

National Planning Policy Framework plan-making requirements – checklist for the Working Draft East Devon Local Plan, December 2021

Introduction

The following table sets out the key plan-making requirements in accordance with the National Planning Policy Framework (NPPF, July 2021)¹ to inform preparation of the Working Draft East Devon Local Plan, December 2021.² We have worked through each NPPF requirement in column A, and recorded in column C:

- whether the provision is relevant to the Working Draft East Devon Local Plan/planning context of East Devon; and
- if it is, whether the Working Draft East Devon Local Plan addresses the NPPF content requirements (or identify whether they are contained in other documents that form part of the development plan in East Devon).

The Working Draft East Devon Local Plan is a relatively early stage in plan-making, and in some cases the assessment states that NPPF requirements are partially met, with the intention that these requirements will be met as the Plan evolves. We have also noted in a number of cases that NPPF requirements are met but this reflects the current direction of travel rather than a definitive end conclusion. The end conclusion may only be appropriate at the point of plan submission for examination. In the table we comment on future work to be undertaken to ensure continued NPPF compliance.

The rows in column C have been colour coded so that the findings are clear:

Working Draft Local Plan meets NPPF requirement
Working Draft Local Plan partially meets NPPF requirement
Working Draft Local Plan does not meet NPPF requirement

¹ [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/publishing.service.gov.uk)

² Nb. This table is based upon the Planning Advisory Service Local Plan Route Mapper Toolkit Part 2: Local Plan Form & Content checklist. It has been amended to exclude the sections on Green Belt and Minerals which are outside the scope of the East Devon Local Plan. The original PAS version, and explanatory document, is available at [Local Plan Route Mapper & Toolkit - reviewing and updating local plan policies | Local Government Association](https://www.local.gov.uk/local-plan-route-mapper-and-toolkit-reviewing-and-updating-local-plan-policies)

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
	<i>General Requirements</i>		
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	Our initial assessment work indicates that we have addressed these requirements, this is, however a fundamental matter of importance that will be kept under review. East Devon is not specifically mentioned in national policy statements.
2.	Contribute to the achievement of sustainable development.	NPPF Para 8, 9, 16	The working draft plan has been developed with the objective of promoting sustainable development. The proposed policies cover a range of economic, social, and environmental issues, guiding development towards sustainable solutions.
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	A range of proposed policies apply this presumption, particularly Strategic policies 1-5 relating to the spatial strategy; chapters 13, 14, and 16 on improving the environment; and strategic policies 25-33 on climate change.
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	Chapter 2 contains the vision and strategic objectives. A range of proposed policies address housing needs and other economic, social and environmental priorities. However, at around 350 pages long, with 91 policies, it could be argued that the working draft LP is not succinct.
5.	Plans should be: Aspirational and deliverable Contain clear and unambiguous policies Accessible through the use of digital tools Serve a clear purpose avoiding duplication	NPPF Para 16	The working draft LP seeks to be aspirational and deliverable but needs further refinement to fully achieve this status. In particular viability evidence is required to ensure the plan is deliverable. Plan policies need to be drafted that are clearly written and unambiguous, avoiding duplication with the NPPF; and consideration will need to be given to how digital tools can best be used.
	<i>Plan Content</i>		

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
6.	Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and design quality of places.	NPPF Para 17, 20	Chapter 3 of the plan specifically seeks to address these overarching strategic concerns. There are, as well, proposed strategic policies throughout the plan.
7.	Outline which policies are 'strategic' policies	NPPF Para 21	Proposed policies clearly set out whether they are intended to be strategic or not. However we will review proposed status and any guidance or good practice on the classification between strategic and non-strategic policies.
8.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> . Look at least 30 years ahead where larger scale developments are part of the strategy.	NPPF Para 22	We will need to keep the plan end date under review to ensure that it looks ahead for 15 years as a minimum from adoption. Also we are proposing a new settlement in the plan and this will have a build life extending beyond plan end date. Policy and supporting evidence will need to be produced and tested to provide confidence and clarity over delivery. Other strategic scale proposals in the working draft plan can also be expected to have a greater than 15 year time horizon.
9.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	Whilst we have, in the working draft plan, identified broad locations for development through a plan strategy and also some proposed land allocations this is an aspect of the plan that will require considerable refinement and further work as plan making progresses. A key diagram will need to be produced as, in due course, will a policies map.
10.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	The working draft plan starts to provide a clear proposed strategy for development with some sites proposed as allocations to help deliver this strategy, set out in chapters 5, 6 and 7. However, a considerable amount of work is needed in order to ensure this strategy can be carried forward into future iterations of the plan,

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			explicitly including the need to ensure sufficient and appropriate sites are allocated for development.
11.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28	Proposed non-strategic policies are included in the plan and identified as such. It is noted, however, that there will be a need for finer grained assessment to ensure all relevant policy matter considerations are appropriately addressed.
12.	Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 58	A fundamental absence, at the present stage on plan making, is viability assessment to demonstrate deliverability of the plan. This will be a crucial work-stream requirement as plan-making progresses in the year 2022.
13.	Local Plans are examined to assess if they have been positively prepared, justified, effective and consistent with national policy.	NPPF Para 35	In putting together the working draft local plan we have sought to ensure that the examinations tests will be met. However considerable extra work will be needed as plan making progresses, including further evidence gathering, to ensure we are in a position to meet this requirement at the point of submitting the plan.
<i>Housing</i>			
14.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point.	NPPF Para 61	We have a housing needs assessment from 2020 and have a new one currently under preparation. On completion, this work will meet our needs (assuming plan preparation proceeds in line with current timetables).
15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 62	We will need to develop policies to meet this requirement, informed by evidence in the housing needs assessment, as have flagged-up in chapter 9.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 63	We will need to develop policies to meet this requirement though in the working draft plan we have flagged-up this need in Policy 37.
17.	Expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups	NPPF Para 65	This consideration has been taken into account in Policy 37.
18.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	NPPF Para 66	We have not, to date, set out any neighbourhood area housing requirements. We will consider how to address this requirement as plan-making progresses.
19.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	NPPF Para 68	Whilst we have proposed sites for development (noting more are needed to meet housing requirements) we have not yet placed these into a trajectory (though existing commitments are identified in a trajectory). More work will be needed in respect of ensuring the deliverable and developable status of sites, and also that provision within the specified time bands aligns with such matters as demonstrating a five year land supply.
20.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 69	Whilst aware of this consideration we have not sought to formally assess potential site allocations and housing supply against this 10% expectation.
21.	Support the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area.	NPPF Para 72	Policy 46 discusses rural exceptions sites and first home exception sites..

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
22.	Include a trajectory illustrating the expected rate of housing delivery over the plan period, and requiring a buffer of 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan.	NPPF Para 74	Early work on trajectory development has started but this will need to be more formally worked up as plan making progresses.
23.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 78	The spatial strategy identifies 23 rural settlements (tier 4) as sustainable places for limited development (Strategic Policy 1 and 2). Further detail would be useful to explain that such development should reflect local needs. Policies 46 and 47 cover exception sites and housing for rural workers. There may be scope to undertake work to look at potential quantification of need.
24.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 79	Proposed plan policy provides for and allocates land for village growth, with this being targeted to “service villages” that have a range of services and facilities, set out in tier 4 in the settlement hierarchy.
25.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 80	Proposed policy 47 addresses housing for rural workers, but other aspects of NPPF para 80 are not included in the LP.
<i>Economy</i>			
26.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 81	Further work is needed on policy development but the working draft plan has a strategy, a series of policies (including Strategic Policy 5, and in chapter 10) and some allocations to address this need.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
27.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.	NPPF Para 82	The working draft plan includes strategy which positively and proactively encourages sustainable economic growth which draws on other strategies. Specifically, Strategic Policy 5 and chapter 10.
28.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 82	The working draft plan does identify and allocate some sites for development (e.g. Strategic Policies 10-13) but further work is needed to complete the provision; this includes refining quantification of need.
29.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 82	To date only preliminary work has been undertaken on assessing potential barriers to investment. There will be a need for more detailed work as the plan progresses in 2022.
30.	Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	NPPF Para 82	Policy is proposed that will seek to introduce flexibility (e.g. Policy 48). However it is an area where further policy development may be required and this would need to follow on after further evidence gathering and assimilation.
31.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 83	Proposed policies provides on the western side of East Devon knowledge and data-driven, creative and high technology industries, as discussed in chapter 5. Large scale warehousing and distribution uses are addressed in Policy 48.
32.	Enable the sustainable growth and expansion of all types of business in rural areas, both through	NPPF Para 84	Proposed policy 49 provides for growth and expansion of business in rural areas.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
	conversion of existing buildings and well-designed new buildings.		
33.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 84	Proposed policy 50 provides for diversification, though policy refinement may well be needed.
34.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 84	Proposed policies 57 and 58 provide for sustainable rural tourism and leisure developments.
35.	Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	NPPF Para 84	Proposed policy 90 seeks ensure retention of local service and facilities. Proposed policy 55 supports new local shops and services.
36.	Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	NPPF Para 85	Proposed policy 49 addresses matters around providing for business and community needs in rural areas, though there is a legitimate need to consider if it is currently not flexible enough, or may be too flexible.
<i>Town centres</i>			
37.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 86	Proposed policy 53 seek to promote town centre vitality and viability and defines a network of town centres.
38.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 86	Proposed policy 54 outlines the approach to town centres, but the physical extent of town centres (i.e. definition by lines on maps) is not yet done and will need to be undertaken.

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39.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 86	Space can be made available for market provision under planning policy, however all existing markets are 'on street' on highway/public land and are outside the control of planning policy. Similarly the establishment and operation of new markets is outside planning policy remit.
40.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 86	Work will need to be undertaken in respect of development need; and allocating sites where necessary.
41.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 86	Whilst further retail related work is needed, it is not likely to be desirable or appropriate for edge of centre sites to be allocated. However further retail evidence is likely to be needed.
42.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 86	Proposed policy 54 does not currently recognise the importance of residential provision in town centres.
<i>Healthy and safe communities</i>			
43.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	NPPF Para 92	Several working draft plan policies seek to promote these outcomes, including Strategic Policies 59 and 78, and Policies 60, 80-83. Though no doubt there is scope to examine these considerations in more depth as policy development continues.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
44.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 93	The spatial strategy supports accessibility to community facilities and services (Strategic Policy 1, 2). More detail can be found in working draft policy 55, chapter 15, and chapter 17. It is an area where more detail can be explored as policies develop further and are refined.
45.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 93	There would be merit in a more comprehensive review of such strategies to seek, where possible, policy alignment.
46.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 93	Proposed policy 55 seeks to guard against unnecessary losses.
47.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 93	Provision is built into policy 55 to allow for development and modernisation. Though with large parts of East Devon towns being old (except Cranbrook) there are heritage considerations that fall into the balance of what is going to be acceptable.
48.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 93	The spatial strategy ensures an integrated approach to locating new development in chapter 3, with further detail in specific locations in chapter 5 and 6. More work is needed specifically in respect of promoting mixed use development.
49.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 94	It is questioned how far or to what degree this can or should be an issue in East Devon, given it is a predominantly rural district. Policies in the working draft local plan would not prevent or inhibit initiatives around estate regeneration though there are no such

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			schemes proposed in the plan and no available evidence showing appropriateness.
50.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 97	It would be relevant to review policy coverage against these considerations, but to date we are not aware of evidence or representation that raises specific concerns.
51.	Provide open space, sports and recreational facilities which meets the needs of the local area.	NPPF Para 98	Proposed Strategic policy 78 sets the framework to provide for provision though further work is need to quantify and justify any specific requirements.
52.	Protect and enhance public rights of way and access.	NPPF Para 100	Policy 57 supports public rights of way in relation to sustainable tourism, but consider whether other references are required.
<i>Transport</i>			
53.	Should actively manage patterns of growth in support of objectives in Para 104. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	NPPF Para 105	Several policies address this requirement, including the spatial strategy as set out in Strategic policies 1, 2 and 5; the more detailed development allocations in chapters 5, 6, and 7; Proposed Policy 59; and chapter 12.
54.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.	NPPF Para 106	Several policies address this requirement, including the spatial strategy as set out in Strategic policies 1, 2 and 5; the more detailed development allocations in chapters 5, 6, and 7; Proposed Policy 59; and chapter 12.
55.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 106	Strategic Policy 61 protects transport sites and routes.

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56.	Provide for attractive and well-designed high quality walking and cycling networks and supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 106	Strategic policy 59 and Policy 60 support walking and cycling.
57.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	NPPF Para 106	Lack of evidence to justify this policy at the current time, so included as an alternative option.
58.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 106	Chapter 5 supports a sustainable aviation cluster at Exeter Airport in supporting text, and Policy 13 allocates land at Exeter Airport. However, no recognition of importance of maintain a national network of general aviation airfields, and no recognition of Dunkeswell Airfield specifically.
59.	If setting local parking standards, take into account issues in Para 107.	NPPF Para 107, 108	Policy 63 proposes to include parking standards, but notes that evidence is still to be gathered, taking into account the issues in NPPF para 107.
60.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 109	Lack of evidence to justify this policy at the current time, so included as an alternative option.

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61.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; the design of streets etc reflects current national guidance; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	NPPF Para 110	Sustainable travel, access, and impact on highway network have all been considered in the HELAA which informs the proposed site allocations. Further detail and evidence gathering, including on the design of sites etc., will be included for allocations as the plan progresses.
62.	Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	NPPF Para 111	Impact on highway network has been considered in the HELAA which informs the proposed site allocations. Further assessment on highways impact will be undertaken as appropriate, as the plan progresses.
<i>Communications</i>			
63.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 114	Policy 64 requires all new development to have access to superfast broadband, and supports the expansion of full fibre broadband connections. Further detail is required to set out how high-quality digital infrastructure is expected to be upgraded over time.
<i>Making effective use of land</i>			

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
64.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	NPPF Para 119	The working draft plan has been written bearing in in these overall concerns. However they are overarching themes and matters that will need revisiting and as policy development and refinement progresses
65.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	NPPF Para 119	We have been mindful of looking at scope for accommodating development on brownfield land in policy development and especially through land allocations. However, such land is a relatively scarce resource in East Devon and might in some cases serve as a valued resource in its own right and in some cases where it does exist would be inappropriately located for development purposes.
66.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 120	We have proposed draft policy that explicit plan for biodiversity gain (Policy 72), though there would also be merit in considering if we could or should go further in terms of promoting more general environmental gain. We will also need to refine our work, and do more in respect of promoting mixed use schemes, especially so in respect of land allocations for development.
67.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	NPPF Para 120	The plan recognises the roles that undeveloped land can play in chapters 8 and 14, though there is merit in assessing how much further it could reasonably go.
68.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	NPPF Para 120	There would be merit in considering if more weight or emphasis could be given brownfield land reuse and remediation. However, and as previously noted, there is limited brownfield land in East Devon and also limited despoiled land in what has traditionally been an agricultural area.

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69.	Promote and support the development of under-utilised land and buildings.	NPPF Para 120	Urban capacity study work has identified limited under used or vacant land and buildings. Policy in the working draft local plan might benefit from review, however, to see if it could be more positive in promoting potential.
70.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 120	The use of airspace above existing residential and commercial premises is not specifically mentioned in the working draft LP.
71.	Reflect changes in the demand for land.	NPPF Para 122	Plan making work has taken into account changing demands for land though this will need to be refined as the plan progresses. As currently proposed not all allocations from the previous local plan are rolled forward as proposed allocations in this new plan.
72.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.	NPPF Para 124	Whilst plan making work as gone some way to address these consideration there would be merit in a more critical assessment of potential matching land allocations to specific housing and development needs. More importantly proposed allocations need more testing and assessment against infrastructure and other considerations cited.
73.	Area-based character assessments, design guides and codes and masterplans can be used to help ensure land is used efficiently while also creating beautiful and sustainable places.	NPPF Para 125	Chapter 11 discusses designing beautiful and healthy spaces and buildings, but does not specifically mention area-based character assessments, design guides or masterplans.
74.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards.	NPPF Para 125	Policies in the working draft local plan do not mention avoiding building homes at low densities; or the use of minimum density standards.

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75.	Contain policies to optimise the use of land, including the use of minimum density standards for city and town centres and other locations that are well served by public transport. Also consider the use of minimum density standards for other parts of the plan area.	NPPF Para 125a, b	Policies in the working draft local plan do not mention the use of minimum density standards for town centres and other locations well served by public transport.
<i>Design</i>			
76.	Set out a clear design vision and provide maximum clarity about design expectations by preparing design guides or codes (either as part of a plan or as SPDs) consistent with the National Design Guide and National Model Design Code.	NPPF Para 127 & 128	Strategic policy 59 sets out design expectations, but there is no mention of design guides or codes consistent with the National Design Guide and National Model Design Code.
77.	Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.	NPPF Para 130	Strategic policy 59 on design and local distinctiveness.
78.	Ensure that new streets are tree-lined, incorporate trees elsewhere, secure long-term maintenance, and retain existing trees where possible.	NPPF Para 131	Policy 75 requires on street planting – could be improved by specifically stating “tree-lined streets”.
<i>Climate change, flooding and coastal change</i>			

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79.	Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	NPPF Para 153	Evidence: emerging Strategic Flood Risk Assessment; initial findings of Water Cycle Study; Plymouth University Coastal Change work.
80.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	NPPF Para 153	Coastal change roll back policies feature in the working draft (Policy 35) local plan though policy refinement in the light of forthcoming evidence may be appropriate.
81.	Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.	NPPF Para 155	We have policies in the plan which provide a positive strategy for renewables and low carbon energy. We identify suitable areas for solar and wind energy and also identify opportunities for when connection to decentralised heat networks is appropriate. Both of these aspects are contained in chapter 8.
82.	Strategic policies should manage flood risk from all sources and apply a sequential, risk based approach to the location of development.	NPPF Para 160, 161	Policy on managing flood risk proposed in Policy 33. However there is the need for further flood risk evidence.
83.	Steer new development to those areas with the lowest risk of flooding from any source. If this is not possible, the exception test may have to be applied, informed by the potential vulnerability of the site and of the development proposed. Where this is the case, sites needs to demonstrate that the development would provide wider sustainability benefits outweighing the flood risk and that the development would be safe for its	NPPF Para 162, 163, 164 and NPPF Annex 3	Proposed policy is included in the working draft plan in Policy 33; and site assessment work has taken into account flooding considerations and flood risks. Allocations boundaries and site capacity levels have been adjusted depending on potential flooding concerns.

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	lifetime without increasing flood risk elsewhere (and where possible will reduce flood risk overall).		
84.	Avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 171	There is emerging evidence to inform Coastal Change Management Areas that feature in proposed policy 34. However there is a need for further evidence (in production), that is required to allow for policy development and refinement and especially for lines to be drawn on maps.
<i>Natural environment</i>			
85.	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.	NPPF Para 174	Proposed policy seeks to establish appropriate (strong) protection in chapters 13 and 14. Such matters as natural capital and ecosystem services will however benefit from more detail investigation as plan production proceeds.
86.	Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	NPPF Para 175	Proposed policy in chapters 13 and 14 seeks to provide the clear distinction called for. Networks of habitats and green infrastructure considerations will, however, benefit from more detailed attention and scrutiny as plan making progresses, as will matters relating to natural capital.
87.	Give great weight to AONBs... the scale and extent of development within AONBs should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the AONB	NPPF Para 176	AONBs have been given great weight in plan production (specifically Policy 66) and in the consideration of site allocations.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
88.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 178	We have introduced Coastal Preservation Area designations and undeveloped coast policy into the working draft local plan. Though designated area boundaries may need further or renewed evidence gathering to justify their suggested extent. However, Heritage Coast is not specifically mentioned in the working draft local plan.
89.	Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.	NPPF Para 179	Further work is needed in respect of these detailed policy considerations.
90.	Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.	NPPF Para 183 & 185	Site assessment work to date, to inform proposed land allocations, has taken account of these considerations and HELAA Panel outputs should provide additional evidence. There will, however, be the need for additional assessment work, including in respect of finding extra housing sites, as plan preparation proceeds.
91.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.	NPPF Para 186	No specific air quality issues have been identified, to date, that impact on policy development. However it is and will be a matter that is kept under review.
92.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 187	Integration has featured as a consideration in respect of policy development and site allocations choices, specifically so in respect of justifying allocations to develop land in selected

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			villages. 'Neighbourly' considerations will be relevant factors to carry forward and further look at as plan making progresses.
<i>Historic Environment</i>			
93.	Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.	NPPF Para 190	The council has a Heritage Strategy and proposed policies in chapter 16 take into account heritage considerations in a positive and constructive manner