



**Local Plans
and the
National Planning Policy Framework**

**Compatibility
Self Assessment Checklist – Lewisham AAP**

(May 2012)

Lewisham Planning Officers have completed this checklist as part of the Council's process in assessing whether the Local Plan is accordance with the NPPF.

This checklist relates to the Lewisham town centre AAP and should be read in conjunction with the checklists for the Core Strategy, Plan-making and Travellers sites.

Introduction

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

These elements are highlighted in red and in italics.

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

How will it help?

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

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

This will help you to:

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

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

Why does it matter?

It matters because to have a plan-led system we need to have sound plans in place. The transition arrangements give authorities with an adopted plan a year to get their policies 'up to date' (in conformity with the NPPF). After that, the policies will be judged

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.

by their degree of conformity and the presumption in favour of sustainable development will apply. If you haven't got a plan in place, you need to do so as soon as possible; the further along the process you are, and the closer the conformity of your policies, the more weight they will have (for full details see Annex 1 'Implementation' paragraphs 208-219).

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

Who should use it?

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

What it doesn't do

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

What else are PAS doing?

There are more parts to this document to follow, including

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

How should you use it?

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

The checklist has used, wherever possible, the same wording as that set out in the NPPF. However, our focus has been to capture the main 'prompts' that you need to consider while keeping the checklist to a reasonable length. However you should cross-refer to the NPPF itself whilst going through the checklist. We have provided paragraph references to help you do this.

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

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

How we made it

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

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

What will happen to this document in the future?

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

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

Email: alice.lester@local.gov.uk

Disclaimer

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

1A: Achieving sustainable development

The presumption in favour of sustainable development and core planning principles (para 6-17)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><i>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</i></p>	<p><i>1. Does the plan positively seek opportunities to meet the development needs of the area?</i></p> <p><i>2. Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)?</i></p> <p><i>3. Do you have a policy or policies which reflect the principles of the presumption in favour of sustainable development? A model policy is provided on the Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive).</i></p>	<p>1. Yes. The AAP delivers considerable growth to assist in meeting the development needs outlined in the Core Strategy (CS). The AAP includes policies and designations for housing, employment, retail and leisure sites.</p> <p>2. Yes. The plan is based on a robust and up-to-date evidence base and will deliver the Core Strategy and AAP vision and objectives. Section 6 of the AAP outlines an implementation plan and a risk assessment and to address flexibility and changing circumstances.</p> <p>3. Yes. This is addressed in the Core Strategy and is not dealt with in the AAP.</p>	<p>1 & 2 no significant difference identified.</p> <p>3. This may be addressed in the forthcoming Development Management DPD.</p> <p>Refer to the Core Strategy Self Assessment for a full explanation.</p>

The presumption in favour of sustainable development and core planning principles (para 6-17)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)		<p>The 12 numbered points below detail the contribution made by the Lewisham town centre AAP towards the 12 core NPPF principles. Each of the principles is primarily covered either wholly or on the most part by the Core Strategy. For this detail you should refer to the Self Assessment for the Core Strategy.</p> <p>1. Plan led: The AAP sets out a practical and efficient approach to development in the town centre and has been produced collaboratively with both local stakeholders and those from further afield.</p> <p>2. Creative solutions to improving places: The major regeneration of the town centre is the aim of the AAP. It sets out a creative strategy to combine growth in housing and retail space</p>	<p>No conflict.</p> <p>No effect on the AAP.</p>

The presumption in favour of sustainable development and core planning principles (para 6-17)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
		<p>alongside improvements to transport networks, green spaces and the river network.</p> <p>3. Supporting sustainable economic development to deliver thriving local places: The AAP is a growth plan, proposing an increase in retail space of 40,000 sqm over the plan period and over 3,000 homes as well as associated leisure and infrastructure space. The growth proposed is a response to the collected evidence base that sets out capacity and need for the increased provision of both residential and commercial space.</p> <p>4. High quality design: The site specific policies in Section 4 of the AAP assist in the delivery of high quality design for both individual sites and Town Centre Areas in the town centre. Design principles</p>	

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		<p>for the Local Plan are identified in the Core Strategy and further details will be identified through the Development Management DPD.</p> <p>5. Valuing the role and character of different areas: The AAP reflects the growth agenda for the town centre as set out in the Core Strategy spatial strategy. This supports development in an appropriate area of the borough.</p> <p>6. Supporting a low carbon future: Detail regarding decentralised energy and communal heating and cooling systems is included in the AAP Policy LAAP24, while LAAP25 details methods of adapting to the effects of climate change in a town centre environment. The general approach to carbon emission reduction is set out in Core Strategy policies 7 and 8.</p>	

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What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
		<p>7. Conserving and enhancing the natural environment: The AAP includes proposals for the enhancement and naturalisation of the river network through the town centre and the provision of open space and recreation space. The wider policy context for this topic is set out in the Core Strategy.</p> <p>8. Encourage the reuse of land: The AAP proposes to deliver considerable development, including 3,000 new homes and 40,000 sqm of new retail floorspace. All development is proposed on brownfield sites.</p> <p>9. Promoting mixed use: All sites in the town centre AAP are proposed to deliver a mix of uses, predominantly a mix of retail and residential, but also including other commercial, leisure and hotel uses. High</p>	

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What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
		<p>accessibility to public transport systems supports the high density mixed-use approach.</p> <p>10. Conserving heritage assets: Adding to the general protective policy framework set out in Core Strategy Policy 16, the AAP Policy LAAP23 details specific local town centre buildings and areas that require particular protection. Borough-wide and town centre specific policies regarding tall buildings support this stance.</p> <p>11. Public transport, walking, cycling: AAP Policy LAAP21 deals with the specific sustainable transport requirements of the town centre and is supported by site specific proposals in Section 4 of the AAP. Core Strategy Policy 14 sets out the borough approach to sustainable movement and encourages development in</p>	

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		<p>locations with good access to public transport, walking and cycling.</p> <p>12. Improve health, cultural and social wellbeing: Policy LAAP22 and the site specific policies of Section 4 identify the specific opportunities in the town centre for development to support the delivery of social and cultural facilities. Policies 19 and 20 of the Core Strategy outline the approach to the delivery of social infrastructure in the borough as a whole.</p>	

1B: Delivering sustainable development

1. Building a strong, competitive economy (paras 18-22)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Set out a clear economic vision for the area which positively and proactively encourages sustainable economic growth (21).	<i>Is there an up to date assessment of the deliverability of allocated employment sites, to meet local needs, to justify their long-term protection (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)?</i>	<p>The AAP vision and objectives set out a clear economic vision and strategy for Lewisham town centre in accordance with NPPF paragraph 21, bullet point 1.</p> <p>The AAP encourages economic growth by protecting well used employment locations and proactively encouraging the growth of the retail and leisure offer in the town centre.</p> <p>An Employment Land Study (ELS) provides an up-to-date evidence base for employment strategy and policies in the Core Strategy as well as the AAP. The ELS assessed all designated employment sites and recommended the release of certain sites while at the same time safeguarding those that supported the London and local economy and were viable. These</p>	<p>No conflict.</p> <p>No effect on the AAP.</p>

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		recommendations are reflected in the CS spatial policies, employment land policies and designations and the AAP spatial and area-wide policies.	
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2. Ensuring the vitality of town centres (paras 23-27)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Set out policies for the management and growth of centres over the plan period (23).	<p><i>1. Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses?</i></p> <p><i>2. Have you identified primary and secondary shopping frontages?</i></p>	<p>1. The borough wide 'Retail Capacity Study', 2009 and 2010 addendum provides the evidence base for major and town centres, including Lewisham.</p> <p>The Core Strategy Spatial Policy 2 reflects the evidence base by detailing the additional retail floorspace that will be accommodated in the town centres located in the Regeneration and Growth Areas. This approach then forms the basis of the vision and objectives for the AAP.</p> <p>The AAP policies, in particular the Town Centre Area and Site policies in Section 4, are responsible for delivering the additional retail floorspace specified in the Retail Capacity Study, the Core Strategy and the AAP vision and objectives.</p> <p>2. Specific detail for Lewisham</p>	<p>No conflict.</p> <p>No effect on the AAP.</p>

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		<p>town centre shopping frontages is incorporated into the AAP through Policy LAAP16 – Retail Areas. This is illustrated by Figure 5.1.</p> <p>Changes to the shopping frontages are shown in the Lewisham AAP Proposals Map Changes Document made available during the pre-submission consultation.</p>	
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3. Supporting a prosperous rural economy (para 28)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development (28).	<i>Do your policies align with the objectives of para 28?</i>	Lewisham is not a rural area so this does not apply.	N/A

4. Promoting sustainable transport (paras 29-41)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Policies that facilitate sustainable development but also contribute to wider sustainability and health objectives (29).</p> <p>Different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas (29).</p>	<p><i>1. If local (car parking) standards have been prepared, are they justified and necessary? (39)</i> <i>(The cancellation of PPG13 removes the maximum standards for major non-residential development set out in Annex D. PPS4 allowed for non-residential standards to be set locally with Annex D being the default position. There is no longer a requirement to set non-residential parking standards as a maximum but that does not preclude lpas from doing so if justified by local circumstances).</i></p> <p><i>2. Has it taken into account how this relates to other policies set out elsewhere in the Framework, particularly in rural areas? (34).</i></p> <p><i>3. Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</i></p>	<p>1. AAP Policy LAAP20 outlines the approach to ensuring that new non-residential developments provide appropriate public and shopper parking. This supports Core Strategy Policy 14 that states that the London Plan car parking standards will apply. These are considered justified and were found sound at the London Plan EIP. The London Plan forms part of the development plan for the borough.</p> <p>2. Rural areas are not applicable to Lewisham.</p> <p>3. The AAP in Section 6 and Appendix 3 includes an implementation plan that demonstrates how the plan and policies will be delivered. Supporting this is an infrastructure delivery schedule for the town centre in Appendix 4 which details transport schemes. The infrastructure</p>	<p>No conflict.</p> <p>No effect on the AAP.</p>

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		<p>schedule is supported by a borough-wide Infrastructure Delivery Plan (IDP) which identifies transport infrastructure and was subject to consultation with adjoining boroughs, the GLA and TfL.</p> <p>Core Strategy Policy 14 part 9 states we will work with other providers and boroughs to 'ensure delivery of necessary transport infrastructure...'. The Strategic Site Allocations (including for Lewisham Gateway) set out essential infrastructure needed to deliver these sites including transport infrastructure.</p>	
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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.		The AAP does not comment on telecommunications policy, it is currently saved as UDP policy URB 11.	N/A

6. Delivering a wide choice of high quality homes (paras 47-55)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of <i>5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47)</i> .	<p><i>1. What is your record of housing delivery?</i></p> <p><i>2. Have you identified:</i></p> <p>a) five years or more supply of specific deliverable sites; <i>b) an additional buffer of 5% (moved forward from later in the plan period), or</i> <i>c) If there has been a record of persistent under delivery have you identified a buffer of 20% (moved forward from later in the plan period)? [Para 47].</i></p> <p><i>3. Does this element of housing supply include windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?</i></p>	Housing delivery targets are dealt with on a boroughwide basis in the Core Strategy. Refer to the Core Strategy Self Assessment for a full explanation.	No conflict. No effect on the AAP.

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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?
Illustrate the expected rate of housing delivery through a trajectory and set out a housing implementation strategy describing how a five year supply will be maintained (47).	<i>To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?</i>	Almost all development in Lewisham is on brownfield land, especially in Lewisham town centre and as such the removal of this target will have no impact on housing delivery.	No conflict. No effect on the AAP.
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50), and caters for housing demand and the scale of housing supply to meet this demand (para 159)	<i>1. Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum threshold? 2. Is your evidence for housing provision based on up to date, objectively assessed needs?</i>	This is addressed in the Core Strategy and is not dealt with by the AAP. Refer to the Core Strategy Self Assessment for a full explanation.	No conflict. No effect on the AAP.
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).	<i>Have you considered whether your plan needs a policy which allows some market housing to facilitate the provision of significant additional affordable housing to meet local needs?</i>	Lewisham is not a rural area and this section is not relevant.	N/A

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What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
	<i>Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)</i>	The AAP does not deal with inappropriate development of back gardens. This is partly dealt with in Saved UDP policy HSG 8 and will be updated for inclusion in the DM DPD.	No conflict. No effect on the AAP.
In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	<i>Examples of special circumstances to allow new isolated homes listed at para 55 (note, previous requirement about requiring economic use first has gone).</i>	Lewisham is not a rural area and this section is not relevant.	N/A

7. Requiring good design (paras 56-68)			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>Site specific design requirements are dealt with where necessary in Section 4 of the AAP.</p> <p>The Core Strategy outlines the boroughwide approach to design and further detailed policies will be included in the Development Management Local Plan.</p>	<p>No conflict.</p> <p>No effect on the AAP.</p>

8. Promoting healthy communities (paras 69-78)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><i>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</i></p>	<p><i>1. Does the plan include a policy or policies addressing community facilities and local services?</i></p> <p><i>2. To what extent do policies plan positively for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure?</i></p>	<p>1. Yes. The AAP details town centre requirements in Policy LAAP22 and site specific details where appropriate in the Town Centre Area policies LAAP3 to LAAP8. The borough-wide strategy towards social infrastructure is detailed in Core Strategy Policies 6, 12, 19 and 20.</p> <p>2. The approach taken through the AAP and the Core Strategy combined provides a positive policy stance for the protection of valued and sustainable community facilities and local services and supports the development and modernisation of such facilities. The AAP promotes development (including housing) in a town centre location where access to infrastructure and services is very good.</p> <p>Further, the Development Management Local Plan will</p>	<p>No conflict.</p> <p>No effect on the AAP.</p>

8. Promoting healthy communities (paras 69-78)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
		contain policies regarding pubs and places of worship.	
<i>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).</i>	<i>Do you have a policy which would enable the protection of Local Green Spaces and manage any development within it in a manner consistent with policy for Green Belts? (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77).</i>	This is addressed in the Core Strategy and not dealt with in the AAP. Refer to the Core Strategy Self Assessment for a full explanation.	No conflict. There is no requirement for the AAP to include a policy relating to Local Green Spaces.

9. Protecting Green Belt land (paras 79-92)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy (83).</p> <p>Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)</p>	<p>If you are including Green Belt policies in your plan, do they accurately reflect the NPPF policy? For example:</p> <p>Lpas should plan positively to enhance the beneficial use of the Green Belt. <i>Beneficial uses are listed in para 81.</i> PPG2 set out that 'Green Belts have a positive role to play in fulfilling objectives. Para 1.6 of PPG2 set out the objectives – some of these have been rephrased/ amended and 'to retain land in agricultural, forestry and related uses' has been omitted.</p> <p>Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (85).</p> <p>Does it allow for the extension or alteration of a <i>building</i>, provided that it does not result in disproportionate additions over and above the size of the</p>	<p>There are no Green Belt designations in Lewisham. Core Strategy Policy 12 makes reference to protecting Metropolitan Open Land (MOL) in accordance with the principles of PPG2 and the London Plan.</p>	<p>No conflict.</p> <p>There is no requirement for the AAP to include a policy relating to either Green Belt or MOL.</p>

9. Protecting Green Belt land (paras 79-92)			
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	<p>original building? (89). PPG2 previously referred to dwelling. Original building is defined in the Glossary.</p> <p>Does it allow for the replacement of a <i>building</i>, <i>provided the new building is in the same use and not materially larger than the one it replaces?</i> (89) PPG2 did not have a separate bullet point – replacement related to dwellings rather than buildings.</p> <p><i>Does it allow for limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development? (89)</i> (PPG2 referred to 'major existing developed sites')</p>		

9. Protecting Green Belt land (paras 79-92)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
	<p>Change from 'Park and Ride' in PPG2 to <i>local transport infrastructure</i> and the inclusion of <i>'development brought forward under a Community Right to Build Order'</i> in relation to other forms of development that are not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. (90).</p>		

10. Meeting the challenge of climate change flooding and coastal change (paras 93-108)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><i>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).</i></p>	<p><i>1. Have you planned new development in locations and ways which reduce greenhouse gas emissions?</i></p> <p><i>2. Does your plan actively support energy efficiency improvements to existing buildings?</i></p> <p><i>3. When setting any local requirement for a building's sustainability, have you done so in a way that is consistent with the Government's zero carbon buildings policy and adopt nationally described standards? (95)</i></p>	<p>1. Yes. The AAP promotes the approach to delivering new development in this location which is highly accessible by sustainable methods of public transport, reducing greenhouse emissions and enhancing local air quality. AAP Policy LAAP21 in particular promotes sustainable transport methods, including cycling and walking. Policies LAAP 24 and LAAP25 promote the use of heating, cooling and decentralized energy systems and climate change adaptation measures respectively. Core Strategy Spatial Policy 2 sets the scene by designating Lewisham town centre as part of the regeneration and growth area and proposing new homes and retail, leisure and commercial development.</p> <p>2. The AAP defers mostly to the Core Strategy to deal with energy efficiency in existing buildings. Core Strategy Policy 8</p>	<p>No conflict.</p> <p>There is no effect on the AAP.</p>

10. Meeting the challenge of climate change flooding and coastal change (paras 93-108)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
		<p>refers to the CfSH and BREEAM standards.</p> <p>3. The approach of Core Strategy Policy 8 set out above (using CfSH and BREEAM) is consistent with the government objective of zero carbon buildings by 2016 and 2019.</p>	
<p>Help increase the use and supply of renewable and low carbon energy (97).</p>	<p><i>1. Do you have a positive strategy to promote energy from renewable and low carbon sources?</i></p> <p><i>2. Have you considered identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</i></p>	<p>1. Yes. The over arching position is set out in Core Strategy Policy 8, with further detail regarding decentralised energy and communal heating and cooling systems included in AAP Policy LAAP24.</p> <p>2. AAP Policy LAAP24 includes details of where potential decentralised networks could exist in the town centre and a number of criteria regarding how new developments should connect to the systems.</p>	<p>No conflict.</p> <p>There is no effect on the AAP.</p>

11. Conserving and enhancing the natural environment (paras 109-125)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Planning policies should minimise impacts on biodiversity and geodiversity (para 117).</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).</p>	<p><i>If you have identified Nature Improvement Areas, have you considered specifying the types of development that may be appropriate in these areas (para 117)?</i></p>	<p>This is addressed in the Core Strategy and the London Plan and is not dealt with in the AAP.</p> <p>Refer to the Core Strategy Self Assessment for a full explanation.</p>	<p>No conflict. The continued relevance of the London Plan supports the Core Strategy approach. There is no requirement for further detail in the AAP.</p> <p>There is no effect on the AAP.</p>

12. Conserving and enhancing the historic environment (paras 126 – 141)			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>AAP Policies LAAP19 and LAAP23 provide detail regarding tall buildings and heritage assets. The Core Strategy sets out a positive approach to the conservation and enjoyment of the historic environment, in particular through Core Strategy Policies 15 - 18.</p> <p>Further detailed policy will be included in the Development Management Local Plan.</p>	<p>No conflict.</p> <p>There is no effect on the AAP.</p>

13. Facilitating the sustainable use of minerals (paras 142-149)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142).</p>	<p><i>Does the plan have policies for the selection of sites for future peat extraction? (143) (NPPF removes the requirement to have a criteria based policy as peat extraction is not supported nationally over the longer term).</i></p>	<p>There are no mineral workings in Lewisham and this section is therefore not considered relevant.</p>	<p>No conflict. No effect on the AAP.</p>

Planning policy for traveller sites

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

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

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

Government's aims in respect of traveller sites are:

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

In addition local planning authorities should:

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

Policy 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 traveler site? If so has a site or sites suitable for the relocation of the community been identified (if the original site is authorised)?	<p>The Lewisham Gateway Strategic Site identified in the Core Strategy included a former traveller site. The site has been emptied and cleared and a replacement site in the borough is being sought. The site assessment to find a replacement location is set out separately.</p> <p>See the Self Assessment for Travellers sites.</p>	<p>No conflict.</p> <p>No effect on the AAP.</p>