Local Plans
and the
National Planning Policy Framework

Compatibility Self-Assessment Checklist

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.

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?*	The Council's Core strategy plans positively for growth. It adopts a positive approach to enabling the right development in the right places. The Council's commitment to promoting sustainable development is embedded within the Core Strategy vision, and threads through objectives and policies. Appendix 1 sets out in detail the way in which the Core Strategy addresses the Chancellor's Written Ministerial Statement, 'Planning for Growth'. Appendix 2 contains the inspector's report on the Core Strategy. The Inspector states,' In terms of housing, employment and other development, the plan provides for growth, reflecting the government's agenda, and generally it strikes the right balance between needs and demands' (12). Core Strategy Policy CS1: Spatial Strategy is a positive overarching policy that encourages sustainable development. It promotes the efficient and effective use of land within the urban area; introducing measures that will support a network of vibrant town and village centres, and makes sufficient land available to accommodate housing and employment growth whilst maintaining the Green Belt.	There are no significant differences. As such there is no effect on the overall strategy. The presumption in favour of development is an integral part of the Core Strategy and a 'golden thread' through the vision, objectives and policies. With regards to 'decision taking', the Council intends to adopt the model policy as a position statement until such time that the emerging Development Management DPD
	Does the plan meet objectively assessed	The Council's Core Strategy is based on objectively assessed needs which have been considered in the context of the	

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		caveats set out in para 14.	can be considered as carrying weight.
	needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)?	Appendix 2 contains the Inspector's report on the Core Strategy. The Inspector states, 'In its approach to the Green Belt the plan is also consistent with the Government's Planning for Growth agenda. This makes clear that wherever possible the answer to proposals for growth should be yes, while ensuring the key sustainable development principles set out in national policy would not be compromised' (16). Policy CS23-Employment land provision, provides a flexible approach to providing for economic growth, taking account of economic tends and the changing need for land (para 7.52). Contingency planning also forms an integral part of the Core Strategy and sets out appropriate measures that will be triggered in the event that plan objectives, specifically with regards to housing, affordable housing and infrastructure, fail to be delivered as planned (para 8.11- 8.18).	
	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 Core Strategy contains numerous policies that reflect the commitment to plan positively for growth and the presumption in favour of sustainable development. Whilst it does not contain an overarching policy (such as the model policy), the Core Strategy has been positively prepared and addresses those matters relating to plan making contained within para. 14 of the NPPF. With regards to those matters that relate to decision taking within para. 14 of the NPPF, the Council propose to include the model policy within its emerging Development Management DPD, the draft of which will be consulted upon at the beginning of 2013. In the interim, the Council has chosen to use the model policy attached as appendix 3 as a position statement that makes it clear that, when taking decisions, there will be a presumption in favour of	

		development (unless a development requires an appropriate assessment under the Habitats Directive, para. 119, NPPF).	
The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)	● be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up to date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;	The Core Strategy is a genuine plan led document. The vision is positive, committing to accommodate growth in a sustainable way that respects local distinctiveness. Policy CS1 sets out the Boroughs overall strategy for future development in the area, directing the right development to the right locations whilst balancing this with environmental and social needs. Policies CS3-CS11, provide plans at a local/ neighbourhood level for all 8 settlement areas across the Borough. Policy CS29 sets out the Council's monitoring strategy, and commits the Council to monitor the plan on an annual basis in order to ensure that it is up to date and effective and to work jointly on larger than local issues. The Core Strategy provides a high degree of predictability and efficiency, but there is still some reliance on saved policies, proposals and designations, which currently form part of the local plan. These saved elements are currently subject to update and review as part of the Development Management DPD and the production of Settlement 'ID' (Investment and Development) Plans. In addition to adopting a local, plan led, approach to delivering sustainable growth, the Council is also reviewing its Statement of Community Involvement in order to adopt new approaches to community involvement that will empower local people to shape their surroundings.	There are no significant differences. As such there is no effect on the overall strategy.

However, the Council intends to develop the approach adopted in the Core Strategy through the emerging documents that will complete the Local Plan, namely; the Statement of Community Involvement, the Development Management DPD and the Settlement 'ID' Plans. |
| | ● not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives; | The desire to enhance and improve the Borough and individual settlements within which people live their lives is embedded within the Core Strategy, beginning with its vision that celebrates the diversity and distinctiveness of local settlements, respects the environment and encourages innovation in order to make Elmbridge a better place to live for current and future generations. Through the adoption of a Community Infrastructure Levy (CIL), together with the | There are no significant differences. As such there is no effect on the overall strategy.

However, the Council intends to develop |

		ongoing engagement of local communities in the development and delivery of the Settlement 'ID' Plans, it is considered that the availability of finances, coupled with greater community engagement and local leadership will offer significant and creative ways of improving people's quality of life and the places where they live.	the approach adopted in the Core Strategy through the emerging documents including the Community Infrastructure Levy (CIL) Charging Schedule and the Settlement 'ID' Plans which will benefit from significant community involvement.
	● proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land	The Core Strategy promoted sustainable growth, directing the right sort of development in the right places. Appendix 1 sets out in detail the way in which the Core Strategy addresses the Chancellor's Written Ministerial Statement, 'Planning for Growth'. Appendix 2 contains the Inspector's report on the Core Strategy. The Inspector states, 'In terms of housing, employment and other development, the plan provides for growth, reflecting the government's agenda, and generally it strikes the right balance between needs and demands' (12). Every effort has been made to identify and then meet the development needs of the area. In setting a local housing target, the Council tested 8 different scenarios ranging between 2,000 and 12,000 over the plan period. Reflecting para. 14 of the NPPF, and the caveats contained within it, the Core Strategy Inspector noted, ' the balance struck by the Council in selecting the housing provision figure also reflects the weight it attaches to protecting land in the Green Belt, but as concluded above the plan's approach on this matter is sound in principle (26).	There are no significant differences. As such there is no effect on the overall strategy.

prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;		
● always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;	In adopting a strategy to accommodate growth within the urban area, specific attention has been given to delivering high quality design and a good standard of amenity. Core Strategy policy CS17-Local character density and design, provides an overarching policy which promotes good design that reflects local character across the Borough. All place policies (CS3-CS11) promote good design within local settlement areas. In addition, detailed consideration has been given to the promotion of high quality design that respects the distinctive character of local areas within the Design and Character SPD, adopted in April 2012. This document was produced in partnership with the local community and is key to the delivery of high quality and innovative designs that will enhance and respect local character whilst providing a good standard of amenity for existing and future occupants.	There are no significant differences. As such there is no effect on the overall strategy.
● take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the	Policy CS1 sets out the spatial strategy for the Borough. Its aim is to accommodate growth within the urban area, taking account of the local distinctiveness of individual settlements and continues to protect the Green Belt. Towns and villages are promoted as the main focus for new development, taking account of their respective roles and character and their integral importance to the health and vitality of the urban areas. Elmbridge does not contain any designated countryside	There are no significant differences. As such there is no effect on the overall strategy.

		or have rural communities within it.	
	intrinsic character and beauty of the countryside and supporting thriving rural communities within it;		
	● support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);	The overall spatial strategy directs new development to previously developed land within the urban area, taking account of the relative flood risk of available sites. The scale and nature of development is dependent on the relative sustainability of the various settlements across the area, coupled with the availability of land. Policy CS25-Travel and Accessibility, Policy CS26-Flooding, and Policy CS27-Sustainable Buildings all support the transition to a low carbon future in a changing climate. In addition, the Council's Design and Character SPD, adopted in April 2012, offers more detailed guidance with regards to the delivery of sustainable buildings and environments.	There are no significant differences. As such there is no effect on the overall strategy.
	● contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;	The overall spatial strategy directs new development to previously developed land within the urban area. The scale and nature of development is dependent on the relative sustainability of sites and higher densities are encouraged within town centres where people are not reliant on a car to access a full range of services. CS17-Local Character, Design and Density, promotes the best use of urban land, which will assist in the protection of the Borough's green spaces. Policies CS14-Green Infrastructure and CS15- Biodiversity, both contribute to the enhancement and conservation of the natural environment.	There are no significant differences. As such there is no effect on the overall strategy.

	● 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;	The overall spatial strategy directs new development to previously developed land within the urban area. Policy CS2-housing provision, location and distribution, ensures the effective use of urban land by delivering high density housing developments in the most sustainable locations. CS15-Biodiversity, directs development to previously developed land, taking account of its existing biodiversity value, and CS17-Local Character, Design and Density, promotes the best use of urban land and promotes higher densities within town centres.	
	● promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);	Policy CS17- Local Character, Design and Density encourages mixed use developments in suitable locations where a range of uses can function and flourish. Policy CS18-Town Centre uses, also encourages higher density mixed use developments. Policy CS16-Social and Community Infrastructure, promotes the mixed use of social and community facilities. Policy CS14-Green Infrastructure, aims to strengthen the multi functional role of green spaces within the Borough through a variety of measures. It aims to give a high level of protection and improve the Borough's green infrastructure assets, the functions of which are set out and include, conservation and enhancement of biodiversity, increasing recreational opportunities, improved flood risk management and making a positive contribution to combating climate change through adaptation and mitigation of impacts as well as the production of food, fibre and fuel.	There are no significant differences. As such there is no effect on the overall strategy.
	● conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this	The Core Strategy vision (para. 4.5) and objective 2 refer to the Borough's historic and cultural assets and the fact that they will be managed and enhanced in order to maintain a high quality environment. The place polices, CS3-CS11, all make specific reference to heritage and conservation areas specifically within the local context. CS17-Local Character, Design and Density also makes reference to the need for new	There are no significant differences. As such there is no effect on the overall strategy. However, there is still reliance on

	and future generations;	developments to integrate sensitively with heritage assets. The Design and Character SPD, adopted by the Council in April 2012 also recognises the need to conserve heritage assets. However, there is still reliance on saved policies contained within the REBLP 2000 when considering planning applications. These policies will be reviewed as part of the Development Management DPD, which is currently being prepared.	saved policies contained within the REBLP 2000 when considering planning applications. These policies will be reviewed as part of the Development Management DPD, which is currently being prepared.
	● 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; and	Policy CS1-Spatial Strategy, sets out the Borough's overall strategy for future development in the area, directing the right development to the right locations whilst balancing this with environmental and social needs. Its aim is to accommodate growth within the urban area, and continue to protect the Green Belt. The scale and nature of development is dependent on the relative sustainability of individual settlements and sites, coupled with potential development opportunities. Policy CS2-Housing provision, location and distribution provides a broad indication of where new housing is anticipated in order that new infrastructure and services can be planned for (including improvements to encourage the use of sustainable modes of travel). Towns and villages are promoted as the main focus for new development and higher densities are encouraged here where people are not reliant on a car to access a full range of services (Policy CS18-Town centre uses). Policy CS25-Travel and Accessibility, specifically promotes improvements to sustainable travel and access to services through a variety of spatial and transport planning measures.	There are no significant differences. As such there is no effect on the overall strategy.
	● take account of and	The Core Strategy takes account of the Surrey, and the	There are no

	support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.	Elmbridge, Sustainable Community Strategy (para. 2.13 and 2.14). These strategies have been produced by infrastructure and service providers working in partnership. In addition, the Core Strategy is supported by an Infrastructure Delivery Plan which takes account of all social, cultural and community planned for the area. Details relating to planned improvements are contained within appendix 2 of the Core Strategy within the Settlement and Investment Schedules. In addition, Policy CS28-Implementation and delivery, makes a commitment to continue to convene the local Infrastructure Delivery Group as well as undertake an annual review of the Infrastructure Delivery Plan. The Policy also sets out the Council's intention to use a tariff based approach to secure facilities and services to meet local needs. The Elmbridge Draft Community Infrastructure Charging Schedule is due to be adopted by the end of 2012.	significant differences. As such there is no effect on the overall strategy. With the aim of securing facilities and services to meet local needs in the future, the Elmbridge Draft Community Infrastructure Charging Schedule is due to be adopted by the end of 2012.

1B: Delivering sustainable development

l. 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).		The Core Strategy vision, CS1: Spatial Strategy, CS18: Town Centre Uses, CS23: Employment land provision and CS24: Hotels and Tourism combine to provide a clear economic vision for the Borough which positively and proactively encourages sustainable economic growth. Appendix 1 sets out in detail the way in which the Core Strategy addresses the Chancellors Written Ministerial Statement, 'Planning for Growth'. Appendix 2 contains the Inspector's report on the Core Strategy. The Inspector states,' In terms of housing, employment and other development, the plan provides for growth, reflecting the government's agenda, and generally it strikes the right balance between needs and demands' (12). The Council commissioned an Employment Land Review (ELR) in 2008 which provides an assessment of the projected demand for employment land as well as an assessment of potential capacity. The Council also undertook an update to this in order to take account of the economic downturn – www.elmbridge.gov.uk/planning/policy. The update showed that additional B2 and B8 floorspace was needed to ensure optimal market conditions. However, for B1	There are no significant differences. As such there is no effect on the overall strategy. Sites currently designated as SEL will be reviewed as part of the production of Settlement 'ID' Plans.
	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)?* | floorspace, it showed that existing vacant floorspace was sufficient to meet projected demand over the next 15 years.

Para. 7.52 of the Core Strategy states that the Council will monitor economic trends and will review the allocation of sites as part of future DPDs.

Para. 49 and 50 of the Inspector's report (appendix 2) supports the Council's approach to employment, referring to the flexibility contained within policy CS23 and the potential for the review of sites currently designated as SEL through the site allocation DPD. | |

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?*	The Elmbridge Retail Study 2006 indicates that there is no need for additional convenience floorspace over the period to 2018. There is no need for additional comparison floorspace unless Market share increases. This is dependant on the success of 'the Heart' town centre redevelopment in Walton. The report estimates that market share will increase, resulting in an additional need for comparision floorspace between 2013 and 2018. As part of the Core Strategy, Walton town centre boundary has been expanded to ensure a sufficient supply of suitable sites.

Policy CS1-Spatial Strategy sets out the continuing role of town and village centres as the focus for new development that will provide a range of services for everyone. The policy takes account of the network and hierarchy of centres and supports their viability. | There are no significant differences. As such there is no effect on the overall strategy.

The allocation of suitable sites to meet the need for town centre uses will be explored/reviewed in further detail in the Settlement 'ID' Plans. |
| | *Have you identified primary and secondary shopping frontages?* | Town centre boundaries, as well as primary and secondary frontages are designated on the Proposals Map and policy CS18 sets out the uses that will be permitted in each location. All place policies make reference to the role of town and village centres and promote future plans appropriate to the role of the specific town or village. Policy CS3-Walton on Thames promotes new development within Walton town centre, (the only 'town' centre within the retail hierarchy), in order to increase the centre's attractiveness and competitiveness. | |

| | | Policy CS23: Employment land provision, directs office development to the most sustainable locations within or on the edge of town centres, or close to public transport.

There are no retail or leisure proposals included within the Core Strategy. Any major retail and leisure proposals in adjoining Boroughs/Districts were taken into account in preparing the Core Strategy. The allocation of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres will be explored/reviewed in further detail in the Settlement Investment and Development ('ID') Plans. | |

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** Elmbridge does not have any designated rural areas	**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?**
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 | Policy CS25: Travel and Accessibility requires maximum parking standards to be applied to all uses, including the consideration of zero parking for certain town centre developments. The Council adopted the parking standards contained in the Parking Strategy for Surrey (March 2003) on 23 June 2004. These standards operate as maximum standards for all new development.

Surrey County Council produced updated guidance for Vehicle and Cycle Parking in January 2012. Given the variance of accessibility/ public transport provision etc across the County, the intention is that the guidance is applied flexibly according to local circumstances. The guidance sets out maximum parking standards for all non-residential development as well as recommendations for residential development.

This most recent guidance will be taken into account when reviewing parking standards as part of the Development Management DPD.

CS25: Travel and Accessibility directs new developments that generate high numbers of trips to previously developed land in sustainable locations within the urban area, including | There are no significant differences. As such there is no effect on the overall strategy.

Parking standards will be reviewed as part of the Development Management DPD.

The settlement 'ID' plans will consider the provision of transport infrastructure in more detail through engagement with the community and transport providers. |

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	in the Framework, *particularly in rural areas? (34).*	town centres and areas with good public transport accessibility. The policy seeks to protect existing footpaths, cycleways and bridleways, delivering new cycling and walking schemes also. CS1-Spatial strategy aims to protect the Borough's green infrastructure by directing new development to built up areas which have access to infrastructure and services. Policy CS14-Green Infrastructure also aims to strengthen the network and its multifunctional role including the creation of new accessible open space and developing strategic access routes that promote healthy living. In addition, Policies CS17: Local Character, Density and Design, CS18: Town centre Uses, CS2: Housing provision, location and distribution encourage higher density development in town and district centres and in sustainable locations.	
	Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?	CS25- Travel and Accessibility and CS28-Implementation and Delivery commits the Council to working in partnership with transport providers and Surrey County Council to support improvements to transport infrastructure. The settlement and investment schedules contained within appendix 2 of the Core Strategy list the transport improvements planned for each settlement area, taking account of different communities and opportunities. These include major upgrades to stations, improvements to station access, lengthening station platforms, improving bus services and enhancing the footpath and bridleway network. In addition, the settlement 'ID' plans will consider the provision of transport infrastructure in more detail through engagement with the community and transport providers.	

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.	no response required	no response required	no response required

5.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*	Over the past 5 years, (2006-2011) a total of 2057 units have been delivered (411 pa average). The Council's housing requirement at that time was 281 pa. The housing requirement between 2011-2026 is the delivery of 3,375 units (min). This equates to 225 pa.

The supporting text to Core Strategy policy CS2: Housing provision, distribution and location sets out details of the supply of specific, deliverable sites to provide five years supply of housing against the local housing target and in accordance with the Spatial Strategy. This is based on information contained within the 2010 Strategic Housing Land Availability Assessment (SHLAA).

Based on the 2011 SHLAA, there is 6.7 years supply of specific | There are no significant differences. As such there is no effect on the overall strategy. |

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	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)?*	deliverable sites. This provides a buffer of 41%. An additional 5% buffer from later on in the plan period is also readily available as there is currently a 10.8 year supply (this figure excludes small site windfall). Advice on deliverability was also provided by the Council's Housing Market Partnership Panel (HMPP), which includes representatives of the development industry. The Panel reviewed all SHLAA sites and provided detailed commentary on issues such as density, viability etc. The Inspector's Report acknowledged that this provided reasonable confidence in the SHLAA's assumptions about development densities and appraisal of other site factors. A significant amount of work on viability was also undertaken to support the Core Strategy (as discussed above). The SHLAA is reviewed annually with the input of the HMPP to ensure a rolling supply of deliverable sites.	
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?*	Appendix 3 of the Core Strategy illustrates the expected rate of housing delivery in a 'Housing Trajectory'. The removal of national and regional brownfield targets will have a minimal impact on housing land supply within Elmbridge, given that the majority of sites (over 90%) are delivered on previously developed land within the urban area. The SHLAA is reviewed annually with the input of the HMPP to ensure a rolling supply of developable sites. Policy CS2: Housing provision, distribution and location, CS29: Monitoring and contingency plans (para 8.11-8.18), together set out a housing implementation strategy describing how a five year supply will be maintained.	There are no significant differences. As such there is no effect on the overall strategy.

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 (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*	Core Strategy Policy CS21: Affordable housing seeks to maximise the delivery of affordable housing to meet local need whilst taking account of viability. The policy will not need to be reviewed in light of the removal of the national minimum threshold as it already includes a sliding scale of thresholds and targets that fall below this. The Core Strategy includes a range of policies which seek to deliver a mix of housing including CS6: Whiteley Village, CS19: Housing Type and Size, CS20: Older People, CS21: Affordable Housing, CS22 – Gypsies, Travellers and Travelling Showpeople. These are based on the current and future demographic and market trends and needs of different groups as set out in various studies – East Surrey Strategic Housing Market Assessment (SHMA), North Surrey Gypsy and Traveller Accommodation Assessment (GTAA), and the Strategic Review of Older People's Housing in Elmbridge – www.elmbridge.gov.uk/planning /policy	There are no significant differences. As such there is no effect on the overall strategy.
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.** Elmbridge does not have any designated rural areas	**n/a**

	Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)	The Council has considered the case for setting out policies relating to development of residential garden land. Policy CS2- Housing provision location and distribution, recognises the potential sensitivity of development on garden land and states that any proposal will be considered in the context of saved polices until such time that these are replaced. The intention is that saved policies HSG16 and 18 will be replaced by policies contained within the Development Management DPD.	There are no significant differences. As such there is no effect on the overall strategy. Development of residential garden land will be considered as part of the Development Management DPD and saved policies reviewed and replaced.
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** Elmbridge does not have any designated rural areas	**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.	no response required	no response required	no response required

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*	Core Strategy policy CS16 – Social and Community Infrastructure aims to plan positively for the provision and integration of community facilities and local services. The policy supports the provision of accessible and sustainable social and community infrastructure. It promotes the mixed use of facilities and aims to safeguard such uses by resisting their loss unless it can be demonstrated that it is no longer needed or viable for any other community use, an alternative facility will be provided in an equivalent location or there is no requirement from any other public service provider for an alternative facility that could be met through a change of use or redevelopment. Policy CS16 aims to work with the County Council to plan positively for education facilities through the intensification of existing sites, identification of new sites in future Development Plan Documents and by securing financial contributions from new development. Policy CS16 does not make reference to local shops, public houses or places of worship. However, the retention of local shops is supported through policy CS1-Spatial Strategy. Policy CS18-Town Centre Uses proposes that secondary frontages within town centres offer opportunities for services such as public houses.	There are no significant differences. As such there is no effect on the overall strategy.

	locations which offer a range of community facilities and good access to key services and infrastructure?	Policies CS1: Spatial Strategy and CS2: Housing provision, distribution and location directs housing development to the most sustainable locations within the urban areas close to existing facilities, services and infrastructure. CS16 seeks to ensure that any provision of social infrastructure is accessible by public transport, cycling or walking.	
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).*	The Core Strategy does not contain a policy relating to the protection of Local Green Spaces specifically, although policy CS1-Spatial strategy and CS14- Green Infrastructure seek to protect and enhance open spaces generally. The intention is that Local Green Spaces will be designated as part of the Settlement 'ID' Plans.	There are no significant differences. As such there is no effect on the overall strategy.

Local Green Spaces will be designated as part of the Settlement 'ID' Plans. |

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). | The Green Belt boundary is established in the Local Plan Proposals Map updated in July 2011 in line with the adoption of the Core Strategy.

Core Strategy Policy CS1-Spatial strategy aims to protect and enhance the multifunctional role of the Green Belt as part of the Borough's green infrastructure network. Policy CS14-Green Infrastructure and Policy CS15- Biodiversity aim to strengthen the multifunctional role of the network, protecting and improving sites for their biodiversity importance and enhancing the beneficial use of the Green Belt.

The Council's 2011 SHLAA concludes that there was sufficient potential within the urban areas to meet the local housing target. Policy CS1: Spatial Strategy therefore aims to focus development in the urban areas and continue to protect the Green Belt. The Green Belt | There are no significant differences. As such there is no effect on the overall strategy.

However there are some changes that need to be addressed through the Development Management DPD to reflect the changes between PPG2 and the NPPF. These include the reconsideration of saved policies relating to; existing dwellings within the Green Belt; Previously developed sites (The designation of Major Developed sites is no longer referred to); |

		will continue to be a key determinant in shaping settlements.	Local transport Infrastructure; Community right to build.
		The Inspector's report (appendix 2) recognises the regional importance of the Borough's Green Belt in containing London and retaining the identity of existing towns. She commented that the plan's approach to the Green Belt was also consistent with the Government's Planning for Growth agenda (para 16)	
	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.*	The detailed consideration of extensions or alterations within the Green Belt is currently dealt with through saved policy GRB5 of the REBLP 2000. This currently only relates to dwellings rather than buildings. Whilst this policy also addresses replacement, this also relates to a dwelling rather than a building. The intention is that GRB5 will be reviewed as part of the Development Management DPD and replaced as appropriate.	
	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	Neither the Core Strategy nor the REBLP 2000 contain an overarching policy relating to limited infilling or the partial or complete redevelopment of previously developed sites. Whiteley Village (Core Strategy Policy-CS6) has been	

	(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).	identified as a village within the Green Belt where limited infilling may be appropriate. Brooklands College is the only 'major developed site' identified within the Green Belt (Saved policy-GRB23). Whilst other landowners had requested that their sites be identified as major developed sites, it was considered that this was most appropriately dealt with through site allocations rather than the Core Strategy. This was an approach supported by the Inspector in her report (para. 27). Given that the NPPF no longer includes reference to Major Developed Sites, the designation of the single existing site will be removed and consideration given to including an appropriate overarching policy in the Development Management DPD. Neither the Core strategy or saved polices contain polices relating to 'Park and Ride' or development brought forward under a Community Right to Build Order. Consideration will be given to how these matters will be dealt with through the Development Management DPD	

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).		Whilst the Core Strategy does not allocate any sites for development, it does take account of relative flood risk in the consideration of a sustainable distribution of dwellings and Policy CS25: Flooding, sets out criteria for assessing the location of development. It requires development to be located, designed and laid out to ensure that it is safe, the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere and that residual risks are safely managed. The policy also states that planning permission will only be granted or land allocated where it can be demonstrated that through a sequential test it is located in the lowest appropriate flood risk zone and would not constrain the natural function of the flood plain. Where sequential and exceptions tests have been undertaken and development takes place in a flood risk area flood mitigation measures will need to be integrated into the design

This policy will be used to assess the allocation of sites for development in the Settlement Investment and Development Plans.

The Council adopted a sequential risk based approach in identifying sites with potential for housing in the SHLAA – www.elmbridge.gov.uk/planning/policy. Whilst preference has been given to locating new residential | There are no significant differences. As such there is no effect on the overall strategy. |

	Have you planned new development in locations and ways which reduce greenhouse gas emissions?	development within flood zone 1, housing falls within the 'more vulnerable' classification of uses, and is considered an appropriate use in flood zone 2 and 3a, provided it is supported by adequate mitigation. As such, the location of identified sites within these flood zones does not preclude them from future residential development.

Policy CS1-Spatial Strategy, sets out the Borough's overall strategy for future development. The scale and nature of development is dependent on the relative sustainability of individual settlements and sites, coupled with potential development opportunities. Policy CS2-Housing provision, location and distribution provides a broad indication of where new housing is anticipated in order that new infrastructure and services can be planned for (including improvements to encourage the use of sustainable modes of travel). Towns and villages are promoted as the main focus for new development and higher densities are encouraged here where people are not reliant on a car to access a full range of services (Policy CS18-Town centre uses). Policy CS25-Travel and Accessibility, specifically promotes improvements to sustainable travel and access to services through a variety of spatial and transport planning measures. |
| | *Does your plan actively support energy efficiency improvements to existing buildings?*

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 | Policy CS27: Sustainable Buildings sets standards for the sustainability of buildings that are consistent with national zero carbon buildings policy. It requires all residential development of 10 units or more to meet Level 4 of the Code for Sustainable Homes in relation to energy and CO2 emissions or higher as dictated by future legislation and guidance. All development must complete the Council's Climate Neutral Checklist. |

	carbon buildings policy and adopt nationally described standards? (95)		
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?* *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)*	Core Strategy Policy CS27 states that the Council will explore opportunities for decentralised and renewable or low-carbon energy sources and that large-scale residential and commercial schemes identified in future DPDs will be required to consider the use of community based systems for the provision of heat and power. Further consideration will be given to identifying suitable areas and sites in the Settlement Investment and Development Plans.	There are no significant differences. As such there is no effect on the overall strategy. Consideration will be given to identifying suitable areas and sites for the use and supply of low carbon energy in the Settlement 'ID' Plans.

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		Core Strategy Policy CS15-Biodiversity seeks to avoid loss, and contribute to net gain, within the Borough and across the region. The policy does not make reference to geodiversity as there are no sites of geological significance located within the Borough. Combined with CS13-Thames basin heaths Special Protection Area and CS14-Green	There are no significant differences. As such there is no effect on the overall strategy.

| 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)?* | Infrastructure, the Core Strategy takes a holistic approach to biodiversity across local authority boundaries.

The Borough does not have any identified Nature Improvement Areas. (These were formally identified by DEFRA). | |

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. | no response required | no response required | no response required |

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.** Minerals Planning is dealt with by Surrey County Council.	**n/a**

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Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

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Policy A: Using evidence to plan positively and manage development (para 6)			
What the policy for traveller sites expects local plans to include to deliver its objectives	**Questions to help understand whether your local plan includes what the policy expects**	**Does your local plan meet the policy's expectations?**	**How significant are any differences?** **Do they affect your overall strategy?**
Early and effective community engagement with both settled and traveller communities.	Has your evidence been developed having undertaken early and effective engagement including discussing travellers accommodation needs with travellers themselves, their representative bodies and local support groups?	Core Strategy Policy CS22- Gypsies, Travellers and Traveling Showpeople has been informed by the North Surrey Gypsy and Traveller Accommodation Assessment (GTAA), 2006-2016. This identifies needs based on discussions with travellers themselves. In addition, the settled community was invited to comment on the level of provision to be planned for (up until 2016) as part of the post submission Core Strategy consultation on local housing targets and pitch requirements that took place in September 2010. The Council's intentions with regards to addressing the needs of Gypsies and travellers up until 2026 are set out below.	The policy contained within the Core Strategy makes reference to meeting needs in accordance with the most up to date GTAA, which will be undertaken with early and effective community engagement. As such there is no effect on the overall strategy. Whilst the community engagement that took place has informed the Council's pitch requirements up until 2016, this is only an interim measure and a full assessment of need is required up until 2026. A new GTAA, the methodology of which has resulted from collaborative working, will be undertaken to provide a robust evidence base to inform the allocation of sites within the Settlement 'ID' Plans.

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?	Whilst the community engagement that took place has informed the Council's pitch requirements up until 2016, this is only an interim measure and a full assessment of need is required up until 2026. A new GTAA will be undertaken to inform the allocation of sites within the Settlement 'ID' Plans. The method for gathering the evidence has been developed jointly between all Surrey Authorities. The Gypsy and Traveller Community have been engaged in the design and content of the methodology. The 'roll out' of the questionnaire will engage Gypsies and Travellers at an early stage and the settled community will also be invited to become involved with the aim of reducing any potential tensions between settled and traveller communities in plan-making and decision-taking. The adoption of a shared methodology across borough boundaries will also assist a common base line through which collaborative planning can take place. Elmbridge also adjoins the London Borough of Kingston. A meeting has already been held with them, Elmbidge Planning Services, and the Chair of the Surrey Planning Working Group in order to facilitate collaborative working across the County boundary.	

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)	Currently, the Core Strategy makes reference to an interim target up until 2016. The Local Plan has a 15 year life span from 2011 to 2026. As such pitch targets for Gypsies, Travellers and traveling showpeople need to be set based on an up to date GTAA.	A new GTAA will be undertaken to inform the allocation of sites within the Settlement 'ID' Plans. Pitch requirements will be set on the basis of the findings of the GTAA and sites identified and updated annually in order to ensure a land supply that addresses needs. In identifying sites, the Council will continue to work collaboratively with adjoining boroughs (see above).

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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?	Until such time that the GTAA is complete, it is not possible to know whether any constraints exist to allocate sufficient sites to meet likely future need. Given the different format of plans and timescales for production for each individual borough, the production of a joint development plan is not considered to be a practical solution to the identification of sites. However, through the duty to co-operate and collaborative working, the potential to consider opportunities to meet need on a cross borough basis can be considered.	Through the duty to co-operate and collaborative working, the potential to consider opportunities to meet need on a cross borough basis can be considered. This will be done as an integral part of the production of the Settlement 'ID' Plans.
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.		The allocation of pitches and plots within the Settlement 'ID' Plans will take account of the circumstances of the specific size and location of the site and the surrounding population size and density in order to reduce any potential tensions between settled and traveller communities as well as provide suitable accommodation from which travellers can access education, health, welfare and employment infrastructure.	This matter will be dealt with through the allocation of pitches and plots within the Settlement 'ID' Plans
Protect local amenity and environment.		The allocation of pitches and plots within the Settlement 'ID' Plans will have due regard to protecting local amenity and the local environment.	See above

4

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?	Core Strategy Policy CS22- Gypsies, Travellers and Travelling Showpeople set criteria to guide land supply to help in addressing identified need. The way in which need will be assessed and land supplied to address this need is addressed in the commentary above.	There are no significant differences. As such there is no effect on the overall strategy.
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	Core Strategy Policy CS22- Gypsies, travellers and Travelling Showpeople has been subject to sustainability appraisal that considers the economic, social and environmental impacts of the policy.	In providing sites to meet identified need, the Council will take account of criteria a-h and the specific local criteria set out in Core Strategy Policy CS22.

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.** Elmbridge does not has any designated rural areas.	

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.** Elmbridge does not has any designated rural areas.	**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	The consideration of the identification of traveller sites will be undertaken as part of the Settlement 'ID' Plans. Development for a Traveller site within the Green Belt would be contrary to the spatial strategy for the Borough. As such, any consideration would only be made in exceptional circumstances.	The consideration of the identification of traveller sites will be undertaken as part of the Settlement 'ID' Plans.

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 is a matter that will be dealt with as part of the Settlement 'ID' Plans.	The consideration of including traveller sites for mixed residential and business use and mixed use yards for traveling showpeople will be undertaken as part of the Settlement 'ID' Plans.

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)?	There are no major development proposals within the Borough that would necessitate the relocation of travelers on a temporary or permanent basis.	not relevant in Elmbridge

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?*	Elmbridge adopted its Core Strategy in July 2011. This provides the overarching policy framework for plan making in the Borough. The intention to produce more detailed matters in DPDs that address site allocations and development management is clearly stated throughout the document and the approach set out in para.8.3. Once adopted (scheduled for Spring 2014), the Local Plan will be complete. Given the stage of preparation, and the Government's desire for Local Authorities to get Local Plans in place as quickly as possible, continuing with our current strategy of having a Local Plan made up of a Core Strategy, Settlement 'ID' Plans, and a Development Management DPD is considered to be the most effective way to deliver a Local Plan, making the most efficient use of resources and providing clarity for developers and the local community. 2 SPDs have been produced and adopted in April 2012. Design and Character helps applicants to make successful applications. Developer Contributions aids infrastructure delivery.	The Elmbridge Local Plan will be made up of 3 key documents, supplemented by SPDs. The approach is justified and is the most effective and efficient given the stage of production.

Local Plans should:	*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)*	The Council's Core Strategy is based on objectively assessed needs, which have been considered in the context of the caveats set out in para 14.	There are no significant differences. As such the Core Strategy meets NPPF expectations.
• Plan positively (para 157)		Appendix 2 contains the Inspector's report on the Core Strategy. The Inspector notes that, although the housing requirement has been set locally, it draws on evidence that underpins the South East Plan.	
		Despite the fact that the final published South East Plan is a Government 'top down' plan, the evidence that informed the content of the plan considered at examination was derived from co-operative working by local authorities through the various stages of preparation.	
		Para 22 of the Inspector's report addresses the Borough's housing target. It is noted that this broadly achieves the South East Plan requirement which sought to balance the housing and economic needs and demands of a relatively buoyant area with the protection of its quality of life. It also exceeds the figure recommended by the panel that examined the South East Plan. This figure took appropriate account of economic and population growth while not relying excessively on urban potential.	
		Whilst the Inspector acknowledged that there were some uncertainties and only limited evidence about neighbouring authorities plans, 'Overall, given current uncertainties, the Council is to be commended for pressing ahead in preparing a core strategy that plans positively for growth' (para. 13).	

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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 164	The Ministry of Defence is not a statutory consultee and has no land holdings within Elmbridge.	**n/a**
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*	A significant amount of viability work was undertaken to inform and support the policies within the Core Strategy to ensure that it does not adversely affect the viability of development or the implementation of the plan. A Viability Study was undertaken by Adams Integra in 2009, amidst the recession, which tested the sensitivity of viability outcomes to the cumulative impact of wider costs and obligations including affordable housing, sustainability standards, infrastructure and Thames Basin Heaths – www.elmbridge.gov.uk/planning/policy. The study was based on the most established route for considering viability, residual valuation, whereby the impacts of a range of development costs, obligations and profit requirements are used to explore the extent of impact on land value and therefore whether sites are still likely to come forward. It assessed a range of development scenarios and included assumptions with regard to development costs such as build costs, financing, marketing and developer profit (15-20% of Gross Development Value). In all cases it ensured that viability outcomes were assessed cautiously. In addition, it explored the impact of increased cost scenarios for example,	There are no significant differences. As such the Core Strategy meets NPPF expectations.

| | *developer to enable the development to be deliverable (173)?* | increased profit requirements, higher planning infrastructure costs, and higher sustainability standards.

The study used the influence of viability on a range of property value levels typically found across the Borough. These are capable of representing values changing through time with market conditions and/or by scheme type and locality.

Overall the Core Strategy strikes an appropriate balance and optimises the delivery of development without compromising the viability of sites or stifling development, bearing in mind the wider planning obligations and costs considered. It seeks to set out a long-term approach in order to provide clarity to landowners and developers, whilst adopting a practical, responsive approach and being sufficiently flexible to deal with changing circumstances or scheme viability issues with clear recognition of this within policy wording and supporting text e.g. CS21: Affordable Housing and CS27: Sustainable Building. | |

| | *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)?* | In producing its draft Community Infrastructure Levy Charging Schedule, the Council revisited its viability study in order to provide an up to date and comprehensive evidence base for the consideration of development viability. The proposed charge (due to be examined in Summer 2012) takes account of the likely cumulative impacts on development in the area of all local standards, supplementary planning documents and policies, as well as nationally required standards. The proposed charge ensures that the cumulative impact of these standards and policies do not put implementation of the development plan at serious risk, and will facilitate development in the future. | There are no significant differences. As such the Core Strategy meets NPPF expectations. |

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*	The Council's Core Strategy plans positively for growth. It adopts a positive approach to enabling the right development in the right places. The Council's commitment to promoting sustainable development is embedded within the Core Strategy vision, and threads through objectives and policies. Appendix 1 sets out in detail the way in which the Core Strategy addresses the Chancellors Written Ministerial Statement, 'Planning for Growth'. Appendix 2 contains the Inspector's report on the Core Strategy. The Inspector states,' In terms of housing, employment and other development, the plan provides for growth, reflecting the government's agenda, and generally it strikes the right balance between needs and demands' (12). Core Strategy Policy CS1: Spatial Strategy is a positive overarching policy that encourages sustainable development. It promotes the efficient and effective use of land within the urban area; introducing measures that will support a network of vibrant town and village centres, and makes sufficient land available to accommodate housing and employment growth whilst maintaining the Green Belt. The Council's Core Strategy is based on objectively assessed needs which have been considered in the context of the caveats set out in para 14. Appendix 2 contains the Inspector's report on the Core Strategy.	There are no significant differences. As such the Core Strategy meets NPPF expectations.

		The Inspector states, 'In its approach to the Green Belt the plan is also consistent with the government's Planning for Growth agenda. This makes clear that wherever possible the answer to proposals for growth should be yes, while ensuring the key sustainable development principles set out in national policy would not be compromised' (16). The Core Strategy contains numerous policies that reflect the commitment to plan positively for growth and the presumption in favour of sustainable development (See Appendix 1). Whilst it does not contain an overarching policy, the Core Strategy has been positively prepared and addresses those matters relating to plan making contained within para. 14 of the NPPF. Please also see response to NPPF para 157 with regards to the consideration of unmet requirements from neighbouring authorities.	