



East
Northamptonshire
Council

Planning Policy Committee – 17th September 2012

National Planning Policy Framework Compatibility Assessment: Rural North, Oundle and Thrapston Plan

Purpose of report

For members to endorse the National Planning Policy Framework (NPPF) Compatibility Assessment carried out on the Rural North, Oundle and Thrapston Plan (RNOTP)

Attachment(s)

Appendix 1 - *Local Plans and the National Planning Policy Framework, Compatibility Self Assessment Checklist* (April 2012) Planning Advisory Service (PAS): For the Rural North, Oundle and Thrapston Plan

1.0 Introduction

- 1.1 Due to the recent changes in national planning policy and the publication of the National Planning Policy Framework (NPPF) (March 2012), the compatibility of the Council's *Rural North, Oundle and Thrapston Plan*, is being assessed.
- 1.2 The Planning Advisory Service has produced a 'Compatibility Self Assessment Checklist' which has been used as a basis to carry out this assessment. The *PAS Compatibility toolkit assessment* for the RNOTP is available to view at Appendix 1. This analysis will assist those providing advice and making decisions.
- 1.3 Members will recall that they were informed about progress with this work at the last Planning Policy Working Party. Full consultation has now taken place with the Development Control Team and any comments have fed into this final assessment document.

2.0 Background and need to review

- 2.1 The introduction of the NPPF has resulted in some minor changes to national planning policy. The NPPF has replaced all former Planning Policy Statements and has slightly amended certain details of former policy.
- 2.2 The NPPF states that for the purposes of decision-taking, the policies in the Local Plan should not be considered out-of-date simply because they were adopted prior to the NPPF. However, the policies contained in the NNPF are a material consideration and local plans may therefore need to be revised to take into account new policies. It states that this should be progressed as quickly as possible, either through a partial review or by preparing a new plan.
- 2.3 The NPPF provides a 12 month transition period from the date of publication. It states that after April 2013 weight should be given to policies in existing local plans according to their degree of consistency with the NPPF. This highlights the need to explore to what extent the adopted RNOT Plan is consistent with the national policy changes.
- 2.4 It should be highlighted that this report and analysis is therefore purely related to the need to test the Adopted RNOTP against the NPPF.

3.0 NPPF key changes and resolutions

- 3.1 As set out in the checklist in Appendix 1, the majority of the Rural North, Oundle and Thrapston Plan is considered to be in general conformity with the NPPF, as the majority of the NPPF replicates former Planning Policy Statements. However, there are a number of changes to national policy which pose a potential for slight inconsistency.

This includes an added flexibility with regards to building in the open countryside; the added principle of the 'presumption in favour of sustainable development' and a potential additional requirement to the 5 year housing supply. These are discussed in more detail in turn below.

- 3.2 In terms of options for the Council, if these issues were to be considered significant then a partial or full review of the RNOTP could be undertaken, however this would obviously have resource implications. As discussed below and shown in Appendix 1, taking all of the individual policy areas together, it is considered that there is only a limited degree of inconsistency with the new NPPF on some of the policies and that any differences are not significant. In terms of risk assessment, it is considered unlikely that the frequency of inappropriate applications will increase as a result of any inconsistency. The review of the North Northamptonshire Core Spatial Strategy will also cover areas of slight inconformity.

4.0 Detail of potential inconsistencies

- 4.1 Appendix 1 sets out all of the potential areas for inconsistency and resolutions, however the key issues are highlighted below.

4.2 Rural economy

Paragraph 28 of the NPPF states that to promote a strong rural economy, local plans should: "support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings".

- 4.3 The RNOTP through policies 23 and 25 allows for the adaption or re-use of buildings in the countryside to promote farm diversification and economic growth according to certain criteria. As locally it is considered necessary for development to be controlled in order to conserve the environment of the countryside and amenity that contributes towards sustainability.

Policy 1 also allows some flexibility stating that in the open countryside, housing development will not 'normally' be permitted. It must also be noted that the review of the North Northamptonshire Core Spatial Strategy is set to include a policy to allow for the more flexible approach in rural areas as outlined in the NPPF.

Rural economy- minor inconsistency

4.4 Housing Supply

Paragraph 47 states that Local Planning Authorities (LPA's): 'should 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'. At the time of writing the RNOTP, the plan allocated the identified need in urban areas and set a windfall policy to allow for sites to meet the rural allocation in the NNCSS.

- 4.5 The District's updated five year supply is not identified through this Development Plan Document, but through the Joint Annual Monitoring Report which compiles a Housing Trajectory each year. The last published AMR highlighted that the whole district had a 4.12 year supply, however this was considered to be down to the recent changes in the national housing market and the decision to exclude supply figures from a number of promoted sites (to retain consistency with other districts in North Northamptonshire).

Note: Members will be considering the latest housing land supply details in a separate committee report.

- 4.6 With regards to a 5% buffer, future Annual Monitoring Reports will take account of the additional 5% now required. The NPPF also states (Para 47) that if there is a record of persistent under delivery LPA's should consider identifying a buffer of 20% moved forward from later in the plan period. However, there is evidence through historic Annual Monitoring Reports that there has not been a persistent under delivery of housing; therefore a buffer of 20% is not considered necessary.

Housing supply - in conformity

4.7 Affordable Housing

The PAS Toolkit questions whether evidence for housing provision is based on up to date objectively assessed need and whether policies requiring affordable housing need to be reviewed in light of the removal of the national threshold. Policy 13 requires up to 40% affordable housing according to certain criteria. This is based on findings of the 2007 Strategic Market Housing Assessment (SHMA) and has come from the adopted NNCSS. The RNOT also sets a threshold based on SHMA findings and viability testing. It is felt that these do not need to be reviewed, following the removal of the national threshold, as they are based on a local evidence base. The review of the NNCSS will also consider the updated SHMA.

- 4.8 The NPPF Para 54 also states that LPA's should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. The RNOT includes a *Rural exception housing policy*, which allows for affordable housing to meet local need in rural areas. It was not considered necessary through the SHMA at the time to allow for market housing to bring forward affordable housing in the policy. It is however expected that the review of the NNCSS will review the North Northamptonshire affordable housing policy.

Affordable Housing - in conformity

4.9 Housing in rural areas

The NPPF Para 55 states that in rural areas LPA's should avoid new isolated homes in the countryside unless there are special circumstances such as; the essential need for a rural worker to live permanently at or near their place of work in the countryside, where such development would represent the optimal viable use of a heritage asset, where the development would re-use redundant or disused buildings or the exceptional quality or innovative nature of the design of the dwelling.

- 4.10 *Policy 1 Settlement roles* of the RNOTP, encourages development towards the larger rural and local service centres, and in smaller villages the boundaries are tightly defined with development mainly only within village boundaries. However, the policy allows some flexibility stating that 'in the open countryside, housing development will

not normally be permitted'. Policy 23 does also allow for exceptions in the open countryside in line with Para 50 through the re-use of redundant or disused buildings according to certain criteria. It must also be remembered that updates to national policy will also be included in the review of the NNCSS.

Housing in rural areas - in conformity

4.11 Sustainable Development

The Toolkit queries whether the Local Plan includes a policy or policies which reflect the principles of the presumption in favour of sustainable development in the NPPF. The plan does not explicitly have clear policies that guide how the presumption in favour of sustainable development should be applied locally in line with Para 15. However the Rural North Oundle and Thrapston Plan (RNOT) is divided into environmental, social and economic policies as a running theme throughout the document, and includes a number of policies which aim to secure development that improves the economic, social and environmental conditions in the area.

- 4.12 The checklist also questions whether existing plans meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in Para14). With regards to whether there is sufficient flexibility to adapt to rapid change, the RNOTP also includes a windfall policy to allow for additional development in line with specific criteria. Any additional demand will also be identified through the Review of the NNCSS which is being reviewed in light of past performance and affects of the housing market; and there is also scope to address additional identified need through the emerging Four Towns Plan in the south of the district.

4.13 Viability

The toolkit asks to what extent the plan has been assessed to ensure viability, taking into account the costs of any requirements such as affordable housing, and infrastructure contributions. All of the policies are based around improving economic growth in the area and based on a just evidence base. Developer contributions will also be covered by a separate document, the emerging North Northamptonshire Community Infrastructure Levy which will include an assessment of viability.

- 4.14 The affordable housing policy has also undergone specific viability testing. It notes that viability testing has found that developer contributions from sites under 15 units would be hard to achieve, therefore a different threshold to the one suggested in the SHMA is set locally. The policy also states that the approach is to consider need and viability on a case by case basis.

Viability- in conformity

5.0 Conclusion

- 5.1 This report sets out the PAS assessment with regards to the existing adopted RNOTP and recent changes to national planning policy (NPPF).
- 5.2 Following assessment against the NPPF, it is concluded that there is only a limited degree of potential inconsistency between the RNOTP and the new National Planning Policy Framework. On that basis, there is no urgent need to review the RNOTP, prior to the preparation of the Four Towns Plan and it is proposed that the RNOT Plan should be given full weight following the end of the transition period in March 2013.

6.0 Equality and Diversity Implications

6.1 There are no equality and diversity implications.

7.0 Legal Implications

7.1 The District Council is required to prepare statutory plans for their area under the 2004 Planning and Compulsory Purchase Act and associated regulations. The NPPF states that after April 2013 weight should be given to policies in existing local plans according to their degree of consistency with the NPPF. Any potential inconsistencies that have not been properly addressed could therefore have legal implications in terms of the Council's Development Management decision making process.

8.0 Risk Management

8.1 The PAS assessment helps East Northamptonshire Council to identify any potential risks of RNOTP/ NPPF incompatibility. It is considered that there is only a very limited degree of inconsistency with the newly adopted national policy document, therefore the adopted RNOT Plan should still be given full weight post March 2013. This reduces potential risks of inappropriate development in the area and/ or legal challenges.

9.0 Financial Implications

9.1 There are no financial implications from the conclusions of this report, as the recommendation is that based on the NPPF/PAS assessment, there is no need to review the RNOTP

10.0 Corporate Outcomes

10.1 The relevant Corporate Outcomes are:

- Good quality of life – prosperous, sustainable
- Effective partnership working
- Strong community leadership

11.0 Recommendations

11.1 The Committee is recommended to:

- Endorse Appendix 1

(Reason – to confirm the policy position of the RNOTP, in particular after the March 2013 NPPF transition period, and to aid development management)

Legal	Power: Localism Act 2011; Planning and Compulsory Purchase Act 2004
	Other considerations: None
Background Papers: National Planning Policy Framework (March 2012)	
Person Originating Report:	Jennie Johnson, Senior Planning Policy Officer Ext.2337
Date: 07 September 2012	

CFO		MO		CX	
------------	--	-----------	--	-----------	--

(Committee Report Normal Rev. 22)



Local Plans and the National Planning Policy Framework

Compatibility Self Assessment Checklist

(April 2012)

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 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'](#).

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.

Who should use it?

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

What it doesn't do

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

What else are PAS doing?

There are more parts to this document to follow, including

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

How should you use it?

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

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

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

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

How we made it

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

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

What will happen to this document in the future?

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

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

Email: alice.lester@local.gov.uk

Disclaimer

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

1A: Achieving sustainable development

The presumption in favour of sustainable development and core planning principles (para 6-17)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><i>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</i></p>	<p><i>Does the plan positively seek opportunities to meet the development needs of the area?</i></p> <p><i>Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para 14)?</i></p> <p><i>Do you have a policy or policies which reflect the principles of the presumption in favour of sustainable development? A <u>model policy</u> is provided on the Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive).</i></p>	<p>The plan has allocated the assessed need from the Regional Spatial Strategy (RSS) and adopted Core Spatial Strategy (CSS) and has a windfall policy, which allows for additional affordable housing demand. Allocations were based on an Urban potential study, Strategic Housing Land Availability Study (Feb 2009) and Sustainability assessment of sites update (Feb 09) as well as an Assessment of potential housing sites in Oundle and Thrapston (Jan 2009).</p> <p>With regards to whether</p>	<p>It is felt that the RNOT Plan does plan positively to meet the identified need in the area and that there is no major conflict that would affect the overall strategy.</p>

		<p>there is sufficient flexibility to adapt to rapid change. A housing trajectory is produced every year, which reviews whether targets are being met within a five year period. The Housing figures in the Core Spatial Strategy are also currently being reviewed in light of past performance and affects of the housing market.</p> <p>The plan doesn't explicitly have clear policies that guide how the presumption in favour of sustainable development should be applied locally in line with Para 15. However the Rural North Oundle and Thrapston Plan (RNOT) is divided into environmental, social and economic policies as a running theme throughout the document, and includes a number of policies which aim to secure development that improves the economic, social and environmental conditions in the area.</p>	
--	--	--	--

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

<p>The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)</p>		<p>It is felt that the plan is in general conformity with all the 12 principles. For example the plan is in line with the principle that planning should; <i>'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 intrinsic character and beauty of the countryside and supporting thriving rural communities within it'</i>; through <i>Policy 1 Settlement roles</i> which encourages growth towards the main centers, and Policies 23-25 which support the rural economy through allowing certain types of development in the open countryside.</p>	<p>It is considered that the document is in conformity with all of the general principles.</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>	<i>A Market towns and rural regeneration study was produced in 2004 as well as a detailed Employment land review produced in 2006. The land review assessed all existing allocated employment sites and whether existing sites require ongoing protection. It was considered that all sites require ongoing protection as any alternatives uses to employment would be contrary to sustainable development principles.</i>	It is considered that the document is in general conformity with Para 21.

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).	<i>Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses? Have you identified primary and secondary shopping frontages?</i>	Expansion of the Town Centre was considered when defining the town centres boundaries in the plan. Both towns have <i>Defined shopping frontages</i> and <i>Primary shopping areas</i> to manage change within the centers. The plan also states that 'the strategy positively and proactively supports the town centers by encouraging uses, activities and investment that will sustain or enhance their character, attractiveness and viability'.	It is felt that the plan is in general conformity with the NPPFs town centre policies Para 23.

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?
<p>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).</p>	<p><i>Do your policies align with the objectives of para 28?</i></p>	<p>Policies 23 and 25 of the Plan allow for the adaption or re-use of buildings in the countryside to promote farm diversification and economic growth according to certain criteria. The plan states that locally it is necessary for this to be controlled in order to conserve the environment of the countryside and amenity that also contributes towards sustainability.</p> <p>Policy 1 does also allow some flexibility stating that in the open countryside, housing development will <u>not normally</u> be permitted.</p> <p>The plan also notes that proposals that positively help to support the diversification or development of the rural economy and sustainability of the communities that live there will still be appropriate in the</p>	<p><i>It is felt that the Policy is generally in conformity with Para 28, and that the added flexibility with new buildings will be covered in the Review of the NNCS which covers the RNOT plan area.</i></p>

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		<p>countryside.</p> <p>It must also be noted that the progressing Review of the NNCSS is set to include a policy to allow for the more flexible approach in rural areas as outlined in the NPPF.</p>	
--	--	--	--

4. Promoting sustainable transport (paras 29-41)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Policies that facilitate sustainable development but also contribute to wider sustainability and health objectives (29).</p> <p>Different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas (29).</p>	<p><i>If local (car parking) standards have been prepared, are they justified and necessary? (39) (The cancellation of PPG13 removes the maximum standards for major non-residential development set out in Annex D. PPS4 allowed for non-residential standards to be set locally with Annex D being the default position. There is no longer a requirement to set non-residential parking standards as a maximum but that does not preclude lpas from doing so if justified by local circumstances).</i></p> <p>Has it taken into account how this relates to other policies set out elsewhere in the Framework, particularly in rural areas? (34).</p>	<p>The RNOT doesn't include any non-residential standards however it does include residential parking standards under <i>Policy 6- Residential Parking standards</i>. However it is felt that these standards are justified and necessary, as the plan acknowledges that <i>as the area is predominantly rural 'despite planned improvements to public transport infrastructure, the Council recognises that car ownership remains high and that only over the longer term will it be possible to broaden real travel choice and thereby limit car usage'</i>. This it is felt justifies a need to include the residential parking standard in this predominately rural area.</p>	<p>There are not considered to be any significant differences with Para 29.</p>

	<p><i>Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</i></p>	<p>The plan also explains that Thrapston and Oundle are the only locations within the plan area where residents have access to a significant range of services and employment opportunities within easy walking and cycling distance, therefore a reduced parking standard is applied in these areas.</p> <p>The plan also includes Policy 5 Transport Network which requires attractive and direct walking and cycling routes connecting into the existing and planned network, for certain sized developments. The policy also requires an improvement to the bus and community transport network through Feeder services.</p> <p>Policy 5 also relates to other policies throughout the plan in line with Para 34, as for example the plan directs growth to the larger</p>	
--	---	--	--

		<p>settlements through <i>Policy 1 Settlement roles</i>, reducing the need to travel.</p> <p>In terms of major infrastructure this is covered by the North Northamptonshire and County level plans. However consultation and close working arrangements have taken place with adjoining Local Authorities.</p>	
--	--	--	--

5. Supporting high quality communications infrastructure (paras 42-46)

<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</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?
<p>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).</p>	<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;</p> <p>b) an additional buffer of 5% (moved forward from later in the plan period), or</p> <p>c) If there has been a record of persistent under delivery have you identified a buffer of 20% (moved forward from later in the plan period)? [Para 47].</p> <p><i>Does this element of housing supply include windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?</i></p>	<p>The five year supply isn't identified through this Development Plan Document, but through the Joint Annual Monitoring Report which compiles a Housing Trajectory each year, which plans for a 5 year supply of specific deliverable sites. The whole district currently has a 4.12 year supply, however this is considered down to the recent changes in the national housing market and a decision that the supply is not to include a number of promoted sites, for consistency with other districts in North Northamptonshire. It must however be noted that the national Brownfield target has since been removed.</p>	<p>There are no significant differences with Para 47 and 48 of the NPPF.</p>

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		<p>There is substantial evidence through the Annual Monitoring Reports that there hasn't been a persistent under delivery of housing historically, when considering the recent blip due to the national fall in the market, therefore a buffer of 20% is not required.</p> <p>The NNCSS sets out the housing figures for the area, therefore the progressing review will plan for the additional 5% now required. This will then continue to be reviewed through the yearly Joint Annual Monitoring Report.</p> <p>East Northamptonshires five year supply doesn't include a windfall figure to make up a shortfall in the five year supply. However the five year supply does include sites with planning applications not allocated in</p>	
--	--	--	--

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		<p>the plan; as it is felt that there is compelling evidence to include these sites. As the principle of development on the land has been decided through planning permissions approval, and there is therefore evidence that they are a reliable source and available in the local area in line with Para 48.</p>	
<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).</p>	<p><i>To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?</i></p>	<p>A Housing Trajectory is maintained through the yearly Joint Annual Monitoring Report.</p> <p>The RNOT includes a Housing Implementation Strategy, which sets out; scenario and contingency planning, risk assessment, engaging housebuilders and stakeholders and triggers for action.</p> <p>It is felt that the removal of the Brownfield target and the potential ability to include greenfield sites within trajectories may help</p>	<p>No conflict.</p>

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		the district to maintain a five year supply as well as the additional 5% housing requirement.	
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 need?</i>	Policy 13 requires 40% affordable housing according to certain criteria. This is based on findings of the 2007 Strategic Market Housing Assessment (SMHA) and has come from the adopted NNCSS. The RNOT also sets a threshold based on SHMA findings and viability testing. It is felt that these don't need to be reviewed since the removal of the national threshold as they are based on a local evidence base. The review of the NNCSS will also consider the updated SMHA.	No conflict.
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>	The RNOT has a rural exception housing policy, which allows for affordable housing to meet local need in rural areas. It wasn't considered necessary through the SHMA at the	The policy is in general conformity, the NNCSS which has set the affordable housing threshold will review the policy in light of recent changes.

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		<p>time to allow for market housing to bring forward affordable housing in the policy. It is however expected that the review of the Core Spatial Strategy will review the affordable housing policy in light of changes to national policy and consider whether this is necessary in the area.</p>	
	<p><i>Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)</i></p>	<p>It is considered that Policy 2 - Windfall development criteria c) restricts inappropriate development of residential gardens, through stating that windfall development will only be granted where the developer has addressed and sufficiently demonstrated through supporting information that 'the scale and siting of any dwellings accord with the character of the surrounding properties and are satisfactorily integrated into the settlement and the surrounding area' and that 'the proposal would not</p>	<p>The NPPF only states that LPA's should consider setting policies of this nature and it is felt that this is covered through existing policies.</p>

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		<p>unacceptably block important views and vistas within the settlement, or of open countryside beyond the settlement, and would not significantly distract from the appearance of the settlement from the surrounding area'.</p>	
<p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<p><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></p>	<p><i>Policy 1 Settlement roles</i>, encourages development towards the larger rural and local service centers, and in smaller villages the boundaries are tightly defined with development mainly only within village boundaries. However the Policy allows some flexibility stating that 'in the open countryside, housing development will not <u>normally</u> be permitted'. Policy 23 does also allow for exceptions in the open countryside in line with Para 50 through the re-use of redundant or disused buildings according to certain criteria.</p>	<p>It is considered that although the NPPF allows more flexibility with regards to housing in particular in the open countryside, the policy does allow some flexibility, through stating that development will not <u>normally</u> be permitted in the open countryside and this update to national policy will also be included in the review of the NNCCSS.</p>

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		Updates to national policy will also be included in the review of the NNCSS.	
--	--	--	--

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.			
---	--	--	--

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?</i></p> <p><i>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>The plan includes site specific policies such as <i>Policy OUN5- Prince William School</i>, which requires the major development proposals at Oundle, Thrapston and King's Cliffe to fund additional school infrastructure at the Prince Williams school in Oundle.</p> <p>Oundle and Thrapston have been identified as Rural Service Centres serving an extensive rural hinterland. The use of the town centre boundaries and the primary and defined shopping areas in these areas will 'positively and proactively support the centre's'; as noted in 7.17 by 'encouraging uses, activities and investment that will sustain or enhance</p>	<p>The plan is considered in general conformity with NPPF Para 70.</p>

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		<p>their character, attractiveness, vitality and viability'.</p> <p><i>Policy 1 - Settlement roles</i> directs growth to the larger rural and local service centers which have a wider variety of community facilities and good access to key services and infrastructure.</p> <p>NNCSS Policy 13 (f) also protects against the loss of community facilities.</p>	
<p><i>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</i></p>	<p><i>Do you have a policy which would enable the protection of Local Green Spaces and manage any development within it in a manner consistent with policy for Green Belts? (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77).</i></p>	<p><i>Policy 15 - Open space, sports and recreational facilities</i> requires measures to be taken to protect and enhance sites identified as having a high value (in terms of quality and accessibility). This policy is in conformity with the NPPF and would allow Neighbourhood plans to identify green areas in line with the Local Green Space</p>	<p>There are no significant differences with the NPPF.</p>

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		requirements in Para 77.	
--	--	--------------------------	--

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' <i>amongst other things</i> (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>This policy isn't relevant to East Northamptonshire.</p>	<p>n/a</p>

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

	<p>Does it allow for the extension or alteration of a <i>building</i>, provided that it does not result in disproportionate additions over and above the size of the original building? (89). <i>PPG2 previously referred to dwelling. Original building is defined in the Glossary.</i></p> <p>Does it allow for the replacement of a <i>building</i>, provided the new building is in the same use and not materially larger than the one it replaces? (89) <i>PPG2 did not have a separate bullet point – replacement related to dwellings rather than buildings.</i></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</i></p>		
--	---	--	--

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

	<p><i>development? (89)</i> (PPG2 referred to 'major existing developed sites')</p> <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>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><i>Policy 1- Settlement Roles promotes growth towards the larger service centers, in order to reduce the need to travel. Policy 4 - Green Infrastructure also includes a requirement to provide improved connectivity through the provision of foot and cycle routes.</i></p> <p>The Adopted North Northamptonshire Core Spatial Strategy includes Policy 14 on energy efficiency and sustainable construction which is in line with the Para 96 of the NPPF. It was not considered necessary to repeat this policy at the local level.</p> <p>The NNCSS Review will also include policies on allowable</p>	<p>The plan is in conformity with Para 94.</p>

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		<p>solutions which offer a solution of improving energy efficiency of existing buildings.</p>	
<p>Help increase the use and supply of renewable and low carbon energy (97).</p>	<p><i>Do you have a positive strategy to promote energy from renewable and low carbon sources?</i></p> <p><i>Have you considered identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</i></p>	<p>These policies aren't covered in the local RNOT DPD but in the wider strategic North Northamptonshire Core Spatial Strategy (NNCSS), under Policy 14. It is considered that this policy is in line with Para 97 of the NPPF, and the policy is currently being reviewed to cover any updates.</p> <p>It must also be noted that although the plan doesn't specifically identify suitable areas for renewable and low carbon energy sources, the plan doesn't preclude such a supporting document coming forward.</p> <p>Consideration of suitable sites for renewable and low carbon energy sources will also be considered through</p>	<p>It is felt that the differences are not significant; the NNCSS is also currently going through review.</p>

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		the NNCSS Review.	
--	--	-------------------	--

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 plan doesn't include reference to the Nature Improvement Area as the document precedes the designation. However this will be included in the review of the NNCSS.</p> <p>The RNOT Plan does however aim to enhance biodiversity in line with Para 117 through Policy 11 with reference to the Biodiversity Action plan and Habitat Opportunity Mapping. This work identifies and promotes the preservation, restoration and recreation of local priority habitats, ecological network and priority species populations at a landscape-scale.</p>	<p>The plan is in general conformity and it is expected that the review of the NNCSS will address any updates in the NPPF.</p>

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

--	--	--	--

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.

-

-

-

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>The plan doesn't include a criteria based policy for Peat extraction. The allocation of minerals is also a duty of the County Council. The Northamptonshire Minerals and Waste Development Framework identifies sites for mineral extraction.</p>	<p>n/a</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

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

Policy A: Using evidence to plan positively and manage development (para 6)			
	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?	The 2008 and 2011 Gypsy and Traveller Accommodation Assessment (GTAA) has reviewed demand in the area, and involved extensive engagement with the traveller community and their representatives.	In conformity with the NPPF.
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	The LPA attend regular meetings with Gypsy and Traveller representatives to ascertain need. In 2008 there was also a detailed Gypsy and Traveller Accommodation Assessment carried out to assess need up to 2017. This has since been reviewed in 2011 and will be included in the	There is no significant conflict with the NPPF, the review if the NNCSS will also include the more up to date GTAA, and includes a criteria based policy to allow for additional need in the area.

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

	<p>inform the preparation of your local plan and make planning decisions?</p>	<p>review of the NNCSS. This assessment took place over the wider Northamptonshire area, and need was allocated over the North Northamptonshire area. The LPA has also been in regular contact with adjoining LPA's such as Huntingdonshire to discuss cross boundary issues and demand in adjoining areas.</p>	
--	---	---	--

Policy B: Planning for traveller sites (paras 7-11)			
	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)	As demand in the area assessed through the GTAA only showed a small demand in the area, and there is already consent to extend one of the pitches inbetween Ringstead and Denford. It wasn't considered necessary to identify a 5 year supply at the time. The GTAA states that future provision should be close to existing private sites, the plan therefore identifies the general area of adjacent /near to existing sites in Ringstead and Irthlingborough; and these areas aren't covered by the northern	It is felt that the plan is in general conformity with the NPPF and that any differences aren't significant.

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		plan, therefore this will be addressed in the emerging Four Towns Plan.	
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?	The area is already covered by a Joint North Northamptonshire CSS for which a cross-boundary GTAA has been carried out which has set local targets.	No issues.
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 plan doesn't specifically allocate pitches.	n/a
Protect local amenity and environment.		Policy 17 in the adopted NNCSS already includes a policy which only allows permission for	In general conformity.

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		gypsy sites according to certain criteria including that the site is not within an areas designated as environmentally sensitive and that the site is closely linked to an existing settlement with an adequate range of services.	
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?	The GTAA only identified a small amount of need which will largely be satisfied by an existing commitment between Ringstead and Denford. The adopted CSS does however include a criteria based policy which allows for identified need to be delivered through the plan period.	The plan is consistent with the NPPF.
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	Not included within this document. Covered by NNCSS Policy 17.	n/a

Policy C: Sites in rural areas and the countryside (para 12)			
	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?		The plan doesn't specifically allocate sites in this plan area.	n/a

Policy D: Rural exception sites (para 13)			
	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>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.</p>	<p>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?</p>	<p>The plan doesn't allocated any land based on the GTAA needs assessment.</p> <p>The RNOT includes policy 2- Windfall development in settlements which would be applied to travellers sites also.</p> <p>The NNCSS Review will also include a reviewed windfall policy to allow for such sites according to certain criteria.</p>	<p>In general conformity, and will be covered in the NNCSS Review.</p>

Policy E: Traveller sites in Green Belt (paras 14-15)			
	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	There isn't a designated Green belt in the area, and it isn't felt that there is an opportunity to add a green belt in line with the NPPF which states that green belts across the country are already established and will only be used in exceptional circumstances.	n/a

Policy F: Mixed planning use traveller sites (paras 16-18)			
	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
	<p>Have you considered including travellers sites suitable for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents)? 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</p>	<p>The plan hasn't allocated any specific sites, based on need demonstrated through the GTAA.</p>	<p>n/a</p>

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

Plan-making

Local Plans (paras 150-157)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Each local planning authority should produce a Local Plan for its area. Any additional DPDs should only be used where clearly justified. SPDs should be used where they help applicants make successful applications/aid infrastructure delivery/not be used to add unnecessarily to financial burdens on development (153)	<i>Are you able to clearly justify the use of additional DPDs if this is the approach that you are pursuing?</i>	It is felt that the production of the Plan is necessary as the Joint North Northamptonshire Core Spatial Strategy just covers higher tier strategic policies. The NNCSS also covers four Local Authority areas and a vast expanse of differing geography. The four areas differ significantly in terms of character, settlement size, form and growth agendas. The Rural North Plan is therefore required to include detailed policies specific to the East Northamptonshire area, such as site specific policies	In conformity with Para 153.

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		and policies necessary in a predominantly rural area.	
<p>Local Plans should:</p> <ul style="list-style-type: none"> Plan positively (para 157) 	<p><i>Have you objectively assessed development needs and planned for them?</i></p> <p><i>If you can't meet them in your area, have you co-operated with others on meeting them elsewhere? (para 182)</i></p>	<p>The plan allocates the assessed need according to the strategic plans and also includes a windfall policy. It is felt that due to the areas historic track record of good delivery, it isn't necessary to consider re-distributing targets elsewhere. This is also decided at the higher tier level of the NNCSS and will be considered through the review of the NNCSS.</p>	<p>In conformity.</p>

Using a proportionate evidence base (paras 158-177)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Defence, national security, counter-terrorism and resilience	See Para 163	The plan includes a flood risk assessment which reduces the threat of natural hazards. Terrorism isn't however considered a significant issue in East Northamptonshire.	No significant differences.
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)	<i>To what extent has your plan been assessed to ensure viability, taking into account the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements? 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</i>	All of the standards are based on a just evidence base which takes into account viability. The document also includes an Implementation Strategy which looks at contingency planning, risk assessment, engaging house builders and stakeholder and triggers for action. The policy on affordable	Although the collective impact of the RNOT policies in combination with national and SPD policies hasn't specifically been considered in combination. All of the local policies are based around improving economic growth in the area; the affordable housing policy specifically has also undergone viability testing. The differences are not

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

	<p><i>a willing land owner and willing developer to enable the development to be deliverable (173)?</i></p> <p><i>To what extent have the likely cumulative impacts on development in your area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards been assessed to ensure that the cumulative impact of these standards and policies do not put implementation of the development plan at serious risk, and facilitate development throughout the economic cycle (174)?</i></p>	<p>housing also states that the policy approach is to consider need and viability on a case by case basis. It also notes that viability testing has found that developer contributions from sites under 15 units would be hard to achieve. Therefore a different threshold to the SHMA is set. The policy also states that the approach is to consider viability and need on a case by case basis.</p> <p>Developer contributions will be covered by the emerging North Northamptonshire Community Infrastructure Levy which will also include an assessment of viability. The S106 SPD is also based on a detailed evidence base.</p>	<p>considered significant to affect the conformity of the overall plan.</p>
--	--	--	---

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?

<p>Authorities should submit a plan for examination which it considers is sound, including being</p>	<p><i>Positively prepared</i></p>	<p>The Plan is considered sound in line with the new tests of soundness in the NPPF.</p> <p>The Plan is considered to be positively prepared to meet the requirements based on need from the adopted strategic plans, through land allocations as well as a Windfall policy to allow for additional need. The plan is considered to be consistent with achieving sustainable development; the settlement hierarchy also directs growth to the larger growth towns across North Northamptonshire.</p> <p>Targets are based on regional growth targets and have been distributed through the wider NNCSS to higher level service centers including Corby and Kettering, then distributed to smaller towns based on a settlement hierarchy. Therefore wider cooperation</p>	<p>In general conformity, no actions necessary.</p>
---	-----------------------------------	--	---

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment

		has been achieved at the Core Spatial Strategy's strategic level.	
--	--	---	--

Planning Advisory Service
Local Plans and National Planning Policy Framework: LPA Self Assessment