Appendix 2

Local Plans and the National Planning Policy Framework

Compatibility Self-Assessment Checklist

London Borough of Hackney Saved UDP policies

This checklist which will help you assess the content of your new or emerging local plan[1] 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.

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[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.

1

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?
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).	*Does the plan positively seek opportunities to meet the development needs of the area?*	While at present most of the UDP policies have not been 'saved' since the adoption of the Core Strategy, overall, the context of the UDP could be considered to support a presumption in favour of sustainable development, although not to the same degree as the Core Strategy. The Plan sets out to ensure that the development needs for the provision of housing are met (provision of 6,000 new homes), providing for economic activity through ensuring the supply of employment land and floorspace and protecting the commercial role of retail centres, directing office growth to centres, ensuring sustainable environmental issues are addressed through the development process (impact on	Taken as a whole, and disregarding that many of the UDP policies have been deleted, the UDP overall can be considered to support a presumption in favour of sustainable development. However, some saved UDP policies will need to be given less weight as full 'development plan' policies, or disregarded, as set out within this checklist.

2

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<tr><td></td><td></td><td>the environment, sustainable design and construction, reduced energy use etc), the need for the protection and provision of open space, and the need to ensure adequate social and physical infrastructure to support development. (The UDP also allocated a number of development sites across the Borough).</td><td></td></tr>
<tr><td></td><td>*Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)?*</td><td>The key elements of policies on housing, employment and retail have not been subject to a rigorous objectively assessed needs assessment in the same way as Core Strategy policies. However, many key UDP policies have not been saved, such as H10 relating to the provision of affordable housing, policies relating to the designation of employment land, and policies on retail land and floorspace. However, the key elements of the Core Strategy have been subject to objectively assessed needs, and the resultant saved UDP policies are compliant with those Core Strategy policies as determined through examination in public.

The Plan is not supported by a robust infrastructure delivery plan.</td><td>Objectively assessed needs for employment land and floorspace have been carried out for Core Strategy employment policies 16, 17 and 18, particularly regarding demand, supply and designation of such land. UDP policies relating to the designation of employment land have been deleted, and the retained saved UDP policies are more development management style policies controlling impacts of uses and therefore not requiring a needs assessment. As such, the respective saved UDP policies can be retained while the emerging DMLP gains material weight and has been adopted. As such the overall strategy is not affected.

All but two UDP housing policies have been deleted and replaced by objectively assessed housing</td></tr>
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3

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needs policies in the Core Strategy, and the overall strategy is not affected. Saved UDP policies can be retained until the DMLP has been adopted.

Regarding saved UDP retail policies, policy R3 complies with policy 13 of the CS which is based on an objective needs assessment for retail and leisure uses in the Borough.
Policy R6 has been superseded in both Dalston and Hackney Central AAP areas which set out the primary and secondary shopping frontages for those centres. The Core Strategy has introduced Finsbury Park as a District Centre which is not reflected in the UDP or its Proposals Map, and the DMLP identifies a secondary shopping frontage for the Centre. The saved UDP policy now only relates to Stoke Newington District Centre, and it's resistance to non-retail uses is not consistent with an up-to-date survey of the identified Core Shopping Area (the DMLP sets out that 60% in the primary shopping frontage should be retail, based on the assessment of current percentage of retail use there). CS policy 13 allows

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			for flexibility of uses in Stoke Newington. As such, although there is not a significant difference between R6 and the NPPF, which requires the identification of primary and secondary frontages in centres, the policy is not compliant with current information and Core Strategy policy and thus should be deleted, with weight given to CS13 and DMLP policy DM9.
			Saved UDP policy R7 – this policy relates to policy R6 which is identified for deletion as above, and policy R8 which is not a saved UDP policy in any case (replaced by CS13). This is not generally consistent with Dalston and Hackney Central AAPs, which identify primary and secondary frontages (and are NPPF-compliant), or DMLP policies 9 and 10 which also identify frontages, and thresholds for retail use in Local Shopping Centres, because policies in those documents allow for changes of use away from retail based on retaining a percentage of retail uses, rather than R7 which allows a change if "appropriate to a shopping centre in terms of function, mode of operation and appearance. Overall though, it

			does facilitate flexible uses in Centres which the NPPF, the Core Strategy and DMLP policies require, so this policy does not affect the overall strategy, but limited weight should be given to it given the conflict with primary and secondary frontage policies in the AAPs and DMLP.

Saved UDP policy R9 – allows for flexibility in the consideration of alternative uses for redundant shop units, generally NPPF compliant, but does not reflect the need for proposals to factor in 'market signals' (this is contained within DMLP policy DM10). However, CS policy 13 needs to be factored in which aims to protect 'essential shops' and community services. As such, limited weight should be given to this policy, weight will need to be given to CS13 and DM10. |
| | *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).* | The UDP does not contain a model policy, the essence of the Core Strategy is the presumption in favour of sustainable development, the model policy will be picked up in the next review of minor changes to the CS. | The rest of the saved UDP retail policies are more 'development management' style policies for considering the impacts of certain uses, and as such an objective needs assessment is not relevant. As such, these policies can be retained.

Change to be picked up in minor |

			revisions to the Core Strategy.

The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)		For many of the core principles, the UDP is generally consistent – it seeks to support the delivery of housing, business and other development needs, it seeks high quality design and a good standard of amenity, includes policy for the use of renewable energy and recycling, seeks to conserve and enhance the natural environment, seeks to conserve heritage assets, promotes the improvement and use of public transport and cycling and walking, seeks the protection and delivery of community services, takes account of the different role and characters of areas to some degree, and supports housing as part of mixed-use development to some degree. It does not explicitly support the re-use of brownfield land in the Borough, but as all development land in Hackney is on brownfield land then implicitly the Plan is consistent with the core principles. The Plan was probably not developed with the same level of joint-working, co-operation and engagement with the community and key stakeholders as the Core Strategy, and less of a	Overall, disregarding the deletion of many of the policies, the UDP can be considered to be consistent with the NPPF with some differences. As regards saved UDP policies, generally they are consistent with these core planning principles in the NPPF.

		creative process in place-shaping. An assessment against these core land-use principles is essentially contained within the further assessment set out below. The Plan as a whole can not be considered to take account of market signals, or to proactively drive and support economic development.	

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).	*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)?*	Overall, the UDP can not be said to have a clear economic vision for the Borough, although it does seek the protection of employment land, enhancement of the Borough's 'town centres', and office development in South Shoreditch. The saved UDP policies, however, do not allocate employment sites, the relevant policies have been deleted. Employment sites are allocated through the CS, which has a clear economic vision to positively encourage sustainable economic growth, address unemployment and increase the employment offer in the Borough. The CS is based on an up to date assessment of the deliverability of allocated employment sites to meet local needs (the Atkins Employment Study 2006, updated in 2010).	Overall, the UDP as whole can not be considered to be consistent with the NPPF in this regard. However, the allocation of employment sites and other key employment and economic policies are contained within the Core Strategy, the saved UDP policies are not affected, although some of the retail policies are affected as set out above in section 1A.

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).	*Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses?* *Have you identified primary and secondary shopping frontages?*	The UDP set out a hierarchy of 'retail centres', Major, District and Local Centres, and identified Core Shopping Areas in the Major and District Centres. These centres are part of the Core Strategy, and an assessment of the boundaries and needs for town centre uses were considered as part of preparing the Plan for adoption. The extent of boundaries, and town uses, was also considered in Dalston and Hackney Central AAPs, which also identify primary and secondary shopping frontages in those respective centres. The DMLP identifies frontages for Stoke Newington and Finsbury Park District Centres. The boundaries of centres are regularly reviewed. Saved UDP polices R6 and R7 are the relevant polices here, the application of these policies is set out in 1A above.	As set out in 1A above, saved policy R6 should be deleted and R7 given limited weight.

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).	*Do your policies align with the objectives of para 28?*	N/a	N/a

13

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?**
Policies that facilitate sustainable development but also contribute to wider sustainability and health objectives (29). 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).	*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).* Has it taken into account how this relates to other policies set out elsewhere in the Framework*, particularly in rural areas? (34).* *Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?*	There are no saved UDP transport related policies, although the deleted policies did address issues such as the need to support sustainable forms of transport and guiding development to locations which minimize the need for unnecessary car commuting or make the most of public transport. The UDP did contain local parking standards, but London Plan car parking standards are now used.	There are no saved UDP transport policies, as such there are no differences, transport policies and sustainable spatial strategy are contained in the Core Strategy.

5.Supporting high quality communications infrastructure (paras 42-46)			
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.		N/a	N/a

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?**
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 *5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47).*	*What is your record of housing delivery?* *Have you identified:* 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].* *Does this element of housing supply include windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?*	The UDP does not identify a housing supply as required by the NPPF. Hackney has consistently met and exceeded its London Plan targets. The Core Strategy 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). 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 the SALP and AAPs. There is compelling evidence to justify the inclusion of windfall sites.	Housing supply is supported policy-wise by the Core Strategy and monitoring of delivery is carried out through the AMR. The two saved UDP policies, H012 and HO15, are not affected.

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).	*To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?*	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 and brownfield targets does not impact on housing supply as all of Hackney's development sites are on brownfield land.	As above.
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)	*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*	Saved UDP policy in the UDP (HO10) on affordable housing has been deleted. The CS 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.

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. | As above. |
| 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). | *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?* | N/a | N/a |

	Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)	N/a	N/a
In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	*Examples of special circumstances to allow new isolated homes listed at para 55 (note, previous requirement about requiring economic use first has gone).*	N/a	N/a

7. Requiring good design (paras 56-68)

There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.			Design policies are contained in the Core Strategy plus draft DMLP, there are no saved UDP policies in this regard.

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?**
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	*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?*	Most UDP policies regarding the promotion of healthy community facilities have been deleted apart from two Saved UDP policies, CS8 and CS9, which promote the provision of places of worship to meet the needs of the community, and for childcare facilities to be a feature of new development. The Core Strategy however has policies addressing the provision of community facilities and other local services. Chapter 4 'Delivering Sustainable Growth', Chapter 5 'Supporting Neighbourhoods and Communities', and Chapter 6 'Dynamic and Creative Economy' contains policies that seek to ensure that Council services and other public, voluntary and community sector partners work together to deliver new or enhanced social infrastructure, education and healthcare services in Hackney where the	The Saved UDP policies alone do not deliver all the relevant NPPF objectives, however, the Core Strategy and Saved UDP policies together deliver the NPPF policy objectives. The emerging DMLP will eventually replace the Saved UDP policies once adopted and contribute to delivering NPPF objectives on promoting healthy communities.

| | | evidence demonstrates they are most in need and growth areas. The emerging DMLP policies (e.g. DM5 Protection and Delivery of Social and Community Facilities), and 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. | |

Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	*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).*	Local Green Space Designation is a new concept introduced by the NPPF and therefore the UDP does not contain a policy to enable local and neighbourhood plans to identify 'Local Green Space'. The Core Strategy 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 one come forward.	The Plan is consistent with the NPPF and the overall strategy is not affected.

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?**
The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82) 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). Boundaries should be set using 'physical features likely to be permanent' *amongst other things* (85)	If you are including Green Belt policies in your plan, do they accurately reflect the NPPF policy? For example: Lpas should plan positively to enhance the beneficial use of the Green Belt. *Beneficial uses are listed in para 81.* 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. Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (85).	N/A – Hackney does not contain Green Belt land.	N/a.

	Does it allow for the extension or alteration of a *building*, provided that it does not result in disproportionate additions over and above the size of the original building? (89). *PPG2 previously referred to dwelling. Original building is defined in the Glossary.* Does it allow for the replacement of *a building, provided the new building is in the same use and not materially larger than the one it replaces? (89)* PPG2 did not have a separate bullet point – *replacement related to dwellings rather than buildings.* *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)* (PPG2 referred to 'major existing developed sites')		

	Change from 'Park and Ride' in PPG2 to *local transport infrastructure* and the inclusion of *'development brought forward under a Community Right to Build Order'* 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).		

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?**
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).	*Have you planned new development in locations and ways which reduce greenhouse gas emissions?*	The first strategic policy of the UDP 'ST1' states that the Council will welcome new development where it is most appropriate and of most benefit to local needs and/or to the wider needs of London, provided that it does not have an unacceptable detrimental impact on local amenity or the environment. Other strategic policies such as ST5 and ST18 state that in implementing all policies regard should be had to the efficient use of energy and promotion of an environmentally sustainable pattern and form of development. The Core Strategy also 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.	The Core Strategy and Saved UDP policies both deliver the NPPF objectives. The overall strategy is not affected.

25

	Does your plan actively support energy efficiency improvements to existing buildings?	There is no relevant Saved UDP policy which supports energy efficiency improvements to existing buildings however CS Policy 29 of the Core Strategy 'encourages the retrofitting of water efficient devices and energy saving equipment to existing residential, industrial or commercial premises'.	
	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)	There is no relevant Saved UDP policy which addresses the Government's zero carbon buildings policy however CS policy 29 adopts the Code for Sustainable Homes (CSH), which is the national standard guiding industry in the creation of residential property with a lower carbon footprint. There is a requirement for new homes approved in 2013 to achieve Level 4 CSH standards, and new homes approved from 2016 to achieve Level 6 CSH standards (i.e. a 'zero carbon home'). BREEAM standards apply for non-residential buildings.	
Help increase the use and supply of renewable and low carbon energy (97).	*Do you have a positive strategy to promote energy from renewable and low carbon sources?*	The UDP had a now deleted policy which allowed the harnessing of renewable energy provided there was no unacceptable environmental or visual intrusion. The Core	

	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)	Strategy however has policies (CS29 and CS30) which more clearly promote energy from renewable and low carbon sources, and the AAPs for Hackney Central and Dalston included detailed policies to promote this too, as does the emerging DMLP. There are no areas allocated in the UDP however the Core Strategy 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.

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?**
Planning policies should minimise impacts on biodiversity and geodiversity (para 117). Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).	*If you have identified Nature Improvement Areas, have you considered specifying the types of development that may be appropriate in these areas (para 117)?*	The Plan does not identify any Nature Improvement Areas, however Saved UDP Policy OS15 states that development will not be permitted close to the proposed Walthamstow Reservoirs Special Protection Area, or within or close to sites of Special Scientific Interest and Local Nature Reserves unless it can be shown that there would be no significant damage to the nature conservation interest. CS Policy 27 'Biodiversity' also seeks to protect, conserve and enhance nature conservation areas and biodiversity.	Nature Improvement Areas are not identified in the Plan. Saved UDP Policy OS15 as well as the Core Strategy and emerging DMLP help deliver the NPPF objectives.

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.		The UDP contains several saved policies for conserving and enhancing the historic environment (EQ13, 14, 15, 17, 19) however these will eventually be replaced by policies in the emerging DMLP regarding extensions, alterations, demolition within conservation areas and in relation to listed buildings and other heritage assets, which more clearly reflect the objectives of the NPPF. Policies regarding the protection of conservation areas and listed buildings are also contained within the Core Strategy.	The Saved UDP policies meet NPPF requirements, and support CS policy.. The overall strategy is not affected.

29

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?
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).	*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).*	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)	*Are you able to clearly justify the use of additional DPDs if this is the approach that you are pursuing?*	The saved UDP polices are interim until replaced by more up to date policies recently consulted on, ie the DMLP. This latter document is required to provide more detailed development management policies to the more strategic Core Strategy policies, as per the LDF system introduced in the 2004 Planning Act (and consistent with para 154 of the NPPF on providing policies for clear decision-making). The SALP (identifying development sites to implement the CS) is consistent with para 157 of the NPPF re 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	The 'Local Plan' (ie DPDs) and the production of SPDs meet the NPPF's expectations.

21

		applications and in infrastructure delivery.	
Local Plans should: • Plan positively (para 157)	*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)*	As per responses to 1A above, re objectively needs assessed, and core planning principles.	As per responses to 1A above, re objectively needs assessed, and core planning principles.

22

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 are assessed against the CS and are reviewed by a Crime Prevention Design Advisor from the Met Police. There are no saved UDP policies re design.	CS policy is used, with more detailed policy in the emerging DMLP.
Ensuring viability and deliverability 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)	*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?* *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)?*	Viability assessments of saved UDP policies have not been carried out. However, the UDP policies that have been saved do not require such assessments. Viability assessments to inform CS, AAP and DMLP policies have and will be undertaken.	The Local Plan overall meets or will meet these requirements.

23

| | *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)?* | As above, disregarding saved UDP policies, key policies in the CS, AAPs, DMLP and SALP have and will be subject to viability assessment, and where relevant development schemes are subject to viability assessments to ensure that the application of Local Plan policies, together with other policies (eg Planning Contributions SPD), does not impact viability. The flexibility of the Local 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, the CIL Charging Schedule, the DMLP, and a reviewed Planning Contributions SPD. | The Local Plan overall meets or will meet these requirements. |

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 ….	*Positively prepared*	As per other responses to this checklist above, the UDP was not prepared based on objectively assessed development needs and infrastructure requirements, but the CS, AAPs, and other emerging documents have been.	The Local Plan overall meets or will meet these requirements.

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 relevant UDP Policy has been deleted. The Core Strategy Policy CS23 however 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 Traveler Accommodation Needs Assessment (LGTANA, 2008). This identified the need for a further 13-34 pitches in the Borough (the Borough already has 5 existing authorised sites for travellers). 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	The evidence base is being developed given the recent change in the NPPF, given that local authorities now assess their own need. This will require close engagement with relevant key stakeholders.

		to assess current local needs, but the 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.	Can you demonstrate that you have a clear understanding of the needs of the traveller community over the lifespan of your development plan? Have you worked collaboratively with neighbouring local planning authorities? Have you used a robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions?	This underpinned policy 23 of the adopted Core Strategy. 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.	As above.

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. Consideration of the need for any joint plan will be given and agreed with neighbouring authorities where relevant.

29

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.		Pitch and plot ratios will be assessed as part of the development of the evidence base.	As above.
Protect local amenity and environment.		This will be considered as part of the development of the evidence base and the identification of sites, which is informed by Core Strategy policy CS23.	The overall strategy and policy is not affected. CS policy 23 seeks to protect local amenity and environment.
Set criteria to guide land supply allocations where there is identified need.	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?	As above responses.	As above responses.
Ensure that traveller sites are sustainable economically, socially and environmentally.	Have your policies been developed taking into account criteria a-h of para 11 of the policy	As above, this will be considered as part of the development of the evidence base and the identification of sites, which is informed by Core Strategy policy CS23.	As above responses.

30

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

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

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?**
	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**	This will be considered as part of the development of the evidence base and the identification of sites, which is informed by Core Strategy policy CS23.	As above responses.

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

35

Summary Checklist

NPPF Policy	Are Saved UDP Policies compliant?
The presumption in favour of sustainable development and core planning principles	The Saved UDP policies are consistent with the NPPF requirements.
Building a strong, competitive economy	The UDP as a whole is not consistent with the NPPF however the allocation of employment sites and other key employment and economic policies are contained within the Core Strategy. Some of the Saved UDP retail policies (R6, R7 and R9) are not entirely consistent with the NPPF.
Ensuring the vitality of town centres	Saved UDP policy R6 should be deleted and R7 and R9 given limited weight.
Promoting sustainable transport	There are no Saved UDP transport policies. Transport policies and the sustainable spatial strategy are contained in the Core Strategy.
Delivering a wide choice of quality homes	Housing supply is supported policy-wise by the Core Strategy and monitoring of delivery is carried out through the AMR. The two Saved UDP policies HO12 and HO15 are not affected and are consistent with the NPPF.
Promoting healthy communities	The Saved UDP policies alone do not deliver all the relevant NPPF objectives, however, the Core Strategy and Saved UDP policies together deliver the NPPF policy objectives. The emerging DMLP will eventually replaced the Saved UDP policies once adopted and contribute to delivering NPPF objectives on promoting healthy communities.
Meeting the challenge of climate change flooding and coastal change	The Core Strategy and Saved UDP policies both deliver the NPPF objectives.
Conserving and enhancing the natural environment	Nature Improvement Areas are not identified

	in the Plan however Saved UDP Policy OS15 as well as the Core Strategy and emerging DMLP help deliver the NPPF objectives.
Conserving and enhancing the historic environment	The Saved UDP policies are consistent with the NPPF requirements and are also supported by the Core Strategy.
Local Plans	The Saved UDP policies are interim until replaced by more up to date policies recently consulted on (i.e. the DMLP). The 'Local Plan' (i.e. DPDs) and the production of SPDs meet the NPPF's expectations.
Using a proportionate evidence base	There are no Saved UDP policies regarding design and the UDP policies that have been saved do not require viability and deliverability assessments. Design policies are contained with the Core Strategy and viability assessments have been carried out to inform the CS, AAPs and DMLP. The Local Plan overall meets or will meet these requirements.
Examining local plans	The UDP was not prepared based on objectively assessed development needs and infrastructure requirements, but the CS, AAPs and other emerging documents have been.
Travellers - using evidence to plan positively and manage development	The evidence base is being developed given the recent change in the NPPF, given that local authorities now assess their own need. This will require close engagement with relevant key stakeholders.
Planning for traveller sites	As above.
Mixed planning use traveller sites	As above.