



planning advisory service

# Local Plans and the National Planning Policy Framework

## Compatibility Self-Assessment Checklist

This checklist which will help you assess the content of your new or emerging local plan<sup>1</sup> against requirements in the National Planning Policy Framework (NPPF) that are new or significantly different from national policy set out in PPGs and PPSs.

***These elements are highlighted in red and in italics.***

**Three Rivers District Council**

---

<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.

## 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>The golden thread of the NPPF is sustainable development, of which there are 3 dimensions: economic, social and environmental. The Council's <b>Core Strategy</b> plans positively for growth by adopting a positive approach to enabling appropriate development in appropriate places. <b>Core Strategy Policy CP1</b> sets out that Sustainable Development is the key principle underpinning the Three Rivers Core Strategy.</p> <p>The <b>Development Management Policies</b> and <b>Core Strategy</b> meet objectively assessed needs. The <b>DM Policies</b> builds on and refines the goals of the <b>Core Strategy</b> in line with the Government's objectives to achieve sustainable development.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</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 para14)?</i></p> <p><i>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 Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive).</i></p>	<p>The <b>Development Management Policies</b> builds upon the objectives of the <b>Core Strategy</b> to plan positively to meet the economic, social and environmental needs of the area, which have been considered in the context of the caveats set out in <b>paragraph 14</b>. The 'sound' Inspector's Report following examination of the <b>Core Strategy</b> confirms that the Council has adequately identified the special requirements of each locality in the District and that it has been demonstrated that inequalities across the District will be dealt with.</p> <p>Policy CP1 of the Core Strategy is the Council's overarching policy on sustainable development.</p> <p>Paragraph 5.2 of the Core Strategy sets out that sustainable development is the key principle underpinning the Three Rivers Core Strategy and is critical to the delivery of many of the Council's and community's aspirations.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>
--	--	---	---



		<p>whilst also maintaining the goal of <b>Core Strategy Policy CP1</b> to ensure the underlying principle of sustainable development is promoted. The <b>Core Strategy Place-Shaping Policies</b> assess how each of the settlements are expected to contribute to the future of the District, the hierarchy of which is illustrated in <b>Core Strategy Figure 5. Appendix 7 of the Core Strategy</b> sets out the Council's monitoring strategy whilst <b>Policy CP13</b> provides the framework for the monitoring and delivery of growth and development in the Core Strategy. To ensure the effective and efficient delivery of the Core Strategy, the Council will look to commit to joint-working, where it is necessary and beneficial to do so. It is recognised that it may be necessary to require a review of the <b>Core Strategy</b> where conditions change, however this can be done as part of the <b>Annual Monitoring Report</b>. The <b>Core Strategy</b> provides a high degree of predictability and efficiency, however there is still some reliance on the current saved policies of the <b>Local Plan (1996-2011)</b> are reviewed as part of the emerging <b>DM Policies</b>.</p>	<p>There are no significant differences. As</p>
--	--	---	---

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

	<ul style="list-style-type: none"> <li>• not simply be about scrutiny, but instead be a create exercise in finding ways to enhance and improve the places in which people live their lives</li>   <li>• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities</li> </ul>	<p>The <b>Core Strategy</b> sets out the long term Spatial Vision for Three Rivers, designed to improve the quality of people’s lives both now and in the future, whilst respecting the distinctiveness of the different settlements within the District. The Inspector’s Report confirms that the <b>Core Strategy</b> adequately identified the special requirements of each locality in the District.</p> <p>The <b>Core Strategy</b> promotes sustainable growth and development. The <b>Core Strategy</b> examination concludes that the Council’s approach to the supply and distribution of housing is justified, to deliver the 4,500 homes required by 2026 and that the Council has a five year supply of housing land. The approach to ‘seeking affordable housing is considered to be justified, as is the Council’s demonstration that the delivery of development in each location of the District will be effective and that infrastructure requirements and school provision have been considered’. Furthermore, the Inspector commented that the overall strategy is justified and appropriate. The approach taken as to where development should be located according to the nature of the different settlements is agreed, as is the general</p>	<p>such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>
--	--	--	---

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

	<ul style="list-style-type: none"> <li>• always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings</li> </ul>	<p>approach to the limited but future development in the Green Belt</p> <p><b>Spatial Vision (i)</b> seeks to recognise opportunities to improve and enhance the built, historic and natural environment wherever possible. <b>Strategic Objective 12</b> seeks to promote safety and security as a high priority in the design of new development in order to create attractive and safe places in which to live, work and play. <b>Policy CP1 (n)</b> seeks to promote buildings and public spaces of a high enduring design quality that respects local distinctiveness, is accessible to all and reduces opportunities for crime and anti-social behavior. <b>Core Strategy Policy CP12</b> requires all development proposals to achieve a high standard of design and highlights particular elements of design that development should have regard to. <b>DM1: Residential Design and Layout</b> sets out the Council's priority to maintain, protect and enhance the quality of the built environment and in particular residential amenities. <b>DM1</b> contributes directly to the <b>Core Strategy Objectives 3, 9, 10 and 12.</b></p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p>
--	--	---	--

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

	<ul style="list-style-type: none"> <li>• take account of the different character roles of different areas, promoting the vitality of our main urban areas, protecting Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it</li> </ul>	<p>The Inspector agreed, during the examination of the Core Strategy, that the approach to where development should be located according to the nature of our towns and villages is justified and appropriate, as is the strategy for limited, but necessary, future development in the Green Belt. The <b>Spatial Strategy</b> sets out that future development within the existing urban area is prioritized through the development of previously developed land and appropriate infilling. The relative importance of the different settlements within the District and their respective roles in achieving the goals of the <b>Core Strategy</b> are set out in the <b>Place-Shaping Policies</b>. The <b>DM Policies</b> refine these objectives. The principle of design forms one of the Council's <b>Core Strategy Policies (CP12)</b> and <b>DM1</b> provides more specific guidance on residential design and layout.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p>
--	---	--	--

## 1B: Delivering sustainable development

1. Building a strong, competitive economy (paras 18-22)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Set out a clear economic vision for the area which positively and proactively encourages sustainable economic growth (21).	<i>Is there an up to date assessment of the deliverability of allocated employment sites, to meet local needs, to justify their long-term protection (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)?</i>	<p>The Core Strategic objective for employment and economic development recognises the importance to 'make provision for future employment and economic development alongside housing growth and protections of the environment'. The content of <b>CP6</b> elaborates on this principle and identifies key areas to support sustainable growth.</p> <p><b>Core Strategic Policy CP6</b> sets out a clear strategy to plan positively for future economic development and supporting sustainable economic growth. The overall objective of para 21 of the NPPF is to ensure potential barriers to investment are addressed, including a poor environment, lack of infrastructure, services or housing. The <b>DM Policies</b> build upon the foundations of the <b>Core Strategy</b> to address these potential issues in order to support sustainable economic growth.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>

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

		<p>The Employment Land Study (2005) was undertaken for the Districts in southwest Hertfordshire, identifying specific requirements in terms of jobs, floorspace and growth projections. A further study, the 'London Arc', assessed the implications of jobs growth targets in the District to 2026. An Employment Land Study Update was undertaken in 2010 in conjunction with Dacorum Borough Council, which recommended continuing to use the data of the London Arc study.</p> <p>The Site Allocations document identifies sites throughout the District for development up to 2026 to support the delivery of the Council's Core Strategy and Community Strategy. It allocates sites for employment. Policy SA2 of this emerging document identifies allocated employment sites to be safeguarded for business, industrial and storage or distribution uses. Sites allocated as having potential for mixed use development may provide for mixed use development including, but not limited to business, industrial and storage or distribution; residential or community uses.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>
--	--	--	---

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?</i>	<p>The Town (Rickmansworth) and Key Centres have been identified as the most sustainable locations in the District. A hierarchy has been established. <b>Place-Shaping Policy 1</b> identifies Rickmansworth as the Principal Town in the District. <b>PSP2</b> identifies the Key Centres and <b>PSP3</b> the Secondary Centres. Policy <b>CP7</b> plans for town centres and shopping and seeks to maintain the vitality and viability of town centres. <b>CP7</b> sets out the important role of town centres in supporting local communities.</p> <p>Policy <b>CP6</b> sets out the Employment and Economic Development strategy. The <b>Employment Land Study (2005)</b> and <b>Update (2010)</b> identifies an over-supply of office space in the District. The London Arc Study predicts that there is likely to be a surplus of 60,000-70,000 sq m in the District.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>

	<p><i>Have you identified primary and secondary shopping frontages?</i></p>	<p><b>Appendix 3</b> of the <b>Core Strategy</b> illustrates graphically the hierarchy and relative size and importance of the town centre, district centres, local centres and local shops. The vital role played by each of these centres in maintaining sustainable communities is recognised by <b>CP7</b>. Each centre can be dissected in order to establish the relative levels of retail activity within those areas. Primary and secondary frontages have been identified in the larger centres. Retail centre boundaries and the Primary and Secondary shopping frontages within these will be considered and allocated through the Site Allocations Development Plan Document.</p>	<p>There are no significant differences. As such there is no effect on the 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>
<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>The <b>Place-Shaping Policies</b> assess how each of the settlements in the District is expected to contribute to the future of the District. <b>PSP4</b> specifically considers the part that development in villages can play. It sets out that some small-scale sustainable development in or on the edge of villages will be allowed in order to meet local community and business needs in order to maintain the vitality of rural communities.</p> <p>77% of the District is Green belt and <b>Policy DM2</b> states that the Council will support application for the re-use/conversion of buildings in the Green Belt where certain criteria are met, which are in line with objectives for sustainable development. <b>DM2</b> therefore enables development that is needed to support agriculture, forestry and rural enterprise, equine related uses and leisure uses.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>

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

		<p><b>PSP2</b> sets out that that the former Leavesden Aerodrome site, which includes the nationally important film studios, is anticipated to be significant in meeting needs for housing and employment through mixed use redevelopment. Specific proposals for the site will be included in the Site Allocations Development Plan Document</p>	
--	--	---	--

<b>4. Promoting sustainable transport (paras 29-41)</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>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>The Council's overarching approach to encouraging sustainable transport choices is set out in Core Strategy <b>Policy CP10</b>, whilst the overarching policy on sustainable development is contained in <b>Policy CP1</b>. The local standards are contained in <b>Appendix 5</b> of the <b>DM Policies</b>, however, these current figures are currently being reviewed. These standards take account of</p> <ul style="list-style-type: none"> <li>• the accessibility of development,</li> <li>• the type, mix and use of development</li> <li>• the availability of and opportunities for public transport</li> <li>• local car ownership levels</li> <li>• overall need to reduce the use of high-emission vehicles</li> </ul> <p>Building on the objective of <b>Core Strategy Objective 7</b> to deliver improved and more integrated transport systems by locating development in accessible locations, <b>Policy DM13</b> seeks to encourage a range of sustainable transport options whilst also</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>

	<p>Has it taken into account how this relates to other policies set out elsewhere in the Framework, <i>particularly in rural areas? (34).</i></p>	<p>recognising the need to provide sufficient parking.</p> <p>The <b>Three Rivers Transport Study Background Update (February 2011)</b> is an update paper to the transport background study that was carried out to assess European, national, regional and local policy context for the development of transport policies in Three Rivers. This document forms part of the Evidence Base Studies.</p> <p>The District comprises a mixture of countryside, villages and small towns, and therefore is predominantly rural in nature. The <b>DM Policies</b> build upon the <b>Core Strategy</b> in order to promote a prosperous rural economy. The Spatial Strategy seeks to direct development to the areas with greatest access to public transport, services and facilities.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>
--	---	---	---

	<p><i>Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</i></p>	<p>The Council identifies the importance of transport and travel in delivering the <b>Core Strategy's Spatial Strategy</b> and contributing to the sustainability of the District. Transport needs have been identified through the <b>Local Transport Plan 2006/7-2011/2</b>, the <b>South West Herts Transportation Strategy</b> (2004 and updated as <b>South West Herts Transportation Plan</b> (2008), the <b>Bus Network Strategy Review</b> (2006), <b>Intelligent Transport Systems Strategy</b> (2008), <b>The Hertfordshire Infrastructure and Investment Strategy</b> (2009) and responses to public consultation. Further to the collaboration with other authorities through the above mechanisms, the Council is committed to working with <b>Hertfordshire County Council</b>, the <b>Highways Agency</b> and other transport providers to provide a coordinated and enhanced transport system which improves the connectivity and transport services to and between settlements within Three Rivers and surrounding areas.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p>
--	---	--	--

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

There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.			
---	--	--	--

<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>
<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 <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>	<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>Historically, housing delivery has been at high levels in the District. The <b>Core Strategy</b> identifies that 4,500 dwellings are required over the period 2001-2026. After compiling figures for net completions from 2001-2010, sites under construction, sites with full planning permission/outline planning permission, the Council are required to identify land for 195 dwellings to 2026. The <b>Site Allocations LDD</b> sets out how the Council will meet the remaining 1,602 dwellings in line with the <b>Core Strategy</b> requirements to 2026.</p> <p>The Council will identify and update annually a supply of specific deliverable sites sufficient to provide five year's worth.</p> <p>The Council does have a consistent and proven record of delivery and therefore it is necessary to include an additional buffer of only 5% on housing targets.</p> <p>A windfall allowance of 38 dwellings per</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As</p>

		<p>year between 2021 and 2026 has been included in these projected figures. The <b>Core Strategy</b> was adopted in October 2011, prior to the adoption of the NPPF and subsequent revocation of <b>PPS3: Housing</b> amongst others. The Core Strategy figures for 2001-2016 are based on monitoring information and the five year supply assessment that was required by <b>PPS3</b>. <b>PPS3</b> set out that allowances for windfall sites should not be included the first 10 years of land supply unless LPAs can provide robust evidence of genuine local circumstances that prevent specific sites being identified. The <b>Core Strategy</b> specifies a windfall allowance of 38 dwellings a year over the period 2021-2026. The Council, in line with <b>PPS3</b> guidance, evaluated past trends in windfall land coming forward for development and estimated likely future implementation dates with regards to the <b>Strategic Housing Land Availability Assessment (SHLAA)</b> in order to establish suitable windfall figures.</p> <p>Whilst these figures may now have to be reviewed following the amended guidance in the NPPF to remove garden land from windfall figures, the Council is satisfied that the existing windfall projections have been examined during the <b>Core Strategy</b> adoption.</p>	<p>such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>
--	--	---	--

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

<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>It is not anticipated that the removal of national and regional brownfield targets will have any significant adverse effect on housing land supply in the District.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p>
<p>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)</p>	<p><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></p>	<p><b>Core Strategy Spatial Vision</b> sets out that priorities for the future include (a) providing growth required to support local communities and provide for their needs in the most sustainable way possible and (c) improving access to housing and affordable housing for communities across the whole District. <b>Strategic Objective 4</b> is to balance the community's need for future homes and jobs by providing sufficient land to meet a range of local housing needs and to maintain a prosperous local economy, and <b>Strategic Objective 5</b> is to increase levels of affordable housing in the District, prioritizing the provision of social rented and larger family-sized homes. <b>Policy CP1 (g)</b> seeks mixed and sustainable communities. <b>Policy CP3</b> states that the Council will promote high quality residential development that respects the character of the District and caters for a range of housing needs. <b>Policy CP4</b> seeks to increase the provision of affordable homes in the District and meet local housing need. <b>Spatial Vision (g)</b> sets out that the regeneration of the South</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p>

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

		<p>Oxhey area is a priority for the future.</p> <p><b>Core Strategy Policy CP4</b> sets out the policy for Affordable Housing, which is informed by the Strategic Housing Market Assessment. Furthermore, the Council will be looking to adopt its <b>Affordable Housing Supplementary Planning Document (SPD)</b>. The Council, as part of its assessment of local affordability, has taken account of the <b>Strategic Housing Market Assessment 2010</b> which provides a thorough assessment of current and future housing markets and needs and the housing requirements of specific groups.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p>
<p>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).</p>	<p><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></p>	<p>It was agreed by the Inspector at the time of the examination that the Core Strategy is justified and appropriate. The approach to where development should be located according to the nature of our towns and villages was agreed, as was the limited, but future, development of the Green Belt. The Inspector also agreed with the projected housing targets and the identified requirements of each locality in the District. Furthermore, the approach to providing 45% affordable housing is justified. <b>DM1</b> sets out the strategy for residential design and layout which intends to protect the character and residential amenity of existing areas and ensure that any development is appropriate.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p>

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

	<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><b>Policy DM1</b> sets out that the Council will seek to protect the character and residential amenity of existing areas of housing from forms of backland development. <b>DM1 (a)</b> details the criteria that should be complied with in order to ensure that development does not cause harm to the local area. This Policy builds on <b>CP12</b> which outlines the Core Strategy’s approach to <b>Design of Development</b>.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</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><b>Policy CP2</b> outlines that the District’s housing provision will be made primarily from within the existing urban area (75). Provision will also be made at the most sustainable locations on the edge of existing settlements, in the Green Belt (25%). Specific sites will be identified in the forthcoming Site Allocations LDD. The suitability of a specific site, however, will be subject to the sustainability of the site. The District is 77% Green Belt, predominantly covering the rural areas of the District. The rural areas are therefore subject to the Green Belt Policies <b>CP11</b> and <b>DM2</b>. <b>DM2</b> states that very special circumstances must be demonstrated for approval to be given for new buildings other than those detailed in national guidance. Very special circumstances may exist where the Council has identified sites through the Site Allocations LDD. Proposals for new dwellings for agricultural</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p>

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

		and/or forestry use are outlined <b>Core Strategy Appendix 3.</b>	
<b>7. Requiring good design (paras 56-68)</b>			
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.			

<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>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</i>	<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>	The <b>Core Strategy Spatial Vision</b> looks to ensure the District will remain a prosperous, safe and healthy place where people want and are able to live and work. <b>Strategic Objective 7</b> looks to deliver improved and more integrated transport systems and reduce the need to travel by locating development in accessible locations. <b>Strategic Objective 8</b> seeks to maintain and enhance the viability, vitality and variety of shops and services within the District, the retention of which will benefit the day-to-day needs of local people and the wider community. <b>Strategic Objective 11</b> aims to provide accessible and varied opportunities for leisure, arts, sport and recreational activities, the provision of which is essential in ensuring the enhancement of the sustainability of communities and residential developments. These <b>Strategic Objectives</b> outline the overarching aim	There are no significant differences. As such there is no effect on the overall strategy.

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

		<p>to promote healthy communities and deliver the social, recreational and cultural facilities and services the community needs.</p> <p><b>Policy DM12</b> sets out the Council's commitment to creating sustainable communities by recognising the importance of provision and protection of community facilities in accessible locations. This should ensure the continued vitality of village and rural communities. <b>DM12</b> seeks to ensure that the loss of such facilities are resisted and that new provisions are sustainable and accessible by sustainable modes of transport.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</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><b>Core Strategy Policy CP9</b> seeks to protect and enhance the assets and provision of green spaces, in order to improve the District's Green Infrastructure. <b>Policy DM6</b> sets out the Council's policy for biodiversity, trees, woodlands, watercourses and landscaping. <b>DM6</b> recognises biodiversity as being a key element of Green Infrastructure. The forthcoming <b>Site Allocations LDD</b> identifies a number of Open Space Allocations throughout the District that will be available for public comment during the consultation period.</p> <p>Through neighbourhood planning processes, a local body/organisation would be able to propose allocating green/open space, provided that the proposal was in conformity with the Local Plan. That said, any proposal for open/green space would also have to be mindful of the criteria set out in the NPPF (77).</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>
---	---	---	---

<b>9. Protecting Green Belt land (paras 79-92)</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>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 <b>'physical features likely to be permanent'</b> amongst other things (85)</p>	<p>If you are including Green Belt policies in your plan, do they accurately reflect the NPPF policy?</p> <p>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>The Green Belt is established in the District. Through the Site Allocations DPD, a review of a 'Major Developed Site in the Green Belt' at Leavesden is being considered. This reflects the objective of <b>Policy CP11.</b></p> <p>The Green Belt objectives as outlined in <b>Policy DM2</b> reflect the purposes of the Green Belt in the NPPF (80).</p> <p>Furthermore, <b>Policy DM2</b> recognises the role of the Green Belt in providing access to the countryside for the urban population and emphasises the importance of retaining and enhancing Green Belt.</p> <p><b>Policy DM2</b> also ties in with <b>Core Strategy Objective 9</b> to conserve and enhance the countryside and the diversity of landscapes, wildlife and habitats in the District. Maintaining the attractive</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>

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

	<p>Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (85).</p>	<p>countryside and visual amenity are further objectives of the <b>Core Strategy</b> and <b>DM Policies</b> that are supported by the <b>NPPF</b>.</p> <p>The <b>Core Strategy Spatial Strategy</b> sets out that the main emphasis for future development is to continue to focus development within the existing urban area through development of previously developed land and appropriate infilling. <b>Policy DM2</b> expands on this overarching aim and states that very special circumstances will have to be demonstrated for new buildings in the Green Belt. <b>Policy DM2</b>, in accordance with the adopted <b>Core Strategy</b> and <b>NPPF</b>, therefore seeks to protect the Green Belt.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</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 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>, <i>provided the new building is in the same use and not materially larger than the one it replaces?</i> (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 development? (89)</i> (PPG2 referred to 'major existing developed sites')</p>	<p><b>DM2 (b)</b> states that extensions to buildings in the Green Belt that are disproportionate in size to the original building will not be permitted.</p> <p><b>DM2 (c)</b> allows for replacement <i>dwellings</i> in the Green Belt similar to that of <b>PPG2</b>. <b>DM2 (c)</b> does not wholly reflect the revised guidance as part of the NPPF whereby the guidance has been amended such that it relates to replacement buildings.</p> <p>Any proposed development would be subject to the Green Belt Policy as set out in <b>DM2</b>. Very special circumstances will need to be demonstrated to overcome the harm to the Green Belt by reason of inappropriateness. The <b>Core Strategy</b> refers 'major developed sites' which reflected the guidance in <b>PPG2</b> (now revoked)</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>Consider amending the policy to include replacement buildings.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>
--	--	---	---

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

	<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>		
--	--	--	--

<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>
<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>The <b>Spatial Strategy</b> requires development sites to be identified taking into account whether development will have a significant impact on the environment. New development should will be planned in the most sustainable locations in the District.</p> <p>The Policy Approach for <b>DM4</b> recognises that it is crucial to address the deficiencies within existing stock. If a Carbon Offset fund is taken forward, it is intended that it will be used to retrofit the existing building stock with energy saving measures.</p> <p>In line with national policy, the Council uses Part L of the Building Regulations as a benchmark for reducing carbon emissions. Paragraph <b>6.6</b> of the <b>DM Policies</b> states that development will not be required to achieve zero carbon emissions entirely within the site boundary. Rather, there will be a minimum requirement for emission savings through energy efficient design of the building fabric</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p> <p>There are no significant differences. As such there is no effect on the overall strategy.</p>

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

		<p>set by Building Regulations. The Council is committed to the 'Allowable Solutions' initiative when this comes into force.</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><b>DM4</b> sets out the Council's policy for carbon dioxide emissions and on-site renewable energy, and contributes directly to <b>Core Strategic Objective 3</b> in terms of reducing energy consumption, promoting use of renewable energy and addressing climate change. In line with national policy, the Council uses Part L of the Building Regulations as a benchmark for reducing carbon emissions. The C-Plan system used by the Council provides a reliable, consistent and transparent method of assessing the likely energy use and carbon dioxide emissions for proposed development.</p> <p><b>DM5</b> sets out that the Council will, in considering proposals for large-scale renewable energy developments, take into account any potential impacts that may occur as a result. Essentially, this policy seeks to balance the beneficial outcomes of renewable energy and any adverse impacts produced by the development itself. The Council will, in determining applications, expect applicants to demonstrate how a suitable site meets the criteria set out in <b>DM5</b> and how an application would contribute to the Council's overarching aim of promoting sustainable development.</p>	

<b>11. Conserving and enhancing the natural environment (paras 109-125)</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>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><b>Spatial Vision (i)</b> sets out a priority for the future to recognise opportunities to improve and enhance the natural environment wherever possible.</p> <p><b>Strategic Objective 9</b> seeks to conserve and enhance the countryside and the diversity of landscapes, wildlife and habitats in the District with a coherent network of Green Infrastructure to support the natural environment and human health. Three Rivers has, as outlined in <b>Policy DM6</b>, identified Sites of Special Scientific Interest, Local Nature Reserves, County Wildlife Sites, Protected Species, Trees and Ancient Woodlands, Geological and physiographical features.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p>

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

		<b>Policy DM6</b> seeks to conserve and enhance these interests where possible.	
--	--	---	--

<b>12. Conserving and enhancing the historic environment (paras 126 – 141)</b>			
There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.			

<b>13. Facilitating the sustainable use of minerals (paras 142-149)</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>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 Core Strategy (Para 1.8) sets out that Hertfordshire County Council is responsible for preparing Minerals and Waste Development Plan Documents. These will set out the principles for the amount of mineral extraction that will take place in the County up to 2026, identify the locations where the most important of these activities will take place, and contain some broad principles that will apply when planning applications for minerals or waste development are being considered.</p>	<p>There are no significant differences. As such there is no effect on the overall strategy.</p>