



Elmbridge
Borough Council
... bridging the communities ...

Elmbridge Local Plan

Impact of the National Planning Policy Framework on cross references to previous national planning policy within the Core Strategy

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
|------------------------------|-------------------|--|---|--|
| CS1- Spatial Strategy | PPG2, PPG17, PPS3 | The cross reference to PPG2 and PPG17 relates to the Council's commitment to protect and enhance the multifunctional role of the Borough's Green Infrastructure and to work with partners to manage and expand sustainable networks of accessible green space and corridors to, and through, the urban area. | <p>73. The para. makes reference to the need for up to date and robust assessments for the needs for open space, sports and recreation facilities and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is required.</p> <p>75. The para states that planning polices should protect and enhance public rights of way and access. LAs should seek opportunities to provide better facilities for users.</p> <p>81. The para states that LAs should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide</p> | The replacement of PPG2, PPG17 and PPS3 by the NPPF does not have an impact on the reference to these documents in policy CS1. |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| | | <p>The cross reference to PPS3 is with regards to the definition of previously developed land.</p> | <p>opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged or derelict land.</p> <p>The Glossary includes a definition of Previously developed land. Whilst the wording is not identical in all respects, the definition remains unchanged.</p> | |
| <p>CS2- Housing provision, location and distribution</p> | <p>PPS3</p> | <p>The cross reference to PPS3 in the 2nd para. is with regards to making effective use of land by encouraging housing development on previously developed land in accordance with the annual national target of at least 60%.</p> <p>(Since 2004, the Borough achieved 98% housing delivery on Previously developed land)</p> <p>Reference to PPS3 in the housing delivery table (para 6.1) relates to the changes to PPS3 that removed private residential gardens from</p> | <p>17. Whilst there is no longer an annual national target, the Core Planning principles encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided that it is not of high environmental value.</p> <p>Given that the annual target of 60% was so significantly exceeded, the removal of an annual target is not considered to be of relevance.</p> <p>The Glossary includes a definition of Previously developed land. Whilst the wording is not identical in all respects, the definition remains</p> | <p>The replacement of PPS3 by the NPPF does not have an impact on the reference to this document in policy CS2.</p> |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| | | <p>definition of Previously developed land.</p> <p>The cross reference to PPS3 in para 6.3 is with regards to the definition of previously developed land.</p> | <p>unchanged and continues to exclude private residential gardens.</p> <p>The Glossary includes a definition of Previously developed land. Whilst the wording is not identical in all respects, the definition remains unchanged.</p> | |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| CS3- Walton on Thames | PPS25 | Policy refers to the need to take account of relative flood risk when redeveloping land within the settlement area. This is cross referenced to PPS25 which requires LPAs to adopt a sequential risk based approach to determining the suitability of land for development. | 100. The adoption of a sequential risk based approach to the location of development continues to apply. Technical guidance on flood risk published alongside the NPPF sets out how the policy should be implemented. | The replacement of PPS25 by the NPPF does not have an impact on the reference to this document in policy CS3. |
| CS4- Weybridge | PPS25 | Policy refers to the need to take account of relative flood risk when redeveloping land within the settlement area. This is cross referenced to PPS25 which requires LPAs to adopt a sequential risk based approach to determining the suitability of land for development. | 100. The adoption of a sequential risk based approach to the location of development continues to apply. Technical guidance on flood risk published alongside the NPPF sets out how the policy should be implemented. | The replacement of PPS25 by the NPPF does not have an impact on the reference to this document in policy CS4. |
| CS5- Hersham | PPS25 | Policy refers to the need to take account of relative flood risk when redeveloping land within the settlement area. This is cross referenced to PPS25 which requires LPAs to adopt a sequential risk based approach to determining the suitability of land for development. | 100. The adoption of a sequential risk based approach to the location of development continues to apply. Technical guidance on flood risk published alongside the NPPF sets out how the policy should be implemented. | The replacement of PPS25 by the NPPF does not have an impact on the reference to this document in policy CS5. |
| CS6- Whiteley Village | PPG2 | Whiteley Village is located entirely within the Green Belt. The policy allows for infill development within the village boundary provided that this is in accordance with PPG2. This means that any infill should not have an adverse effect on the | 89. The para confirms the Government's commitment to resisting inappropriate development in the Green Belt. Limited infilling in villages is listed as one of the exceptions to this overarching principle. | The replacement of PPG2 by the NPPF does not have an impact on the reference to this document in policy CS6. |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| | | character of the village concerned. Limited infilling within the village boundary would not be considered as inappropriate development within the Green Belt. | | |
| CS7- East and West Molesey | PPS25 | Policy refers to the need to take account of relative flood risk when redeveloping land within the settlement area. This is cross referenced to PPS25 which requires LPAs to adopt a sequential risk based approach to determining the suitability of land for development. | 100. The adoption of a sequential risk based approach to the location of development continues to apply. Technical guidance on flood risk published alongside the NPPF sets out how the policy should be implemented. | The replacement of PPS25 by the NPPF does not have an impact on the reference to this document in policy CS7. |
| CS8- Thames Ditton, Long Ditton, Hinchley Wood and Weston Green | PPS25 | Policy refers to the need to take account of relative flood risk when redeveloping land within the settlement area. This is cross referenced to PPS25 which requires LPAs to adopt a sequential risk based approach to determining the suitability of land for development. | 100. The adoption of a sequential risk based approach to the location of development continues to apply. Technical guidance on flood risk published alongside the NPPF sets out how the policy should be implemented. | The replacement of PPS25 by the NPPF does not have an impact on the reference to this document in policy CS8. |
| CS9- Esher | PPS25 | Policy refers to the need to take account of relative flood risk when redeveloping land within the settlement area. This is cross referenced to PPS25 which requires LPAs to adopt a sequential risk based approach to determining the suitability of land for development. | 100. The adoption of a sequential risk based approach to the location of development continues to apply. Technical guidance on flood risk published alongside the NPPF sets out how the policy should be implemented. | The replacement of PPS25 by the NPPF does not have an impact on the reference to this document in policy CS9. |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| CS14- Green Infrastructure | PPG2, PPG17, PPS9 | The references to PPG17 and PPG2 relates to how a proposal for the development of an open space will be assessed whether it is located within the urban area or the Green Belt. | 73. The para emphasises the importance of access to high quality open spaces and opportunities for sport and recreation to the health and well being of communities. The continued need for a robust and up to date open space assessment is also confirmed. | The replacement of PPG2, PPG17 and PPS9 by the NPPF does not have an impact on the reference to these documents in policy CS14. |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| | | special circumstances which outweigh the harm to the Green Belt would need to be demonstrated if inappropriate development was to be permitted. | 'establishing coherent ecological networks that are more resilient to current and future pressures.' | |
| CS15- Biodiversity | PPS9 | The reference to PPS9 relates to the protection and improvement of all sites designated for their biodiversity value. This principally relates to assessing the impact of development on SSSIs. It means that where a development within or outside a SSSI is likely to have a significant effect permission should not normally be granted. An exception should only be made where the benefits of the development clearly outweigh the impacts. Saved Local Plan Policies ENV31-33 provide a local framework for assessing developments on or affecting national and local sites in accordance with PPS9. | 118. Bullet point 2 of this para sets out a framework for determining development proposals on land within or outside SSSIs where it is likely to have a significant effect. It confirms the approach set out in PPS9. | The replacement of PPS9 by the NPPF does not have an impact on the reference to this document in policy CS15. The saved local plan policies ENV31-33 will be reviewed through the Development Management DPD. |
| CS16- Social and Community Infrastructure | PPS1 | The policy reasons outlines the need to promote the development of community facilities that offer the opportunity for; more sharing between services, financial efficiency; and ensuring a more efficient use of land and buildings as | 70. Bullet point 1 confirms the Government's commitment to securing community facilities that allow services to share buildings. Bullet point 2 confirms Government's intention to prevent the loss of valued facilities where their loss | The replacement of PPS1 by the NPPF does not have an impact on the reference to this document in policy CS16. |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| | | set out in PPS1. The policy also seeks to protect the loss of such facilities from a social or community use where there continues to be a need for such facilities. | would reduce the community's ability to meet its day-to-day needs. | |
| CS17- Local Character, Density and Design | PPS1, PPS1 supplement, PPS3 | The policy reasons make reference to PPS1 and PPS3 with regard to making effective and efficient use of land. They also make reference to the PPS1 supplement on climate change that addresses a wide range of issues, which combine to deliver sustainable development specifically with regards to reducing emissions, and stabilising climate change. | 17. Bullet point 8 confirms that LPAs should make effective use of land by focusing on previously developed land. The overarching aim of the NPPF is to deliver sustainable development. 7. bullet point 3 makes specific reference to the need to mitigate and adapt to climate change including moving to a low carbon economy. 93-99. Paras make specific reference to climate change and delivery of renewable and low carbon energy | The replacement of PPS1, PPS1 supplement and PPS3 by the NPPF does not have an impact on the reference to these documents in policy CS17. |
| CS18- Town Centre Uses | PPS4 | The definition of town centres uses makes direct reference to those listed within PPS4. | 23. Bullet point 6 confirms town centre uses as previously outlined in PPS4. | The replacement of PPS4 by the NPPF does not have an impact on the reference to this document in policy CS18. |
| CS19- Housing type and size | PPS3 | The footnote to PPS3 in para 7.25 of the supporting text relates to planning for a mix of house types to meet the needs of the community. | 50. Bullet point 1 refers to planning for a mix of housing based on current and future demographic trends and the needs of different | The replacement of PPS3 by the NPPF does not have an impact on the reference to this document in policy C19. |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| | | | groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes). | |
| CS20- Older People | PPS3 | The footnote to PPS3 in para 7.29 of the supporting text relates to planning for a mix of house types to meet the needs of the community. | 50. Bullet point 1 refers to planning for a mix of housing based on current and future demographic trends and the needs of different groups in the community (such as older people). | The replacement of PPS3 by the NPPF does not have an impact on the reference to this document in policy CS20. |
| CS21- Affordable housing | PPS3 | The footnote to PPS3 in para 7.35 of the supporting text relates to the policy taking account of viability. | 173. The para highlights the need to take account of the costs of requirements likely to be applied to development, including affordable housing, to ensure viability and deliverability. | The replacement of PPS3 by the NPPF does not have an impact on the reference to this document in policy CS21. |
| CS22- Gypsies, Travellers and Travelling Showpeople | PPG2 | Para. 2 of the policy makes reference to the fact that the development of sites for Gypsies, Travellers and Travelling Showpeople in the Green Belt will be considered in accordance with PPG2. | Planning policy for traveller sites. 14, 15. These paragraphs confirm that traveller sites are considered as inappropriate development in the Green Belt and should not be approved, except in very special circumstances. | National planning policy for traveller sites is set out in a separate document to the NPPF but should be read in conjunction with it. The replacement of PPG2 by the NPPF, and the specific reference to the Green Belt in the national planning policy for travellers does not have an impact on the reference made to PPG2 in policy CS22. |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| CS23- Employment land provision | PPS4 | Point 1 of the policy relies on the definition of town centres uses as set out in PPS4 and the application of a sequential approach to town centres uses, which includes offices, (para. 7.51 of the supporting text. | 23. Bullet point 6 confirms town centre uses as previously outlined in PPS4. | The replacement of PPS4 by the NPPF does not have an impact on the reference to this document in policy CS23. |
| CS24- Hotels and Tourism | PPG2 | Para 1 of the policy supports existing hotels and visitor attractions provided that this does not compromise the objectives of PPG2. | 87, 88 and 89. These paras state that inappropriate developments, by definition, are harmful to the Green Belt and should not be approved except in very special circumstances. The construction of new hotels and visitor attractions are not listed as 'exceptions' and are therefore included as inappropriate developments. | The replacement of PPG2 by the NPPF does not have an impact on the reference to this document in policy CS24 |
| CS25- Travel and Accessibility | PPG13 | Point 1 of the policy directs high trip generating development to previously developed land in sustainable locations within the urban area. These include town centres and areas with good public transport accessibility. Reference is made to the fact that this is outlined in PPG13. | 17. Bullet point 11 states that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. 34. Developments generating significant movement should be located where the need to travel will be minimised and the use of sustainable travel modes maximised. | The replacement of PPG13 by the NPPF does not have an impact on the reference to this document in policy CS25. |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| CS26 - Flooding | PPS25 | Policy refers to sequential test and cross-refers to PPS25. | 100. The adoption of a sequential risk based approach to the location of development continues to apply. The 3rd bullet of the paragraph also makes reference to safeguarding land from development that is required for current and future flood management. Technical guidance on flood risk published alongside the NPPF sets out how the policy should be implemented. However, the advice previously contained in annex F is no longer available. It is anticipated that the use of SuDS in new development is now a matter that will be dealt with in the Surrey Strategic Management Strategy. | The replacement of PPS25 by the NPPF does not have an impact on the reference to this document in policy CS26. |
| Section 8, Introduction, Implementation and Delivery | PPS12 | Para 8.1 refers to the fact that deliverability is a key part of the tests of soundness as set out in PPS12. | 182. The 3rd third bullet states that the plan should be deliverable over its period. | The replacement of PPS12 by the NPPF does not have an impact this section. |
| CS28- Implementation and Delivery | PPS12 | The supporting text cross-refers to PPS12 with regards to the need to work with existing partnerships, such as the LSP, in securing delivery of infrastructure. | 17. Bullet point 1 reiterates the commitment in PPS12 that plans should be based on joint working and co-operation. 162. States that Local Planning Authorities should work with other authorities and providers. | The replacement of PPS12 by the NPPF does not have an impact on the reference to this document in policy CS28. |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| CS29- Monitoring | PPS12 | Para 8.10 of the supporting text outlines need for the effectiveness of policies to be monitored as required by PPS12. | 153. No direct reference is made to the monitoring. However, the principle of reviewing plans in full or in part is referred to in Para 153. Without effective monitoring, it would not be possible to know if it was necessary to respond to changing circumstances. In addition, the Localism Act, includes a requirement for monitoring on a regular basis in order to measure the effectiveness of policies in the delivery of planning objectives. | The replacement of PPS12 by the NPPF does not have an impact on the reference to this document in policy CS29. |
| Provision of infrastructure and services | PPG2, PPG17 | <p>The cross references to PPG17 in para 8.18, point 2 relates to how a proposal for the development of an open space will be assessed. This means that the development of any open space should only be permitted where it is clearly surplus to requirements, offers an opportunity to remedy a deficiency in provision of a particular type of open space or facilitates the exchange of one site for another.</p> <p>The footnote reference to PPG2 relates to the need to demonstrate very special circumstances to justify inappropriate development within the Green Belt. The footnote to</p> | <p>74. The para provides a framework for assessing development proposals on open spaces confirming they cannot be built on unless they are surplus; or the loss would be replaced by equivalent or better provision in a suitable location; or the development is for an alternative sports and recreation provision, the needs for which clearly outweigh the loss.</p> <p>87, 88 and 89. These paras state that inappropriate developments, by definition, are harmful to the Green Belt and should not be approved except in very special</p> | The replacement of PPG2 and PPG17 by the NPPF does not have an impact on the reference to these documents in this section. |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| | | PPG17 relates to the framework for assessing development proposals on open spaces as discussed above. | circumstances. | |
| Objective led performance framework | PPS4 | Reference is made to Town Centre uses as defined in PPS4. | 23. Bullet point 6 confirms town centre uses as previously outlined in PPS4. | The replacement of PPS4 by the NPPF does not have an impact on the reference to this document in the objective led performance framework. |
| Glossary-affordable housing | PPS3 | The Glossary includes a definition of Affordable Housing. It refers to PPS3 for further details. Annex B of PPS3 includes a detailed definition of affordable housing to include social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. It should be available at a cost low enough for eligible households to afford determined with regard to local incomes and house prices. Products should be available in perpetuity or subsidy recycled. | The Glossary includes a definition of Affordable Housing to include social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. It should be available at a cost low enough for eligible households to afford determined with regard to local incomes and house prices. Products should be available in perpetuity or subsidy recycled. | The replacement of PPS3 by the NPPF does not have an impact on the reference to this document in the glossary. |

| Core Strategy Policy | Ref to PPG/ PPS | Comment | NPPF paragraph reference | Impact of the NPPF |
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| Glossary- Brownfield land | PPS3 | The Glossary includes a definition of Brownfield land, describing it as Previously developed land, and makes reference to PPS3 with regards to the exclusion of private residential gardens. | The Glossary does not have a definition of Brownfield land but does include a definition of Previously developed land. Whilst the wording is not identical in all respects, the definition remains unchanged and continues to exclude private residential gardens. | The replacement of PPS3 by the NPPF does not have an impact on the reference to this document in the glossary |
| Glossary- Planning Policy Guidance/ Planning Policy Statement | All | The Glossary provides an explanation of PPGs and PPSs stating that they set out the Government's policy framework | All PPGs and PPSs are replaced by the NPPF. Their replacement is set out in Annexe 3. | The replacement of all previous PPGs and PPSs renders the explanation in the glossary. |
| Glossary- Previously Developed land | PPS3 | The Glossary includes a definition of Previously developed land and makes reference to PPS3 with regards to the exclusion of private residential gardens. | The Glossary includes a definition of Previously developed land. Whilst the wording is not identical in all respects, the definition remains unchanged and continues to exclude private residential gardens. | The replacement of PPS3 by the NPPF does not have an impact on the reference to this document in the glossary |