



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

## **Compatibility Self Assessment Checklist – Lewisham Site Allocations DPD (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 Site Allocations DPD and should be read in conjunction with the checklists for the Core Strategy, Travellers sites and Plan-making.**

## Introduction

We have produced a checklist to help you assess the content of your local plan<sup>1</sup> 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

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<sup>1</sup> 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](mailto: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 <a href="#">model policy</a> is provided on the <a href="#">Planning Portal</a> in the Local Plans section, as a suggestion (but this isn't prescriptive).</i></p>	<p>1. Yes. The Site Allocations DPD (SA DPD) identifies sites across the borough where development and growth can be accommodated. Sites providing for retail, housing and employment needs are identified.</p> <p>2. Yes. The SA DPD is based on a robust and up-to-date evidence base and will implement relevant Core Strategy objectives and policy priorities. Section 9 of the Core Strategy outlines a risk assessment and contingency planning to address flexibility and changing circumstances.</p> <p>3. This is addressed in the Core Strategy and is not dealt with in the SA DPD.</p>	<p>1 &amp; 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?
		Refer to the Core Strategy Self Assessment for a full explanation.	
The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)		<p>Where, in addition to the Core Strategy, the SA DPD makes a contribution to the 12 principles, this is expanded on below.</p> <p><b>1. Plan led</b>                      The SA DPD provides a practical framework to assist decision making. The site allocations specify appropriate uses and capacities which ensures a common understanding of development expectations.</p> <p><b>2. Creative solutions to improving places</b>                      Creative solutions can be applied to specific developments within the broad allocation for each site.</p> <p><b>3. Supporting sustainable economic development to deliver thriving local places</b>                      The SA DPD delivers aspects of</p>	<p>No conflict arises.</p> <p>No effect on overall strategy.</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>the Core Strategy approach to allocating land in the borough. The SA DPD puts forward sites in appropriate locations that will contribute to meeting the housing, business and other needs of Lewisham, as identified in the Core Strategy. The SA DPD also allocates MELs and LELs, providing for and protecting employment land.</p> <p><b>5. Valuing the role and character of different areas</b> In line with Lewisham's Spatial Strategy (set out in the Core Strategy), the SA DPD directs the type and quantity of development to appropriate parts of the borough.</p> <p><b>7. Conserving and enhancing the natural environment</b> The SA DPD proposes new SINCs and additions and deletions to existing SINCs.</p> <p><b>8. Encourage the reuse of</b></p>	

<b>The presumption in favour of sustainable development and core planning principles (para 6-17)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
		<p><b>land</b>                      Almost all of Lewisham's allocated development sites are brownfield sites.</p> <p><b>9. Promoting mixed use</b>                      The importance and promotion of mixed use development is reflected in the allocated uses for many of the site allocations.</p> <p><b>10. Conserving heritage assets</b>                      Each site allocation identifies heritage assets on site or in the surrounding area that should be considered as part of a development application.</p> <p><b>11. Public transport, walking, cycling</b>                      The distribution of sites in the SA DPD reflects the Core Strategy's Spatial Strategy which directs the majority of development in the borough towards the regeneration and growth areas which have good</p>	



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<b>The presumption in favour of sustainable development and core planning principles (para 6-17)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
		public transport links.	

## 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>Lewisham's Employment Land Study (ELS) provides an up-to-date evidence base for employment strategy and policies in the Core Strategy as well as the SA DPD.</p> <p>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 recommendations are reflected in the Core Strategy spatial policies, employment land policies and designations. The recommendations are also reflected in the SA DPD which designates Local Employment Locations and Mixed Use Employment Locations.</p> <p>The SA DPD also allocates non</p>	<p>The SA DPD and CSP 3-5 are not considered to be in conflict with NPPF.</p> <p>No effect on overall strategy.</p>

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		<p>designated sites which are called 'other employment locations'. These were not assessed in the ELS but are generally protected and criteria are provided to consider alternative uses including residential (CPS5).</p> <p>The Core Strategy vision, strategic objectives and spatial strategy set out a clear economic vision and strategy for the borough in accordance with NPPF paragraph 21, bullet point 1. The Core Strategy positively and proactively encourages sustainable economic growth linking deprived areas with the employment benefits arising from the development of major sites and key locations in the borough.</p>	
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<b>2. Ensuring the vitality of town centres (paras 23-27)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
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 SA DPD allocates development sites outside of Lewisham and Catford Major centres. Preparation of Area Action Plans for both these centres is currently underway. The SA DPD does not include the 5 strategic sites identified in the Core Strategy.</p> <p>The borough wide 'Retail Capacity Study', 2009 and 2010 addendum provides the evidence base for major and district town centres.</p> <p>2. Yes. Based on the recommendations in the Retail Capacity Study and addendum, the SA DPD identifies primary, secondary and other shopping frontages within the centres.</p>	<p>No conflict arises.</p> <p>No effect on overall strategy.</p>

<b>3. Supporting a prosperous rural economy (para 28)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
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.	No conflict.  No effect on overall strategy.

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) (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>2. Has it taken into account how this relates to other policies set out elsewhere in the Framework, particularly in rural areas? (34).</p> <p><i>3. Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</i></p>	<p>This is addressed in the Core Strategy and is not dealt with in the SA DPD.</p> <p>Refer to the Core Strategy Self Assessment for a full explanation.</p>	<p>No conflict.</p> <p>No effect on overall strategy.</p>

<b>5. Supporting high quality communications infrastructure (paras 42-46)</b>			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>The SA DPD does not refer to communications infrastructure nor is a telecommunication policy included in the Core Strategy. However UDP policy URB 11 is saved.</p>	<p>Saved UDP policy URB 11 generally conforms with intention of these paragraphs. No conflict is considered to arise.</p> <p>No effect on overall strategy.</p>

<b>6. Delivering a wide choice of high quality homes (paras 47-55)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of <i>5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47)</i> .	<p><i>What is your record of housing delivery?</i></p> <p><i>Have you identified:</i></p> <p>a) five years or more supply of specific deliverable sites;  <i>b) an additional buffer of 5% (moved forward from later in the plan period), or</i>  c) <i>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>Does this element of housing supply include windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?</i></p>	<p>This is addressed in the Core Strategy and is not dealt with in the SA DPD.</p> <p>Refer to the Core Strategy Self Assessment for a full explanation.</p>	<p>No conflict.</p> <p>No effect on overall strategy.</p>
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 and as such the removal of this target will have no impact on housing delivery.	<p>No conflict.</p> <p>No effect on overall strategy.</p>



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?
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50), and caters for housing demand and the scale of housing supply to meet this demand (para 159)	<i>Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum threshold? Is your evidence for housing provision based on up to date, objectively assessed needs</i>	This is addressed in the Core Strategy and is not dealt with in the SA DPD.  Refer to the Core Strategy Self Assessment for a full explanation.	No conflict.  No effect on 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).	<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
	<i>Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)</i>	Neither the SA DPD nor the Core Strategy deals 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 due to omission but will be included in the emerging DM DPD.  No effect on overall strategy.

<b>6. Delivering a wide choice of high quality homes (paras 47-55)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
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>The SA DPD contains limited reference to the design of each of the allocated sites.</p> <p>The Core Strategy vision, objectives and policies require good design and there is no conflict with this section of NPPF. Some detailed matters may not be included in Core Strategy but are reflected in Saved UDP policies and will be included in DM DPD.</p> <p>Applicants proposing development on allocated sites are required to consider the design matters set out in the saved UPD policies and any emerging policies included in the DM DPD.</p>	<p>No conflict.</p> <p>No effect on overall strategy.</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>Does the plan include a policy or policies addressing community facilities and local services? To what extent do policies plan positively for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure?</i></p>	<p>This is addressed in the Core Strategy and is not dealt with in the SA DPD.</p> <p>Refer to the Core Strategy Self Assessment for a full explanation.</p>	<p>There is no significant conflict with CS policies.</p> <p>No effect on overall strategy.</p>

<b>8. Promoting healthy communities (paras 69-78)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<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>	<p>This is addressed in the Core Strategy and is not dealt with in the SA DPD.</p> <p>Refer to the Core Strategy Self Assessment for a full explanation.</p>	<p>There is no conflict with Core Strategy policies.</p> <p>No effect on overall strategy.</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>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>This is addressed in the Core Strategy and is not dealt with in the SA DPD.</p> <p>Refer to the Core Strategy Self Assessment for a full explanation.</p>	<p>There is no conflict with Core Strategy policies.</p> <p>No effect on overall strategy.</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>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?
<i>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).</i>	<p><i>Have you planned new development in locations and ways which reduce greenhouse gas emissions?</i></p> <p><i>Does your plan actively support energy efficiency improvements to existing buildings?</i></p> <p><i>When setting any local requirement for a building's sustainability, have you done so in a way that is consistent with the Government's zero carbon buildings policy and adopt nationally described standards? (95)</i></p>	<p>This is addressed in the Core Strategy and is not dealt with in the SA DPD.</p> <p>Refer to the Core Strategy Self Assessment for a full explanation.</p>	<p>There is no conflict with Core Strategy policies.</p> <p>No effect on overall strategy.</p>
Help increase the use and supply of renewable and low carbon energy (97).	<p><i>Do you have a positive strategy to promote energy from renewable and low carbon sources?</i></p> <p><i>Have you considered identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources</i></p>	<p>This is addressed in the Core Strategy and is not dealt with in the SA DPD.</p> <p>Refer to the Core Strategy Self Assessment for a full explanation.</p>	<p>There is no conflict with Core Strategy policies.</p> <p>No effect on overall strategy.</p>

<b>10. Meeting the challenge of climate change flooding and coastal change (paras 93-108)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
	<i>(see also NPPF footnote 17)</i>		

11. Conserving and enhancing the natural environment (paras 109-125)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Planning policies should minimise impacts on biodiversity and geodiversity (para 117).</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).</p>	<p><i>If you have identified Nature Improvement Areas, have you considered specifying the types of development that may be appropriate in these areas (para 117)?</i></p>	<p>The SA DPD proposes new SINC's and additions and deletions to existing SINC's. In addition, Core Strategy Policy 12 part (f) mentions protecting sites and designating sites of importance for nature in accordance with PPS 9 and the London Plan.</p> <p>London Plan Policy 7.19 provides details of what is acceptable for SINC's.</p>	<p>The Council does not consider the deletion of PPS9 in favour of the NPPF will cause any difficulties. The London Plan reference is still appropriate. Therefore no significant conflict arises.</p> <p>No effect on overall strategy.</p>

<b>12. Conserving and enhancing the historic environment (paras 126 – 141)</b>			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>Each of the allocated site entries within the SA DPD identifies the heritage assets in close proximity that should be considered. In addition, the Core Strategy sets out a positive approach to the conservation and enjoyment of the historic environment.</p> <p>Not all the detailed points made in this section are covered. The missing detail could be included in DM DPD and planning applications for the development of allocated sites would be assessed against relevant criteria.</p>	<p>No conflict</p> <p>No effect on overall strategy.</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 not considered relevant.</p>	<p>No conflict  No effect on overall strategy.</p>