPDs - most notably the Development Management Policy Manual. In addition cross checking between the Core Strategy and the London Plan has not revealed any significant omissions.</p>	<ul style="list-style-type: none"> • Local Development Scheme 2011 • Core Strategy/London Plan Checklist
<p>21. Are there realistic timescales related to the objectives?</p>	<p>The objectives relate to the whole plan period. Where phasing is needed, this is covered in the relevant spatial and thematic policies - a principal example being the table showing phased housing delivery on page 87.</p> <p>Strategic sites - which are those which will deliver the plan's objectives - are identified in the strategy and detailed in Appendix 1. Phasing is shown for the development of these sites - covering three 5-year periods (Short, medium and long term). The required supporting infrastructure is identified in the Infrastructure Delivery Plan - which is attached to the Core Strategy as Appendix 3. This includes proposals for the short and medium term. The IDP will be rolled forward as required - and was prepared in the light of the Newham Infrastructure Study 2010 and discussions with the relevant providers.</p>	<ul style="list-style-type: none"> • Core Strategy Submission Draft - especially page 87 and Appendices 1 and 3 • Newham Infrastructure Study 2010
<p>22. Are the policies internally consistent?</p>	<p>Yes - it is considered that any such inconsistencies would have been highlighted in the sustainability appraisal. In addition all of the plan's policies seek to implement the Council's overall vision for Newham. Policies are not overly prescriptive and the weight given to each policy will be a matter of judgement, relating to how well each development delivers the plan's objectives.</p>	<ul style="list-style-type: none"> • Sustainability Appraisal Report
<p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? 	<p>The Core Strategy does not repeat material that is contained in any other plans, although the London Plan and the East London Joint Waste DPD is referenced where this is helpful.</p> <p>As set out in Newham's 2011 Local Development Scheme, Newham is preparing 4 DPDs, which together will contain the borough's statutory planning policies:</p>	<ul style="list-style-type: none"> • Local Development Scheme 2011

	<ul style="list-style-type: none"> • the Core Strategy provides a strategic framework for the delivery of growth and infrastructure, setting out a spatial framework for development, and overarching policies aimed at creating successful places, providing jobs, homes and infrastructure, and tackling climate change. • the Development Management Policy Manual will set out more detailed development management policies and guidance that will help deliver the overarching policy aims of the Core Strategy and ensure that new development contributes towards these aims. • The East London Joint Waste DPD will set out a range of policies dealing with the treatment, recycling, storage and disposal of waste; and will identify any necessary land use allocations. • The Site Allocations DPD identifies individual sites not detailed in the Core Strategy that will deliver Core Strategy targets for the delivery of homes, employment, retail and community facilities. <p>The LDF as a whole will deliver the spatial aspects of the Council's overall strategy. Planning policies will relate to spatial planning and will not duplicate policies set out elsewhere or delivered under other legislation. The policies will not be excessively prescriptive and will not contain excessive detail.</p>	
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<p>Yes, all the policies within the document include a section explaining how they will be implemented.</p> <p>Also while every area can claim to be unique in some way, Newham does display some very special characteristics that will support the plan's implementation. This includes:</p> <ul style="list-style-type: none"> • being the location for the 2012 Olympic Games, with the government, the GLA, Newham Council and other agencies all committed to ensuring a successful games and a lasting legacy. 	<ul style="list-style-type: none"> • Core Strategy Submission Draft

	<ul style="list-style-type: none"> • containing large areas of available development land, in a location which is already highly accessible and with further transport investment planned. • the current investment taking place at Stratford and Canning Town (in addition to the Olympics) is certain to enhance Newham as an attractive area for businesses and as a place to live. • strong commitment from the government, the Mayor of London and from Newham Council to the regeneration of East London (and the Thames Gateway generally), and to improve the socio-economic circumstances of the people who live here. <p>The policies in the Core Strategy are considered to be realistic and achievable over the 15 year timescale of the plan. The plan is also sufficiently flexible to ensure that the Council can respond to changing circumstances.</p>	
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<p>The Core Strategy contains a spatial framework and a series of over-arching policies to guide development. These will be used for development management purposes and will set the context for more detailed development management policies in the Development Management Policy Manual DPD. To avoid confusion and duplication, the Core Strategy includes a schedule of UDP policies which will be deleted.</p>	<ul style="list-style-type: none"> • Core Strategy Submission Draft (Particularly Appendix 2)
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<p>Yes. Ensuring that adequate infrastructure is provided to meet the projected growth of Newham (and to meet the needs of its existing businesses and residents) is central to the plan - and forms one of the 5 main policy strands within the submitted document. The Council's policies are set out on pages 106 - 133 and cover:</p> <ul style="list-style-type: none"> • Strategic Transport • Sustainable Transport • Waste and Recycling • Local Heat and Power Networks • Town Centre Hierarchy and Network • Green Infrastructure • Blue Ribbon Network • Community Facilities • Infrastructure Delivery 	<ul style="list-style-type: none"> • Core Strategy Submission Draft - Pages 106-133 and Appendix 3 • 2010 Newham Infrastructure Study

	<p>The policies in this section are based on the 2010 Newham Infrastructure Study.</p> <p>The above policies are supported by the Infrastructure Delivery Plan - set out as Appendix 3. This identifies the social, transport and utilities infrastructure required to meet needs associated with growth in Newham. It sets out responsibilities for the delivery of each scheme, funding arrangements and likely timescales for delivery.</p>	
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	Yes - see responses to sections 24 and 26 above.	<ul style="list-style-type: none"> • See sections 24 and 26 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?	Yes - see responses to sections 24 and 26 above.	<ul style="list-style-type: none"> • See sections 24 and 26 above
29. Is it clear who is intended to implement each part of the strategy/ development plan document?	Whilst these questions can be answered in the affirmative, there is some uncertainty on points of detail - arising from likely changes in administrative responsibilities within the borough.	<p><u>Documents:</u></p> <ul style="list-style-type: none"> • Core Strategy Submission Draft
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?	As noted above Newham is affected by a unique combination of factors, and this has led to a unique set of administrative arrangements. In addition to Newham Council, planning responsibilities are shared with the Mayor of London, the Olympic Delivery Authority and the London Thames Gateway Development Corporation. In addition the Lea Valley Regional Park Authority covers a (relatively small) part of the borough, whilst the Olympic Park Legacy Company is responsible for the future use of the Olympic Park. The Mayor of London also heads a number of other organisations within the 'GLA Family' - most notably in this context, Transport for London and the London Development Agency.	<p><u>Links to other agencies:</u></p> <p>www.communities.gov.uk www.london.gov.uk www.london2012.com www.leevalleypark.org.uk www.ltqdc.org.uk</p>

	<p>All these bodies have of course been consulted in the preparation of the Core Strategy and are clearly major stakeholders in its implementation.</p> <p>As a result of changing circumstances, including a new government, changes are taking place in the above framework - the London Development Agency is being taken in-house by the Mayor of London and the ODA will cease to function when the Olympic Park is completed. The Development Corporation is also expected to cease functioning in 2013 with its functions passed to the Mayor and the Boroughs. The 2011 Localism Bill also contains a number of relevant provisions - including powers for the Mayor of London to establish Mayoral Development Corporations (almost certain to include the Olympic Park) whilst local communities are given powers to prepare their own plans - within the framework provided by strategic policy.</p> <p>Despite these changes the Council is satisfied the Core Strategy is a robust document which will guide development across the borough - including areas within the Thames Gateway and the Olympic Park. It will also provide a strategic context for any neighbourhood plans that may be produced. All these factors make it particularly important that the Core Strategy is adopted early in 2012.</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 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>The Core Strategy reflects the concept of spatial planning. It sets out a vision and spatial framework for the delivery of growth in Newham, taking into account local circumstances Newham's sustainable community strategy, views expressed during consultation and national and regional policy.</p> <p>Spatial policies reflect the physical and socio-economic geography of the borough - including the creation of the docks and their eventual demise as working docklands. As well as the direct loss of employment, Newham lost its geographical advantage for port dependant industry. These changes have provided Newham with a swath of</p>	<ul style="list-style-type: none"> • Core Strategy Submission Draft (Especially Policies B1 and S1 - S6)

	<p>development land stretching from Stratford, south through Canning Town and Custom House and east through the Royal Docks to Beckton. This has been termed the Arc of Opportunity.</p> <p>The Core Strategy sets out a clear and understandable spatial strategy for future development. Policy S1 explains this overall strategy and policies S2 to S5 detail this for the sub-areas within the arc, namely :</p> <ul style="list-style-type: none"> • Stratford and West Ham (including the Olympic Park) • Royal Docks • Canning Town • Beckton <p>The rest of the borough has been identified as 'Urban Newham' and policy S6 covers this area with the aim of strengthening the existing communities and developing locally distinctive town centres.</p> <p>Overall the plan provides an integrated approach to delivering positive social, environmental and economic outcomes, by ensuring growth is delivered, that the necessary infrastructure is provided; that development is of a high quality and that issues relating to climate change are fully addressed. The strategy and the associated infrastructure delivery plan will ensure that the policies and programmes of other relevant organisations can be co-ordinated to create maximum benefit to the borough.</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>Yes - the Council considers that the Strategy is sufficiently flexible to cope with changes which might reasonably be anticipated. Much of the context for the plan is provided by the London Plan - to some extent London Plan policies are imposed by circumstance but the Council believes that there are no major issues here likely to prove fatal to achieving a sound DPD. A revised version of the London Plan will be adopted during 2011, and the Council has taken this into account in preparing the current submission draft.</p>	<p><u>Documents</u></p> <ul style="list-style-type: none"> • Core Strategy Submission Draft • London Plan 2008 (Consolidated Version with Amendments) • Draft Replacement London Plan 2009

	<p>Potential circumstances relevant to the plan that can be anticipated include the publication of the Government's National Planning Framework and the possible creation of a Mayoral Development Corporation covering the Olympic Park. The latter emphasizes the need for an up-to-date Core Strategy, whilst the Council is confident that its evidence base is strong enough to support the plan policies and that the Council's overall vision and objectives can withstand changes in national policy.</p>	<p><u>Link:</u> www.communities.gov.uk</p>
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<u>Flexible</u>		
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>The answer to this question is very similar to that given in response to section 33 above. Also, as commented elsewhere, the plan seeks to implement a broad vision for the borough - changes in detail or to individual components are unlikely to undermine this bigger picture.</p> <p>Newham is certain to change over the next 15 years - although economic circumstances may affect the pace of this change. The draft Replacement London Plan 2009 assumes that London will experience a cyclical recovery following the current recession, and the Council has also adopted this position.</p> <p>Also as noted earlier, the plan can generally withstand changes in the provision or phasing of new infrastructure. A possible exception to this is Crossrail - the cancellation of this project would significantly affect the Council's ambitions for Newham.</p> <p>The plan does not include a fall-back position in relation to this issue and the Council feels that it would be unreasonable to expect it to do so. However the Council accepts that a review of the plan may be necessary if Crossrail (specifically the sections in Newham and the links to Central London) does not go ahead as planned</p>	<p><u>Documents:</u></p> <ul style="list-style-type: none"> • Core Strategy Submission Draft • Draft Replacement London Plan 2009 <p><u>Link:</u> www.crossrail.co.uk</p>

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

Yes, it is considered that the Core Strategy is sufficiently flexible to deal with changes in most foreseeable circumstances. In assessing risks, it is useful to identify the most important parts of the plan and possible changes in circumstances affecting these. As highlighted elsewhere key elements of the plan include the regeneration of East London generally, the Olympic Legacy, the development of Stratford, the renewal of Canning Town, transport improvements (particularly Crossrail), housing and employment growth across the borough, and the attraction of high quality development to the Royal Docks.

The two main risks most likely to affect these projects are changes in political circumstances and changes in economic circumstances. No plan can be immune to such changes. However there is a high degree of commitment from all concerned to include the regeneration of East London, securing an Olympic Legacy, and the development of Stratford as a metropolitan centre. It also seems increasingly likely that Crossrail will go ahead as planned.

Targets for employment and housing growth are clearly at risk if the financial situation fails to improve. Sufficient land is available in Newham to meet current growth targets, but lack of demand or lack of profitability may affect the speed of implementation. If this occurs land can be mothballed or put to temporary use, without threatening the overall integrity of the plan or the Council's vision. The plan will of course be closely monitored so that changes in circumstances can be identified and corrective action taken as needed.

Looking at housing specifically, targets derive from the London Strategic Housing Land Availability Assessment and Housing Capacity Study (SHLAA) prepared by the GLA with the London boroughs. This provided a London-wide housing target and new borough targets through a review of the London Plan. The revised London Plan proposes an annual monitoring target for Newham of 2500 additional homes per year. Sites and housing delivery figures have been identified

Documents:

- [Core Strategy Submission Draft](#)
- [Draft Replacement London Plan 2009](#)
- [London Plan Evidence Base](#)
- [Annual Monitoring Reports](#)

Link:

www.crossrail.co.uk

	<p>in Newham’s housing trajectory and are consistent with the figures proposed by the SHLAA, and indicate sufficient housing sites are available in Newham to meet future London Plan targets. The Council maintains a Housing Trajectory of projected yearly housing starts, which is kept under review. Details of the current Trajectory are given in the Annual Monitoring Report.</p> <p>Overall the Council is satisfied that the plan has achieved the correct balance between clarity and certainty on one side and the need for flexibility on the other, should circumstances change.</p>	
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<p>Yes. As discussed above the Core Strategy has been prepared to be flexible enough to respond to a variety of circumstances while ensuring that the Council’s vision and objectives for the borough are delivered. If for any reason, the strategy / policies are failing this will be identified through regular monitoring and appropriate action will be taken.</p> <p>Regular monitoring, through the Annual Monitoring Report, will be the key mechanism to make sure that remedial action will be taken if the strategy or policies are not being delivered. The AMR will measure progress in delivering the Core Strategy, and identify any aspects that are not being achieved as planned and any changing circumstances that may affect implementation. This will allow the Council to adjust the application of policies where appropriate and, if necessary, review or bring forward alternative approaches or policies. Monitoring indicators are contained in Appendix 4 of the Core Strategy.</p>	<ul style="list-style-type: none"> • Core Strategy Submission Draft • Annual Monitoring Reports

<u>Monitoring</u>		
<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> <p>38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?</p> <p>39. Are suitable targets and indicators present (by when, how and by whom)?</p>	<p>Yes. Each policy in the plan contains a section on implementation, which in turn provides the basis for subsequent monitoring. Policy outcomes can be both qualitative and quantitative in nature, the latter including housing delivery and industrial land release.</p> <p>Monitoring indicators are listed in Appendix 4, and will be monitored by the Council through the AMR. This includes the Housing Trajectory. Infrastructure requirements are set out in the Infrastructure Delivery Plan. This will also be monitored and adjusted if necessary.</p> <p>The Council has worked closely with its partners in the preparation of the Core Strategy and will continue to work closely with them as the plan moves into its delivery phase. This will help us to identify matters and situations that may affect delivery and explore appropriate alternative or amended approaches.</p>	<ul style="list-style-type: none"> • Core Strategy Submission Draft • Annual Monitoring Reports

<u>Is the Plan Consistent With National Policy?</u>		
<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>	<p>No. However it should be noted that the Government is currently preparing a new National Planning Policy Framework. The stated aims of this are to:</p> <ul style="list-style-type: none"> • hand power back to local communities to decide what is right for them - instead of imposing excessive rigid rules from the centre. • be more user-friendly and accessible, so that it is easier for members of the public to have a meaningful say in planning decisions. • make sure that planning is used as a mechanism for delivering Government objectives only where it is relevant, proportionate and effective to do so. • establish a presumption in favour of sustainable development. 	<p><u>Link:</u> www.communities.gov.uk</p>

	<p>The Core Strategy has been prepared following extensive consultation with the local community, and the Council welcomes the use of locally determined policies. Policies in the Strategy have been designed to be relevant to the particular needs of Newham, and to provide a sound basis for the future development of the borough.</p>	<ul style="list-style-type: none"> • Core Strategy Submission Draft • Section 30 (d) Consultation Statement
<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>	<p>The Core Strategy is not considered to include any policies that do not add anything to existing national guidance. Representations made by the former Government Office for London on earlier drafts of the Core Strategy did not identify any such matters. The Council has endeavoured, as far as is possible, to ensure that policies are specific to Newham, and do not merely repeat national policy.</p>	<ul style="list-style-type: none"> • Core Strategy Submission Draft • Section 30 (d) Consultation Statement

Document List is on following page.

Legal Compliance and Soundness Self Assessment - Document List

[Home](#)

Submission Documents

Core Strategy Submission Draft	Please see submitted documents. Alternatively all of these documents can be accessed or downloaded from the Newham Council website.
Sustainability Appraisal	
Submission Proposals Map	
Statement of Community Involvement	
Amendment to SCI	
Section 30 (d) Consultation Statement	
Section 30 (e) Details of representations received	
Copies of representations made	
Legal Compliance Checklist	
Test of Soundness Self Assessment (This document)	
Equalities and the LDF (EqIA)	
Habitat Regulations Assessment	
PPS 25 Sequential Test	
Schedule of minor changes to Submission Draft identified by LBN officers	
Schedule of minor changes to Submission Draft made in response to representations	
Cabinet and Council Report and copy of minutes (28/3/2011)	

<http://www.newham.gov.uk/Planning/LocalDevelopmentFramework/CoreStrategy.htm>

Previous Core Strategy Documents

Issues and Options for the Core Strategy
Choices for the Core Strategy

<http://www.newham.gov.uk/Planning/LocalDevelopmentFramework/EarlierStagesoftheCoreStrategy.htm>

Legal Compliance and Soundness Folders

Folder 1	Local Development Schemes	Examination Library LCS 1
Folder 2	Evidence Base	Examination Library LCS 2
Folder 3	Engagement	Examination Library LCS 3
Folder 4	Related Strategies	Examination Library LCS 4
Folder 5	Correspondence	Examination Library LCS 5
Folder 6	Annual Monitoring Reports	Examination Library LCS 6
Folder 7	London Plan	Examination Library LCS 7
Folder 8	Other	Examination Library LCS 8