



planning advisory service

Local Plans and the National Planning Policy Framework

Compatibility Self Assessment Checklist

(April 2012)

Introduction

We have produced a checklist to help you assess the content of your local plan¹ against requirements in the National Planning Policy Framework (NPPF) that are new or significantly different from national policy previously set out in PPGs and PPSs.

These elements are highlighted in red and in italics.

Although not part of the NPPF it also includes the 'Planning policy for traveller sites' published on 23 March 2012.

How will it help?

We want to help local authorities to get up-to-date plans in place. This tool will help you to:

- assess your local plan against national policy
- identify gaps
- understand risks
- start to plan how to manage those risks.

This will help you to:

- respond proactively and speedily to the NPPF
- prepare for an examination
- make robust planning decisions
- implement your policies.

PAS will continue to work with authorities through the NPPF transition period.

Why does it matter?

It matters because to have a plan-led system we need to have sound plans in place. The transition arrangements give authorities with an adopted plan a year to get their policies 'up to date' (in conformity with the NPPF). After that, the policies will be judged by their degree of conformity and the presumption in favour of sustainable development will apply. If you haven't got a plan in place, you need to do so as soon as possible; the further along the process you are, and the closer the conformity of your policies, the more weight they will have (for full details see Annex 1 'Implementation' paragraphs 208-219).

For PAS's interpretation of what you need to know about transition, see '[Things we think you should know about the NPPF](#)'.

¹ We use the term "local plan" throughout this document. However, adopted plans may comprise a number of development plan documents prepared under the Planning and Compulsory Purchase Act 2004, in which case it may be all of those documents that a local planning authority may wish to consider in the context of the NPPF using this document.

Who should use it?

The checklist was written with adopted plans in mind, but it should also be useful as a check for emerging local plans. It is for all planning authorities in England, including counties and National Parks.

What it doesn't do

It is not an interpretation of national planning policy or a prescribed solution. It excludes the implications of the Localism Act. It doesn't deal with the process of plan-making or aspects of the NPPF which relate specifically to decision making. Nor does it list the things that you *don't* have to do any more as requirements have been dropped.

What else are PAS doing?

There are more parts to this document to follow, including

- a comprehensive checklist of all requirements, new and retained,
- An understanding of what the 'gaps' or discrepancies might mean for you (your risks)
- Some actions you could take to address these risks

How should you use it?

We have structured the checklist in the order of the NPPF, but you might want to prioritise the areas that you think are most important to your area and your overall strategy, and concentrate on the policy areas where you have the most development pressure.

The checklist has used, wherever possible, the same wording as that set out in the NPPF. However, our focus has been to capture the main 'prompts' that you need to consider while keeping the checklist to a reasonable length. However you should cross-refer to the NPPF itself whilst going through the checklist. We have provided paragraph references to help you do this.

Note, however, that this document highlights the new/significantly different bits of the NPPF compared to PPGs and PPSs. You'll need to think about whether, if you've quite an old adopted plan, it was fully compliant with more recent bits of government guidance (eg PPS3 revised June 2011).

The checklist concentrates on identifying where the gaps (or incompatibilities) are; you might want to also keep your own audit trail of the evidence you have identified to demonstrate compatibility, or otherwise, with the NPPF.

How we made it

- We looked at the NPPF and the Impact Assessment published alongside the draft NPPF.
- We identified the main things that it asks or requires local plans to include, and highlighted those that are significantly different from previous national policy and guidance as set out in PPGs and PPSs.
- We turned this into a checklist, and set out some ideas about how local planning authorities could identify parts of their local plan that may be most at odds with this, what may happen as a result, and things they could do to manage this (*to follow*).
- We developed these ideas in consultation with a selection of local planning authorities.

We've worked with the Planning Inspectorate on this and it builds on pilot work done by the Inspectorate. The checklist is intended to provide a constructive starting point for any assessment of how the Framework impacts on plan preparation and is an important element of the support service referred to in paragraph 217 of Annex 1 to the National Planning Policy Framework

What will happen to this document in the future?

It will be reviewed in the light of feedback from local planning authorities that have used it and other stakeholders and updated again as necessary later in 2012.

If you have any feedback please send it to PAS at:

Email: alice.lester@local.gov.uk

Disclaimer

This is a PAS document and has not been endorsed by the Department for Communities and Local Government. We are positive that if you go through this exercise you will be able to make a judgment, with confidence, about how your plan relates to the requirements of the NPPF. It will also give you some indication of the sort of actions you may wish to pursue if you need to move towards alignment with the NPPF in any of the policy areas.

1A: Achieving sustainable development

The presumption in favour of sustainable development and core planning principles (para 6-17)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><i>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</i></p>	<p><i>Does the plan positively seek opportunities to meet the development needs of the area?</i></p> <p><i>Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)?</i></p> <p><i>Do you have a policy or policies which reflect the principles of the presumption in favour of sustainable development? A model policy is provided on the Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive).</i></p>	<p>Yes, the Core Strategy sets out overarching targets for development to meet the District's needs to 2026. This was objectively assessed through the evidence base and subject to independent examination.</p> <p>As the Core Strategy was adopted in 2010 it does not include PINS model policy. However it is considered that sustainable development focused on positive promotion of regeneration is at the heart of the Strategy.</p> <p>The Presumption in Favour of Sustainable Development Policy has been introduced to the pre-submission publication Site Allocations and Policies DPD</p>	<p>It is not considered that there are significant differences. The Strategy is based on delivering development targets that have been objectively assessed.</p>

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<p>The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)</p>		<p>It is considered that the Adopted Core Strategy strongly reflects the 12 core land use principles set out in the NPPF. In particular it focuses on supporting sustainable economic development.</p>	<p>The Core Strategy strongly reflects the 12 Core Land Use principles.</p>
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1B: Delivering sustainable development

1. Building a strong, competitive economy (paras 18-22)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Set out a clear economic vision for the area which positively and proactively encourages sustainable economic growth (21).	<i>Is there an up to date assessment of the deliverability of allocated employment sites, to meet local needs, to justify their long-term protection (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)?</i>	<p>Yes - a comprehensive Employment Land Study was undertaken to inform allocations. Some long standing employment sites have consequently been identified to deliver mixed use developments during the Plan Period, for example the former British Sugar site at Stourport Road, Kidderminster.</p> <p>The KCAAP actively encourages the regeneration of some key brownfield sites in and around Kidderminster town centre, incorporating large elements of mixed uses. For example the Churchfields area.</p>	It is not considered that there are any significant differences. The Core Strategy is based on a Comprehensive Employment Land Study.

2. Ensuring the vitality of town centres (paras 23-27)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Set out policies for the management and growth of centres over the plan period (23).	<p><i>Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses?</i></p> <p><i>Have you identified primary and secondary shopping frontages?</i></p>	<p>Yes – there is a strong focus on the regeneration of the town centres. In particular Kidderminster and Stourport-on-Severn. Kidderminster is subject to an Area Action Plan to actively promote its regeneration.</p> <p>Primary and Secondary shopping frontages are identified in both the pre-submission publication Site Allocations and KCAAP DPDs</p>	There are no significant differences.

3. Supporting a prosperous rural economy (para 28)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development (28).</p>	<p><i>Do your policies align with the objectives of para 28?</i></p>	<p>Policy DS04 sets out the strategic approach to rural regeneration within the District. It encourages promoting development which contributes to traditional rural employment sectors and farm diversification and the provision of rural based workspace and live/work units.</p> <p>It also supports developments that provide essential facilities and services and seeks to safeguard the network of local groups of shops and public houses.</p> <p>Policy CP04 supports sustainable tourism opportunities within the rural settlements.</p>	<p>It is not considered that there are significant differences. It is noted that Policy DSO4 retains a primary focus on traditional rural employment sectors whilst Para 28 of the NPPF states:</p> <ul style="list-style-type: none"> - "Support the sustainable growth and expansion of <u>all types</u> of business and enterprise in rural areas" <p>However, it is considered that this subtle difference is not significant and can also be addressed through the generic Development Control Policies contained within the Site Allocations and Policies DPD.</p>

4. Promoting sustainable transport (paras 29-41)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Policies that facilitate sustainable development but also contribute to wider sustainability and health objectives (29).</p> <p>Different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas (29).</p>	<p><i>If local (car parking) standards have been prepared, are they justified and necessary? (39) (The cancellation of PPG13 removes the maximum standards for major non-residential development set out in Annex D. PPS4 allowed for non-residential standards to be set locally with Annex D being the default position. There is no longer a requirement to set non-residential parking standards as a maximum but that does not preclude lpas from doing so if justified by local circumstances).</i></p> <p>Has it taken into account how this relates to other policies set out elsewhere in the Framework, particularly in rural areas? (34).</p> <p><i>Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</i></p>	<p>The Core Strategy does not set local car parking standards. Standards reflect national guidelines and Worcestershire County Council's standards.</p> <p>Yes the District Council has worked closely with key stakeholders and the Highway Authority Worcestershire County Council on Infrastructure</p>	<p>It is not considered that there are any significant differences.</p>

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		<p>Delivery Plans. Policy CPO3: Promoting Transport Choice and Accessibility addresses the delivery of transport infrastructure. It identifies a number of strategic transport infrastructure schemes to support regeneration during the plan period.</p>	
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5.Supporting high quality communications infrastructure (paras 42-46)

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There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.			
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6. Delivering a wide choice of high quality homes (paras 47-55)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of <i>5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47)</i>.</p>	<p><i>What is your record of housing delivery?</i></p> <p><i>Have you identified:</i></p> <p>a) five years or more supply of specific deliverable sites; <i>b) an additional buffer of 5% (moved forward from later in the plan period), or</i> c) <i>If there has been a record of persistent under delivery have you identified a buffer of 20% (moved forward from later in the plan period)? [Para 47].</i></p> <p><i>Does this element of housing supply include windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?</i></p>	<p>The District Council's record for housing delivery has been consistent. There is currently a 6.5 year housing land supply. It is therefore considered that there has been consistent delivery over the 5% buffer during recent years.</p> <p>The Council has identified a 5 year supply of specific deliverable sites within the pre-submission publication site allocations and KCAAP DPDs.</p> <p>Historically windfall sites have made a significant contribution to the housing land supply, although there is not currently a windfall allowance within the Core Strategy.</p>	<p>The DPDs have identified a 5 year supply of specific deliverable sites and it is considered that the Council also has an additional 5% buffer.</p> <p>Currently a windfall allowance is not included within the Core Strategy, although historically windfall sites have made a significant contribution to housing delivery.</p> <p>The District Council could consider introducing a windfall allowance when the Core Strategy is next reviewed. This is not considered to be a significant issue currently due to our healthy housing land supply.</p>

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<p>Illustrate the expected rate of housing delivery through a trajectory and set out a housing implementation strategy describing how a five year supply will be maintained (47).</p>	<p><i>To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?</i></p>	<p>During 2008/09 96% of residential land development took place on brownfield sites within the District. Since 2003/04 the amount of residential development on previously developed land has not dropped below 70%. With more recent figures standing at 72% for brownfield completions during 2011/12 (this is as a result of changing national policy and the need to reclassify garden land as Greenfield). The SHLAA indicates that all of the District's future housing requirements to 2026 can be met from brownfield sites. It is not therefore considered that the removal of national and regional targets will impact on housing land supply.</p>	<p>This would not impact on the overall strategy.</p>
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50), and caters for housing demand and the scale of housing supply to meet this demand (para 159)</p>	<p><i>Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum threshold? Is your evidence for housing provision based on up to date, objectively assessed needs</i></p>	<p>Core Policy CP04 relates to the provision of affordable housing and generally seeks to secure affordable housing provision of 30% on sites of ten or more dwellings within Kidderminster and Stourport and 30% on sites of 6 or more dwellings within Bewdley and the rural areas.</p> <p>This policy is based on objectively assessed evidence set out in the Strategic Housing</p>	<p>The retention of minimum thresholds is considered to be fully justified by robust, objectively assessed local evidence.</p>

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		<p>Market Assessment which recognized that windfalls make up a significant % of total housing completions within the Housing Market Area and that very little affordable housing has been secured on these smaller sites. It therefore recommended that an element of affordable housing should be provided on smaller sites and therefore the threshold was lowered in the Core Strategy. It is considered that this is fully justified and based on local evidence.</p>	
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p>	<p><i>Have you considered whether your plan needs a policy which allows some market housing to facilitate the provision of significant additional affordable housing to meet local needs?</i></p>	<p>Yes. Policy SAL.DPL2 on Exception Sites in the Publication Site Allocations states "Proposals for less than 100% affordable housing provision on exceptions sites will need to be accompanied by a robust viability assessment, as set out in policy SAL.DPL3 – Financial Viability, to justify enabling development</p> <p>Site specific policies, for example the former Blakedown Nurseries site contain wording to facilitate the provision of enabling market housing where fully justified to enable delivery.</p>	<p>Full consideration has been provided within the plan to allow for enabling market housing in appropriate circumstances.</p>

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	<p><i>Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)</i></p>	<p>Yes. Policy SAL.DPL1 allocates the sites on the Proposals Maps which are considered suitable for residential development. These focus on previously developed land and the NPPF definition clearly excludes land in built up areas such as private residential gardens.</p>	<p>No significant differences – this would not impact on the overall strategy which is consistent with national policy.</p>
<p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<p><i>Examples of special circumstances to allow new isolated homes listed at para 55 (note, previous requirement about requiring economic use first has gone).</i></p>	<p>Core Strategy Policy DS04 allows for new housing to meet local needs in rural areas, it also recognizes the need for rural based workspace and live/work units.</p> <p>The Publication Site Allocations and Policies DPD includes a Policy (SAL.DPL2) on Rural Housing this provides flexibility for rural housing exception sites, rural workers dwellings and replacement dwellings in the open countryside.</p> <p>The Publication Site Allocations and Policies DPD includes a Policy (SAL.UP10) relating to the Re-use and Adaptation of Rural Buildings.</p>	<p>No significant differences – this would not impact on the overall strategy which is consistent with national policy.</p>
<p>7. Requiring good design (paras 56-68)</p>			

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There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.		The Core Strategy includes Policy CP11: Quality Design and Local Distinctiveness	N/A
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8. Promoting healthy communities (paras 69-78)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<i>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</i>	<i>Does the plan include a policy or policies addressing community facilities and local services? To what extent do policies plan positively for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure?</i>	<p>Policy CP07 Delivering Community Wellbeing in the Core Strategy places emphasis on the expansion, enhancement and shared use of community facilities.</p> <p>Policy SAL.DPL11 of the Publication Site Allocations and Policies resists the loss of community services and facilities unless clear evidence is demonstrated to prove that it would not be economically viable to retain the buildings for a community use and that the community facility could not be provided by an alternative occupier or the local community.</p>	No significant differences – this would not impact on the overall strategy which is consistent with national policy.

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<p><i>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).</i></p>	<p><i>Do you have a policy which would enable the protection of Local Green Spaces and manage any development within it in a manner consistent with policy for Green Belts? (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77).</i></p>	<p>The District Council is producing a Green Infrastructure Strategy to identify a comprehensive network of green infrastructure. This will be used to assess the potential for the protection of Local Green Spaces. However, since the Core Strategy focuses new development to the urban areas of Kidderminster and Stourport on Severn it is considered that no Local Green Spaces are at risk from development. Within the larger rural settlements to the East of the District, the villages are washed over by Green Belt so would be protected under Green Belt policy.</p>	<p>No significant differences – this would not impact on the overall strategy which is consistent with national policy.</p>
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9. Protecting Green Belt land (paras 79-92)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy (83).</p> <p>Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)</p>	<p>If you are including Green Belt policies in your plan, do they accurately reflect the NPPF policy?</p> <p>For example:</p> <p>Lpas should plan positively to enhance the beneficial use of the Green Belt. <i>Beneficial uses are listed in para 81.</i> PPG2 set out that 'Green Belts have a positive role to play in fulfilling objectives. Para 1.6 of PPG2 set out the objectives – some of these have been rephrased/ amended and 'to retain land in agricultural, forestry and related uses' has been omitted.</p> <p>Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (85).</p>	<p>The Core Strategy specifies at paragraph 5.13: <i>"The level of development to be accommodated within the District can be met primarily on brownfield sites and there are no existing exceptional circumstances that warrant a review of the Green Belt boundary."</i></p> <p>Policy SAL.UP1 Green Belt within the Publication Site Allocations and Policies DPD reflects the NPPF Policy.</p>	<p>No significant differences – this would not impact on the overall strategy which is consistent with national policy.</p>

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	<p>Does it allow for the extension or alteration of a <i>building</i>, provided that it does not result in disproportionate additions over and above the size of the original building? (89). <i>PPG2 previously referred to dwelling. Original building is defined in the Glossary.</i></p> <p>Does it allow for the replacement of a <i>building</i>, <i>provided the new building is in the same use and not materially larger than the one it replaces?</i> (89) <i>PPG2 did not have a separate bullet point – replacement related to dwellings rather than buildings.</i></p> <p><i>Does it allow for limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development?</i> (89) (PPG2 referred to ‘major existing developed sites’)</p>	<p>Yes. Also refers to the re-use/conversion of rural buildings.</p> <p>Yes. Policy SAL.UP1 of the Site Allocations reflects this.</p> <p>The Site Allocations and Policies DPD includes a specific policy (SAL.PDS1) relating to Previously Developed Sites in the Green Belt.</p>	
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	<p>Change from 'Park and Ride' in PPG2 to <i>local transport infrastructure</i> and the inclusion of '<i>development brought forward under a Community Right to Build Order</i>' in relation to other forms of development that are not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. (90).</p>	<p>Currently the draft policies within the Pre Submission Publication Site Allocations do not refer to development under a Community Right to Build Order. This could usefully be included within the Site Allocations and Policies DPD via a minor amendment to be submitted for examination.</p>	
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10. Meeting the challenge of climate change flooding and coastal change (paras 93-108)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<i>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).</i>	<p><i>Have you planned new development in locations and ways which reduce greenhouse gas emissions?</i></p> <p><i>Does your plan actively support energy efficiency improvements to existing buildings?</i></p> <p><i>When setting any local requirement for a building's sustainability, have you done so in a way that is consistent with the Government's zero carbon buildings policy and adopt nationally described standards? (95)</i></p>	<p>Yes, the overarching Development Strategy contained in the Core Strategy seeks to reduce the need to travel by focusing new development on brownfield sites within the urban areas with good access to local services.</p> <p>The Core Strategy contains a policy CP01: Delivering Sustainable Development Standards which reflects the national standards.</p>	No significant differences – this would not impact on the overall strategy which is consistent with national policy.
Help increase the use and supply of renewable and low carbon energy (97).	<p><i>Do you have a positive strategy to promote energy from renewable and low carbon sources?</i></p> <p><i>Have you considered identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</i></p>	<p>Yes as set out in Policy CP01, which is supportive of freestanding renewable energy developments.</p> <p>Worcestershire County Council undertook a feasibility assessment for potential areas across the County to provide large scale renewable and low carbon energy sources. Due to constraints no such sites were</p>	No significant differences – this would not impact on the overall strategy which is consistent with national policy.

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		considered suitable for the Wyre Forest District.	
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11. Conserving and enhancing the natural environment (paras 109-125)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Planning policies should minimise impacts on biodiversity and geodiversity (para 117).</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).</p>	<p><i>If you have identified Nature Improvement Areas, have you considered specifying the types of development that may be appropriate in these areas (para 117)?</i></p>	<p>Nature Improvement Areas have not been identified. The Core Strategy contains Policy CP14: Providing Opportunities for Local Biodiversity and Geodiversity. This safeguards existing biodiversity sites and supports the establishment of new sites where this is considered to be appropriate.</p>	<p>No significant differences – this would not impact on the overall strategy which is consistent with national policy.</p>

12. Conserving and enhancing the historic environment (paras 126 – 141)			
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.			N/A

13. Facilitating the sustainable use of minerals (paras 142-149)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142).</p>	<p><i>Does the plan have policies for the selection of sites for future peat extraction? (143) (NPPF removes the requirement to have a criteria based policy as peat extraction is not supported nationally over the longer term).</i></p>	<p>N/A</p>	<p>N/A</p>

Planning policy for traveller sites

The CLG 'Planning policy for traveller sites' was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. 'Planning policy for travellers sites' should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers which respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (lpas) make their own assessment of need for the purposes of planning
- That lpas work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green Belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

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Policy A: Using evidence to plan positively and manage development (para 6)			
What the policy for traveller sites expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
Early and effective community engagement with both settled and traveller communities.	Has your evidence been developed having undertaken early and effective engagement including discussing travellers accommodation needs with travellers themselves, their representative bodies and local support groups?	<p>Yes a Gypsy and Traveller Accommodation Assessment was undertaken to inform policy development.</p> <p>Extensive consultation took place in October/November 2011 on potential site allocations. This was undertaken in accordance with the Council's Statement of Community Involvement and all representative groups were consulted.</p>	No significant differences – this would not impact on the overall strategy which is consistent with national policy.

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<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<p>Can you demonstrate that you have a clear understanding of the needs of the traveller community over the lifespan of your development plan?</p> <p>Have you worked collaboratively with neighbouring local planning authorities?</p> <p>Have you used a robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions?</p>	<p>Yes, following extensive consultation. There is a need also within the District for a Site for Travelling Showpeople and a criteria based policy has been developed</p> <p>The District Council has engaged neighbouring authorities within the Consultation and has arranged meetings under the Duty to Co-operate to discuss any potential implications.</p>	
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Policy B: Planning for traveller sites (paras 7-11)			
What the policy for traveller sites expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring lpas (8)	Have you identified, and do you update annually, a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set targets? Have you identified a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. (9)	Yes site specific allocations have been made in the Pre Submission Publication Site Allocations DPD following extensive consultation.	No significant differences – this would not impact on the overall strategy which is consistent with national policy.
Consider the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites.	Have you identified constraints within your local area which prevent you from allocating sufficient sites to meet likely future need? If so have you prepared a joint development plan or do you intend to do so? Is the reason for this clearly explained?	Yes, there are considerable constraints present within the District due to Green Belt and flooding issues. The sites identified for allocation fall within the District's own administrative boundary and it is not considered (based on the level of need and existing level of pitch provision) that it will be necessary to allocate cross border sites.	No significant differences – this would not impact on the overall strategy which is consistent with national policy.

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<p>Relate the number of pitches and plots to the circumstances of the specific size and location of the site and the surrounding population size and density.</p>		<p>Based on assessment of level of need undertaken through the GTAA and Regional Policy Interim Statement. Also reflects local planning constraints following extensive recent consultation.</p>	<p>No significant differences – this would not impact on the overall strategy which is consistent with national policy.</p>
<p>Protect local amenity and environment.</p>		<p>Considered that the proposed allocations protect local amenity and the impact on open countryside, this was a key factor in the recent consultation.</p>	<p>No significant differences – this would not impact on the overall strategy which is consistent with national policy.</p>
<p>Set criteria to guide land supply allocations where there is identified need.</p>	<p>Has an up-to-date assessment of the need for traveller sites been carried out? If an unmet need has been demonstrated has a supply of specific, deliverable sites been identified based on the criteria you have set? Where there is no identified need, have criteria been included in case applications nevertheless come forward?</p>	<p>Based on assessment of level of need undertaken through the GTAA and Regional Policy Interim Statement. Also reflects local planning constraints following extensive recent consultation.</p> <p>The Pre Submission Publication Site Allocations included a site allocations policy and criteria for planning applications that come forward for gypsies, travelers and travelling showpeople sites.</p>	<p>Based on assessment of level of need undertaken through the GTAA and Regional Policy Interim Statement. Also reflects local planning constraints following extensive recent consultation.</p>
<p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<p>Have your policies been developed taking into account criteria a-h of para 11 of the policy</p>	<p>Yes, it is considered they take full account of national policy</p>	<p>Based on assessment of level of need undertaken through the GTAA and Regional Policy Interim Statement. Also reflects local planning constraints</p>

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			following extensive recent consultation.
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Policy C: Sites in rural areas and the countryside (para 12)			
What the policy for traveller sites expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
When assessing the suitability of sites in rural or semi-rural settings lpas should ensure that the scale of such sites do not dominate the nearest settled community?		There are no sites considered to be suitable for allocation in the District's rural areas due to Green Belt constraints and access to local services.	Based on assessment of level of need undertaken through the GTAA and Regional Policy Interim Statement. Also reflects local planning constraints following extensive recent consultation.

Policy D: Rural exception sites (para 13)			
What the policy for traveller sites expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
If there is a lack of affordable land to meet local traveller needs, lpas in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers sites.	If you have a lack of affordable land to meet local traveller needs in your rural area have you used a rural exception site policy, and if so, does it make it clear that such sites shall be used for affordable traveller sites in perpetuity?	No this is not considered appropriate, due to the intention to allocate sites to meet the need through the Pre Submission Publication Site Allocations.	Based on assessment of level of need undertaken through the GTAA and Regional Policy Interim Statement. Also reflects local planning constraints following extensive recent consultation.

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Policy E: Traveller sites in Green Belt (paras 14-15)			
What the policy for traveller sites expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.	Have you made an exceptional limited alteration to the defined Green Belt boundary to meet a specific, identified need for a traveller site? Has this alteration been done through the plan-making process and is it specifically allocated in the development plan as a traveller site only	No . This is not considered to be necessary or appropriate based on needs assessments.	Based on assessment of level of need undertaken through the GTAA and Regional Policy Interim Statement. Also reflects local planning constraints following extensive recent consultation.

Policy F: Mixed planning use traveller sites (paras 16-18)			
What the policy for traveller sites expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
	<p>Have you considered including travellers sites suitable for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents)? If mixed sites are not practicable have you considered the scope for identifying separate sites for residential and for business purposes in close proximity to one another? Have you had regard to the need that travelling showpeople have for mixed-use yards to allow residential accommodation and space for storage of equipment? NB Mixed use should not be permitted on rural exception sites</p>	<p>There is the need for a site for Travelling Showpeople within the District. The Council is working closely with the family to identify an appropriate site, following extensive consultation in late 2011, where it was not possible to identify a specific site to meet their need. As such a criteria based policy has been developed specifically to assess the suitability of a site against the sequential assessment should an application be received. This takes account of the specific need of the travelling showpeople.</p>	<p>Based on assessment of level of need undertaken through the GTAA and Regional Policy Interim Statement. Also reflects local planning constraints following extensive recent consultation.</p>

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Policy G: Major development projects (para 19)			
What the policy for traveller sites expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
	Do you have a major development proposal which requires the permanent or temporary relocation of a traveller site? If so has a site or sites suitable for the relocation of the community been identified (if the original site is authorised)?	N/A	N/A

Plan-making

Local Plans (paras 150-157)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Each local planning authority should produce a Local Plan for its area. Any additional DPDs should only be used where clearly justified. SPDs should be used where they help applicants make successful applications/aid infrastructure delivery/not be used to add unnecessarily to financial burdens on development (153)	<i>Are you able to clearly justify the use of additional DPDs if this is the approach that you are pursuing?</i>	Yes. The District Council has an Adopted Core Strategy and the Site Allocations and KCAAP are fully consistent with its strategy they are also required to deliver the Core Strategy and level of development and regeneration within the District.	No significant differences – this would not impact on the overall strategy which is consistent with national policy.
Local Plans should: <ul style="list-style-type: none"> Plan positively (para 157) 	<i>Have you objectively assessed development needs and planned for them? If you can't meet them in your area, have you co-operated with others on meeting them elsewhere? (para 182)</i>	Yes, a comprehensive evidence base informed the Core Strategy and this was tested at Independent Examination. The Evidence Base has been updated to inform the production of the Site Allocations and KCAAP.	No significant differences – this would not impact on the overall strategy which is consistent with national policy.

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Using a proportionate evidence base (paras 158-177)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Defence, national security, counter-terrorism and resilience	See para 163		
<p>Ensuring viability and deliverability</p> <p>The sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened (173)</p>	<p><i>To what extent has your plan been assessed to ensure viability, taking into account the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements?</i></p> <p><i>In so doing to what extent has it taken into account the normal cost of development and on-site mitigation and provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable (173)?</i></p>	<p>The Council commissioned consultants GVA Grimley to undertake viability assessment of the emerging Core Strategy policies. The findings of this work informed the final strategy and were subject to scrutiny at examination.</p> <p>A policy relating to financial viability has also been included within the Site Allocations DPD. The KCAAP takes full account of financial viability. The majority of development sites within the District are brownfield regeneration sites and this is therefore a key issue which the Development Plan must address in order to successfully deliver development.</p>	<p>No significant differences – this would not impact on the overall strategy which is consistent with national policy.</p>

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	<p><i>To what extent have the likely cumulative impacts on development in your area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards been assessed to ensure that the cumulative impact of these standards and policies do not put implementation of the development plan at serious risk, and facilitate development throughout the economic cycle (174)?</i></p>	<p>This formed part of the work undertaken by GVA Grimley and was fed into the modelling work.</p>	<p>No significant differences – this would not impact on the overall strategy which is consistent with national policy.</p>
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Examining Local Plans (para 182)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Authorities should submit a plan for examination which it considers is sound, including being	<i>Positively prepared</i>	<p>It is considered that the Core Strategy was positively prepared and demonstrates flexibility and awareness of the constraints relating to brownfield redevelopment.</p> <p>The Site Allocations and KCAAP are based on extensive work undertaken in relation to the need to regenerate the District, which has been subject to intensive stakeholder input.</p> <p>There has been general support for the DPDs throughout their consultation stages and it is considered that they represent a proactive strategy for the regeneration of the District's main urban areas.</p>	No significant differences – this would not impact on the overall strategy which is consistent with national policy.