



**Elmbridge**

**Borough Council**

*... bridging the communities ...*

## **Elmbridge Local Plan**

Proposed Submission Development Management Plan: NPPF Conformity

**February 2014**

## Introduction

- 1.1. Since it came to power in May 2010, the Coalition Government has introduced a series of reforms to the planning system, with the aim of making the system less complex and more accessible whilst at the same time continuing to protect the environment and promote sustainable growth. The National Planning Policy Framework (NPPF), which was published in March 2012, is a key part of this new system as it consolidates a set of national priorities and objectives that must be considered when planning for and deciding on new development.
- 1.2. The NPPF establishes a presumption in favour of sustainable development aims to strengthen local decision making and additionally reinforces the importance of maintaining an up-to-date Local Plan.
- 1.3. Elmbridge Borough Council is currently producing a new Local Plan for the Borough in the form of a portfolio of individual documents. When completed, this will supersede the Replacement Elmbridge Borough Local Plan which dates back to 2000. The first of the documents to be produced was the Core Strategy. This was adopted in July 2011 and therefore predated the publication of NPPF. However, following the NPPF's introduction on 27 March 2012, the Government provided a 12 month adjustment period for all local authorities to ensure that their existing policies were in line with the NPPF: 'For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework (para 214)'. The Council's Core Strategy NPPF conformity checklists (September 2012) are available from the Council's website [www.elmbridge.gov.uk/planning](http://www.elmbridge.gov.uk/planning) and demonstrate that the policies contained within the Core Strategy are consistent with the contents of the NPPF.
- 1.4. The Development Management Plan preparation began following the adoption of the Core Strategy. Detailed reporting on preparation activity is outlined in other supporting documentation, namely the Consultation Statement and Duty to Co-Operate statement of compliance.
- 1.5. This report demonstrates how Elmbridge Borough Council considers that the submission Development Management Plan is in conformity with the NPPF. The report is produced in table form, and lists the policy numbering at proposed submission stage and the second column outlines the applicable paragraphs of the NPPF for the policy conforms to in column two. Column three outlines whether or not NPPF reliance is sufficient and essentially replicates much of the information contained in the Sustainability Appraisal report. It also explains why reliance on the NPPF alone would not be an acceptable policy direction for Elmbridge. In the final column, any matters with potential cross-boundary implications are also considered.

- 1.6. Overall, the Council considers that the proposed submission policies are in conformity with the key aims and objectives of the NPPF. However, as set out by NPPF paragraph 182, all local plans must undergo Examination in Public and an independent Inspector will take the final decision on whether or not the four tests of soundness have been met. This includes assessing the Development Management Plan's consistency with the NPPF.
- 1.7. This report is produced for information purposes only, and setting out conformity with national policy in the manner taken by this report is not a statutory requirement. Nevertheless when read in conjunction with the other supporting documentation, this approach is considered to robustly demonstrate the clarity and transparency of the Council's approach in arriving at the proposed submission policy position. It should therefore enable any interested parties to understand the level of conformity between the Development Management Plan and the NPPF on a policy-by-policy basis.

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
<p><b>DM1 Presumption in favour of Sustainable Development</b> This policy ensures that the Council takes a positive approach in considering development proposals, reflecting the NPPF's presumption in favour of sustainable development.</p>	<p><b>14</b> – At the heart of the National Planning Policy Framework is a presumption in favour of sustainable Development, which should be seen as a golden thread running through both plan-making and decision-taking.</p> <p><b>15</b> – Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is suitable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<p>No. The Planning Inspectorate considers that the insertion of this 'model policy' into a Local Plan will be an appropriate way of ensuring the presumption in favour of sustainable development is met.</p>	<p>No. It is not considered that this policy has, or is likely to give rise to, any cross-boundary issues. Every new Local Plan is expected to include this policy.</p>
<p><b>DM2 Design and Amenity</b> The policy sets out design criteria which applications should comply with, and provides a link to the Design and Character SPD.</p>	<p><b>Section 7 – Requiring Good Design (paragraphs 56 to 68).</b> This section includes guidance to: establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; optimise the potential of the site to accommodate development; respond to local character and history, and reflect the identity of local surroundings and</p>	<p>No. The NPPF sets generic policy which is applicable across the whole of England. While the NPPF contains a considerable amount of guidance on general development principles, a detailed policy is needed to provide localised standards and criteria having regard to local character for each area as set out in the Design and Character SPD. The policy also sets out specific criteria against which the</p>	<p>No. This policy sets design criteria for proposals, which will be applicable within Elmbridge only. It is not considered that this policy has, or is likely to give rise to any cross boundary issues.</p>

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	materials; create safe and accessible environments, where crime, disorder, and the fear of crime do not undermine quality of life or community cohesion; and are visually attractive as a result of good architecture and appropriate landscaping.	design and layout of any development should be considered such as scale, mass, height, topography etc.	
<p><b>DM3: Mixed Uses</b> The policy sets out the Council's approach to the delivery of mixed use developments.</p>	<p><b>17 – Bullet point 9</b> - The NPPF promotes mixed used developments that encourage multiple benefits and recognising that land can perform many functions.</p> <p><b>23 – Bullet point 9</b> – NPPF states that Planning policies should “...recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.....” DM9 aims to deliver these benefits by encouraging mixed use development in town centres and resisting single use buildings.</p> <p><b>69 – Bullet point 1</b> - planning policies and decisions, in turn, should aim to achieve places which promote</p>	<p>No. The NPPF does not contain any policies on the siting of mixed use developments, or how they should be designed and located. The NPPF also does not offer a detailed policy or criteria for assessing the compatibility of uses within a development. A local policy is needed to address these matters.</p>	<p>No. Encouraging mixed use development can ensure activity in an area for longer periods of time each day, which can help in combatting crime and the fear of crime. It is not considered that this policy has, or is likely to give rise to any cross boundary issues.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed use developments ...”		
<p><b>DM4 – Comprehensive development</b> The policy sets out the Council’s approach to the delivery of larger sites</p>	<p><b>17: Bullet point 8</b> – Encourages the effective use of Land by reusing land that has been previously developed. By seeking a co-ordinated approach to sites in a Borough where developable land is scarce DM4 seeks to achieve, where possible, the most effective use of that land through comprehensive development.</p> <p><b>17: Bullet point 9</b> – Promotes mixed use development that encourages multiple benefits. DM4 supports this as such development can be more readily achieved through delivering comprehensive development across smaller sites in town centres where feasible.</p> <p><b>17: Bullet point 11</b> – NPPF states that authorities should actively manage patterns of growth to make the fullest possible use of public transport walking and cycling, and</p>	<p>No. The NPPF paragraphs read as an aspirational statement and do not contain the detail required to assess proposals at a local level. This necessitates the inclusion of a local Development Management policy. Criteria set within the local policy can also contribute to better decision-making and ensure that development sites will offer a greater range of floorspace and uses, and score more highly against a wider number of the objectives for sustainability development. This could not only help to boost economic growth but could help to improve accessibility to services while also seeking to make good use of previously developed sites.</p>	<p>No. This policy highlights the advantages of landowners working together to deliver schemes, which is considered to demonstrate positive planning to address a local issue (namely, a lack of development land). It is not considered that this policy has, or is likely to give rise to any cross boundary issues.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>focus development in locations which are or can be made sustainable. Alongside seeking comprehensive development of adjacent sites DM9 also seeks to achieve more sustainable development of sites in the same ownership where a uses would be better situated on alternative sites.</p>		
<p><b>DM5 - Pollution</b> The policy deals with development proposals on or near to contaminated land or hazardous installations. It also seeks to ensure that both new and existing development is not exposed to, and does not create, unacceptable levels of noise or light pollution.</p>	<p><b>109</b> – The planning system should prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution.</p> <p><b>110</b> - In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.</p> <p><b>120</b> - To prevent unacceptable risks from pollution and land instability,</p>	<p>No. Whilst the NPPF provides a general level of policy guidance, a detailed Development Management policy is required to clarify the local approach and the nature and scale of investigation depending on the site being developed.</p>	<p>No. It is not considered that the policy has any cross-boundary impacts as it is derived from national guidance. Furthermore neighbouring local authorities must take a similar approach through their own planning and pollution control regimes.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution should be taken into account. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.</p> <p><b>121</b> - Planning policies and decisions should also ensure that:</p> <ul style="list-style-type: none"> <li>• the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation;</li> <li>• after remediation, as a</li> </ul>		

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	<p>minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and</p> <ul style="list-style-type: none"> <li>adequate site investigation information, prepared by a competent person is presented.</li> </ul> <p><b>122</b> - In doing so, local planning authorities should focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. Local planning authorities should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.</p> <p><b>123</b> - Planning policies and decisions should aim to:</p>		

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	<ul style="list-style-type: none"> <li>• avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;</li> <li>• mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;</li> <li>• recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and</li> <li>• identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.</li> </ul> <p><b>124</b> - Planning policies should sustain compliance with and contribute</p>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.</p> <p><b>125</b> - By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.</p>		
<p><b>DM6: Landscape and Trees</b> The policy sets out an approach to tree retention, protect trees, and landscape</p>	<p><b>58</b> – Planning policies and decisions should aim to ensure that developments are visually attractive as a result of good architecture and appropriate landscaping.</p> <p><b>61</b> - Planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic</p>	<p>No. The NPPF paragraphs read as an aspirational statement. Although the NPPF provides an overarching strategy for landscape and natural environment issues, reliance on the NPPF paragraphs alone will not provide the detailed locally specific criteria required to assess that development proposals will make a positive impact on the local landscape. A Development</p>	<p>No. The policy sets out criteria to protect and retain trees within Elmbridge. Other authorities are required to take a similar policy approach within their own areas so it is not considered that the policy will have</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>environment.</p> <p><b>114</b> – Local Planning Authorities should set out a strategic approach in their local plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure</p> <p><b>118</b> - Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;</p> <p><b>156</b> - Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p>	<p>Management policy provides the greater weighting needed to make decisions on applications that include a wide range of landscape issues on a day-to-day basis.</p>	<p>any cross-boundary impacts.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p><b>170</b> - Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.</p> <p><b>206</b> - Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.</p>		
<p><b>DM7: Access and Parking</b> The policy sets out criteria and parking standards which will be applicable throughout the borough.</p>	<p><b>Paragraphs 32-40, Section 4 - Promoting Sustainable Transport</b></p> <p><b>32</b> - All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether: the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure; safe and suitable</p>	<p>No. Elmbridge has specific local transport issues including high car ownership and so requires a specific policy relating to the local context and relevant to the issue of access and parking. As a nationally-applicable policy document the NPPF only provides a strategic policy direction relating to the promotion of sustainable transport in local plans, and is unable to include the detail with regard to localised access and parking provisions on individual planning proposals. DM7 provides the</p>	<p>No. Following Public Participation consultation stage, this policy was amended to require a minimum of one space per residential unit in area of high parking stress. This amendment was to address a local issue around parking and recognise the increasing car</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>access to the site can be achieved for all people; and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.</p> <p><b>34</b> - Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.</p> <p><b>35</b> - Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; create safe and secure layouts which minimise</p>	<p>necessary detail setting local parking standards that balance the need to promote more sustainable transport with the concerns of residents regarding the increasing levels of parking stress within the Borough.</p>	<p>ownership across the Borough. Whilst traffic and congestion are issues across Surrey and neighbouring Boroughs the Council does not consider this policy to have an impact on this issue and after writing to neighbouring Boroughs under the Duty to Co-operate no concerns were raised.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; incorporate facilities for charging plug-in and other ultra-low emission vehicles; and consider the needs of people with disabilities by all modes of transport.</p> <p><b>36</b> - A key tool to facilitate this will be a Travel Plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan.</p> <p><b>37</b> - Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p> <p><b>39</b> - If setting local parking standards for residential and non-residential development, local planning authorities should take into account: the accessibility of the development; the type, mix and use of development; the availability of and opportunities for public transport; local car ownership</p>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	levels; and an overall need to reduce the use of high-emission vehicles.		
<p><b>DM8 : Refuse, recycling and External plant</b> The policy sets criteria to ensure that appropriate provision is made for recycling, waste storage and management within new developments.</p>	No relevant paragraphs	Current national policy (including the NPPF, Planning Policy Statement 10 and the consultation Draft National Waste Management Plan, July 2013) do not contain any specific policy or guidance on bin storage and waste facilities. Local people have stated in past consultations that the location of bins was problematic and had a negative impact on the street scene and character of the area. This is a localised issue, and national guidance does not address the matter. Therefore inclusion of a local Development Management policy is considered necessary.	No. The policy outlines design-based criteria to ensure bin storage and plant is sited and designed carefully in order to prevent any negative effects on amenity and the street scene while providing waste and recycling facilities. It is not envisaged that this policy will have any cross-boundary impacts.
<p><b>DM9: Social and Community Facilities</b> The policy sets criteria to ensure that new facilities are sustainably located, will help retain community, social and educational facilities, and will make good use of previously developed sites by enabling</p>	<p><b>28</b> – Promote the retention and development of local services and community facilities in villages, such as.....meeting places, sports venues, cultural buildings, public houses and places of worship.</p> <p><b>69</b> - Planning policies and decisions should aim to achieve places which</p>	No. The principle for the protection of local community facilities and services is established in the NPPF, however no detail is provided as to how this should be achieved. A detailed local policy is required to provide this level of guidance.	<p>No. It is not anticipated that any cross-boundary issues will arise as a result of this policy.</p> <p>The loss of an essential community</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
<p>the redevelopment of redundant facilities where it is appropriate and supporting a mixed uses on such sites that support the needs communities and increase collaboration between services and communities.</p>	<p>promote: opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity; safe and accessible environments where crime, disorder, and the fear of crime do not undermine quality of life or community cohesion; and safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.</p> <p><b>70</b> – Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities...; guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability</p>		<p>facility such as a school, particularly where the facility is located close to the borough boundary could have a cross-boundary impact, but the policy does not address loss of facilities. As a site-specific matter, policy addressing the issue of loss will appear in the Settlement ID Plans.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>to meet its day-to-day needs; ...and ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community.</p> <p><b>71</b> - Local planning authorities should take a positive and collaborative approach to enable development to be brought forward under a Community Right to Build Order, including working with communities to identify and resolve key issues before applications are submitted.</p> <p><b>72</b> - The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: give great weight to the need to create, expand or alter schools; and work with schools promoters to identify and resolve key planning issues before</p>		

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	<p>applications are submitted.</p> <p><b>73</b> - Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.</p> <p><b>74</b> – Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational</p>		

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	provision, the needs for which clearly outweigh the loss.		
<p><b>DM10: Housing</b> The policy sets out requirements for development proposals which make provision for housing including making the most efficient use of land, resisting the loss of housing, improving living standards by setting minimum space standards and outlining the Authority's policy on garden land development.</p>	<p><b>Section 6: Delivering a wide choice of high quality homes Paragraphs 47-55</b></p> <p><b>47-</b> The NPPF seeks to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework. Whilst the Development Management Plan does not set the amount of development that is expected to be delivered in the Borough DM10 does establish that development should make the most effective use of land to meet local housing needs and resists the loss of housing.</p> <p><b>49 –</b> NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development.</p>	<p>No. The NPPF does not provide the locally-specific detail which would be necessary to create successful policy; therefore an additional Development Management policy is required.</p> <p>The Council's overarching approach to housing delivery, including quantity or location was set out in the Core Strategy and delivery against the targets in the Core Strategy, such as the 5 year land supply, are set out in the AMR. DM10 sets out the criteria that will be used to ensure that the most effective use of land for housing development in an area where developable land is restricted and there is pressure to develop low density high value housing and provide a better choice of housing as required by the NPPF.</p> <p>The Development Management Plan does not identify sites for development. The identification of sites for housing delivery across the</p>	<p>No. The policy approach itself is not expected to raise cross-boundary issues.</p> <p>There could be possible cross-boundary impacts if the rate of household formation and population growth in Elmbridge was to exceed that of housing completions. It would also be relevant to state that, strategically, there could be impacts on Elmbridge if neighbouring boroughs were not able to bring forward sufficient sites to meet their own</p>

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	<p>Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.</p> <p><b>50</b> - To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.</p> <p><b>53</b> - Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens,</p>	<p>Borough will be addressed by the Settlement ID Plans.</p> <p>As required by paragraph 53 of the NPPF the Council has set out a policy on garden development which supports appropriate development on such sites. Such sites make a meaningful contribution to the supply of housing as an efficient use of land, particularly large and underused gardens, and in some locations has become established as characteristic of the area.</p>	<p>housing requirements although information from neighbouring Surrey borough AMR's do not indicate this will be the case.</p>

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	<p>for example where development would cause harm to the local area.</p> <p><b>54</b> - In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.</p> <p><b>55</b> - To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there</p>		

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	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.		
<p><b>DM11: Employment</b> This policy sets out the Council's approach to the loss of employment land, and development of further sites for employment purposes including home-working.</p>	<p><b>Section 1. Building a strong, competitive economy, paragraphs 18-22</b></p> <p><b>18</b> - The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.</p> <p><b>19</b> - The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.</p> <p><b>20</b> - To help achieve economic growth, local planning authorities</p>	<p>No. The NPPF sets out generic policy which is applicable across the whole country. It does not contain detailed policies which address localised matters or provide criteria on key issues such as live-work units or working from a dwelling which the NPPF promotes in paragraph 21.</p> <p>Ensuring a mix of land uses in the Borough is important, and the loss of such sites will be resisted unless it can be fully justified. However, where this can be justified the policy supports its release for other appropriate uses such as housing which conforms to paragraph 51 of the NPPF and ensure sites are not maintained in an inappropriate use in the long term. Though relying on national policy alone may see good quality employment sites lost to other uses and for this reason, a Development Management policy is needed due to the high residential</p>	<p>No. As the policy will only be used in site specific circumstances, it is unlikely that it will raise any cross-boundary issues. Additionally the identification and designation of Strategic Employment Land sites will form part of the forthcoming Settlement ID Plans</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>should plan proactively to meet the development needs of business and support an economy fit for the 21st century.</p> <p><b>21</b> - Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not</p>	<p>values often making such development more financially attractive compared to returns on existing uses. This policy will ensure only appropriate redevelopment of sites is undertaken. This also ensures that the Council can react to any expansion or contraction of different sectors and supporting appropriate changes of use where necessary as outlined in paragraph 21.</p>	

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>anticipated in the plan and to allow a rapid response to changes in economic circumstances; plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.</p> <p><b>22</b> – Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative use of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.</p>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p><b>51</b> - Local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers. They should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.</p>		
<p><b>DM12: Heritage</b> This policy seeks to ensure that development protects, conserves and enhances the Borough's historic environment, including heritage assets.</p>	<p><b>Section 12. Conserving and enhancing the historic environment (Paragraphs 126-141).</b> This section outlines the approach that should be taken by Councils to ensure the impact of new development on the historic environment is limited.</p>	<p>No. The NPPF only provides general guidance on heritage assets and the historic environment, as a result a detailed Development Management policy is required in order to add local context and detailed assessment criteria to this guidance to support decision making. In particular it sets out an agreed list of nationally and locally important buildings against which the policy should be assessed.</p>	<p>No. The detailed policy seeks to add a local context to national guidance, but it is unlikely to raise any cross-boundary issues.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
<p><b>DM13: Riverside development and uses</b> The policy sets out the Council's approach to riverside development.</p>	<p><b>Paragraphs 73-75, 77 and 165</b></p> <p><b>73</b> - Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.</p> <p><b>74</b> - Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed</p>	<p>No. The NPPF is not sufficiently detailed at the local level with regard to riverside development and uses with policy steers coming through generic policy, or either open space and recreation, or environmental policy. A detailed policy is therefore required to strengthen the NPPF's policy 'steer'.</p> <p>In addition, policy CS12 of the Core Strategy sets out the strategic policy on the River Thames Corridor and its tributaries. It states that detailed planning guidance will be included in the Development Management and Site Allocations documents. This policy must therefore set detailed criteria, building upon CS12.</p>	<p>No. It is not considered that the approach of this policy has, or is likely to give rise to, any cross-boundary issues. The impacts of development proposals must be fully assessed and neighbouring authorities must also address flooding matters via policies in their own local plans.</p> <p>However flooding, per se, is a cross-boundary issue. Although this policy does not allow inappropriate developments which will harm the water environment, the river networks do not respect different administrative</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p> <p><b>75</b> - Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</p> <p><b>77</b>- The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: where the green space is in reasonably close proximity to the community it serves; where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and where the green area</p>		<p>boundaries and there is always a potential risk that development in one local authority area will impact on existing development downstream within another Local Authority's area without satisfactory mitigation</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>concerned is local in character and is not an extensive tract of land.</p> <p><b>165-</b> Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks. A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.</p>		
<p><b>DM14: Evening Economy</b> The policy sets out the Council's approach to development of new late-night facilities including restaurants and bars.</p>	<p><b>23-</b> Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should: recognise town centres as the heart of</p>	<p>No. The NPPF sets out policies requiring authorities to support the vitality and viability of town centres and support a range of uses. However with regard to the evening economy, a key element in Elmbridge's town and village centres, there is insufficient detail in order to</p>	<p>No. The policy sets criteria for the establishment of new fast food takeaways, restaurants and bars throughout Elmbridge.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>their communities and pursue policies to support their viability and vitality; define a network and hierarchy of centres that is resilient to anticipated future economic changes; define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations; promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres; retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive; allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities</p>	<p>make effective day to day decisions. does not provide specific policy against which to assess proposals on a day-to-day basis. A local policy is therefore required to set criteria which address the suitability, or otherwise, of proposals of this nature.</p>	<p>Due to the scale of the proposals covered by the policy, it is not considered that this policy will raise any cross-boundary impacts.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites; allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre; set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres; recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.</p>		
<b>DM15: Advertisements, Shopfronts and Signage</b>	<b>67</b> - Poorly placed advertisements can have a negative impact on the	No. The NPPF reads as an aspirational statement. It does not	No. A criteria-based Development

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
<p>The policy sets out the Council's approach to applications for new signage and advertisements.</p>	<p>appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority's detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts</p>	<p>provide detailed policy on the design of advertisements and shop-fronts, only general advice on the location of advertisements. The NPPF highlights the effect that poorly placed advertisements may have on the built and natural environment, but this does not provide sufficient detail to reach a satisfactory decision at local level taking into account local character issues.</p>	<p>Management policy is able to ensure that unnecessary light pollution can be averted and that advertisements do not unnecessarily detract from the historic environment or disturb wildlife. Due to the size and scale of proposals which will be covered by this policy, it is not considered that this policy has, or is likely to give rise to any cross boundary issues.</p>
<p><b>DM16:Telecommunications</b> The policy outlines requirements for development, involving telecommunications infrastructure.</p>	<p><b>Section 5 – Supporting high quality communications infrastructure (paragraphs 42 to 46)</b>  <b>42</b> - Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and</p>	<p>No. Although the NPPF requires local plans to support the expansion of electronic communications networks including telecommunication and high speed broadband and to keep the number of telecoms masts to a minimum, it does not say how this should be achieved, which invariably necessitates a further local policy.</p>	<p>No. This detailed policy seeks to add a local context to national guidance. It is not considered that this policy has, or is likely to give rise to any cross boundary issues.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>other communications networks also plays a vital role in enhancing the provision of local community facilities and services.</p> <p><b>43</b> - In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate</p> <p><b>44</b> - Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum</p>	<p>Reliance on national policy only could provide outline guidance on telecommunications development, but which could result in negative impacts on landscape and townscape.</p>	

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>distances between new telecommunications development and existing development. They should ensure that: they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services.</p> <p><b>45-</b> Applications for telecommunications development (including for prior approval under Part 24 of the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include: the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or</p>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>technical site; and for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines; or for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.</p> <p><b>46</b> - Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.</p>		
<b>DM17: Green Belt (Development of New Buildings)</b>	<b>Section 9. Protecting Green Belt Land (All paragraphs 79-92)</b>	No. The NPPF is clear that the five aims of Green Belt include preventing urban sprawl and coalescence of	No. The policy sets out how and where the Council may

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
<p>The policy sets out the Council's approach to development of new buildings within the designated Green Belt.</p>	<p><b>79</b> - The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p><b>80</b> - Green Belt serves five purposes:</p> <ul style="list-style-type: none"> <li>• to check the unrestricted sprawl of large built-up areas;</li> <li>• to prevent neighbouring towns merging into one another;</li> <li>• to assist in safeguarding the countryside from encroachment;</li> <li>• to preserve the setting and special character of historic towns; and</li> <li>• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p><b>81</b> - Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for</p>	<p>towns, (para 80) but Local Authorities are required to plan positively to enhance the beneficial use of the Green Belt, including opportunities to provide outdoor sport and recreation or improving damaged and derelict land. The national position at para 89 and 90 acknowledges circumstances when some built development may be appropriate within Green Belt, but as there is no direct guidance relating to new ancillary domestic development in the Green Belt, local policies are required to clarify the approach and set detailed criteria.</p>	<p>consider approving limited development within areas of Green Belt land which falls entirely within Elmbridge council's area of jurisdiction. It is not considered that there are any cross-boundary issues resulting from this policy.</p> <p>Furthermore, at the present time the Council is not planning to review or amend the Borough's present Green Belt boundaries.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.</p> <p><b>82</b> - The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.</p> <p><b>83</b> – 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. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p><b>84</b> - When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.</p> <p><b>85</b> - When defining boundaries, local planning authorities should:</p> <ul style="list-style-type: none"> <li>• ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;</li> <li>• not include land which it is unnecessary to keep permanently open;</li> <li>• where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan</li> </ul>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>period;</p> <ul style="list-style-type: none"> <li>• make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;</li> <li>• satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and</li> <li>• define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.</li> </ul> <p><b>86</b> - If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used,</p>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.</p> <p><b>87</b> - As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p><b>88</b> - When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations</p> <p><b>89</b> - A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:</p> <ul style="list-style-type: none"> <li>• buildings for agriculture and forestry;</li> <li>• provision of appropriate facilities for outdoor sport,</li> </ul>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;</p> <ul style="list-style-type: none"> <li>• the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;</li> <li>• the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;</li> <li>• limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or 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</li> </ul>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>including land within it than the existing development.</p> <p><b>90</b> - Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:</p> <ul style="list-style-type: none"> <li>• mineral extraction;</li> <li>• engineering operations;</li> <li>• local transport infrastructure which can demonstrate a requirement for a Green Belt location;</li> <li>• the re-use of buildings provided that the buildings are of permanent and substantial construction; and development brought forward under a Community Right to Build Order.</li> </ul> <p><b>91</b> - When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects</p>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.</p> <p><b>92</b> - Community Forests offer valuable opportunities for improving the environment around towns, by upgrading the landscape and providing for recreation and wildlife. An approved Community Forest plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals within Community Forests in the Green Belt should be subject to the normal policies controlling development in Green Belts.</p>		
<p><b>DM18: Green Belt (Development of Existing Buildings)</b> The policy sets out the Council's approach to development of existing buildings within the Green Belt.</p>	<p><b>Section 9. Protecting Green Belt Land (All paragraphs 79-92, description as under DM17)</b></p>	<p>No. As a nationally applicable policy document, the NPPF does not define the extent of the Green Belt at a local level. This is shown on the proposals map, as per NPPF Para 83.</p> <p>The NPPF is clear that the five aims of Green Belt include preventing urban sprawl and coalescence of towns,</p>	<p>No. This policy only applies to areas of Green Belt land which fall entirely within Elmbridge council's area of jurisdiction. It is not considered that there will be any</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
		(para 80) but Local Authorities are required to plan positively to enhance the beneficial use of the Green Belt, including opportunities to provide outdoor sport and recreation or improving damaged and derelict land. The national position at para 89 and 90 acknowledges circumstances when some built development may be appropriate within Green Belt, but local policies are required to clarify the approach and set detailed criteria.	cross-boundary issues resulting from this policy. Furthermore, at the present time the Council is not planning to review or amend the present Green Belt boundaries.
<p><b>DM19: Horse-related uses and development</b> This policy outlines the Council's requirements for acceptable forms of equestrian development in terms of size, impact on green belt, location, amenity etc.</p>	<p><b>75</b> - Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</p> <p><b>Also Section 9. Protecting Green Belt Land (All paragraphs 79-92, as under DM17)</b></p>	No. The NPPF does not provide specific guidance on the development of equestrian facilities. Due to the popularity of this activity in the Borough, it is considered that a detailed local policy is necessary to manage this issue.	No. Due to the size and nature of equestrian facilities, it is not considered that this policy has, or is likely to give rise to, any cross-boundary issues.
<p><b>DM20: Open Space and Views</b> This policy sets out the Council's approach to protecting open space and</p>	<p><b>Paras 73-78</b></p> <p><b>73</b> - Access to high quality open spaces and opportunities for sport and recreation can make an important</p>	No. The reference to Local Green Space policy contained in Paras 76-78 of the NPPF requires that a local policy must be consistent with policy for Green Belts. DM20 specifically	No. Although proposals which affect networks of green infrastructure, wildlife habitats or

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
strategic views.	<p>contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.</p> <p><b>74</b> - Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the needs for which clearly</p>	states this to avoid ambiguity as to the tests required for any future development of such land. Section 9 (Paragraphs 79 to 92) of the NPPF sets out Green Belt policy and when taken together, the NPPF paragraphs imply that more localised detail will be required for satisfactory management of the Borough's open spaces which will be not be provided by relying on the NPPF alone.	<p>corridors, open spaces or views of landmarks could have some cross-boundary impacts, in practice it may not be possible to identify any such effects until planning applications are received, or via new designations of open space or local green space.</p> <p>It is not considered that the policy approach itself raises any cross boundary issues.</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>outweigh the loss.</p> <p><b>75</b> - Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</p> <p><b>76</b> - Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. 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.</p>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p><b>77</b> - The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: where the green space is in reasonably close proximity to the community it serves; where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and where the green area concerned is local in character and is not an extensive tract of land.</p> <p><b>78</b> – Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.</p>		
<p><b>DM21: Nature Conservation and Biodiversity</b> The policy seeks to ensure that development preserves,</p>	<p><b>Section 11. Conserving and Enhancing the Natural Environment, Paragraphs 109-114, 117-119</b></p>	<p>No. The NPPF is a national policy document where the content is applicable across the entirety of the country and, as such, it cannot address any locally specific</p>	<p>No. Although proposals affecting the networks of green infrastructure, wildlife habitats and</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
<p>maintains and where possible enhances existing habitats and biodiversity.</p>	<p><b>109</b> - The planning system should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> <li>• protecting and enhancing valued landscapes, geological conservation interests and soils;</li> <li>• recognising the wider benefits of ecosystem services;</li> <li>• minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</li> <li>• preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and</li> <li>• remediating and mitigating despoiled, degraded, derelict</li> </ul>	<p>requirements or provide detail on individual sites or areas. The importance of the natural environment in Elmbridge is reflected in the importance of the Green Infrastructure network set out in policy CS14 of the Core Strategy. The policy must provide detailed criteria to be able to preserve and enhance nationally and locally designated sites.</p>	<p>corridors may be cross-boundary in nature, in practice it may not be possible to identify any such effects until planning applications, including supporting documentation are received. It is not considered that the policy approach itself raises any cross boundary issues.</p>

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	<p>and contaminated and unstable land, where appropriate.</p> <p><b>110</b> - In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.</p> <p><b>111</b> - Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.</p> <p><b>112</b> - Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural</p>		

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	<p>land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.</p> <p><b>113</b> - Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.</p> <p><b>114</b> – Local planning authorities should:</p> <ul style="list-style-type: none"> <li>• set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and</li> <li>• maintain the character of the</li> </ul>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast.</p> <p><b>117</b> - To minimise impacts on biodiversity and geodiversity, planning policies should:</p> <ul style="list-style-type: none"> <li>• plan for biodiversity at a landscape-scale across local authority boundaries;</li> <li>• identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;</li> <li>• promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection</li> </ul>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;</p> <ul style="list-style-type: none"> <li>• aim to prevent harm to geological conservation interests; and</li> <li>• where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.</li> </ul> <p><b>118</b> – When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:</p> <ul style="list-style-type: none"> <li>• if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;</li> <li>• proposed development on</li> </ul>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;</p> <ul style="list-style-type: none"> <li>• development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;</li> <li>• opportunities to incorporate biodiversity in and around developments should be</li> </ul>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>encouraged;</p> <ul style="list-style-type: none"> <li>• planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss; and</li> <li>• the following wildlife sites should be given the same protection as European sites: <ul style="list-style-type: none"> <li>- potential Special Protection Areas and possible Special Areas of Conservation;</li> <li>- listed or proposed Ramsar sites; and</li> <li>- sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.</li> </ul> </li> </ul>		

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p><b>119</b> - The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.</p>		
<p><b>DM22: Recreational uses of waterways</b> The policy sets out the Council's approach to recreational use of the Thames, its tributaries and all other water areas including the riverbanks.</p>	<p><b>Paragraphs 73-75, 77 and 165</b></p> <p><b>73</b> - Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.</p> <p><b>74</b> - Existing open space, sports and</p>	<p>No. The NPPF does not contain specific policies on recreational uses of the waterways, and as it is a nationally applicable framework it is not able to provide sufficiently detailed local guidance for Elmbridge.</p> <p>In addition, policy CS12 of the Core Strategy sets out the strategic policy on the River Thames Corridor and its tributaries. It states that detailed planning guidance will be included in the Development Management and Site Allocations documents. This policy must therefore set detailed criteria, building upon CS12. Many of the reservoirs and waterways in Elmbridge are of national and international biodiversity significance with SSSI, Ramsar and SPA designations. None of these are within Green Belt. In addition, many of the</p>	<p>No. This policy does not allow inappropriate development which will harm the water environment, and requires that the impacts of developments on areas of nature conservation are fully considered.</p> <p>It is not considered that the policy approach itself has, or is likely to give rise to, any cross-boundary issues. Moreover, neighbouring local authorities must</p>

Policy	Conformity with the NPPF (relevant paragraph/section)	Would reliance on the NPPF be sufficient?	Cross-boundary issues identified (Yes/No):
	<p>recreational buildings and land, including playing fields, should not be built on unless: an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p> <p><b>75</b> - Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</p> <p><b>77</b>- The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: where the green space is in reasonably close proximity to the community it serves; where the green</p>	<p>strategic views and landmarks are river related and cross borough boundaries and this is covered by other DM policies. The Design and Character SPD provides guidance for the design of new riverside development.</p>	<p>prepare policies within their own local plans to mitigate flood risk within their area of jurisdiction.</p> <p>However when dealing with waterways it is important to acknowledge that the river and canal networks do not respect administrative boundaries and always a potential for development in one local authority area to impact on existing development downstream within another Local Authority's area if proper mitigation is not provided.</p>

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	<p>area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and where the green area concerned is local in character and is not an extensive tract of land.</p> <p><b>165-</b> Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks. A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.</p>		

