

## Appendix 2:

# PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 2: LOCAL PLAN FORM & CONTENT CHECKLIST

## Why you should use this part of the toolkit

The following table sets out a checklist of the key requirements for the content and form of local plans as set out in the National Planning Policy Framework (NPPF). Guidance to supplement the NPPF is set out within [National Planning Practice Guidance](#), which is regularly updated by the Government. You should review relevant sections of the National Planning Practice Guidance and consider any implications for your policies. You should also be mindful of Written Ministerial Statements which form material considerations in plan-making.

This part of the Toolkit will assist by informing all plan making stages, including any visioning and scoping exercises seeking to ascertain what the plan should cover. It should be applied before consultation or publication of a local plan update. This will help to ensure that you have considered all of the key plan-making requirements in preparing your plan in accordance with the NPPF.

This part of the toolkit deals only with the local plan content requirements specified in the NPPF. Toolkit Part 1 provides more detail on carrying out a review of the need to update policies within your plan. Toolkit Part 3 sets out the process requirements for local plan preparation as set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Toolkit Part 4.

## How to use this part of the toolkit

You can use column C in the table to record the results of your assessment against the checklist for the following plan making stages:

- Local Plan Review:** The toolkit can be used to inform the decision on whether or not your local plan policies need to be updated. In this case:
- Ask yourself whether the development plan for your area (which may comprise more than one development plan document or include a spatial development strategy and/or neighbourhood plans) still meets current NPPF requirements.
  - Identify which policy and document addresses the requirement in column C or identify why it is not relevant.

If your plan was adopted under the NPPF 2012 you might find the following quick reference colour codes helpful to identify new or revised NPPF requirements since the adoption of your plan:

**Key:**

New plan-making requirement of the NPPF 2019 and/or NPPF 2021 not contained within the previous 2012 version
Revised plan-making requirement of the NPPF, containing some changes from the 2012 version
Requirement of the NPPF which has not changed from the 2012 version in relation to plan-making

**Scoping your policies update:** The checklist can also be used to determine the scope of your local plan policies update and ensure that content requirements are addressed. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/ planning context of your local authority area(s); and then
- consider whether your local plan policies update will need to address these content requirements or identify whether they are contained in other documents that form the development plan in your area.

**Assessing your draft policies update:** The checklist can also be used to ensure that your emerging draft policies update is adequately addressing content requirements of national planning policy. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/planning context of your local authority area(s); and then
- if it is, whether your draft local plan policies update addresses these content requirements (or identify whether they are contained in other documents that form part of the development plan in your area).

## How to use the results of this part of the toolkit

This checklist is to help you review your policies and/or develop an update to these where required. There is no requirement to publish or submit this table to the Planning Inspectorate. However, you may find it (or some elements) helpful to assist you in demonstrating how the policies update does/does not accord with the NPPF.

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
	<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	<p>There are no major infrastructure projects currently proposed in the local planning authority areas and as such the provisions associated to nationally significant infrastructure projects are not directly relevant.</p> <p>A Written Ministerial Statement (WMS) published on the 24<sup>th</sup> of May 2021 introduced First Homes policies and removed the government's policy in relation to Entry Level Exception Sites. It should be noted that the content of the WMS was not included in the NPPF update published in July 2021. Due to the Local Plan's adoption prior to the publication of the WMS, it does not include policies in accordance with this WMS. Having considered the national First Homes provisions, the Councils have determined that the most legitimate way to consider the routine implementation of First Homes for northern Devon is as part of the review of the North Devon and Torridge Local Plan ("the Local Plan"). This approach recognises the need to robustly consider the wider policy implications of introducing First Homes and to legitimise the formal introduction of the additional local requirements necessary for the product to meet identified local needs.</p>
2.	Contribute to the achievement of sustainable development and the UN Sustainable Development Goals.	NPPF Para 7, 8, 9, 16	<p>The Local Plan is considered to support the achievement of sustainable development and the NPPF's sustainable development objectives.</p> <p>The Local Plan has been informed by Sustainability Appraisal (SA) throughout. The SA has supported the selection of options for the spatial strategy and site allocations and policies have been assessed against the SA objectives which have been developed in line with the strategic objectives of the Local Plan.</p> <p>Section 3 of the Local Plan has specific policies relating to sustainable development (ST01-ST05).</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The local Plan seeks to provide a balanced, considered and integrated approach to the delivery of sustainable development, having regard to social, economic and environmental considerations.</p> <p>The Local Plan meets NPPF requirement.</p>
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	<p>Policy ST01: Principles of Sustainable Development, states the Councils will take a positive approach towards development, that reflects the presumption in favour of sustainable development contained in the NPPF.</p> <p>The Local Plan provides policies that support a sustainable pattern of development, providing a hierarchy of places that considers the development needs of the area and community visions for places, whilst having regard to infrastructure, environmental constraints, and opportunities of the plan area, alongside particular localities and locations.</p> <p>In the rural areas, the Local Plan seeks to provide a balanced approach to development and protecting the countryside, having regard to: access to services and facilities, capacities for growth, community aspirations and accommodating local need, whilst enabling development that is necessarily located in the countryside.</p> <p>The Local Plan provides for meeting the full objectively assessed need for housing and balanced levels of economic development, whilst planning for delivery of associated infrastructure. The Local Plan accommodates the unmet need for arising from the neighbouring Exmoor National Park Authority.</p> <p>Policies ST06 (Spatial Development Strategy for Northern Devon’s Sub-Regional, Strategic and Main Centres) and ST07 (Spatial Development Strategy for Northern Devon’s Rural Area) provide the spatial development strategy for the plan area which promote a sustainable pattern of development, with Policy ST08 (Scale and Distribution of New Development in Northern Devon) providing the scale and distribution of new development. Infrastructure</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>provision is aligned with growth (see policies ST23: Infrastructure, ST10: Transport Strategy and the individual spatial strategies and allocations for individual settlements.</p> <p>The Local Plan is supported by an Infrastructure Delivery Plan in order to enable and facilitate delivery of necessary infrastructure in line with planned growth.</p> <p>Policy ST02 (Mitigating Climate Change) addresses mitigating climate change whilst Policy ST03 (Adapting to Climate Change and Strengthening Resilience) provides approaches for adapting to climate change.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	<p>Section 2 of the Local Plan sets out the wider context in which it sits and the Local Plan's vision and strategic aims and objectives. These provide a clear and positive vision as to what the plan area will be like at the end of the plan period and provides a framework for addressing housing needs and other economic, social, and environmental priorities which are detailed in the strategic policies.</p> <p>The Local Plan was prepared with extensive engagement with the local communities (<u>see consultation statement</u>) to enable them to shape their surroundings, together with contributions from statutory and wider ranging representative groups and organisations.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
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	<p>The Local Plan has been prepared with the objective of contributing to the achievement of sustainable development (see question 2).</p> <p>The Local Plan sets out an aspirational vision for the future of northern Devon, driven by a positive strategy to deliver growth, whilst balancing environmental enhancements and protections. It provides a bottom-up, place-based</p>

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
			<p>approach, seeking to deliver community-led visions for individual places, whilst providing a wider holistic and integrated strategy for northern Devon. It seeks to accommodate levels of growth above the minimum objectively assessed need, whilst supporting balanced levels of economic growth and infrastructure delivery.</p> <p>Levels of growth and associated strategies, defined in the Local Plan, were considered deliverable by the Local Plan Inspector. A review of key strategic allocations provides that, overall, they are showing delivery in accordance with the development proposed, albeit later than anticipated in some cases. In turn, this is contributing to the positive delivery of the wider spatial strategies for places and northern Devon as a whole.</p> <p>The Local Plan is considered to provide policies that are clear and unambiguous, with no fundamental tensions identified in its practical implementation post adoption. The Local Plan is considered to be constructed in a logical manner, discerning strategic versus non-strategic aspects, grouping strategies and policies by theme and topic, and providing a logical approach to place-based aspects – setting out a vision and strategy which cascades to site-based detail.</p> <p>The Local Plan is accessible digitally in an interactive online format, supported by an interactive digital policies map that provides links back to individual policies.</p> <p>Policies appear to serve a clear purpose and avoid duplication. There are a total of 23 strategic policies clearly grouped by theme, under sustainable development, spatial strategy, economic, environmental, housing and social/community sections (by way of comparison the East Devon Local Plan has 53 strategic policies, and the Mid Devon Local Plan has 14 strategic policies.).</p> <p>There are 30 development management policies; these avoid excessive duplication with strategic policies, although there is some limited overlap</p>

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			<p>across the development management and strategic policy areas. These have not however caused fundamental challenges that prejudice or undermine the practical implementation of the Local Plan.</p> <p>The Local Plan meets NPPF requirement.</p>
<i>Plan Content</i>			
6.	<p>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.</p>	<p>NPPF Para 17, 20</p>	<p>Part One of the Local Plan provides strategic policies that seek to address the priorities for the development and use of land.</p> <p>Policy ST06 sets out the spatial development strategy for northern Devon’s urban areas, identifying where the main focus of growth will be within a hierarchy of a sub-regional centre (Barnstaple), strategic centre (Bideford) and main centres. Similarly, Policy ST07 sets out the complementary spatial development strategy for the rural areas, identifying: (1) ‘local centres’ which will be the primary focus for development in rural areas; (2) ‘villages’, where development will be enabled to meet local needs and growth aspirations and (3) ‘rural settlements’ with more limited levels of services where development of a modest scale will be enabled to meet local needs. Outside of these settlements, the Local Plan provides that development will be more strictly limited to conserve and enhance the character of the countryside and support appropriate rural employment. Policy ST08 sets out the planned scale and distribution of housing and employment development across the settlements identified in Policies ST06 and ST07.</p> <p>The remaining strategic policies set out a comprehensive set of strategies that together seek to provide a flexible but robust framework to steer the delivery of high-quality sustainable development that meets northern Devon’s economic, environmental and social objectives and needs. Provisions to deliver quality places are threaded throughout the strategies and policies of the Local Plan but is specially addressed through Policy ST04 (Improving the Quality of Design).</p>

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			<p>Paragraph 20 of the NPPF provides that strategic policies should set out an overall strategy for coastal change management. The Local Plan contains a range of strategy and policy provisions (significantly Policy ST03 and ST09 and place-based strategies) to ensure that regard is had to current and future coastal erosion, inundation and flood risk. The Local Plan does not, however, incorporate Coastal Change Management Areas as a mechanism for managing these matters.</p> <p>The Local Plan meets NPPF requirement.</p>
7.	Outline which policies are 'strategic' policies	NPPF Para 21	<p>The 'strategic' policies are clearly outlined as those set out in the Local Plan Part One – Strategic approach and policies.</p> <p>The Local Plan meets NPPF requirement.</p>
8.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> . Where larger scale developments are proposed that form part of the strategy for the area, policies should be set within a vision which looks further ahead (at least 30 years).	NPPF Para 22, having regard to the transitional provisions at NPPF para 221	<p>The Local Plan provides for a plan period from 2011 to 2031. It was adopted in 2018 and therefore only provided a remaining plan period of c. 13 years at point of adoption. At adoption the plan period was therefore less than the specified minimum period. This was, in part, a consequence of a protracted Examination in Public. The remaining plan period was not identified as a matter for concern through the Examination in Public, with the Inspector's Report finding the Local Plan to be sound and supporting a recommendation for the Councils to take the Local Plan forward for adoption.</p> <p>LP does not meet the NPPF requirement.</p>
9.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	<p>Figure 1.1 (key diagram) shows the broad locations for development in northern Devon, with land use designations and allocations shown on the accompanying policies map.</p> <p>The Local Plan meets NPPF requirement.</p>



	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
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	<p>The Local Plan taken as a whole provides a comprehensive strategy to deliver sufficient land in order to address objectively assessed needs for development over the plan period.</p> <p>The distribution strategy (Policy ST08) sets out the high-level strategy for bringing forward development to meet housing and economic development needs and requirements (a minimum of 17,220 dwellings over the plan period - 861 dwellings per annum - and 84.9 ha of land for economic development).</p> <p>The adopted Local Plan identifies a five-year supply of deliverable housing sites and sets out the strategy for maintaining this supply over the plan period. Policy ST21 (Managing the Delivery of Housing) sets out proactive provisions to manage the supply of housing, should it not be forthcoming as planned.</p> <p>The Local Plan is predicated on an identified supply of housing and economic land to meet the significant majority of the respective requirements.</p> <p>The Local Plan does not contain any phasing or measures to artificially constrain the rates of development delivery. Rather, the nature and scale of committed and allocated sites provides that there will be a gradual delivery of new dwellings across the plan period. The Housing Trajectory (Appendix 2 of the Local Plan) indicates the projected delivery of housing growth across the plan period for each site allocation. The distribution of development is detailed further through the housing and economic land allocations set out in the Town and Rural Strategies sections.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
11.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28	The Local Plan contains a series on non-strategic policies for specific places and types of development. These comprise a comprehensive set of localised strategies and site-based allocation policies for individual places (Part 2 of the Local Plan) along with a portfolio of detailed Development Management

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>policies to enable the robust consideration of proposals for different types of development (Part 3 of the Local Plan).</p> <p>Place-based strategies and associated site allocations for larger settlements (sub-regional, strategic, and main centres) were treated as strategic policies to recognise their importance in achieving the vision and spatial objectives of the Local Plan.</p> <p>The Local Plan meets NPPF requirement.</p>
12.	Set out contributions expected from development and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 58	<p>The Local Plan includes provisions that set out the expectations for development to contributions towards affordable housing and other infrastructure.</p> <p>Policy ST18 (Affordable Housing on Development Sites) sets out detailed policy requirements in relation to the scale and nature of affordable housing provision expected from market housing proposals.</p> <p>Policy ST23 (Infrastructure) sets out the expectations for development to provide or contribute towards the timely provision of physical, social and green infrastructure made necessary by the specific and/or cumulative impact of those developments.</p> <p>The Local Plan contains a range of other detailed policy provisions associated to the delivery of obligations and contributions – for example Policy DM10 (Green Infrastructure Provision) providing detailed green infrastructure requirements.</p> <p>The Local Plan is supported by an Infrastructure Delivery Plan which sets out the range of strategic infrastructure required to support planned development over the plan period, including consideration about delivery mechanisms and funding sources.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>A range of site allocation policies include detailed provisions setting out the infrastructure expected to be delivered directly through or in association with the development of those specific sites.</p> <p>The Local Plan contains provisions to enable the level of affordable housing provision, along with other infrastructure and planning requirements to be altered based on a robust appraisal of development viability. These mechanisms provide flexibility to ensure that policy requirements and obligations do not undermine the delivery of the Local Plan.</p> <p>The preparation of the Local Plan was supported by strategic viability evidence to inform and demonstrate that the provisions of the development plan were acceptable. The Local Plan was considered sound and appropriate through an Examination in Public.</p> <p><i>The Local Plan meets NPPF requirement.</i></p>
13.	Local Plans and development strategies are examined to assess if they have been positively prepared, justified, effective and consistent with national policy.	NPPF Para 35	<p>The Local Plan was subject to an Examination in Public which considered whether it was positively prepared, justified, effective and consistent with national policy (albeit in accordance with 2012-based national policy). The examination determined the Local Plan to comply with these requirements (subject to main modifications which were applied to the adopted Local Plan).</p> <p><i>The Local Plan meets NPPF requirement.</i></p>
	<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. Any housing needs which cannot be met within neighbouring areas should also be taken into account when establishing the amount of housing to be planned for within the plan.	NPPF Para 61	<p>This requirement post-dates the adoption of the Local Plan, which was assessed by reference to 2012-based national policy, under transitional arrangements.</p> <p>The Local Plan housing requirement (861 dwellings per annum) was informed by a locally-derived approach and robust technical evidence, based upon</p>

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			<p>policy, guidance and best practice in place at time of plan preparation and examination.</p> <p>The resultant annualised housing requirement of 861 dwellings comfortably exceeds the most recent figure for indicative local housing need, based on the standard method (April 2022), of 759 dwellings.</p> <p>Although the local housing need based on the standard method is lower than the current requirement, there is a need to consider the implications of any economic growth ambitions, e.g., and consequently whether an increase on the minimum need figure may be appropriate.</p> <p>The Local Plan had regard to the need to consider unmet housing need from neighbouring areas, with the adopted Local Plan accommodating the unmet need from the part of Exmoor National Park Authority that resides in North Devon, atc.10 dwellings per annum.</p> <p>Given that the local planning authority area of North Devon Council deviates from the geographic boundary of the wider Local Authority (due to Exmoor National Park), in accordance with national Planning Practice Guidance, it would/ will be necessary to deviate from the standard methodology in the derivation of local housing need in any case.</p> <p><b>The Local Plan partially meets this NPPF requirement but with mitigating circumstances.</b></p>
15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 62	<p>The range of housing needed by different groups of the community was considered through the preparation of the Local Plan, supported by detailed evidence of housing need.</p> <p>The Local Plan does not directly identify the size, type and tenure of housing needed for different groups. Rather Policy ST17 (1) requires the scale and mix</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>of dwellings, in terms of dwelling numbers, types, sizes and tenures, provided through development proposals to reflect identified local housing needs.</p> <p>The Local Plan accordingly sets out that a housing mix should be established by having regard to relevant up-to-date and robust evidence.</p> <p>Preparation of the Local Plan, and its subsequent implementation, has been supported by a Housing and Economic Needs Assessment which provides detailed evidence about the housing need for different groups.</p> <p>A number of allocations within the Local Plan provide for the delivery of extra care housing, sufficient to meet needs over the first half of the plan period. Policy ST17 (2) (Specialist Housing Accommodation) provides the policy basis for considering applications for specialist housing accommodation, such as sheltered, close and extra-care housing.</p> <p>The Local Plan does not provide specific policy provisions for the delivery of accessible and adaptable homes, although these can be encouraged in response to evidence of identified local need through the provisions of Policy ST17 as part of considering housing mix. No specific policy is included within the Local Plan as the associated evidence base did not provide supporting justification (due to a change in government policy during the preparation of the Local Plan). However, paragraph 7.14A of the Local Plan encourages such accommodation where a need is identified.</p> <p>The Local Plan does not include specific policy provisions in relation to self-build and custom housebuilding (partly due to a change in government policy during the evidence gathering stage). The provisions of the wider Local Plan provide flexibility to enable the delivery of such housing, with many smaller developments achieved accordingly. This is recognised by paragraph 7.19 of the Local Plan which indicates that it provides for this form of development where they would fit with the wider spatial strategy of the Local Plan.</p>

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			<p>The requirement for Traveller pitches and plots is established through Policy ST20: Providing Homes for Traveller Communities. Due to establishing this need late in the later stages of plan preparation, the intention has been to prepare a separate Travellers Development Plan Document to allocate sites to meet the identified need. The Regulation 18 consultation occurred in September 2016, alongside a call for sites. Sufficient sites were not identified to meet the identified need at that point in time. The Councils have indicated an intention to deal with this matter as part of a comprehensive plan update, as agreed by the Councils in December 2020.</p> <p><b>The Local Plan partially meets the NPPF requirement.</b></p>
16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 63	<p>Local Plan Policy ST18 Clause (7) sets out the specific tenures of affordable housing that will be sought, subject to enabling variation based on identified local housing need and/or development viability.</p> <p>Following the adoption of the Local Plan, revisions to national planning policy in 2019 amended the definition of affordable housing and introduced a requirement for 10% affordable home ownership (see below).</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
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. A minimum of 25% of all affordable homes should be First Homes, subject to the transitional requirements set out in the Planning Practice Guidance.	NPPF Para 65	<p><b>Affordable Home Ownership</b></p> <p>Local Plan Policy ST18 Clause (7) provides that affordable housing will be sought initially based on a tenure mix of 75% social rented and 25% intermediate accommodation.</p> <p>Applying the national planning policy requirement 10% affordable home ownership to the Local Plan policy requirement for 30% affordable housing on market housing sites would result in a requirement for an alternative affordable housing tenure split of 33.3% for home ownership and 66.6% for social rented housing. This would result in a significant reduction in the level</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>of social rented housing which could be sought; diminishing the ability to meet identified needs for affordable housing across northern Devon.</p> <p>The Strategic Housing Market Assessment update ( <u>Northern Peninsula Housing Market Area, Strategic Housing Market Assessment (SHMA) Update Final Report; Housing Vision, 2015</u>) identified the significant scale of affordable housing need across northern Devon; the need for affordable housing in each district being 57% (North Devon) and 58% (Torridge) of all newly forming households. Further evidence identifies a need for a high propensity of social rented housing (Tables 7.3 &amp; 7.4, <u>Strategic Housing Market Assessment: Torridge and North Devon Update - Final Report; Housing Vision 2012</u>). Following on, the tenure mix is founded on established evidence of housing need for northern Devon as contained in the Housing and Economic Needs Assessment (Chapter 8, Housing and Economic Needs Assessment, GL Hearn, May 2016), which advocated that 80% of affordable housing be sought as social and affordable rented housing, and which has been subject to review as part of the independent examination of the adopted Local Plan.</p> <p>It is clear from the referenced evidence that the application of the national provision for 10% affordable home ownership in northern Devon would result in a diminishing ability to meet the identified affordable housing needs of the specific group of households across northern Devon requiring social rented housing. The approach would result in the provision of affordable housing that could not be accessed by the majority of households that are deemed to be most in housing need. It is the Councils’ position that their ability to address affordable housing needs would be significantly prejudiced by the introduction of a 10% home ownership requirement.</p> <p>As set out above, national planning policy provides an opportunity for exclusion from the requirement for 10% affordable home ownership on major development on the basis that it would significantly prejudice the ability to</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>meet the identified affordable housing needs of specific groups; with Paragraph 62 of the NPPF establishing that “those requiring affordable housing” are within the scope of “different groups in the community” and that their tenure requirements should be reflected in planning policies (paragraph 63, NPPF).</p> <p>Recognising that evidence demonstrates a high level of need for the social rented tenure, the delivery of which would be prejudiced by the national requirement for affordable home ownership, the Councils have taken the opportunity provided through national planning policy to not apply the 10% home ownership requirement as part of the affordable housing mix on qualifying proposals for open market housing. Accordingly, the 10% home ownership requirement as part of the affordable housing mix on qualifying development sites will not be applied. No variance in the implementation of clause (7) of Policy ST18 is therefore considered necessary because of national planning policy (Paragraph 65, NPPF) and the stated tenure mix remains the starting point for establishing the tenure mix required by developments</p> <p><b>First Homes</b></p> <p>The WMS dated 24th May 2021 introduces a First Homes policy (it should be noted that the content of the WMS was not included in the NPPF update published in July 2021). The Local Plan does not include a First Homes policy. Having considered the national First Homes provisions, the Councils have determined that the most legitimate way to consider the routine implementation of First Homes for northern Devon is as part of a review of the Local Plan. This approach recognises the need to robustly consider the wider policy implications of introducing First Homes and to legitimise the formal introduction of the additional local requirements necessary for the product to meet identified local needs.</p> <p>The Local Plan partially meets the NPPF/WMS requirements.</p>



	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
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	<p>This is a requirement was introduced subsequent to the adoption of the Local Plan (by virtue of the publication of the 2019 NPPF). The Local Plan does not therefore explicitly set out housing requirement figures for neighbourhood plan areas. In any case, there were only very limited numbers of designated neighbourhood areas in place during the period of plan preparation. The Local Plan does however establish specific minimum housing requirement figures for a large range of places (ranging from the Sub-Regional Centre to a significant number of Villages) which reflect the overall strategy for the pattern and scale of development, community aspiration and relevant site allocations. These could readily form the basis for deriving housing requirements for neighbourhood areas.</p> <p>The Local Plan partially meets the NPPF requirement.</p>
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	<p>The Local Plan was able to demonstrate a supply of specific, deliverable sites sufficient for five years from the based date of 1<sup>st</sup> April 2017 (recognising the timeline of plan examination).</p> <p>The Local Plan meets NPPF requirement.</p>
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	<p>The requirement for identifying land to accommodate at least 10% of the housing requirement on sites no larger than one hectare was introduced through 2019-based amendments to national policy after the adoption of the Local Plan.</p> <p>The Local Plan did not therefore explicitly address this matter; it does, however, provide a significant proportion of its housing requirement on smaller sites.</p> <p>Throughout plan production, efforts were made to increase the range of smaller sites for housing, in response to requests to support small house builders.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			The actual percentage of the housing requirement accommodated on sites no larger than one hectare is yet to be determined and requires further analysis.  Compliance yet to be determined.
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	A Written Ministerial Statement dated 24 <sup>th</sup> May 2021 removes this requirement, replacing it with a policy for the provision of First Homes (see the answer to question one). It should be noted that the NPPF was subsequently updated on 27 <sup>th</sup> July 2021, however it did not incorporate revisions to reflect this element of the WMS. Therefore, it is considered that the direction from the WMS is no longer a requirement that needs to be supported.  The Local Plan no longer needs to address this requirement.
22.	Support the supply of homes through utilising masterplans, design guides and codes where appropriate to support larger scale developments.	NPPF Para 73	This new requirement was introduced to national planning policy through the 2019-based update to national planning policy and thus after the adoption of the Local Plan. It is accordingly not addressed in the Local Plan. None-the-less, many of the allocation policies for the larger, more strategic development sites are worded such as to seek them to be developed in a comprehensive manner. Masterplans, design guides and codes would often not form part of the development plan but rather sit alongside as supporting documentation (often as Supplementary Planning Documents). The provisions of the Local Plan would not preclude such an approach from being followed.  The Local Plan partially meets the NPPF requirement.
23.	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	A Housing Trajectory is included in Appendix 2 to the Local Plan. The option offered through national planning policy to demonstrate a five-year housing supply through an annual position statement post-dates Local Plan adoption.  Of note the approach to demonstrating a five-year housing supply, identified under policy ST08, includes a higher 20% buffer.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			The Local Plan meets NPPF requirement.
24.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 78	<p>The Local Plan is predicated on a strategy that reflects and responds to local needs for housing in rural areas, with Policy ST07 (Spatial Development Strategy for Northern Devon’s Rural Area) providing a framework for the Local Plan to do so. Strategies for individual places (Local Centres and Villages) were prepared in collaboration with local communities and were responsive to local ambitions for development and growth. The Local Plan provides rural exception site policies (Policies ST19: Affordable Housing on Exception sites and ST19A: Starter Homes Exception Sites) to enable affordable housing schemes to come forward to meet identified local housing need. The Local Plan also contains a range of Development Management policies allowing for housing for rural workers (Policy DM28: Rural Worker Accommodation), succession farmer housing (Policy DM29: Farmer Family Attached Accommodation) and occupancy restricted dwellings for local needs at Rural Settlements (Policy DM24: Rural Settlements).</p> <p>The Local Plan meets NPPF requirement.</p>
25.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 79	<p>The Local Plan provides a range of strategies, policies and allocations that together provide a framework to enable rural places to grow and thrive, whilst having regard to local context, circumstances, and aspirations.</p> <p>Policy ST07 provides a hierarchy for the rural settlements that reflects both their existing role and capacity for growth. The strategies for individual places take account of opportunities to thrive, with more sustainable places having been planned for population growth (i.e., Local Centres), whilst smaller places (i.e., Villages) were still subject to planned development with a view to maintaining or growing their population; with allocations for housing growth provided at both Local Centre and Village level.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Strategies for individual places took account of community views, which presented a range of ambition for growth; community views were generally taken forward in the Local Plan with the consideration capacity to accommodate sustainable growth. For Local Centres and Villages, the Local Plan accommodates opportunities for speculative housing development within the boundaries of the settlements where opportunities arise, whilst supporting affordable housing on sites adjoining these places where a local need is identified. For smaller places with some very limited services and facilities (so-called Rural Settlements), the Local Plan enables housing to be provided to meet identified local needs, subject to some locational qualifications.</p> <p>The Local Plan additionally provides opportunities for economic growth in rural areas, through a limited range of site allocation opportunities and a series of criteria-based policies that enable appropriate development proposals to be accommodated. The Local Plan also contains provisions to support the development and diversification of rural enterprises.</p> <p>The current approach of the plan recognises the inter-related role that individual places play in rural areas and the way that they support one another. It is however recognised that there are opportunities to develop this approach further and to better recognise these more localised relationships – this is a matter highlighted by elected members as something appropriate to explore further.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
26.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 80	Development in the Countryside is restricted through the spatial development strategy for Rural Areas (Policy ST07). This requires that beyond Local Centres, Villages and other Rural Settlements, development will be limited to that which is enabled to meet local economic and social needs. This guards against development in unsustainable locations and protects the character of the wider countryside.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>In line with national planning policy, the strategies and development management policies of the Local Plan make provision for the reuse of disused and redundant buildings and for rural workers accommodation.</p> <p>The Local Plan does not however provide explicit policy provisions for the following specific circumstances for enabling isolated dwellings in the countryside:</p> <ul style="list-style-type: none"> <li>• homes of 'exceptional quality'</li> <li>• The optimal viable use of a heritage asset</li> <li>• The subdivision of an existing residential building.</li> </ul> <p>Although the Local Plan is silent on these specific matters resulting in a slight tension to the spatial strategy, effective decisions are able to be reasonably made by reference to the wider provisions of the Local Plan and relevant provisions of national planning policy.</p> <p><b>The Local Plan partially meets the NPPF requirement.</b></p>
	<i>Economy</i>		
27.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 81	<p>The Local Plan is considered to provide a positive framework for economic development and growth that is intended to create conditions where businesses can invest, expand, and adapt.</p> <p>The Local Plan provides a holistic approach to supporting economic development, being achieved through a combination of the spatial planning vision, spatial strategy and a range of strategic policies (including ST11 - Delivering Employment and Economic Development) and various development management policies which positively support and enable employment development in towns, villages and rural areas. Policy ST11 (2), significantly provides for a flexible approach to employment land release in response to the relocation or expansion proposals that will contribute to improvements in the economy.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The Local Plan allocates just under 85ha of land for employment to allow for choice and flexibility to the market; being higher than the 72 – 81 hectares advised as being needed across the plan period in the supporting evidence to the Local Plan (Housing and Economic Needs Assessment 2016).</p> <p>The Local Plan meets NPPF requirement.</p>
28.	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	<p>The vision for the northern Devon economy is set out in section 5 of the Local Plan. This is complemented and supported by the spatial planning vision, spatial strategy, a combination of strategic policies and approaches, enabling development management policies and a portfolio of site allocations for economic development.</p> <p>As the Heart of the South West’s (HotSW) Local Industrial Strategy (LIS) was published after the adoption of the Local Plan, there was no opportunity to ensure the alignment of strategies. However, the evidence used to inform the Local Plan included the HotSW Strategic Economic Plan and the Northern Devon Economic Strategy. The Local Plan is generally considered to provide sufficient opportunities and flexibility to support and encourage sustainable economic growth.</p> <p>The Local Plan meets NPPF requirement.</p>
29.	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	<p>The Local Plan provides a range of site allocations for economic development, in strategic locations contingent with the spatial strategy, in excess of the scale of land identified as necessary to meet identified needs over the plan period.</p> <p>The Local Plan provides a range of complementary criteria-based policies that will enable the further release of land for economic development where it is demonstrated that this is necessary to meet an unmet need (subject to a range of qualifying criteria). Elsewhere the visions, strategies and allocations</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>for individual places highlight opportunities and intentions for regeneration and associated investment.</p> <p>The Local Plan meets NPPF requirement.</p>
30.	<p>Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.</p>	<p>NPPF Para 82</p>	<p>The Local Plan takes a positive and proactive approach to enabling and facilitating development. The Local Plan recognises that northern Devon’s economy is underpinned by its high-quality environment and quality of life.</p> <p>The Local plan seeks to address barriers to investment such as housing and local services by providing an integrated and holistic consideration of social, economic, and environmental matters (e.g., through strategic policies in section 7 and 8 and related development management policies).</p> <p>Preparation of the Local Plan included consideration of the necessary infrastructure investment required to service planned growth; articulating this through the accompanying Infrastructure Delivery Plan, spatial strategies for places and requirements stipulated through individual development proposals.</p> <p>The Local Plan additionally requires development proposals to contribute appropriately to meeting the infrastructure and service needs generated by the proposal (either individually or cumulatively).</p> <p>The Local Plan was recognised to have the role and responsibility of facilitating additional public sector investment, as demonstrated by its role in underpinning the business case for the upgrade of the A361 link road.</p> <p>The Local Plan meets NPPF requirement.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
31.	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	<p>The Local Plan is considered to provide a flexible policy framework that can enable northern Devon to respond to changes in economic circumstances within the plan period.</p> <p>The Local Plan’s vision for the northern Devon economy is “a diverse and resilient economy that can adapt to challenges and maximise opportunities, underpinned by an appropriate skilled workforce and effective infrastructure” (paragraph 5.1).</p> <p>In order to offer choice, flexibility and resilience, the Local Plan identifies additional land for economic growth in excess of the evidenced scale required to meet identified needs over the plan period, whilst a range of criteria-based policies (and in particular Policy DM12: Employment Development Towns, Local Centres and Villages) support the release of additional land for economic development where it is demonstrated that this is necessary to meet an unmet need (subject to a range of qualifying criteria).</p> <p>Local Plan Policy ST11 (Delivering Employment and Economic Development) identifies that the Councils will work in partnership to maintain and enhance the local economy and support inward investment. It supports the flexible release of land in response to relocation or expansion proposals, whilst supporting the modernisation of employment sites to meet future needs.</p> <p>Local Plan Policy DM12 allows for the development of new sites adjoining or well related to a range of rural settlements (Local Centres and Villages) to meet identified business needs (subject to a range of qualifying criteria). Elsewhere, Policy DM14 (Rural Economy) provides support for new small-scale economic development in and around smaller rural settlements or existing operations, whilst other provisions also enable proposals for the diversification of the rural economy (Policy DM15: Farm Diversification).</p>



	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Live-work accommodation is supported through the Local Plan in appropriate sustainable locations, whilst accommodation is enabled on the basis of need for rural workers through Policy DM28: Rural Worker Accommodation.</p> <p>The Local Plan is considered to provide a flexible and adaptable range of strategies, policies and allocations that can adapt and remain resilient to changes and challenges that arise across the plan period.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
32.	<p>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.</p>	NPPF Para 83	<p>The Local Plan recognises and responds to the varying needs of different sectors of the economy, doing so by providing both specific proposals and site allocations for particular uses and by providing a range of flexible policies to enable economic development where specific needs are identified. These were informed by sectoral analysis provided through evidence prepared in support of the Local Plan (Housing and Economic Needs Assessment). The Local Plan for example, seeks to give priority to waterside locations for uses that require a coastal location, whilst safeguarding previously developed sites, jetties, and wharves, along with facilities at Appledore and Yelland (Policy ST09: Coast and Estuary Strategy). With respect to agriculture, the Local Plan provides for the development of new livestock markets (Policies HOL01 at Holsworthy and SM03 at South Molton) and associated agri-business uses in key locations for agriculture. More widely, allocations of land for economic development were directed to locations with market interest for growth.</p> <p>Whilst the Local Plan does not make explicit provision in response to the specific sectors identified in national planning policy, these were introduced to national policy as requirements after its adoption. Local Plan Policy ST11 does however seek to support the provision of high value jobs in business, education, and research, those supporting a low carbon economy and other key growth sectors in sustainable locations.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
33.	Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.	NPPF Para 84	<p>The Local Plan provides a positive framework to enable the sustainable growth and expansion of all types of business in rural areas. It is responsive to a range of rural economic and social needs, and it supports the appropriate reuse of rural buildings. Support is provided for rural employment and farm and rural business diversification schemes. This is reflected in the spatial development strategy for rural areas (ST07), individual Local Centre and Village strategies and through various development management policies.</p> <p>Sites are allocated for economic development at a number of rural settlements, with associated policies to guide the form of development.</p> <p>The Local Plan additionally provides a range of enabling criteria-based policies that positively support various forms of economic development in rural areas. Policy DM12 allows for the development of new sites adjoining or well related to a range of rural settlements to meet identified business needs (subject to a range of qualifying criteria). Whilst Policy DM14 provides support for new small-scale economic development in rural areas - in and around a range of smaller rural settlements, at existing operations and through the change of use or conversion of existing buildings.</p> <p>Local Plan Policy DM15 supports proposals for sustainable farm diversification and for appropriately located equine-related development (Policy DM16: Equine Development), it also provides support for tourism proposals (Policies ST13: Sustainable Tourism, DM17: Tourism and Leisure Attractions &amp; DM18: Tourism Accommodation) in appropriate rural locations. Whilst the tourism policies are considered to be fully compliant with the provisions of national policy, it is recognised that they may not fully meet the aspirations of some elected members.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
34.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 84	The Local Plan is considered to provide a positive approach to enable the development and diversification of agriculture and other land-based rural

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>businesses, with the vision setting out the ambition for rural businesses and agriculture to thrive.</p> <p>Policy DM15 (Farm Diversification) provides an enabling criteria-based policy that supports proposals for farm diversification, whilst wider forms of small-scale economic development are enabled in a variety of rural locations, including at existing operations, through Policy DM14 (Rural Economy). The housing needs of rural workers is recognised, with policies facilitating additional housing for rural workers, where justified based on need (Policy DM28: Rural Worker Accommodation) and through succession housing for farming families (Policy DM29: Farmer Family Attached Accommodation).</p> <p>The Local Plan meets NPPF requirement.</p>
35.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 84	<p>Tourism and leisure are recognised through the Local Plan as important parts of northern Devon's economy. Local Plan Policy ST13 supports high quality tourism development and states that "tourism growth should be sustainable and should not damage the natural or historic assets of northern Devon". A pair of criteria-based policies (Policies DM17 &amp; DM18) enable sustainable rural tourism and leisure developments in sustainable locations, and which respect the character of the countryside. The use of disused or redundant buildings is enabled (Policy DM27) for tourism uses – be that accommodation or otherwise. Whilst the tourism policies are considered to fully compliant with the provisions of national policy, following workshops with elected members, it is recognised that they may not fully meet some of their aspirations.</p> <p>The Local Plan meets NPPF requirement.</p>
36.	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	<p>The Local Plan seeks to safeguard community services and facilities. In particular, Policy ST22 (Community Services and Facilities) seeks to both enable new provision of community services and facilities, whilst protecting against their loss unless there is compelling evidence to demonstrate that</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>they are no longer appropriate or required. A range of criteria-based Development Management policies provide complementary provisions relating to rural services and businesses to support this approach (e.g., DM12, DM14, DM19 and DM21).</p> <p>The Local Plan meets NPPF requirement.</p>
37.	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	<p>The Local Plan enables a range of opportunities in the rural areas to meet the needs of local businesses and communities. Policy ST11 (7) provides support for economic development proposals and the diversification of the rural economy where the proposals do not conflict with other policies of the Local Plan. Proposals for community services and facilities are enabled within and adjoining a broad range of rural settlements (Local Centres, Villages and Rural Settlements), subject to a range of qualifying criteria.</p> <p>The Local Plan provides support for innovative schemes to secure local delivery of public services in areas poorly served by public and community transport (Policy ST22: Community Services and Facilities).</p> <p>Whilst the development of the spatial hierarchy for the rural areas had regard to the availability of public transport, the lack of public transport is not an absolute factor embedded in criteria-based policies for development in rural areas.</p> <p>The Local Plan generally seeks to direct development to sustainable locations, it does so with a significant degree of flexibility, recognising the constraints often found in rural areas. The spatial development strategy for rural areas (Policy ST07) recognises that some limited development can take place in the countryside areas, away from settlements, 'to meet local economic and social needs'. Policy DM12 (Employment Development at Towns, Local Centres and Villages) provides</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			for employment activity adjacent to or well related to settlement in defined Towns, Local Centres and Villages, with Policy DM14 enables small-scale economic development at smaller rural settlements, re-using disused or redundant rural buildings or at sites of existing operations.  The Local Plan meets NPPF requirement.
38.	<i>Town centres</i>		
39.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 86	<p>The Local Plan (Policy ST12: Town and District Centres) identifies a network of town and district centres across northern Devon which offer a range of goods and services.</p> <p>Barnstaple is recognised as the largest centre delivering the greatest range of convenience and comparison retail options, reflecting its status as a Sub-regional Centre. Bideford is also an important centre, which provides a reduced level and range of retail and service provision from Barnstaple but a distinctly greater range than the area's other towns. The other Main Centres at Braunton, Great Torrington, Holsworthy, Ilfracombe and South Molton are locally important but smaller and support a range of services which are strongly influenced by their proximity to other centres. The vitality and viability of these centres is promoted and protected through Policy ST12, the individual town strategies and development management policies (e.g., DM19: Town and District Centres).</p> <p>Changes to the permitted development regime along with the use classes order, which introduce flexibilities to move away from traditional town centre uses, pose potential challenges in terms of maintaining the vitality and viability of town centres. Whilst the spatial strategy for the town and district centres (Policy ST12) continues to provide an appropriate high-level strategy that positively seeks to support vibrant and vital town centres, the detailed development management policy (Policy DM19) is less effective in light of</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>both changes to the planning regime (use classes and permitted development rights) and the changing nature of town centre activity.</p> <p><b>The Local Plan partially meets the NPPF requirement.</b></p>
40.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 86	<p>The Local Plan and associated Policies Map defines the extent of the town centres, primary shopping areas and primary frontages for the range of defined centres. Policy ST12 (Town and District Centres) provides the retail strategy for the plan area including the types of uses supported within these centres, with the town centres, primary shopping areas and Primary Frontages set out in the policy maps for Barnstaple, Bideford, and the other main centres. Policy DM19: Town and District Centres provides the detailed criteria-based policy which establishes how proposals will be considered and the uses which will be deemed appropriate.</p> <p>Whilst the spatial strategy for the town and district centres (Policy ST12) continues to provide an appropriate high-level strategy that positively seeks to support vibrant and vital town centres, the detailed development management policy (Policy DM19) is less effective in light of both changes to the planning regime (use classes and permitted development rights) and the changing nature of town centre activity.</p> <p><b>The Local Plan partially meets the NPPF requirement.</b></p>
41.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 86	<p>The Local Plan does not contain any specific policy related to the retention or enhancement of existing markets.</p> <p>A number of the main centres do have covered or street markets – including Barnstaple, Bideford, Great Torrington, Holsworthy and South Molton. Wider policies of the Local Plan would be generally supportive of the retention and enhancement of physical market infrastructure and buildings, recognising their role in supporting the vitality and viability of town centres. Wider provisions (Policy ST12) also seek to support the town centres through the</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>positive management of regeneration measures, which could include provisions associated to markets or associated public realm enhancements. Similar opportunities for regeneration and enhancements are also recognised in a number of the town specific spatial strategies. The town strategies for Holsworthy and South Molton makes provision for the relocation and enhancement of the current livestock markets.</p> <p>Whilst the Local Plan does not make specific provisions for the retention and enhancement of existing markets, it is considered to contain appropriate enabling provisions.</p> <p>The Local Plan meets NPPF requirement.</p>
42.	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	<p>The Local Plan provides and supports a range of regeneration and redevelopment opportunities in and around a number of its town centres.</p> <p>Whilst the nature of the proposals that might be required to come forward is possibly now different to envisaged at the point of plan preparation, the Local Plan provides sufficient scope and flexibility to support development that might be needed to support the changing nature of town centre uses, particularly in combination with the flexibilities inferred by changes to the use classes order and permitted development rights.</p> <p>Given the changing nature of town centre use and activity, it is considered unlikely that there would be a need to identify sites to grow the town centres to meet the scale and type of development likely to be needed in the next ten years, although it is recognised that there may be a need to identify sites to support specific re-development opportunities. The lack of such sites in the existing Local Plan does not, however, preclude their development by having regard to its wider provisions.</p> <p>Further up-to-date evidence would be required to support the development of a revised local plan to understand and inform the location of appropriate</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			town centre boundaries, primary shopping areas, primary frontages along with visions, strategies and site proposals for individual centres.  <i>The Local Plan meets NPPF requirement.</i>
43.	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	The expansion of the retail/town centre uses offer in Barnstaple and South Molton is proposed on sites adjacent or well connected to the existing town centres (BAR11 and SM04). Similarly, a range of regeneration opportunities are provided in and around the town centre for Bideford (BID07). As above, there will be a need to develop further up-to-date evidence to ascertain whether these proposals and associated policies are still appropriate and whether there is a need for the same, similar or different allocations in the future.  <i>LP meets the NPPF requirement</i>
44.	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	Policy ST12 (Town and District Centres recognises the role that residential, leisure and other non-retail uses can play in ensuring the viability and vitality of town centres and that these uses will be encouraged to achieve a 'mix of facilities and active town centres. The Local Plan seeks to protect retail activity in the town centres, especially in the defined Primary Frontages but it is flexible in enabling residential uses where appropriate. Policy DM19 explicitly recognises the role that residential development can have in supporting the viability and vitality of Town and District Centres, supporting proposals for a range of uses, including residential, subject to compliance with a range of criteria.  Changes to use classes and permitted development rights subsequent to the adoption of the Local Plan have also introduced additional opportunities for residential development within the town centres.  <i>LP meets the NPPF requirement.</i>
45.	<i>Healthy and safe communities</i>		



	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
46.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	NPPF Para 92	<p>The Local Plan threads the principles of achieving healthy, inclusive and safe places and communities throughout: from the vision, aims and objectives (particularly the objectives under Aim 4), through to strategic approaches and detailed policy provisions.</p> <p>The spatial planning vision seeks to ensure that people can live well, that more residents enjoy a healthy and active lifestyle and benefit from excellent education, health and leisure facilities, complemented by investment in green infrastructure, by designing new developments to promote healthier living. This propagates through the aims and objectives of the Local Plan which include provisions that seek to provide improved opportunities to services and facilities (4)(b), ensure there are more opportunities to lead healthy lives (4)(f), that the built environment is designed to promote healthy living (4)(i) and that public access is improved to environmental assets to support wellbeing; safe places are also referenced.</p> <p>These aims and objectives, propagate through to the wider strategies and policies, and whilst healthy lifestyles are not mentioned explicitly, the principles are embedded into the wider policy approaches – including, for example, consideration of adapting to climate change and facilitating a step change toward the use of sustainable modes of transport (Policy ST02: Mitigating Climate Change), improving access to natural and managed green spaces (Policy ST03: Adapting to Climate Change and Strengthening Resilience), achieving high quality inclusive and sustainable design (Policy ST04: Improving the Quality of Development), improving overall accessibility by providing a wide range of integrated practical and attractive travel options, including pedestrian, cycle and bridleway networks (Policy ST10: Transport Strategy), providing improved community services and facilities (Policy ST22: Community Services and Facilities). The Local Plan also embeds the expectation (Policy DM04: Design Principles) that all major residential proposals should be supported by a Building for Life 12 (or successor) assessment which seek to ensure the delivery of this NPPF requirement. It is</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>noted that this will not apply to all developments across the plan area. DM04 also recognises the need to create inclusive and well-connected environments that promote ease of movement.</p> <p>The theme of healthy lifestyles and accessibility is included in some of the town and village spatial strategies (e.g. Barnstaple) and is reflected in development management policies. However, it is recognised that the next Local Plan could provide a more comprehensive approach to this matter, with potentially scope for the strategic policies to more clearly identify and pull together the strands and themes that connect sustainable travel, accessible places and healthy lifestyles.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
47.	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	<p>This requirement is met through strategic policy ST22 (Community Services and Facilities), which supports new and safeguards existing facilities. The policy provides a positive approach to enabling innovative schemes for the delivery of public services in areas poorly served by public and community transport. Policy DM21 (Local and Rural Shops) deals with new local and rural shops to meet local community needs while Policy DM19 (Town and District Centres) recognises the role of community facilities in promoting viability and vitality.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
48.	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	<p>The Local Plan had regard to a wide range of plans and strategies during its preparation, supported by a significant range of engagement with relevant stakeholders – including those from the health, social and cultural sectors – who promoted their own strategies and objectives. These propagate throughout the Local Plan and its approaches, with supporting measures to improve health, social and cultural well-being embedded and reflected across a wide range of strategic and development management policies – from the retention and enhancement of community services, facilities and</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>infrastructure, through the design of places that reflect on local distinctiveness and sense of place, to the promotion of active travel. The Local Plan was also supported by a Health Impact Assessment (HIA), whilst the Sustainability Appraisal identified a range of relevant plans and strategies.</p> <p>The Local Plan meets NPPF requirement.</p>
49.	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	<p>The Local Plan seeks to protect important facilities and services. In particular, it does this by seeking to prevent the loss of community services and facilities (Policy ST22: Community Services and facilities). The Local Plan also enables development proposals to contribute towards the enhancement of existing services and infrastructure. Further, the need for protection of local green spaces is recognised in the individual town strategies and wider provisions (Policies ST14: Enhancing Environmental Assets and DM10: Green Infrastructure Provision).</p> <p>The Local Plan meets NPPF requirement.</p>
50.	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	<p>The Local Plan supports extensions and improvements to existing community facilities, along with proposals to deliver innovative proposals to support local service delivery, whilst resisting their loss unless justified (Policy ST22: Community Services and Facilities). The Local Plan also enables the development of local and rural shops to meet local community needs and safeguards them unless there is suitable alternate provision (Policy DM21: Local and Rural Shops).</p> <p>The Local Plan meets NPPF requirement.</p>
51.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 93	<p>The Local Plan seeks to provide an integrated and holistic approach to sustainable development that considers the social, environmental, and economic strands. This propagates through the Local Plan, which seeks to ensure a balance between the locations of housing, employment opportunities and access to services and facilities. This is reflected in its</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>strategic aims and objectives, the strategic policies relating to sustainable development (in particular, Policies ST02 and ST04) and the spatial development strategy (as set out in Policies ST06 and ST07). These were derived from a detailed assessment of settlement ‘sustainability’, capacity, and aspiration – connecting a top-down consideration of northern Devon’s aspirations, needs and demands to a bottom-up approach of looking at individual places, their specific needs and opportunities. This resulted in a network of place-based strategies that have seek to balance the housing and employment, along with consideration of wider infrastructure.</p> <p>The Local Plan meets NPPF requirement.</p>
52.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 94	<p>This is not a wide-spread issue in northern Devon, with no proposals identified at the point of plan preparation. The Local Plan does not therefore include any specific policy provisions related to this. The wider strategies and provisions of the Local Plan would however support estate regeneration where a specific development proposal arises, and positive outcomes identified.</p> <p>The Local Plan has supported schemes where they have been forthcoming – including redevelopment of affordable housing schemes in Barnstaple and Bideford.</p> <p>The Local Plan meets NPPF requirement.</p>
53.	Plan positively to meet school place requirements and to encourage development which will widen choice in education.	NPPF Para 95	<p>The Local Plan has positively planned for school place requirements and the provision of adequate education infrastructure. The local planning authority worked closely with the local education authority (Devon County Council) and education providers (in particular Petroc) in order to understand needs and requirements across the plan period, seeking to plan for these appropriately. The Spatial Planning Vision recognises the importance of having high quality educational and training provision, along with the importance of Petroc College. The Local Plan provides for a range of new education infrastructure (in particular early-years provision and primary schools), with their delivery</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>embedded in place-based strategies, the associated site allocations and the supporting Infrastructure Delivery Plan (IDP). Proposals to support the expansion of Petroc (Further Education establishment) are also included.</p> <p>The Local Plan meets NPPF requirement.</p>
54.	Work proactively and positively with promoters, delivery partners and statutory bodies to plan for public service infrastructure.	NPPF Para 96	<p>The local planning authorities worked closely with a broad range of stakeholders across the preparation of the Local Plan and continue to do so during its implementation to facilitate delivery.</p> <p>The needs for public service infrastructure, identified through evidence gathering and engagement, were considered when developing the local plan, including place-based strategies and individual allocations. The North Devon and Torridge Infrastructure Delivery Plan supports the Local Plan and additionally sets out how the public service infrastructure will be delivered.</p> <p>The Local Plan meets NPPF requirement.</p>
55.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 97	<p>The Local Plan recognises the importance of public safety – with one of the objectives (4)(g) seeking to ensure that community environments are safe and secure, whereby crime and anti-social behaviour are tackled effectively. The strategies for key places recognise the need to ensure that they are safe environments. Many site-specific allocations seek to ensure that development creates safe environments – with the strategy for Bideford (Policy BID) for example, seeking to ensure that the town centre is ‘safe’ through a programme of regeneration and public realm enhancements. More widely, the supporting text to Policy ST12 (Town and District Centres) identifies the need to ensure an improved sense of safety and security for town centre users. The need for well-designed and safe public and private spaces is established through Policy DM04 (Design Principles).</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The Local Plan does not explicitly consider the risk of malicious threats, including sites where large gatherings might be expected, although these are likely to be relatively limited given the nature of northern Devon. The Police Architectural Liaison Officer is routinely consulted on development proposals. There are training and operational defence sites around the Taw-Torridge estuary and where applicable policies support the continued use of these sites (e.g., ST09: Coast and Estuary Strategy).</p> <p>The Local Plan partially meets the NPPF requirement.</p>
56.	Provide open space, sports and recreational facilities which meets the needs of the local area. Consider how they can deliver wider benefits for nature and support efforts to address climate change.	NPPF Para 98	<p>The Local Plan was informed by a comprehensive green infrastructure needs assessment and strategy.</p> <p>The Local Plan recognises in its vision the importance of open space, sport and recreation facilities, seeking for residents to be able to enjoy an active and healthy life through investment in green infrastructure which has improved the quality and access to a well-connected network of open spaces, with new developments designed to promote healthier living.</p> <p>The Local Plan seeks to protect and integrate green infrastructure into urban areas, whilst improving access to natural and managed green space (Policy ST03: Adapting to Climate Change and Strengthening Resilience), whilst increasing opportunities for access, education and appreciation of all aspects of northern Devon’s environment (Policy ST14: Enhancing Environmental Assets). In doing so, the plan seeks to apply an ecosystem services approach (Vision, Policies ST03 &amp; ST14). The Local Plan also looks to conserve and enhance landscapes and networks of habitats, including cross-boundary green infrastructure links, strengthening the resilience of biodiversity to climate change by facilitating migration of wildlife between habitats and improving their connectivity (Policy ST03).</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The Local Plan (Policy ST23: Infrastructure) expects development proposals to provide physical, social and green infrastructure to address the needs generated by the development.</p> <p>Policy DM10 (Green infrastructure Provision) sets out the required standards for green infrastructure provision, including play space, parks, sport and recreation grounds. Strategic provision of such facilities is focused in hubs identified in a number of settlements, with additional references in many settlement strategies. More widely (the supporting text) recognises the co-benefits that can be achieved from green infrastructure – including for example sustainable drainage and biodiversity (paragraph 3.44).</p> <p>It is recognised that the implementation of the Local Plan would benefit from habitat opportunities mapping, which is being addressed through the development of the Nature Recovery Network.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
57.	Protect and enhance public rights of way and access.	NPPF Para 100	<p>The Local Plan (Policies ST10: Transport Strategy and DM05: Highways) seeks to maintain and enhance the function and connectivity of the public rights of way network in northern Devon; protecting and enhancing, whilst facilitating improvements to existing connections or providing new, where practical to do so. This positive approach is also reflected in the individual place-based strategies and policies for towns and rural places.</p> <p>The Local Plan also seeks to increase opportunities for access to northern Devon’s environment for all sections of the community (Policy ST14: Enhancing Environmental Assets).</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
58.	<i>Transport</i>		

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
59.	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	<p>The spatial development strategy (Policies ST06: Spatial Development Strategy for Northern Devon's Sub-Regional, Strategic and Main Centres and ST07: Spatial Strategy for Northern Devon's Rural Area) directs the main focus of development to Barnstaple and Bideford with six 'main centres' also taking an appropriate level of growth. These places benefit from existing transport infrastructure and opportunities for sustainable travel so are considered the most sustainable locations. More restricted growth is permitted in the smaller settlements where there are more limited options for sustainable travel, whilst recognising that development will support their role as rural service centres, improving the sustainability of rural communities.</p> <p>The Local Plan meets NPPF requirement.</p>
60.	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	<p>The Local Plan's spatial hierarchy is underpinned by a detailed settlement assessment, and the Strategic Housing Land Availability Assessment considered access to public transport, services and facilities and employment opportunities when assessing potential development sites.</p> <p>The Sustainability Appraisal, prepared alongside the Local Plan considered the sustainability credentials of potential site options. When identifying locations for growth, consideration was given to the potential for making sustainable mixed-use places, both by considering their proximity and access to other uses, and the co-location of development through proposed development.</p> <p>Larger scale strategic allocations across northern Devon include a mix of uses including residential alongside employment, leisure, retail, and education.</p> <p>The Local Plan meets NPPF requirement.</p>
61.	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	<p>Key access routes to serve proposed development sites and improve connectivity are identified on the Policies Map. Place-based spatial strategies, along with individual site allocations identify locations for specific infrastructure for widening transport choice and realising opportunities for</p>



	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>large scale development, including locations for significant junction improvements and, for example, park and change facilities.</p> <p>The Local Plan's Transport Strategy (Policy ST10) aims to safeguard routes and explore opportunities for the reuse and reinstatement of former railway lines (e.g. Lynton to Barnstaple railway).</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
62.	Provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 106	<p>The Local Plan recognises the importance of active travel, including walking and cycling for northern Devon.</p> <p>The Transport Strategy (Policy ST10) aims to develop 'quality strategic recreational routes and local pedestrian, cycle and bridleway networks' and 'improve interchanges for transfer between modes of travel', whilst the design of places (Policy DM04: Design Principles) seeks to ensure that places are accessible to all. The Local Plan also seeks to ensure that the needs and accessibility of all highway users, including cyclists and pedestrians, are considered.</p> <p>The Local Plan envisages new routes that will integrate with existing public rights of way including strategic recreational routes such as the South West coast path and Tarka Trail. There are also a range of specific walking and cycle route proposals identified, across Barnstaple, in Bideford/Northam, Holsworthy and elsewhere. Provision of cycle parking is recognised (Policy DM06: Parking Provision) as part of wider parking provision which seeks provision for all forms of transport, whilst explicitly having regard to the provision of safe walking and cycling routes. More specifically, individual proposals recognise specific opportunities – including, for example, secure cycle parking as part of redevelopment scheme for a car parking site (BAR11). A Local Cycling and Walking Infrastructure Plan is currently being prepared for the settlements of Barnstaple, Bideford and Northam, to assist with the delivery of Local Plan objectives.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			The Local Plan meets NPPF requirement.
63.	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	There are no large-scale transport facilities such as airports in the northern Devon area. Key road and rail routes and the opportunities/need for these to be upgraded (e.g. A361/A39 corridor) are identified in the Transport Strategy (Policy ST10) and the associated Infrastructure Delivery Plan (IDP). Ambitions for developing rail freight facilities have been cited, however these have not yet been developed into working proposals.  The Local Plan meets NPPF requirement.
64.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 106	The Local Plan area does not have any general aviation airfields as defined by the Department of Transport General Aviation Strategy (2015).  The Local Plan meets NPPF requirement.
65.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 109	The Local Plan does not identify specific lorry parking facilities, although its wider policies could potentially enable such provision in sustainable locations should proposals be forthcoming. The Local Transport Plan does not identify deficits of provision/or the need for additional provision in respect of overnight lorry parking facilities. Further evidence would be needed to understand the demand.  The Local Plan meets NPPF requirement.
66.	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, parking areas, other transport elements and the content of	NPPF Para 110	The Local Plan's spatial strategy (Policies ST06: Spatial Development Strategy for Northern Devon's Sub-Regional, Strategic and Main Centres and ST07: Spatial Strategy for Northern Devon's Rural Area), along with the scale and distribution of development (Policy ST08), was derived having regard to minimising journeys and securing opportunities for sustainable transport modes. Transport infrastructure requirements of the allocation sites were

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	associated standards reflects current national guidance including the National Design Guide and the National Model Design Code; 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.		<p>considered through the Strategic Housing Land Availability Assessment and the Sustainability Assessment process. Where appropriate, individual policies associated to specific site allocations include provisions that reflective site circumstances and opportunities. The general policies of the Local Plan seek the integration of transport infrastructure to support sustainable modes of transport, including their appropriate integration into development.</p> <p>The Local Plan does, however, predate both the National Design Guide and the National Model Code and as such does not explicitly reflect their content. Further work would be required to fully establish the plan's alignment to their provisions.</p> <p><b>The Local Plan partially meets the NPPF requirement.</b></p>
67.	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	<p>Policy ST10 (Transport Strategy) only requires a Transport Assessment or a Transport Statement and a Travel Plan for developments that generates significant traffic movements.</p> <p>The Highway Authority will assess the impact of development on the road network and highway safety. Policy DM05 (Highways) provides a more detailed approach which is considered compatible with national policy provisions.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
68.	<i>Communications</i>		
69.	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	<p>The provision of digital communications infrastructure is supported by the Local Plan (Policy ST23: Infrastructure), which seeks to ensure developments contribute to the timely provision of new infrastructure.</p> <p>More specifically, the Local Plan provides an enabling policy (Policy DM11a: Telecommunications) that sets the criteria against which proposals for new or upgraded telecommunications equipment will be considered and supported.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>A wide range of place-based strategies and site allocations include support for the delivery of superfast broadband connections, whilst the supporting text for the rural area's spatial strategy states that 'high speed electronic communication links will be encouraged particularly where they will reduce social isolation or improve business opportunities.</p> <p>The Local Plan (Policy DM04: Design Principles) does require proposals to incorporate appropriate infrastructure to enable connection to fast ICT networks. There is no specific overarching strategy within the Local Plan supporting the expansion of the electronic communications networks across northern Devon or specific references to delivery or upgrading of mobile technology and full fibre broadband and how it will be delivered or upgraded over time. It should be recognised however that much development associated to telecommunication improvements does not require explicit consent (being permitted development or prior approval). Where consent is required, the Local Plan (in particular Policy, DM11a, but also Policy DM04) provides the basis for considering proposals.</p> <p><b>The Local Plan partially meets the NPPF requirement.</b></p>
70.	<i>Making effective use of land</i>		
71.	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	<p>The Local Plan has been developed having detailed regard to effective and efficient opportunities for the delivery of development required to meet objectively assessed need. The Strategic Housing Land Availability Assessment (SHLAA) along with other assessments of land, identified the potential locations and sites that could deliver development, detailing constraints, and opportunities, whilst deriving the scope of individual sites to accommodate development.</p> <p>The Local Plan identifies regeneration and development opportunities on previously developed land, whilst having regard to site context and constraints when deriving the appropriate scale and mix of development.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>More widely, the Local Plan (Policy ST02: Mitigating Climate Change) seeks to ensure that the natural and built environment is conserved and enhanced through the prudent use of key resources, including land, whilst it also seeks (Policy ST03: Adapting to Climate Change and Strengthening Resilience) to ensure that the risks from potential climate change hazards are minimised to protect and promote healthy and safe environments. Policies ST04 (and DM04) require the high-quality design of new developments that respond to the characteristics of the site and optimise the efficient use of land.</p> <p>The Local Plan also contains provisions to safeguard amenity (DM01: Amenity Considerations), whilst not causing any unacceptable harm to public health and safety (Policy DM02: Environmental Protection).</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
72.	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	<p>The Local Plan sought to fully consider opportunities for the use of previously developed land, identifying opportunities through the Strategic Housing Land Availability Assessment (SHLAA) and other land assessments. Previously developed land suitable for development is limited across northern Devon (as confirmed by the Brownfield Land Registers). Previously developed land was prioritised for redevelopment or regeneration by virtue of allocation within the Local Plan where it was identified as being suitable and available. Resultantly, the Local Plan contains allocation policies, and associated references in place-based strategies, to a range of regeneration and redevelopment opportunities, particularly within the sub-regional centre and other towns.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
73.	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	<p>The Local Plan seeks to achieve multiple benefits from development, with Policy ST02 Mitigating Climate Change, expecting development to make a positive contribution towards the social, economic and environmental footprint of northern Devon by ensuring a 'balanced mix of uses where</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>development takes place' and that development protects and enhances biodiversity, geodiversity, landscape, coastline, air and water resources.</p> <p>A number of the larger allocations, for example BAR01: Westacott Strategic Extension and BID01: Bideford West Urban Extension, propose a mix of uses including housing, employment, green infrastructure and community facilities. More specific policy provisions seek to ensure that proposals deliver multiple benefits: for example, the delivery of sustainable drainage systems and/or enhancements to biodiversity through the provision of green infrastructure.</p> <p>The Local Plan meets NPPF requirement.</p>
74.	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	<p>The Local Plan makes a range of references to ecosystem services and these principles, whilst not explicit within individual policies, are threaded throughout the plan. Policies DM09: Safeguarding Green Infrastructure and DM10: Green Infrastructure Provision, in particular, seek to safeguard and improve the provision of green infrastructure. These policies recognise the multiple functions that undeveloped land can perform as part of the network of green infrastructure.</p> <p>The Local Plan meets NPPF requirement.</p>
75.	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	<p>The Local Plan (Policy ST02: Mitigating Climate Change) seeks to ensure that the natural and built environment is conserved and enhanced through the prudent use of key resources, including land, whilst redeveloping previously developed land, reusing and recycling resources.</p> <p>In preparing the Local Plan the local planning authorities, sought to fully consider opportunities for the use of previously developed land, identifying opportunities through the Strategic Housing Land Availability Assessment (SHLAA) and other land assessments. Previously developed land suitable for development is limited across northern Devon (as confirmed by the Brownfield Land Registers). Previously developed land was prioritised for</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>redevelopment or regeneration by virtue of allocation within the local plan where it was identified as being suitable and available to do so. Resultantly, the Local Plan contains allocation policies, and associated references in place-based strategies, to a range of regeneration and redevelopment opportunities, particularly within the sub-regional centre and other towns.</p> <p>A number of specific site allocation policies are provided within the Local Plan, with the explicit purpose of redeveloping, regenerating and/or remediating individual sites: including, for example, the former creamery in Great Torrington (Policy GT01), the former power station site at Yelland (Policy FRE01) and the former factory site at Anchorwood Bank (Policy BAR12).</p> <p>Whilst the plan appropriately seeks the redevelopment, regeneration and remediation of identified opportunity sites, it does not contain more general policy provisions that seek to explicitly provide substantial weight towards the redevelopment of such sites.</p> <p><b>The Local Plan partially meets the NPPF requirement.</b></p>
76.	Promote and support the development of under-utilised land and buildings.	NPPF Para 120	<p>As detailed above, the Local Plan supports the redevelopment of previously developed land and the effective use of land in general. Local Plan Policy DM27: Reuse of Redundant and Disused Rural Buildings, explicitly promotes the re-use of disused and redundant rural buildings, however it does not provide explicit references to promote and support the development of under-utilised land and buildings.</p> <p>Development opportunities were considered through the plan making process on such sites resulting in the allocation of a number of sites, which provide opportunities for the redevelopment of under-utilised land and buildings. A range of site-specific opportunities are identified through the Local Plan – for example the Bideford Regeneration Sites (Policy BID07) and in Barnstaple Queen Street / Bear Street (Policy BAR11).</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			The Local Plan partially meets the NPPF requirement.
77.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 120	<p>The Local Plan does not have specific policies in relation to this requirement. The wider provisions of the Local Plan, when taken as a whole, are considered however to provide an appropriate policy framework to allow for the consideration of such proposals – with, in particular, regard to policies on amenity (Policy DM01: Amenity Considerations), design (Policy DM04: Design Principles) and access (Policy DM05: Highways).</p> <p>The Local Plan meets NPPF requirement.</p>
78.	Reflect changes in the demand for land.	NPPF Para 122	<p>The Local Plan sets out a framework to monitor the development of allocated sites. A plan review will need to consider the reallocation of land for alternative uses where there is no longer a realistic prospect of the proposed use coming forward. The Development Management policies of the Local Plan provide flexibility to enable alternative uses where appropriate (e.g. DM13: Safeguarding Employment Land). The Local Plan also allows for appropriately located windfall development to come forward on non-allocated sites.</p> <p>The Local Plan meets NPPF requirement.</p>
79.	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	<p>The Local Plan provides a responsive policy framework that is intended to have regard to the range of matters specified in national policy, whilst not defining any prescribed density standards.</p> <p>In the context of delivering a balanced mix of uses, redeveloping previously developed land and achieving the prudent use of resources, including land, the Local Plan (Policy ST02: Mitigating Climate Change and Policy ST04: Improving the Quality of Development) seeks development to respond to the characteristics of the site, its context, and the surrounding area, whilst having regard to wider design principles.</p>



	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Additionally, the Local Plan (Policy ST17: A Balanced Local Housing Market) seeks the housing mix to relate to the site character, context, and development viability. Wider provisions allow for development proposals to respond to a range of design related matters (Policy DM04: Design Principles) to help secure well-designed, attractive and healthy places, whilst other provisions (Policy ST23; Infrastructure) seek to secure (or contribute towards) appropriate infrastructure where required.</p> <p>The Local Plan meets NPPF requirement.</p>
80.	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. Area-based character assessments, design guides, design codes and masterplans are appropriate tools to use to help to ensure land is used efficiently while also creating beautiful and sustainable places.	NPPF Para 125	<p>There is not an existing or anticipated shortage of land required to meet identified housing needs, with the Local Plan identifying a specific housing land supply in excess of the assessed requirement. Accordingly, the Local Plan is not required to include minimum density standards.</p> <p>The Local Plan does not provide prescribed density standards, rather seeking the prudent use of land (Policy ST02: Mitigating Climate Change), whilst seeking proposals to deliver high quality design that has regard to the characteristics of the site, its wider context and the surrounding area. The Local Plan does not include, nor explicitly require the use of area-based character assessments, design guides or codes or masterplans but these could readily be applied in support of a proposal if deemed appropriate, with Local Plan Policy ST04: Improving the Quality of Development, requiring proposals to be based on a clear process that analyses and responds to the specific circumstances. These could be prepared by the local planning authority, or third parties if considered necessary and appropriate.</p> <p>The Local Plan meets NPPF requirement.</p>
81.	<i>Design</i>		
82.	Set out a clear design vision and provide maximum clarity about design expectations through the preparation of design codes or guides consistent with the National Design Guide and National	NPPF Para 127, 128 & 129	The Local Plan, in particular Policy ST04: Improving the Quality of Development, coupled with aspects of other strategic policies when read as a whole, sets out a clear high-level strategy/vision for achieving high quality

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	Model Design Code, and which reflect local character and design preferences. Design codes and guides can either form part of a plan or be supplementary planning documents.		<p>inclusive and sustainable design, with more detailed development management approaches (Policy DM04: Design Principles) providing more detail on design expectations.</p> <p>National policy (paragraph 128) sets out that all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code. It is not necessary, or often appropriate, for design codes and guides to form part of a local plan; rather forming complementary supplementary planning documents. The use of such codes or guides in such a form is considered to be wholly compatible with the Local Plan.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
83.	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	<p>The Local Plan recognises the importance of creating attractive and functional places; it contains a broad range of policies to delivery a “quality of place” (including Policies ST04: Improving the Quality of Design, ST14: Enhancing Environmental Assets, ST15: Conserving Heritage Assets, ST17: A Balanced Housing Market, DM04: Design Principles, DM07: Historic Environment and DM08: Biodiversity and Geodiversity) that seek to ensure the delivery of high-quality places that are responsive to their context.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
84.	Ensure new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.	NPPF Para 131	<p>The specific requirement for tree-lined streets, along with the measures to secure the long-term maintenance of newly planted trees was introduced to national planning policy in July 2021; and accordingly, they are not directly addressed in the Local Plan. The retention of existing trees where possible is required within an extensive range of site-specific allocation policies, with the identification of replacement planting also widely sought.</p> <p><b>The Local Plan partially meets the NPPF requirement.</b></p>
85.	<i>Green Belt</i>		

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
86.	Ensure proposals for new Green Belts demonstrate why development management policies would not be adequate, any major changes in circumstances to warrant the creation of a new Green Belt, the consequences for sustainable development, the need for Green Belt to support adjoining areas, and how new Green Belt would meet other objectives of the Framework.	NPPF Para 139	The Local Plan area does not include Green Belt designations. Therefore, this requirement is not relevant.
87.	Establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.	NPPF Para 140	The Local Plan area does not include Green Belt designations. Therefore, this requirement is not relevant.
88.	Give first consideration to land which has been previously developed and/or is well-served by public transport, including increasing density within town and cities centres. Set out the ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.	NPPF Para 141 & 142	The Local Plan area does not include Green Belt designations. Therefore, this requirement is not relevant.
89.	Where Green Belt boundaries are being defined, they should be clearly outlined and be consistent with the plan's strategy for meeting identified requirements for sustainable development.	NPPF Para 143	The Local Plan area does not include Green Belt designations. Therefore, this requirement is not relevant.
90.	<i>Climate change, flooding and coastal change</i>		
91.	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	The Local Plan provides a robust framework which provides a range of measures across all the requisite aspects of national planning policy, although it does not necessarily do so in a fully comprehensive manner across all identified provisions.

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
			<p>The Local Plan is founded on the principles of ecosystems services, recognising the key role of environmental assets in climate change resilience; these principles are embedded throughout the Local Plan.</p> <p>The Local Plan contains comprehensive strategic policies to support mitigating climate change (Policy ST02: Mitigating Climate Change) and to adapt to climate change (Policy ST03: Adapting to Climate Change and Strengthening Resilience).</p> <p>The Local Plan does comprehensively plan for the long-term implications of flood risk (in particular Policies ST03 and ST09: Coast and Estuary Strategy, along with specific place-based strategies and site allocations), being also supported by Strategic Flood Risk Assessments Level 1 &amp; 2. Additionally, it seeks to manage coastal change, incorporating provisions that require development to avoid risk from current and future coastal erosion, along with planning to defend coastal settlements and resorts from marine inundation and tidal flooding (Policies ST03, ST09 &amp; DM02: Environmental Protection).</p> <p>The Local Plan does not however incorporate Coastal Change Management Areas, although work is underway to establish the extent of these. The Local Plan does recognise the need to plan for water management – including SuDS and water efficiency measures (Policy ST03 and DM04: Design Principles), with plan development considering the need for increasing water supply capacity (deemed unnecessary at that time).</p> <p>The Local Plan contains extensive provisions for supporting and managing biodiversity and landscape, including recognition of the potential impacts of climate change and the need to plan to adapt (Policy ST03), including, for example, recognition of the need to plan for coastal squeeze. The Local Plan also recognises the need for development to be resilient to the impacts of climate change, including the potential of passive heating and cooling, along with natural light and ventilation (Policy ST03).</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			The LP partially meets the NPPF requirement.
92.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	NPPF Para 153	<p>The Local Plan's, spatial strategy along with place-based strategies and determined locations for development were informed by a range of technical evidence including Strategic Flood Risk Assessments and took account of the views of key stakeholders such as the Environment Agency, South West Water and Natural England.</p> <p>The Local Plan contains a comprehensive range of strategic policy provisions to both mitigate the impacts of climate change (Policy ST02: Mitigating Climate Change), help ensure communities and development adapt to climate change (Policy ST03: Adapting to Climate Change and Strengthening Resilience) and ensure that development proposals contribute towards the creation of resilient and cohesive communities (Policy ST04: Improving the Quality of Development).</p> <p>The Local Plan recognises more geographically specific aspects within relevant policy provisions – such as through the Coast and Estuary Strategy (Policy ST09) and individual place-based strategies and site allocations (including, for example, those for Barnstaple, Bideford, Northam and Ilfracombe).</p> <p>The Local Plan meets NPPF requirement.</p>
93.	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	<p>The Local Plan (in particular Policy ST16: Delivering Renewable Energy and Heat) provides a positive policy approach that supports renewable and low carbon energy and heat generating development (excluding wind energy development), community led schemes to offset energy and heat demand from renewable and low carbon sources and on-site provision of renewable heat and/or low carbon technologies.</p> <p>A range of other complementary policy provisions also contribute towards the provision of a positive strategy (including Policies ST02: Mitigating Climate Change, ST05: Sustainable Construction and Building and ST09: Coast and Estuary Strategy).</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			The Local Plan meets NPPF requirement.
94.	Manage flood risk from all sources and apply a sequential, risk based approach to the location of development.	NPPF Para 160 & 161	<p>Local Plan Policy ST03 (Adapting to Climate Change and Strengthening Resilience) set out the strategy to manage flood risk. This includes locating and designing development to minimise flood risk, upgrading flood defences, re-establishing functional flood plains and adopting effective water management systems (e.g. SUDS). The supporting text identifies the principal risks from fluvial flooding and tidal flooding along the coast and Taw-Torridge estuary. More localised cases of flooding will be from high surface water run-off and inadequate land and highway drainage. Place-based strategies were derived having regard to flood risk as appropriate, whilst many site-specific policies contain reference to flood risk and required mitigation or infrastructure provision as necessary.</p> <p>Whilst the Local Plan does not explicitly set out the sequential approach to managing flood risk, it is implied and functions appropriately in combination with national planning policy.</p> <p>The Local Plan meets NPPF requirement.</p>
95.	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 lifetime without increasing flood risk elsewhere (and where possible will reduce flood risk overall).	NPPF Para 162, 163, 164 and NPPF Annex 3	<p>The Local Plan (Policy ST03: Adapting to Climate Change and Strengthening Resilience) contains strategies to manage flood risk. This includes locating and designing development to minimise flood risk, upgrading flood defences, re-establishing functional flood plains and adopting effective water management systems (e.g. SUDS). Locationally specific provisions are also incorporated in place-based strategies and individual site allocations as appropriate. Similarly, the coast and estuary strategy (Policy ST09) contains provisions specific to that location.</p> <p>The Local Plan recognises (generally within Policy ST03 and more specifically within place-based strategies and site allocations) that there will be occasions where development in particular locations subject to flood risk may be justified based on wider sustainability or regeneration benefits.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			The Local Plan meets NPPF requirement
96.	Avoid inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 171	<p>The Local Plan contains a comprehensive set of measures to reduce risk from coastal change. Policy ST03 (Adapting to Climate Change and Strengthening Resilience) seeks to avoid the development of land for vulnerable uses at risk from flooding, whilst requiring development to be located to avoid risk from current and future coastal erosion.</p> <p>The Local Plan (Policy ST03) also recognises the role of the Shoreline Management Plan. The Coast and Estuary Strategy (Policy ST09) indicates that settlements and resorts will be defended against marine inundation, coastal erosion, and tidal flooding, whilst seeking not to transfer risk elsewhere. Equally, it highlights that opportunities to manage coastal realignment and re-establish functional floodplains will be supported in accordance with the Shoreline Management Plan. In doing so, it also recognises the potential impacts and opportunities for biodiversity including consideration of coastal squeeze. National policy (paragraph 167) requires plans to identify Coastal Change Management Areas and set out the type of the development that will be appropriate within these areas. This is an area of omission in the current Local Plan, although the development of technical evidence to inform such areas is underway.</p> <p>The LP partially meets the NPPF requirement.</p>
97.	<i>Natural environment</i>		
98.	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	The Local Plan contains a comprehensive portfolio of strategies and more detailed development management provisions associated the protection and enhancement of the natural environment (in particular Policy ST14: Enhancing Environmental Assets. Sustainable development strategic policies (ST01-ST04), ST07 (rural areas strategy) and ST09 (coast and estuary strategy) are also relevant. The Local Plan (Policy ST14) embeds the principles of ecosystem services, ensures that regard is had to protecting and enhancing both valued

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			landscapes (including the AONB), along with local landscape and seascape character. It seeks to protect and enhance sites of biodiversity and geodiversity whilst having regard to the hierarchy of sites and their status, whilst seeking to conserve the best and most versatile agricultural land. Wider policies of the Local Plan, in particular the spatial strategy articulated through Policies ST06: Spatial Development Strategy for Northern Devon's Sub-Regional, Strategic and Main Centres and ST07: Spatial Strategy for Northern Devon's Rural Area, seek to protect the countryside.  <i>The Local Plan meets NPPF requirement.</i>
99.	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	Policy ST14: Enhancing Environmental Assets refers to the hierarchy of designated sites and sets out the approach to maintaining and enhancing a 'network of designated sites and green infrastructure, including retention and enhancement of critical environmental capital'. Further detail on the specific designations within the hierarchy and the approach to enhancing biodiversity and geodiversity within these areas is set out in Policy DM08: Biodiversity and Geodiversity, Policy DM10: Green Infrastructure is also relevant.  The plan area includes the North Devon Biosphere Reserve (identified in Policy ST14) which brings together innovative approaches to sustainable development across the sub-region. The biosphere operates at an ecosystem scale defined by the catchments of the Rivers Taw and Torridge and offshore marine areas stretching out to Lundy and beyond. Policy ST14 also takes account of other designated sites that cross plan boundaries – for example, the Exmoor SAC.  <i>The Local Plan meets NPPF requirement.</i>
100.	Great weight should be given to National Parks, the Broads and the Areas of Outstanding Natural Beauty. The scale and extent of development within these designated areas should be limited. Development within their setting should be sensitively located and	NPPF Para 176	The Local Plan area includes The North Devon AONB and adjoins Exmoor National Park.



	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	designed to avoid or minimise adverse impacts on the designated areas.		<p>Local Policy ST14: Enhancing Environmental Assets, seeks to protect and enhance the quality of northern Devon’s natural environment, including through the conservation of the setting, special character and qualities of the AONB. It further recognises the setting and special qualities of the National Park, including its dark night skies.</p> <p>The Local Plan’s spatial strategy, along with individual place-based strategies and specific site allocations, take into account of the AONB and national park, recognising their character and setting and the need to limit development proposals in particular locations.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
101.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 178	<p>The Local Plan explicitly seeks to conserve the special character and importance of Heritage Coast areas, being recognised through a range of strategies and policy provisions (Policies ST09: Coast and Estuary Strategy, ST14: Enhancing Environmental Assets, ST15: Conserving Heritage Assets and DM08A: Landscape and Seascape Character).</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
102.	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	<p>The Local Plan, through the accompanying Policies Map identifies a range of biodiversity sites and habitats, ranging from international designated sites (i.e. Special Areas of Conservation), through nationally designated sites (i.e. Sites of Special Scientific Interest) to locally designated sites (i.e. County Wildlife Sites and Local Nature Reserves), along with other areas of green infrastructure, which are subject to provisions through the plan to safeguard and enhance whilst having regard to their status (Policy ST14: Enhancing Environmental Assets and Policy DM08: Biodiversity and Geodiversity).</p> <p>The Local Plan (Policy DM08) further seeks to ensure that development has regard to the importance of habitats and designated sites and that these are taken into account, considering opportunities for the creation of local and district-wide biodiversity networks of wildlife corridors linking County Wildlife</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Sites and other areas of biodiversity importance. The Local Plan further incorporates provisions (Policy ST14) that seek a net gain in northern Devon's biodiversity.</p> <p>The Local Plan does not directly identify and map wider local wildlife-rich habitats and ecological networks, however both local planning authorities have access to comprehensive habitat mapping via service level agreements with the Devon Biodiversity Records Centre. Further work is being carried out across the County to establish comprehensive network mapping as part of the Nature Recovery Network programme, which would be able to support the practical implementation of the existing plan and/or inform the preparation of a future plan.</p> <p><b>The LP partially meets the NPPF requirement.</b></p>
103.	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	<p>The Local Plan (Policy ST03: Adapting to Climate Change and Strengthening Resilience) recognises the risks arising from pollutants, seeking to minimise those to protect and promote healthy and safe environments. The Local Plan also seeks to locate development to avoid risk from coastal erosion (Policy ST03), with accompanying development management policies (DM02: Environmental Protection and DM08: Biodiversity and Geodiversity) providing more detailed policy provisions around land stability, contamination and risks arising from pollution, including consideration of risks to public health and safety and the natural environment.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
104.	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	<p>The Local Plan (Policy ST03: Adapting to Climate Change and Strengthening Resilience) seeks to minimise the risks arising from pollutants to protect and promote healthy and safe environments. More detailed provisions (Policy DM02: Environmental Protection) seek to manage the risk from pollutants and ensure that unacceptable impacts do not arise.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The Local Plan (Policy DM02) contains provisions associated to Air Quality Management Areas and the implementation of measures identified in associated Local Air Quality Action Plans. The Local Plan is additionally supported by an Air Quality Supplementary Planning Document (SPD).</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
105.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 187	<p>The Local Plan (Policy ST04: Improving the Quality of Development) requires development to achieve high quality inclusive and sustainable design that responds to the characteristics of the site, its wider context, and the surrounding area.</p> <p>The Local Plan contains provisions to safeguard the amenity of neighbouring occupiers and uses, and the intended occupants of any proposed development (Policy DM01: Amenity Considerations), whilst also ensuring that any arising hazards are considered (Policy DM02: Environmental Protection). The supporting text to DM01 states that existing businesses should not be faced with additional costs to overcome any environmental health problems following the location of a new development.</p> <p><b>The Local Plan meets NPPF requirement.</b></p>
106.	<i>Historic Environment</i>		
107.	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	<p>The Local Plan (Policy ST15: Conserving Heritage Assets) sets out a comprehensive strategy for the conservation of heritage assets, including the need to give great weight to the desirability of preserving and enhancing northern Devon's historic environment. It recognises the importance of the historic landscape and seeks to conserve the cultural, built, historic and archaeological features, having regard to their designation and status (whilst also having regard to undesignated assets).</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The Local Plan (Policy ST15) additionally emphasises the importance of increasing opportunities for access, education, and the appreciation of the historic environment. As per the supporting text to this policy, the Councils will identify heritage assets considered to be at risk and will take steps as opportunities arise towards securing improvement in their condition to mitigate the risk. Further detailed provision for assessing proposals for development which affect heritage assets is provided by a criteria-based development management policy (DM07: Historic Environment).</p> <p><b>The Local Plan meets the NPPF requirement.</b></p>
108.	<i>Minerals</i>		
109.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 210	This is not relevant for the Local Plan. Mineral and Waste policies are the responsibility of the Minerals and Waste Planning Authority (Devon County Council) and are set out in the Devon Minerals Plan and the Devon Waste Plan.
110.	Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials.	NPPF Para 210	<p>This is not fully relevant for the Local Plan. The Local Plan (Policy ST02: Mitigating Climate Change) does however seek the conservation and enhancement of the natural, built, and historic environment through the prudent use of resources, including the reduction, reuse and recycling of resources, including construction materials. The Local Plan additionally provides a specific detailed development management policy on Construction and Environmental Management (Policy DM03) that seeks to minimise waste from construction sites, reusing or recycling residual waste on site where possible. Wider Mineral and Waste policies are the responsibility of the Minerals and Waste Planning Authority (Devon County Council) and are set out in the Devon Minerals Plan and the Devon Waste Plan.</p> <p><b>The Local Plan meets the NPPF requirement (so far as relevant).</b></p>
111.	Safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas.	NPPF Para 210	This is not directly relevant for the Local Plan. Mineral and Waste policies are the responsibility of the Minerals and Waste Planning Authority (Devon

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			County Council) and are set out in the Devon Minerals Plan and the Devon Waste Plan. Minerals Safeguarding Areas are defined by the Minerals and Waste Planning Authority and shown on the adopted Policies Map.  <i>The Local Plan meets the NPPF requirement (so far as relevant).</i>
112.	Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	NPPF Para 210	This is not relevant for the Local Plan. Mineral and Waste policies are the responsibility of the Minerals and Waste Planning Authority (Devon County Council) and are set out in the Devon Minerals Plan and the Devon Waste Plan.
113.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.	NPPF Para 210	This is not fully relevant for the Local Plan.  The Local Plan (Policy ST09: Coast and Estuary Strategy) does however safeguard facilities at Appledore and Yelland for their value as landing stages for marine aggregates, whilst seeking to maintain the role and operation of Bideford and Ilfracombe as commercial and leisure ports/ harbours (recognising that Bideford is utilised for the export of aggregates). Mineral and Waste policies are the responsibility of the Minerals and Waste Planning Authority (Devon County Council) and are set out in the Devon Minerals Plan and the Devon Waste Plan.  <i>The Local Plan meets the NPPF requirement (so far as relevant).</i>
114.	Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health	NPPF Para 210	This is not fully relevant for the Local Plan.  Local Plan Policies ST03: Adapting to Climate Change and Strengthening Resilience, DM01: Amenity Considerations, DM02: Environmental Protection, DM03: Construction and Environmental Management, DM08: Biodiversity and Geodiversity and DM08A: Landscape and Seascape Character do operate to safeguard from adverse impacts on the built, natural, and historic environments, whilst seeking to protect human health.

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
			<p>Mineral and Waste policies are the responsibility of the Minerals and Waste Planning Authority (Devon County Council) and are set out in the Devon Minerals Plan and the Devon Waste Plan.</p> <p>The Local Plan meets the NPPF requirement (so far as relevant).</p>
115.	Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction	NPPF Para 210	This is not relevant for the Local Plan. Mineral and Waste policies are the responsibility of the Minerals and Waste Planning Authority (Devon County Council) and are set out in the Devon Minerals Plan and the Devon Waste Plan.
116.	Ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high-quality restoration and aftercare of mineral sites takes place.	NPPF Para 210	This is not relevant for the Local Plan. Mineral and Waste policies are the responsibility of the Minerals and Waste Planning Authority (Devon County Council) and are set out in the Devon Minerals Plan and the Devon Waste Plan.