

Appendix 2

Policy	Consistency with NPPF
Strategic Targets Policy 1- Achieving Growth	<p>NPPF Guidance</p> <p>The NPPF requires Local planning authorities to positively seek opportunities to meet the development needs of their area (para 14).</p> <p>One of the 12 core land-use planning principles set out in the NPPF states that “Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities” (para 17).</p> <p>Compliance of saved policy with NPPF</p> <p>Core Strategy strategic target policy 1 sets out how we will work with our partners, local communities and developers to ensure that developments achieve the required growth and improvements to achieve our targets in Southwark. The NPPF seeks to promote development that is sustainable and achieve the required levels of growth that meet the development needs of an area. Core Strategy strategic target policy 1 is consistent with the overall goals of achieving the necessary levels of growth in Southwark to ensure we meet our targets and should be given significant weight in determining planning applications.</p>
Strategic Targets Policy 2: Improving Places	<p>NPPF Guidance</p> <p>The NPPF requires Local planning authorities (LPAs) to positively seek opportunities to meet the development needs of their area (para 14).</p> <p>One of the 12 core land-use planning principles set out in the NPPF states that "Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing</p>

	<p>affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities" (para 17).</p> <p>Compliance of saved policy with NPPF</p> <p>Core Strategy strategic targets policy 2 sets out our targets for the delivery of new homes, new jobs and new shopping and leisure floorspace in the areas of the borough that will experience the most significant levels of growth over the plan period. These targets take into account the core planning principles that are set out in the NPPF and their inclusion in the core strategy is evidence of our positive approach towards supporting sustainable growth in the borough. The policy is entirely consistent with the tone and policies of the NPP and should be given significant weight.</p>
<p>Strategic Targets Policy 2: Improving Places <u>Area visions:</u> CAZ; Bankside, Borough and London Bridge Opportunity Area; Elephant and Castle Opportunity Area; Canada Water (and Rotherhithe) action area; Aylesbury Action Area; Peckham and Nunhead action area Old Kent Road action area Camberwell Action Area Herne Hill The Blue Dulwich Village/West Dulwich East Dulwich Lordship Lane town centre</p>	<p>NPPF guidance</p> <p>At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (paras 6 -15).</p> <p>The purpose of the planning system is to contribute to the achievement of sustainable development (para 6).</p> <p>The NPPF requires Local planning authorities (LPAs) to positively seek opportunities to meet the development needs of their area (para 14).</p> <p>The 12 core land-use planning principles should underpin plan-making and decision making (para 17)</p> <p>Compliance of saved policy with NPPF</p> <p>The set of area visions under Core Strategy Strategic Targets policy 2 set out the quantum and type of development we envisage that will need to be delivered to promote the area's success and growth over the plan period. The area visions are consistent with Policy 2 and the overall core land-use planning principles to achieve sustainable development and should be given significant weight in the planning process.</p>
<p>Strategic Policy 1: Sustainable development</p>	<p>NPPF guidance</p> <p>At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development,</p>

	<p>which should be seen as a golden thread running through both plan-making and decision-taking (paras 6 -15). The purpose of the planning system is to contribute to the achievement of sustainable development (para 6).</p> <p>Compliance of saved policy with NPPF Core Strategy policy 1 requires applicants for major developments to demonstrate the economic, environmental and social impacts of the proposal have been addressed through a sustainability appraisal. The NPPF has a presumption in favour of sustainable development which could be interpreted as removing the need for developers to demonstrate the sustainability of a proposal through a sustainability appraisal. Core Strategy Policy 1 is consistent with the overall goals of achieving sustainable development and should be given some weight in the planning process.</p>
<p>Strategic Policy Sustainable transport</p>	<p>2: NPPF Guidance Paragraphs 29-41 and 69</p> <p>One of the core planning principles is to “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”</p> <p>Section 4: <i>Promoting sustainable transport</i> details the ways in which planning should support a more sustainable transport system; highlighting the role that planning policies should play in promoting active travel.</p> <p>Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives... the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel (paragraph 29)</p> <p>Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (paragraph 34)</p> <p>Planning policies and decisions should aim to achieve places which promote:</p> <ul style="list-style-type: none"> • Safe and accessible development, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas (paragraph 69). <p>Compliance of policy with NPPF</p>

	<p>The Core Strategy policy focuses on encouraging alternatives to private car use and on locating large developments that generate high volumes of trips in accessible locations, in order to create a more sustainable transport system. The policy highlights the benefits of this approach in terms of safety, health, the environment and the efficiency of the road network. The policy is entirely consistent with the transport priorities that are set out in the NPPF and should be afforded significant material weight.</p>
<p>Strategic Policy 3: Shopping, leisure and entertainment</p>	<p>NPPF Guidance LPAs should</p> <ul style="list-style-type: none"> • Recognise town centres as the heart of their communities and pursue policies to support their viability and vitality. • Define a network and hierarchy of centres that is resilient to anticipated future economic changes. • Define town centre boundaries and set policies that make clear which uses will be permitted in the centres. • Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres. • Undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites (para 23). • 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 (para 70) <p>Compliance of saved policy with NPPF Policy 3 sets out the network and hierarchy of town centres in the borough, following a review of their role and function. The adopted proposals map designates town centre boundaries.</p> <p>The council has undertaken an assessment of the need for future capacity for retail floorspace (through our Retail Capacity Study 2009) and the policy sets out a strategy which involves significantly expanding Elephant and Castle and Canada Water town centres. It provides target new retail floorspace to be provided over the plan period to help provide a more diverse retail offer in these locations and capture a larger market share. Both have been elevated up the hierarchy to become major town centres.</p> <p>The policy supports the provision of new retail space in the other designated town centres to promote diversification and choice, whilst ensuring that the scale of new development is appropriate to their role and character, and that a balance of different uses, including shops, bars, restaurants and cafes is maintained,</p>

	<p>which is consistent with the NPPF.</p> <p>Policy 3 is used in conjunction with Southwark Plan Policy 1.7 which sets out the range of uses appropriate for location in town centres and a range of assessment criteria designed to ensure that the vitality and viability of the centres is retained. The policy also protects small scale retail facilities ('A' class uses) outside town and local centres to help meet day-to-day needs, consistent with the NPPF.</p> <p>Core Strategy Policy 3 is consistent with the NPPF and should be given significant weight in determining planning applications</p>
<p>Strategic Policy 4: Places for learning, enjoyment and healthy lifestyles</p>	<p>NPPF Guidance Paragraphs 69, 70 and 72</p> <p>The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning. Planning policies and decisions, in turn, should aim to achieve places which promote:</p> <ul style="list-style-type: none"> • opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity; • safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and • safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. <p>(paragraph 69)</p> <p>To deliver the social, recreational and cultural facilities and service the community needs, planning policies and decisions should:</p> <ul style="list-style-type: none"> • plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

	<ul style="list-style-type: none"> • 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; • ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; • ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. <p>(paragraph 70)</p> <p>The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:</p> <ul style="list-style-type: none"> • give great weight to the need to create, expand or alter schools; and • work with schools promoters to identify and resolve key planning issues before applications are submitted. <p>(paragraph 72)</p> <p>Compliance of policy with NPPF Core Strategy policy 4 sets out that we will encourage a wide range of community facilities to support communities and provide for a range of activities. In particular the policy highlights the need to provide a range of health and education facilities. This approach is entirely consistent with the NPPF and the policy should be afforded significant material weight.</p>
Strategic Policy 5: Providing new homes	<p>NPPF Guidance To boost significantly the supply of housing, local planning authorities should:</p> <ul style="list-style-type: none"> • use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period; (paragraph 47) <p>Compliance of saved policy with NPPF This policy sets out how we will meet our housing need and targets. It includes our housing trajectory which we update annually to demonstrate that we have identified sites to deliver new homes. This approach is entirely</p>

	consistent with the NPPF and the policy should be afforded significant material weight.
Strategic Policy 6: Homes for people on different incomes	<p>NPPF Guidance</p> <p>To boost significantly the supply of housing, local planning authorities should:</p> <ul style="list-style-type: none"> • use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period; (paragraph 47) <p>To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:</p> <ul style="list-style-type: none"> • plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community; • identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; • and where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time. (paragraph 50) <p>Compliance of saved policy with NPPF</p> <p>The Core Strategy sets out a clear vision for the provision housing and affordable in Southwark. It is supported by key evidence such as the Strategic housing Market Assessment, Affordable Housing Viability Assessment and our Housing Requirements Study. Our approach to affordable housing was also tested through the Examination in Public process. The Core Strategy does not refer to affordable rent as a type of affordable housing as it was adopted before its introduction. The definitions are in line with PPS3 as this was the relevant document at the time. The NPPF doesn't say specifically that we have to have a policy on affordable rent, only that we need to ensure that Local Plans meets need. The council will investigate the need for affordable rent by updating the housing evidence base and update our approach to affordable housing through the Local Plan review.</p> <p>This policy is consistent with the NPPF and should be given significant weight in planning decisions.</p>

<p>Strategic Policy 7: Family homes</p>	<p>NPPF Guidance To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:</p> <ul style="list-style-type: none"> • identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; (paragraph 50) <p>Compliance of saved policy with NPPF Core Strategy Policy 7 policy sets out our approach to providing a range of different housing types and sizes. The formulation of the policy was informed by our Strategic Housing Market Assessment and our Housing Requirements Study which both highlighted that there is a particular shortage of housing suitable for families in Southwark.</p> <p>This policy ensures that we can deliver a wide range of homes and is therefore consistent with the NPPF and should be given significant weight in planning applications.</p>
<p>Strategic Policy 8: Student homes</p>	<p>NPPF Guidance To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:</p> <ul style="list-style-type: none"> • identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; (paragraph 50) <p>Compliance of saved policy with NPPF Core Strategy Policy 8 provides our approach to meeting the need for student housing whilst balancing the need for other types of housing such as affordable housing. We will allow new student homes as long as they also contribute to affordable housing. This enables us to meet our affordable housing targets whilst also providing accommodation for students. This approach is supported by our Strategic Housing Market Assessment and our Housing Requirements Study which both recognised the need for more student bedrooms but also highlighted the huge need for more affordable housing.</p> <p>This policy ensures we deliver new student homes as well as affordable housing to meet our identified need and is therefore consistent with the NPPF and should be given significant weight in planning applications.</p>
<p>Strategic Policy 9:</p>	<p>NPPF Guidance</p>

<p>Homes for travellers and gypsies</p>	<p>To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:</p> <ul style="list-style-type: none"> • plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community; (paragraph 50) <p>Alongside the NPPF, the government also published Planning Policy for Traveller sites.</p> <p>Compliance of saved policy with NPPF Our core strategy policy ensures that we protect our existing sites and it sets out criteria for new facilities. We protect our 38 pitches (across four sites) and set out a range of criteria that need to be taken into consideration when looking at new facilities. We will review our approach through the Local Plan review and potentially prepare a separate plan in this issue.</p>
<p>Strategic Policy 10: Jobs and businesses</p>	<p>NPPF guidance LPAs should</p> <ul style="list-style-type: none"> • Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; (para 21). • Set criteria, for local and inward investment to match the strategy and to meet anticipated needs over the plan period (para 21). • Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area (para 21). • Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; • Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; • Avoid long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.(para 22). • Have a clear understanding of business needs and work with partners to prepare and maintain a robust evidence base (para 160). <p>Compliance of saved policy with NPPF</p>

	<p>Policy 10 sets out a clear economic vision and strategy for the borough. The Policy supports existing business sectors i.e. office, small businesses and industrial/storage/warehousing, setting out sustainable locations in which business space should be provided and also protected. The policy also provides a target of up to 500,000 sqm for new business floorspace (derived through our evidence base the Employment Land Review 2010) to be accommodated over the plan period to meet the demands of businesses which need to locate in central London. Land outside the locations listed can be released for other uses. The policy is used in conjunction with Policy 1.4 of the Southwark Plan which sets out criteria to assess that where there is no reasonable prospect of land coming forward for business use in the locations listed, it can be released for other purposes, which is consistent with the NPPF.</p> <p>The policy recognises and supports the emerging sectors of green manufacturing, biosciences and technology to locate in these locations. In particular the policy protects the clusters of industrial and warehousing activities to meet existing needs and to enable Southwark’s economy to diversify into emerging sectors. The strategy will help to diversify the range of job opportunities and benefit local people. The policy also promotes the growth of the creative, cultural and tourism industries, protecting and promoting the provision of small flexible business space to help meet the needs of the sectors.</p> <p>The strategy is also based upon an assessment of the quantitative and qualitative needs for business activities and existing and future supply of land (the Employment Land Review, 2010). The strategy and approach were examined by the inspector in the Core Strategy Examination in Public. The inspector concluded that: “The Council’s evidence represents a proportionate and credible means of assessing employment land for the purposes of setting a strategy for the Borough and for controlling the release of surplus land. It is a tailored approach to the Borough which has had due regard to government advice and is capable of monitoring... In conjunction with SP10, the saved policies of the UDP (for example Policy 1.4) will provide adequate flexibility in relation to the use of employment land and premises for alternative purposes, including residential, in the majority of the Borough” (paras 32-34).</p> <p>Core Strategy policy 10, is consistent with the NPPF and should be given significant weight in determining planning applications.</p>
<p>Strategic Policy 11: Open spaces and wildlife</p>	<p>NPPF guidance LPAs should;</p> <ul style="list-style-type: none"> • Set out planning policies that are based on robust and up-to-date assessments of the needs for open

	<p>space, sports and recreation facilities and opportunities for new provision (para 73)</p> <ul style="list-style-type: none"> • Protect existing open space, sports and recreational buildings and land, including playing fields from inappropriate development (para 74) • Support Local communities through local and neighbourhood plans to identify for special protection green areas of particular importance to them by designating the land as Local Green Space (para 76) • protect and enhance valued landscapes, geological conservation interests and soils; (para 109) • recognise the wider benefits of ecosystem services; (para 109) • minimise impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; (para 109) <p>Compliance of saved policy with NPPF</p> <p>Core strategy policy 11 seeks to improve, protect and maintain a network of open spaces and green corridors from inappropriate development. Core strategy policy 11 also protects important sites for biodiversity from harmful development and ensures that biodiversity will be taken into account in the determination of all planning applications helping to provide net gains in biodiversity. The policy is consistent with the NPPF and should be given significant weight in determining planning applications.</p>
Strategic Policy 12: Design and conservation	<p>NPPF Guidance</p> <p><u>Design</u></p> <p>One of the core planning principles set out in paragraph 17 of the NPPF is that LPAs should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.</p> <p>Section 7 'Requiring good design' sets out the importance and requirements for good design within the built environment. The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. (para 56)</p> <p>LPAs should</p>

- plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. (57)
- ensure that local and neighbourhood plans develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments: will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development:
 - establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
 - respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
 - create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and;
 - are visually attractive as a result of good architecture and appropriate landscaping. (para 58)
- consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally. (para 59)

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| | <ul style="list-style-type: none">• should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness. (para 60)• ensure that although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment. (para 61)• have local design review arrangements in place to provide assessment and support to ensure high standards of design. They should also when appropriate refer major projects for a national design review. In general, early engagement on design produces the greatest benefits. In assessing applications, local planning authorities should have regard to the recommendations from the design review panel. (para 62)• In determining applications, give great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area. (para 63)• Refuse permission for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. (para 64)• not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits). (para 65) |
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Heritage

One of the core planning principles set out in paragraph 17 of the NPPF is that LPAs should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

Section 12 Conserving and enhancing the historic environment ' states that LPAs should:

- set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:
 - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - the desirability of new development making a positive contribution to local character and distinctiveness; and
 - opportunities to draw on the contribution made by the historic environment to the character of a place. (para 126)
- When considering the designation of conservation areas, ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest. (para 127)
- In determining applications, should require an applicant to describe the significance of any

heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. (Para 128)

- identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. (para 129)
- Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision. (para 130)
- In determining planning applications, take account of:
 - The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness. (para 131)

- When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. (para 132)
- 133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
 - the nature of the heritage asset prevents all reasonable uses of the site; and
 - no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
 - the harm or loss is outweighed by the benefit of bringing the site back into use. (para 133)
- Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. (para 134)
- Ensure that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having

regard to the scale of any harm or loss and the significance of the heritage asset. (135)

- Local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred. (para 136)
- Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. (para 137)
- Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole. (para 138)
- Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets. (para 139)
- Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. (para 140)

	<ul style="list-style-type: none"> Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.³⁰ However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. (para 141) <p>Compliance of saved policy with NPPF</p> <p>The NPPF introduces an additional requirement to make an assessment of an impact on the significance of the heritage asset of buildings, settings, areas, places etc. This analysis introduces an additional qualitative assessment under the general policy to conserve and enhance.</p> <p>Core Strategy policy 12 seeks to ensure the highest possible standards of design for buildings and public spaces and that Southwark’s heritage assets are conserved and enhanced. The policy is broadly consistent with the design and heritage guidance within the NPPF and should be given significant weight in determining planning applications</p>
<p>Strategic Policy 13: High environmental standards</p>	<p>NPPF guidance</p> <p>LPAs should;</p> <ul style="list-style-type: none"> support the transition to a low carbon future in a changing climate and encourage the use of renewable resources. (para 17) support the move to a low carbon future by actively supporting energy efficiency improvements to existing buildings; and setting any local requirement for a building’s sustainability in a way that is consistent with the Government’s zero carbon buildings policy and adopt nationally described standards. (para 95) should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. (para 98) take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned

	<p>to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure (Para 99)</p> <ul style="list-style-type: none"> • Prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability (para 109) • prevent unacceptable risks from pollution and land instability (para 120) <p>Compliance of saved policy with NPPF Core Strategy policy 13 seeks to ensure that development does not have an adverse effect on the environment, this includes having a negative impact on flood risk, coastal change, water supply and changes to biodiversity and landscape. Core Strategy policy 13 also seeks to maximise energy efficiency and to minimise and reduce energy consumption and CO2 emissions helping to support the transition to a low carbon future. The policy is consistent with the NPPF and should be given significant weight in determining planning applications</p>
Strategic Policy Implementation	14: NPPF Guidance The core planning principles set out in the NPPF states that Planning should: <ul style="list-style-type: none"> • be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency • not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives • proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs <p>The Plan-making section states that “Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities” (paragraph 150) and that “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the</p>

community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area”

The NPPF contains various other references to working with communities and with other organisations and agencies to deliver sustainable development, for instance in paragraph 31 and 33 in the context of transport and in paragraph 100 in terms of flood risk.

With regard to the use of section 106 planning obligations, the NPPF states that: “Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Planning obligations should only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development”

(paragraphs 203 and 204)

Compliance of saved policy with NPPF

The implementation policy stresses that we will deliver sustainable development in Southwark by working closely with the local community, with partner organisations and with developers. It also states that we will use section 106 planning obligations and/or community infrastructure levy (CIL) to help mitigate any negative impacts associated with new development and to provide the infrastructure required to underpin growth and meet the Core Strategy policies and objectives. This approach is entirely consistent with that advocated in the NPPF.