



Local Plans and the National Planning Policy Framework Compatibility Draft Self Assessment Checklist

(April 2012)

Haringey Planning Officers have completed this checklist as part of the Council's process in assessing whether the draft Local Plan Strategic Policies are in accordance with the NPPF.

Introduction

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

These elements are highlighted in red and in italics.

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

How will it help?

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

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

This will help you to:

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

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

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.

Why does it matter?

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

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

Who should use it?

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

What it doesn't do

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

What else are PAS doing?

There are more parts to this document to follow, including

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

How should you use it?

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

The checklist has used, wherever possible, the same wording as that set out in the NPPF. However, our focus has been to capture the main 'prompts' that you need to consider while keeping the checklist to a reasonable length. However you should cross-refer

to the NPPF itself whilst going through the checklist. We have provided paragraph references to help you do this.

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

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

How we made it

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

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

What will happen to this document in the future?

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

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

Email: alice.lester@local.gov.uk

Disclaimer

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

1A: Achieving sustainable development

The presumption in favour of sustainable development and core planning principles (para 6-17)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><i>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</i></p>	<p><i>Does the plan positively seek opportunities to meet the development needs of the area?</i></p> <p><i>Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)?</i></p> <p><i>Do you have a policy or policies which reflect the principles of the presumption in favour of sustainable development? A model policy is provided on the Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive).</i></p>	<p>Yes. This is demonstrated in the Local Plan Vision and Objectives and is in line with the Council's Sustainable Community Strategy.</p> <p>Yes – See Local Plan evidence base and Sustainability Appraisal</p> <p>NEW model Policy – Presumption in favour of Sustainable Development to be inserted.</p>	<p>N/A</p> <p>No change</p> <p>Sustainable Development has been the fundamental principle underpinning the Local Plan. The new policy has been introduced to reflect the changes and ensure compliance with the NPPF.</p>

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?
The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)	<ol style="list-style-type: none"> 1. Be genuinely plan-led, empowering local peoples to shape their surroundings 2. Not simply about scrutiny 3. Proactively drive and support sustainable economic development 4. Always seek to secure high quality design 5. Take account of the different roles and character of different areas, and recognising the intrinsic character and beauty of the countryside 6. Support the transition to a low carbon future in a changing climate 7. Contribute to conserving and enhancing the natural environment 	<ol style="list-style-type: none"> 1. Plan has been prepared in consultation with the local community at each key stage of its development. 2. Managed through DM 3. See LP policies SP1 Managing Growth; SP2 Housing; SP8 Employment; SP9 Skills & training; SP10 Town Centres 4. SP11 Design 5. SP12 Conservation and SP13 Open Space and Biodiversity 6. SP4 Working towards a Low Carbon Haringey and SP5 Water management and flooding 7. SP13 Open space & biodiversity 	No change

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	<p>8. Encourage the effective use of brownfield land</p> <p>9. Promote mixed use developments</p> <p>10. Conserve heritage assets in a manner appropriate to their significance</p> <p>11. Actively manage patterns of growth</p> <p>12. Take account of and support local strategies to improve health.</p>	<p>8. SP1 Managing Growth and COI H3 –No. of dwellings on PDL, COI BD2 Floorspace on PDL</p> <p>9. Spatial Strategy (2.1.9), SP8 Employment – Local employment areas, SP10 Town Centres, SP14 Health, SP7 Transport</p> <p>10. SP 12 Conservation, SP11 Design</p> <p>11. SP1 Managing Growth</p> <p>12. SP14 Health and well-being</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>Haringey's Spatial Vision, strategic objectives and spatial strategy set out a clear economic vision and strategy for the borough in accordance with NPPF paragraph 21, bullet point 1. The Core Strategy positively and proactively encourages sustainable economic growth linking deprived areas with the employment benefits arising from the development of major sites and key locations in the borough.</p> <p>Atkins Employment Studies (2008 and update 2012) show the need to protect the defined employment areas in the borough. The employment land hierarchy set out in SP8 identifies employment sites where certain uses are permitted, building flexibility into the plan.</p>	No change.

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>SP10 Town Centres sets out the Council's policy. The policy was informed by the Retail Study for the borough 2008 and complies with NPPF para. 23-27, including a hierarchy and the need to protect town centres.</p> <p>Yes, they are identified on the Proposals Map. Further detail on primary and secondary frontages will be set out in the Development Management Policies.</p>	No change.

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, particularly in rural areas? (34).</p> <p><i>Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</i></p>	<p>SP7 Transport sets out the Policy for Haringey. Maximum parking standards have been retained because they are considered justifiable in a dense urban area with good public transport accessibility. The policy is therefore in line with the NPPF.</p> <p>N/A</p> <p>Yes. Haringey has worked with adjoining authorities through the North London Sub Regional Transport Forum and Transport for London on the provision of viable infrastructure</p>	<p>No change</p> <p>N/A</p> <p>No change</p>

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5. Supporting high quality communications infrastructure (paras 42-46)			
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?
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.		The Local Plan will address this issue in the Development Management Policies	No change

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 <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><i>What is your record of housing delivery?</i></p> <p><i>Have you identified:</i></p> <p>a) five years or more supply of specific deliverable sites; 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>Over the past five years Haringey has been delivering, on average, 10% more housing units than the London Plan (2008) target for Haringey of 680 additional units. This is reflected in the Council's Housing Trajectory and previous Annual Monitoring Reports (AMR).</p> <p>The Housing Trajectory identifies and demonstrates a five and 15-year supply of land for housing from the date of adoption. Drawing from the Strategic Housing Land Availability Assessment (SHLAA) 2009 and other evidence, the Council has identified specific sites to deliver housing in the first five years of the plan.</p> <p>The Council does not rely on windfall sites to meet its housing target. The trajectory shows a demonstrable housing land</p>	<p>To demonstrate that SP2 is in line with the requirements of paragraph 47 of the NPPF, the Council proposes an additional paragraph (after para 3.2.4) as follows:</p> <p><i>'The Council's Housing Trajectory shows a demonstrable housing land supply and is capable of bringing forward additional sites from future years to meet the requirements of an additional 5% buffer, as set out in the NPPF, to ensure future housing needs are met.' In doing this, the Council will seek to enable the development of 861 new houses per year; or 5% above the mayor's target of 820 units per year'</i></p>

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		supply for 15 years.	
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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).	<i>To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?</i>	The removal of national and regional brownfield targets will have little impact on housing land supply in Haringey.	
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)	<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>Policy SP2 provides for high quality design, affordable and suitable housing to meet the needs of a growing and diverse population, in line with paragraph 50 of the NPPF. SP2 makes clear that off site provision of affordable housing will only be considered in exceptional circumstances where it may be preferable to on-site provision.</p> <p>The North London sub-region Strategic Housing Market Assessment (2011) sets out the overall amount of housing required in the borough in the first five years of the Plan, and informs the housing mix, household size, the need for, and level of, specialist housing to be provided to meet the borough's housing need. The Affordable Housing Viability Study 2010 shows that the policy requirements are viable.</p>	No change.

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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).	<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>	N/A	N/A
	<i>Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)</i>	The Local Plan does not have a specific policy relating to inappropriate development of residential gardens. This will be addressed in the Development Management Policies. This will also reflect the approach set out in the London Plan (2011).	No change.
In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	<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>	N/A	N/A

7. Requiring good design (paras 56-68)			
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?
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.		SP11 - Design	No change

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>Strategic Policy 14 (SP14) sets out that the Council will work strategically to improve health and well being in the borough.</p> <p>Policy SP16 Community Facilities sets out that the Council will work with its partners to ensure that the appropriate improvement and enhancements of community facilities and services are provided for Haringey's communities, including in areas of health, education, social care, libraries, open spaces, community and youth facilities, leisure, emergency services, transport, waste, water supply and sewerage, and energy and telecommunications services.</p> <p>SP13 protects open space and biodiversity.</p>	No change

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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 Core Strategy allows the Council to introduce other green space designations (see first bullet point of SP13). The mechanism and consideration of these will be considered within the Council's Open Space Hierarchy and set out in other local plan documents, e.g. the Development Management Policies.</p>	<p>No change.</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? For example:</p> <p>LPA's 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>SP13 sets out the Council's objective to protect Green Belt and strongly resist any inappropriate development there. This is in line with the requirements set out in Section 9 of the NPPF.</p> <p>Within Haringey an area of the Lee Valley Regional Park is strategically designated as Green Belt. It provides a range of sporting, nature conservation and recreational activities for both residents of the borough and visitors alike. The LVRP Plan (2000) sets out its vision for the park as a cohesive, sustainable and valued regional green lung, with emphasis on the biodiversity and water assets of the area.</p>	<p>In paragraph 6.3.9 of the Local Plan replace reference to PPG2 Green Belts with paragraphs 79 – 92 of the NPPF.</p> <p>In paragraph 6.3.11 of the Local Plan remove reference to PPG2 Green Belt.</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>	N/A	
	<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>	N/A	
	<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>	N/A	

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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?
<i>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).</i>	<p><i>Have you planned new development in locations and ways which reduce greenhouse gas emissions?</i></p> <p><i>Does your plan actively support energy efficiency improvements to existing buildings?</i></p> <p><i>When setting any local requirement for a building's sustainability, have you done so in a way that is consistent with the Government's zero carbon buildings policy and adopt nationally described standards? (95)</i></p>	<p>SP4 sets out the Council's policy of working towards a low carbon Haringey. Buildings need to meet Code for Sustainable Homes Level 4 or BREEAM 'very good'. All residential buildings will need to be zero carbon from 2016 and non-residential by 2019 in line with the Government's zero carbon policy.</p> <p>SP5 sets out the policy on water management and flooding. A joint SFRA stage 1 has been carried out for the borough (and adjoining boroughs) with a sequential test for development in the Haringey Areas of Development. A Surface Water Management Plan will be produced for the borough. SP5 reflects the need to guide development away from areas at greatest risk of flooding with the use of the Sequential Test.</p>	<p>Minor change.</p> <p>To be in line with the NPPF and to reflect up to date Building Regulations, the Council are proposing the following change to SP4 1a:</p> <p><i>"From 2011 onwards, all new residential development will achieve a minimum 44% 25% reduction in total (regulated) CO2 emissions in line with..."</i></p> <p>The following change to be made to paragraph 4.1.14:</p> <p><i>"The equivalent of CO2 reduction targets in Code Level 4 for Sustainable Homes is 44% 25% reduction in total regulated CO2 emissions in comparison with total emissions from a building which complies with 2006 10 Building Regulations".</i></p>

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		Where this is not possible, the exception Test will be required to ensure safety of the development over its lifespan Further detail will be set out in the DM policies.	
Help increase the use and supply of renewable and low carbon energy (97).	<p><i>Do you have a positive strategy to promote energy from renewable and low carbon sources?</i></p> <p><i>Have you considered identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</i></p>	<p>Decentralised energy systems are to be promoted, where viable, as set out in the NPPF and 20% of energy generation should be from on-site renewable energy.</p> <p>The Council is also in the process of identifying locations for potential decentralised energy network hubs and Muswell Hill has been designated as one of only ten Low Carbon Zones in London.</p>	No change

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 Council has not identified Nature Improvement Areas. SP13 sets out the Council's policy on Open Space and Biodiversity and the need to protect and enhance the natural environment. SP11 also sets out policy in relation to design and the natural environment. The policies set out the need for all development to be designed for the protection and enhancement of the natural environment and biodiversity, in line with the NPPF.</p>	<p>No change</p>

12. Conserving and enhancing the historic environment (paras 126 – 141)			
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?
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.		SP12 Conservation	No change

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).	<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>	N/A	N/A

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 travellers accommodation needs with travellers themselves, their representative bodies and local support groups?	SP3 ensures that existing pitches are protected and maintained, and based on historical demand and evidence (Gypsy and Traveller Accommodation Needs Assessment 2008) the Council aims to provide an additional four pitches up to 2017. These potential sites and their phasing will be identified in the Site Allocations DPD. This will be carried out through early and effective community engagement and robust evidence, and will be in line with requirements set out in the Planning policy for traveller sites and the NPPF.	No change

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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>	See above	
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Policy B: Planning for traveller sites (paras 7-11)			
What the policy for traveller sites expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring lpas (8)	Have you identified, and do you update annually, a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set targets? Have you identified a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. (9)	SP3 ensures that existing pitches are protected and maintained, and based on historical demand and evidence (Gypsy and Traveller Accommodation Needs Assessment 2008) the Council aims to provide an additional four pitches up to 2017. These potential sites and their phasing will be identified in the Site Allocations DPD. This will be carried out through early and effective community engagement and robust evidence, and will be in line with requirements set out in the Planning policy for traveller sites and the NPPF.	No change

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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?	See above	
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.		See above	
Protect local amenity and environment.		The policy sets out the necessary criteria for ensuring good quality sites in suitable locations, with access to education, health, employment, welfare and leisure facilities, in line with the planning policy for traveller sites. This reflects the guidance set out in Planning Policy for Traveller Sites.	

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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?	See above	
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	See above	

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

Policy D: Rural exception sites (para 13)			
What the policy for traveller sites expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
If there is a lack of affordable land to meet local traveller needs, lpas in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers sites.	If you have a lack of affordable land to meet local traveller needs in your rural area have you used a rural exception site policy, and if so, does it make it clear that such sites shall be used for affordable traveller sites in perpetuity?	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?
	<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>SP3 ensures that existing pitches are protected and maintained, and based on historical demand and evidence (Gypsy and Traveller Accommodation Needs Assessment 2008). The Council aims to provide an additional four pitches up to 2017. These potential sites and their phasing will be identified in the Site Allocations document.</p>	<p>No change.</p>

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

Plan-making

Local Plans (paras 150-157)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Each local planning authority should produce a Local Plan for its area. Any additional DPDs should only be used where clearly justified. SPDs should be used where they help applicants make successful applications/aid infrastructure delivery/not be used to add unnecessarily to financial burdens on development (153)	<i>Are you able to clearly justify the use of additional DPDs if this is the approach that you are pursuing?</i>	All references to the Local Development Framework will now be replaced with Local Plan. The Local Plan Strategic Policies is the key strategic document for the borough. Development Management Policies and Site Allocations Documents will support the Local Plan.	No change.

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<p>Local Plans should: Plan positively (para 157)</p>	<p><i>Have you objectively assessed development needs and planned for them?</i></p> <p><i>If you can't meet them in your area, have you co-operated with others on meeting them elsewhere? (para 182)</i></p>	<p>Yes. The development plan is supported by a substantial evidence base and was subject to a sustainability appraisal and public consultation at each stage of the plan making process.</p> <p>n/a</p>	
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Using a proportionate evidence base (paras 158-177)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Defence, national security, counter-terrorism and resilience	See para 163	N/A	N/A

<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><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>The Local Plan is supported by a number of key evidence base including:</p> <ul style="list-style-type: none"> ▪ Affordable Housing Viability Study ▪ Employment studies ▪ Retail Capacity study ▪ Climate change and capacity assessment for sustainable energy demand and supply in new buildings in Haringey ▪ North London Strategic Flood Risk Assessment ▪ Infrastructure Delivery Plan ▪ Sustainability Appraisal <p>All policies have been assessed in the Sustainability Appraisal including the viability and deliverability of options. The Affordable Housing Viability Study assessed the viability on affordable housing, used to inform SP2 Housing.</p>	
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Examining Local Plans (para 182)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Authorities should submit a plan for examination which it considers is sound, including being	<i>Positively prepared</i>	<p>The Local Plan sets out a vision and key policies for the future development of the borough up to 2026. It takes forward the priorities of Haringey's Sustainable Community Strategy and other plans and strategies to identify a vision for Haringey as a place to live, work and visit and contains key policies and an implementation framework to deliver the vision.</p> <p>The Council's overall strategy for managing future growth in Haringey is to promote the provision of homes, jobs and other facilities in the areas with significant redevelopment opportunities at, or near, transportation hubs, and support</p>	No change.

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		<p>appropriate development at other accessible locations, with more limited change elsewhere.</p> <p>The plan has been developed in line with the SCI and has been subjected to public consultation and sustainability appraisal at each stage of the plan development.</p>	
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