



Local Plans and the National Planning Policy Framework Compatibility Self-Assessment Checklist London Borough of Hackney Core Strategy

This checklist which will help you assess the content of your new or emerging local plan¹ against requirements in the National Planning Policy Framework (NPPF) that are new or significantly different from national policy set out in PPGs and PPSs.

These elements are highlighted in red and in italics.

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.

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>The Plan complies with these paras in the NPPF, and positively seeks opportunities to meet the development needs of the Borough. The Plan is essentially a spatial plan for the sustainable growth and development of the Borough until 2025.</p> <p>Chapter 4 'Delivering Sustainable Growth' sets out the spatial strategy for sustainable growth, such as in the Borough's town centres, railway corridors, South Shoreditch/Central Activities Zone (CAZ), new communities (Woodberry Down and Hackney Wick), and regenerated housing estates. Policies in the chapter articulate how such growth will occur in these locations, supported by a sustainable transport policy and the need to build the capacity of infrastructure to support this growth. Infrastructure provision</p>	<p>There are no significant differences. The overall strategy is not affected.</p> <p>However, if the Government's plan to introduce permitted development rights for change from B1 (a) (offices) to C3 (residential) come into force, this could have a high impact on the sustainable spatial strategy for the Borough set out in the Core Strategy, it would detrimentally impact the current identification of supply of employment land and floorspace to meet needs in this sector, and affects the identified housing pipeline supply as many new housing units can not be identified through the planning process. The introduction of this change by the Govt is considered inconsistent with the advice set out in the NPPF.</p>

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		<p>is also supported through policies in Chapter 5 'Supporting Neighbourhoods and Communities'.</p> <p>Theme based policies in the Plan contain policies supporting housing growth (for example to ensure LBH meets its London Plan targets, the provision of a mix of housing and supporting the provision of family housing and affordable housing to meet Borough needs, high density development is promoted in areas of high public transport accessibility, the protection of and identification of sites for gypsies and travelers), a strong economy (identifying development needs for retail and other businesses activities and floorspace, and providing policies to support the vitality and viability of town centres, and ensuring the supply of employment land and floorspace for business activities), and policies supporting the protection and enhancement of the Borough's natural, built and historic environment, bio-diversity, the prudent use of natural resources, minimizing pollution and mitigating and adapting to climate change</p>	
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	<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>The Plan was adopted in 2010, based on up-to-date assessments of need, through its evidence base, eg, employment, housing, retail needs studies. Much of the evidence base is produced by independent consultants providing an objective assessment of needs. Flexibility has been incorporated within policies to allow for them to adapt to rapid change, such as employment policies which facilitate a mixed-model of development to assist with viability, and allow for the submission of marketing information to demonstrate if there is market demand for the proposed loss of employment land and floorspace.</p> <p>Not specifically, but as stated above the Plan has a presumption in favour of sustainable development.</p>	<p>There are no significant differences. The overall strategy is not affected. The evidence base will need to be kept under review to ensure it is up to date and reflects any changes, eg changes in market forces.</p> <p>However, as noted above, if permitted development rights are introduced for change from B1(a) to C3, this impacts on the objectively assessed needs for different sectors in the Borough, and an impact assessment and review of all evidence base will be required.</p> <p>There are no significant differences. The overall strategy is not affected. The model policy can be picked up in minor amendments to the Core Strategy.</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>The Plan is consistent with the core land-use principles, where relevant (Hackney does not have Green Belt land so the Plan does not reflect this matter). It has been recently adopted based on relevant evidence base, and prepared in a cooperative manner with key stakeholders, and provides a practical and certain framework for guiding development and change, determining planning applications, and for informing the development of other local plans, such as the Development Management (DMLP) and Site Allocations Local Plans (SALP).</p> <p>An assessment against these core land-use principles is essentially contained within the further assessment set out below.</p>	<p>There are no significant differences. The overall strategy is not affected. As noted above, however, change in pd rights could have a detrimental impact on the land use principles, particularly in regard to the NPPF's guidance that local plans should meet the business needs of an area.</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>Generally, the Plan has a clear economic vision to positively encourage sustainable economic growth, address unemployment and increase the employment offer in the Borough. It encourages economic development, growth and the promotion of the effective use of land through the identification and regeneration of sites, the promotion of employment clusters and the encouragement of mixed use development with a strong viable employment component. It encourages economic diversity, the support of existing businesses and business development by facilitating the location of micro, small and medium companies in the Borough. 'Town centres' are identified as locations for growth and investment.</p> <p>The Plan's policies are based on an up to date assessment of the</p>	<p>There are no significant differences. The overall strategy is not affected. The employment designations will need to be regularly monitored and reviewed.</p> <p>However, as noted above, the pd rights changes if brought into force would have a highly significant impact on the economic vision for the Borough, and the designation of employment sites. Effectively, the Council will not be able to implement its current CS employment policies, as change of use, effectively for all B classes can not be overseen by the planning system.</p>

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		<p>deliverability of allocated employment sites to meet local needs (the Atkins Employment Study 2006, updated in 2010). This evidence base objectively assesses the Borough's needs, and provides a hierarchy of designations for employment land and floorspace for the life of the Plan (15 years). Generally, the policies facilitate the managed release of employment land, protecting some land for key economic use (Strategic Industrial Land (SIL) in Hackney Wick/Olympic Park to reflect the London Plan designation, and Local Significant Industrial Sites (LSIS's), while allowing for a mixed-use development model to assist with viability and reflect the changing nature of employment land in Other Industrial Areas (OIAs) and Priority Employment Areas (PEAs). The evidence base identifies that there is a reasonable prospect of allocated land being used for such purposes as there will be a need for the supply of such land and floorspace to meet demand over the Plan period, providing that supporting development is allowed to assist in the upgrade of stock (as facilitated in the PEAs and OIAs) to support the</p>	
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		<p>location of emerging and expanding business sectors (eg creative industry).</p> <p>Flexibility has been incorporated within policies to allow for them to adapt to rapid change, and allow for the submission of marketing information to demonstrate if there is market demand for the proposed loss of employment land and floorspace.</p>	
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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>The Plan contains a hierarchy of 'retail centres', Major, District and Local Centres. It assessed the boundaries of these centres (mainly former UDP designations) to consider if such boundaries were appropriate. The boundaries of Dalston Major Centre and Hackney Central District Centre have been considered in light of work carried out for the respective Area Action Plans (AAPs) for those areas. A Retail Health Check report was also carried out in 2010 which provided baseline planning data for use in reviewing and monitoring Core Strategy and the development of future DPD's. Data was gathered to inform the development of retail policies in the emerging DMLP and SALP for the diversity of centres by use class, retail proportions of essential and convenience units, and comparison and location of</p>	<p>There are no significant differences. The overall strategy is not affected. The boundaries of all 'retail centres', and primary and secondary frontages, will need to regularly monitored and reviewed.</p> <p>The Government is considering introducing pd rights to allow a range of buildings to convert temporarily to a set of alternative uses including shops (A1), financial and professional services (A2), restaurants and cafes (A3) and offices (B1) for up to two years. It is not clear what the pd rights would entail, however, this could impact on the identification of town centre boundaries, and primary and secondary frontages, which are requirements of the NPPF.</p>

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		<p>vacant premises in each centre.</p> <p>The AAPs for Dalston and Hackney Central, and the emerging DMLP, identify primary and secondary shopping frontages. The Hackney Wick AAP also identified the possibility for designating a Local Centre in the future. These proposals are now being considered by the London Legacy Development Corporation (LLDC) who is now the planning authority for the area covered by the AAP.</p>	
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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?
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).	<i>Do your policies align with the objectives of para 28?</i>	N/a	N/a

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, <i>particularly in rural areas? (34).</i></p> <p><i>Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</i></p>	<p>The Plan promotes the use of public transport, cycling and walking, and meeting the mobility requirements of all users, and seeks to reduce the need to travel by private vehicle.</p> <p>The Plan does not set local car parking standards, London Plan standards are referred to.</p> <p>The standards set out in the London Plan support sustainable development, allowing for higher density development close to areas of strong public transport accessibility and reducing the need for car parking. The Core Strategy is consistent with this approach, and the approach is consistent with the other elements of the Framework in the London context.</p>	<p>The Plan is consistent with the NPPF and the overall strategy is not affected.</p> <p>Changes to pd rights for changes from B1 (a) to C3 could have a significant impact on requirements for car parking across the Borough, as such can not be overseen by the planning system. The Government is proposing prior approval of certain matters under these pd rights, however, there will be a level of expectancy by developers for car parking to serve residential developments. This could have a significant impact on sustainable transport policies.</p>

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		<p>The Council has worked with the GLA and TfL to ensure the adequate provision of transport infrastructure in the Borough (eg the delivery of London Overground and improvements to the North London Line, and the Plan sets out that the Council will continue to do so (eg safeguarding for Crossrail 2).</p>	
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5.Supporting high quality communications infrastructure (paras 42-46)			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>N/a</p>	<p>N/a</p>

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> a) five years or more supply of specific deliverable sites; b) an additional buffer of 5% (moved forward from later in the plan period), or c) 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].</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>Hackney has consistently met and exceeded its London Plan targets.</p> <p>The Plan and the updated housing trajectory in the Annual Monitoring Reports (AMR) 2010-11 and 2011-12 identify tranches of five year housing supply (now from 2012 in three tranches of 5 years). An additional buffer of 5 years supply moved forward from later in the Plan period is not needed as the trajectory shows that we will deliver 39% above the existing London Plan target during the current 5 year phase. The Council does not have a record of under-delivery so a buffer of 20% is not required.</p> <p>The supply does include an element of windfall sites, although the updated trajectory in the 2011-12 AMR indicates less reliance on windfall sites given the allocation of sites in</p>	<p>The Plan is consistent with the NPPF and the overall strategy is not affected. The housing supply and its delivery will be regularly monitored through the production of AMRs.</p> <p>Changes to pd rights for changes from B1 (a) to C3 could affect the identification of the housing pipeline supply as many new housing units can not be identified through the planning process. In effect, as Hackney meets and is planned to meet its housing targets, there could well be an over-supply of housing not supported by contributions for supporting infrastructure. This is considered inconsistent with the advice set out by the Government in its NPPF.</p>

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		<p>the SALP and AAPs. With regard to windfall sites, these are a legitimate component of housing supply in view of the characteristics and densely built up nature of the Borough and that the majority of housing is delivered through a large number of relatively small developments that can not be identified. Because the actual location and size of such schemes cannot always be predicted, but are an important source of supply they are identified as one component of the trajectory for the final ten years of the plan period to reflect prevailing development trends in a Borough such as Hackney. This case was accepted by the Inspector during examination of the Plan.</p>	
<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>A housing trajectory is prepared annually as above, and the Plan sets out a succinct implementation strategy that is on-going. The removal of national brownfield targets does not impact on housing supply as all of Hackney’s development sites are on brownfield land.</p>	<p>The Plan is consistent with the NPPF and the overall strategy is not affected.</p>

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<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>The Plan contains policies requiring affordable housing (specifically Policy 20). These do not need to be reviewed as the threshold of 10 units set out in CS20 is consistent with London Plan policy 3.13.</p> <p>Housing policies are based on up to date objectively assessed evidence base studies, the Housing Needs Assessment 2009, Strategic Housing Market Assessment 2010, and Affordable Housing Viability Study 2009.</p>	<p>Changes to pd rights for changes from B1 (a) to C3 would mean that that the Council would not be able to seek affordable housing in such development scenarios.</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>N/a</p>	<p>N/a</p>
	<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>N/a</p>	<p>N/a</p>

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<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>N/a</p>	<p>N/a</p>
<p>7. Requiring good design (paras 56-68)</p>			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>			

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>Chapter 4 'Delivering Sustainable Growth', Chapter 5 'Supporting Neighbourhoods and Communities, and Chapter 6 'Dynamic and Creative Economy' contain policies addressing community facilities and local services.</p> <p>Essentially, policies CS 7, 8, 9, 10, 11, and 12 seek to protect and promote the improvement of integrated community facilities and services, such as health provision and other social infrastructure. The spatial strategy seeks to ensure that through policy 13 and the above policies that services are generally provided in an integrated manner within the Borough's network of 'town centres', where accessibility and other infrastructure is at its strongest.</p> <p>The emerging DMLP policies, and</p>	<p>The Plan is consistent with the NPPF and the overall strategy is not affected.</p> <p>Changes to pd rights for changes from B1 (a) to C3 could mean that housing is developed without the ability of the Council through the planning system to oversee the provision of adequate supporting infrastructure, and lead to unsustainable development. This is contrary to the NPPF.</p>

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		<p>policies in the AAPs, reinforce these Core Strategy policies, and the Infrastructure Delivery Plan is regularly reviewed to see how the Council can best implement these policies.</p>	
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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 Plan identifies and protects open spaces in the Borough, (although allows for some appropriate development on ‘amenity green spaces’). It does not specifically identify Local Green Spaces as set out in the NPPF. The NPPF states that the designation of Local Green Spaces should come from the community through the Neighbourhood or Local Plan process, so it is possible that such designations could be made in a Neighbourhood Plan should any come forward within the Borough.</p>	<p>The Plan is consistent with the NPPF and the overall strategy is not affected.</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>N/A – Hackney does not contain Green Belt land.</p>	<p>N/a.</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? (89)</i> (PPG2 referred to 'major existing developed sites')</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>		
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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?
<p><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>	<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>The spatial strategy in the Plan directs most new development to existing centres where public transport accessibility is strong, and which reduce the need to travel by private vehicle, and which facilitate relatively high density development which allows economies of scale for the provision of low carbon buildings and energy systems.</p> <p>The Plan supports energy efficiency improvements to existing buildings (policy CS29).</p> <p>The Plan contains policy (CS29) based on the Government's zero carbon buildings policy and nationally described standards (Code for Sustainable Homes and BREEAM). The AAPs for Dalston and Hackney Central articulate this policy further specific to these locations, as will the emerging DMLP on a Borough wide basis.</p>	<p>The Plan is consistent with the NPPF and the overall strategy is not affected.</p> <p>Changes to pd rights for changes from B1 (a) to C3 could mean that the Council could not, through the CS, oversee via the planning system sustainable design and construction of residential buildings.</p>

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<p>Help increase the use and supply of renewable and low carbon energy (97).</p>	<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>The Plan contains policies (CS29 and CS30) promoting energy from renewable and low carbon sources, and the AAPs for Hackney Central and Dalston include detailed policies to promote this too, as does the emerging DMLP.</p> <p>The Plan under CS1, CS4, CS5 and CS30 identifies suitable areas for such sources and supporting infrastructure, mainly centres such as Dalston, Hackney Central and Hackney Wick, and estate renewal areas such as Woodberry Down. The AAPs also identify sites for such uses and the need for supporting infrastructure.</p>	
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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>The Plan does not identify any Nature Improvement Areas.</p>	<p>The Plan is consistent with the NPPF and the overall strategy is not affected.</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.			

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>

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>	The production of other Development Plan Documents (DPDs) can be clearly justified. The Core Strategy is the strategic spatial document for the Borough, part of the Local Development Framework introduced under the 2004 Planning Act. One key purpose of the LDF system was to make it easier to produce and review development plans through producing several plans, with the Core Strategy as the overarching strategic document. The CS identifies the need for the production of more detailed planning policy, ie the DMLP to provide detailed development management policy (consistent with para 154 of the NPPF on providing policies for clear decision-making) and the SALP (identifying development sites to implement the CS, consistent with para 157 of the NPPF re	The Plan is consistent with the NPPF and the overall strategy is not affected.

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		<p>allocating sites). Other DPDs have been adopted (AAPs for Dalston, Hackney Central, Hackney Wick and Manor House). Supplementary Planning Documents (SPDs), both existing and proposed, are needed to add further guidance to assist in making successful applications and in infrastructure delivery.</p>	
<p>Local Plans should:</p> <ul style="list-style-type: none"> Plan positively (para 157) 	<p><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></p>	<p>As per the responses to this checklist above, development needs have been objectively assessed.</p> <p>This Plan has been adopted prior to the production of the NPPF and as such the 'Duty to Co-operate' is not applicable in this instance, however, extensive engagement occurred with key stakeholders throughout the course of the production of the document.</p>	<p>The Plan is consistent with the NPPF and the overall strategy is not affected.</p>

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	Applications assessed against the Plan are reviewed by a Crime Prevention Design Advisor from the Met Police.	The Plan is consistent with the NPPF and the overall strategy is not affected.
<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>Viability assessments to inform Plan policies have been undertaken in relation to key elements such as affordable housing policies, employment policies, and retail policies. Policy application on development schemes in many cases takes into consideration financial viability where relevant, such as for affordable housing and employment floorspace provision, as are the levels of planning contributions sought. Viability assessments are based on a residual appraisal factoring in the normal cost of development, on-site mitigation and standard expected developer profit.</p>	The Plan is consistent with the NPPF and the overall strategy is not affected.

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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>As above, key policies have been subject to viability assessment, and where relevant development schemes are subject to viability assessments to ensure that the application of Plan policies, together with other policies (eg Planning Contributions SPD). The flexibility of the Plan to factor in viability, which is exercised in the assessment of planning applications, means that the implementation of the development plan is not at risk. Further viability work will be carried out across the range of policy documents as further documents are progressed, eg this Plan, the CIL Charging Schedule, the DMLP, and a reviewed Planning Contributions SPD.</p>	<p>The Plan is consistent with the NPPF and the overall strategy is not affected. Further viability assessment of the Council's full range of planning policy documents will be undertaken as those documents progress.</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>	As per other responses to this checklist above, the Plan has been prepared based on objectively assessed development needs and infrastructure requirements.	The Plan is consistent with the NPPF and the overall strategy is not affected.

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

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 traveller's accommodation needs with travellers themselves, their representative bodies and local support groups?	The Plan policy on gypsies and travellers, CS23, was based on pre-NPPF planning policy guidance and procedure, with need for traveller pitches being identified for London as a region by the GLA through the London Gypsy and Traveller Accommodation Needs Assessment (LGTANA, 2008). This identified the need for a further 13-34 pitches in the Borough (the Borough already has 5 existing authorized sites for travelers). The NPPF has now changed that process, so that local authorities need to assess their own need to provide for gypsies and travelers. This need is now being assessed by the Council together with key stakeholders to seek to accommodate this need. Given this Plan was adopted pre NPPF, the policy is based on LGTANA needs and it will take some time to quantify current local needs.	The Plan policy is consistent with the NPPF and Guidance in that existing sites are protected and suitable sites will be brought forward to meet need. The overall strategy is not affected. Work to identify current and future needs is underway and on-going, and the identification and delivery of sites should also be seen as a parallel process to that of plan-making.

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		Regardless policy CS23 is still appropriate in that it seeks to resist the loss of existing sites and bring forward suitable sites to meet needs.	
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>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>	This underpinned policy 23 of the adopted Plan. In assessing current and future local needs, the Council will work with neighbouring planning authorities, and key stakeholders including the traveller community. The development of such robust evidence base is underway and on-going.	The development of evidence base of current and future need will be done in co-operation with all relevant key stakeholders as identified. The overall Core Strategy is not affected, such work on identifying and delivering sites and pitches is part of the implementation of the strategy.

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)	As above, this work is underway and on-going.	As above.
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?	Any constraints are being identified as above, if there is a requirement for and agreement for a joint plan then this will be undertaken.	As above, the overall strategy and policy is not affected. Consideration of the need for any joint plan will be given and agreed with neighbouring authorities where relevant.

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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>Pitch and plot ratios will be assessed as part of the development of the evidence base.</p>	<p>The overall strategy and policy is not affected.</p>
<p>Protect local amenity and environment.</p>		<p>This will be considered as part of the development of the evidence base and the identification of sites, which is informed by Plan policy CS23.</p>	<p>The overall strategy and policy is not affected.</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>As above responses.</p>	<p>The overall strategy and policy is not affected.</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>As above, this will be considered as part of the development of the evidence base and the identification of sites, which is informed by Plan policy CS23.</p>	<p>The overall strategy and policy is not affected.</p>

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?	N/a	N/a	N/a

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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 traveller's 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?	N/a	N/a

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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	N/a	N/a

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)?</p> <p>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?</p> <p>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?</p> <p>NB Mixed use should not be permitted on rural exception sites</p>	<p>This will be considered as part of the development of the evidence base and the identification of sites, which is informed by Plan policy CS23.</p>	<p>The overall strategy and policy is not affected.</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

Summary Checklist

NPPF Policy	Are Core Strategy Policies compliant?
The presumption in favour of sustainable development and core planning principles	The CS policies are compliant with the NPPF.
Building a strong, competitive economy	The CS policies are compliant with the NPPF requirements.
Ensuring the vitality of town centres	The CS policies are compliant with the NPPF requirements.
Promoting sustainable transport	The CS policies are compliant with the NPPF requirements.
Delivering a wide choice of quality homes	The CS policies are compliant with the NPPF requirements.
Promoting healthy communities	The CS policies are compliant with the NPPF requirements .
Meeting the challenge of climate change flooding and coastal change	The CS policies are compliant with the NPPF
Conserving and enhancing the natural environment	The CS policies are compliant with the NPPF requirements.
Conserving and enhancing the historic environment	The CS policies are compliant with the NPPF requirements.
Local Plans	The Core Strategy is consistent with the NPPF requirements.
Using a proportionate evidence base	The Core Strategy is consistent with the NPPF requirements. Further viability assessment of the Council's full range of planning policy documents will be undertaken as those documents progress.
Examining local plans	The Core Strategy is consistent with the NPPF requirements.
Travellers - using evidence to plan positively and manage development	The CS policy CS23 is consistent with the NPPF requirements in that existing sites are protected and suitable sites will be brought forward to meet need. Work to identify current and future needs is underway and on-going,

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	and the identification and delivery of sites should also be seen as a parallel process to that of plan-making.
Planning for traveller sites	The CS policy CS23 is consistent with the NPPF requirements.
Mixed planning use traveller sites	The CS policy CS23 is consistent with the NPPF requirements.