

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.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
<i>General Requirements</i>			
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	<p>As required by para 16 the NLPR generally avoids the duplication of policies, including those within the NPPF.</p> <p>The borough does not contain any proposals for “nationally significant infrastructure projects”.</p>
2.	Contribute to the achievement of sustainable development and the UN Sustainable Development Goals.	NPPF Para 7, 8, 9, 16	<p>The central ambition of the NLPR is to help ensure that development within the borough is “sustainable”. In this regard the over-arching vision and the topic specific policies seeks to address the three overarching objectives; economic, social and environmental.</p> <p>In terms of the vision, the Local Plan supports “good growth” or that which is “inclusive”, “green” and “liveable”. These include the economic, social and environmental objectives of sustainable development.</p> <p>In terms of the specific policies. The need to reflect economic objectives are principally set out in chapters 5 (Town Centres) and chapters 6 (Business); the social objective in chapter 3 (Homes) and 7 (Social Infrastructure); and the environmental in chapters 4 (Conservation and Design) and 2 (Green-Blue future). The NLPR notes that there is considerable overlap, and that the plan must be read in its entirety. This includes the allocations which are all informed by these overarching objectives.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	<p>As noted above the NLPR promotes a “sustainable pattern of development”.</p> <p>For plan making this means that the NLPR:</p> <p><i>Meets the development needs of the area, or provide for objectively assessed need for housing and other uses.</i></p> <p>This is addresses in detail in the relevant section.</p> <p><i>Housing:</i></p> <p>The NLPR includes a housing trajectory that sets this out. This is set out in Chapter 3: Homes and Appendix 1.</p> <p><i>Retail and Leisure uses:</i></p> <p>There is no signifinct need for new comparison retail and leisure uses. The modest need for new convenience retail use can be met in existing centres through the filling of vacant units and through allocations for sites within and immediately adjoining centres and within the two opportunity areas.</p> <p><i>Business uses:</i></p> <p>The need will largely be met through existing permissions/ pipeline, and supported through the intensification of existing business uses where appropriate.</p>

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			<p>This is addressed throughout the plan, the sites specific allocations and through Policy IP1. This states that the Council will ensure that <i>“sufficient supporting infrastructure is delivered alongside development to ensure good growth”</i>.</p> <p>Improve the environment and mitigate climate change. The policies within chapter 2, “Green-Blue future” directly consider the need to protect the environment and to mitigate climate change. These are addressed in detail in the relevant section.</p> <p>The built environment is considered in chapter 4, “Conservation and design”.</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	The entire plan is intended to implement a positive vision for the borough, or to address housing needs and other economic, social and environmental priorities. This is driven by a strong visions (V1) which sets out that the Local Plan will <i>“support good growth”</i> , through being <i>“Inclusive”</i> , <i>“Green”</i> and <i>“Liveable”</i> .
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	Whilst ambitious, the NLPR is deliverable, and has been underpinned through a rigorous Viability assessment. (RBKC Local Plan: Viability Study (BNP Feb 2022). Allocations have only been included when the Council is satisfied that they will be deliverable. This also reflected through the Borough’s Housing Trajectory.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The policies are clear and unambiguous, and provide a clear framework against which all future planning applications will be made. They have been drawn up with assurance from colleagues in the development management teams – as a “sense check” to make sure that they will be effective in practice.</p> <p>The Council formed part of the DLUHC’s Local Plan digital planning path finders and has used this experience to ensure that we make full use of digital tools. This includes throughout the plan making process to ensure a wide reach and accessible documents. It will also include a digital planning proposal map which will show the relevant designations. This is available on line.</p>
	<i>Plan Content</i>		
6.	Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and design quality of places.	NPPF Para 17, 20	The NLPR contains a set of strategic policies which clearly set out the priorities for development and the use of land.
7.	Outline which policies are ‘strategic’ policies	NPPF Para 21	Appendix 3 sets out which policies, or parts of policies, are strategic and which are non-strategic.
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	NPPF Para 22, having regard to the	The Local Plan sets out the vision for future development over a 20 year period. This includes land use polices as well as a number of detailed allocations.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	should be set within a vision which looks further ahead (at least 30 years).	transitional provisions at NPPF para 221	
9.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	The NLPR includes a key diagram (Figure 1.4) as well as detailed land use designations and allocations. The latter are all available through a searchable map available on the Council's website.
10.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	The NLPR includes a set of strategic policies which provide a clear strategy for bringing sufficient land forward to address objectively assessed need. This is considered in detail elsewhere in this toolkit.
11.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28	The NLPR includes a number of local or "non-strategic" policies which set out more detailed policies. Appendix 3 sets out which policies, or parts of policies, are strategic and which are non-strategic.
12.	Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 58	The NLPR is clear in setting out the contributions expects from development. The Council is satisfied that these requirements are deliverable. This viability has been considered through a rigorous Viability assessment. (RBKC Local Plan: Viability Study (BNP Feb 2022)).

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>These contributions include, for example, RBKC affordable housing (Policy HO3), affordable workspace (Policy BC3). Both the threshold where the requirement kicks in, and the level of contribution, is set out.</p> <p>In addition, the allocations for the larger sites set out what specific contributions will be required. These have only been included when the Council is satisfied that they will be deliverable.</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	The Council is satisfied that this is the case for all policies. The IIP will determine whether this is indeed the case.
	<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>The Council has a Local Housing Needs Assessment and has calculated the overall need figure using the standard method. This is set out in the Policy Formulation Report for Policy HO1, October 2022 (para 2.1.20-2.1.26).</p> <p>Paragraph 34 of the NPPG on Housing and Economic Needs Assessment referred to in paragraph 61 of the NPPF clarifies that <i>“the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs”</i>.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The Borough’s housing needs calculation using the standard methodology as set out in the NPPG on Housing and Economic Needs Assessment, Step 3 is of most relevance as this states that where relevant strategic policies for housing have been adopted within the last 5 years, <i>“the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies.”</i> It further clarifies that <i>“for areas covered by spatial development strategies, the relevant policies are those contained within the spatial development strategy.”</i> This should also be no older than 5 years. The spatial development strategy is the London Plan which was published in March 2021 and therefore within the last 5 years. Based on this our housing need figure would be capped at 40% above the housing requirement of 448 homes per annum or 627 homes per annum.</p> <p>Step 4, the cities and urban centres uplift step is a recent addition to the calculation of the standard method updated on 16 December 2020. Adding an extra 35% over the capped 627 homes per annum gives a figure of 847 (rounded up) per annum.</p>
15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 62	<p>The following policies provide for a variety of needs: HO1: Delivery and Protection of Homes – protects Houses in Multiple Occupation HO3: Community Housing – sets out the tenure mix that will be required for community</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>HO4: Housing size and standard – sets out the bedroom size mix based on the latest evidence set out in the LHNA and requirements for accessible housing.</p> <p>HO5: Specialist Housing – sets out policies to protect and support housing for older people and supported housing.</p> <p>HO6: Other Housing Products – sets out policies for build to rent, co-living and student housing.</p> <p>HO7: Estate Renewal – supports retention over demolition and provides the framework for estate renewal for schemes led by registered providers. The Council is committed to end wholesale estate regeneration on estates it owns.</p> <p>HO8: Gypsy and Traveller Accommodation – policy to protect, improve and if possible to increase the capacity of the existing Traveller’s site at Stable Way.</p> <p>The evidence of need for these policies is as set out in the LHNA, September 2022. The policy justification is set out in detail in the Policy Formulation Reports for Policies HO1-HO2 and HO3-HO7.</p>
16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 63	<p>This is set out in Policy HO3: Community Housing</p> <p>The evidence of need for these policies is as set out in the LHNA, September 2022. The policy justification is set out in detail in the Policy Formulation Reports for Policies HO3-HO7.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
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>This is set out in Policy HO3: Community Housing. Part L of the policy sets out 30 per cent of the community housing must be provided as intermediate housing. Within this home ownership products can be provided as long as they cater to a variety of income levels below the maximum caps. Part M of the policy sets out 25% First Homes can be provided in North Kensington. The high land values in the Borough would make First Homes unworkable elsewhere as they would increase the Government's £420,000 price cap.</p> <p>Of note is Paragraph 23 of the NPPG on First Homes which states that "the 25% expected First Homes contribution for any affordable product can make up or contribute to the 10% overall number of homes expected to be an affordable home ownership product on major developments as set out in the NPPF</p>
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	Para 66 of the NPPF makes an exception to this requirement at footnote 32 which states <i>"Except where a Mayoral, combined authority or high-level joint plan is being prepared as a framework for strategic policies at the individual local authority level; in which case it may be most appropriate for the local authority plans to provide the requirement figure."</i>
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	The NLPR includes a housing trajectory that sets this out. This is set out in Chapter 3: Homes and Appendix 1.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			A separate paper Five Year Housing Land Supply and Stepped Housing Trajectory October 2022 has also been produced.
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	We have made a concerted effort to allocate small sites and the large majority of the allocated sites (over 60%) are on sites that are less than 1 hectare.
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	Given the central London character of the Borough the definition of an exception site being adjacent to existing settlements will not be met. The policy is not applicable to the Borough.
22.	Support the supply of homes through utilising masterplans, design guides and codes where appropriate to support larger scale developments.	NPPF Para 73	The Council has produced Opportunity Area Heights Analysis for the two Opportunity Area sites – Kensal Canalside and Earl's Court. In addition, alongside the NLPR the Council has produced a Placemaking Framework for Earl's Court and has an adopted SPD for Kensal Canalside.
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	The NLPR includes a housing trajectory that sets this out. This is set out in Chapter 3: Homes and Appendix 1. A 20 per cent buffer is applicable in the Borough.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			A separate paper Five Year Housing Land Supply and Stepped Housing Trajectory October 2022 has also been produced.
24.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 78	The policies are tailored to local circumstances.
25.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 79	NA
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	NA
	<i>Economy</i>		
27.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 81	<p>The vision for the NLPR is to “support good growth”. This has a number of elements including an ambition to provide a range of employment opportunities as well as supporting our town centres. This is explicit in recognising the “<i>the need to build new homes and workspaces</i>”. This ties in with the Council’s own <u>Economic Strategy</u> which sets out the wider Council’s plan to promote a successful local economy. Planning, and the provision of the premises needed is only a small part of this.</p> <p>The NLPR takes a two pronged approach to supporting our business. It seeks to protect the business that we have (that is offices as well as retail and other traditional town centre uses) and to support the provision of new premises. These are</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			supported in named strategic sites and elsewhere where they comply with the "town centre first" principle. This approach allows the council to meet the need for additional office floorspace as identified in our Employment Land Study.
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 NLPR is to "support good growth". This has a number of elements including an ambition to provide a range of employment opportunities as well as supporting our town centres. This is explicit in recognising the "the need to build new homes and workspaces". This ties in with the Council's own Economic Strategy which sets out the wider Council's plan to promote a successful local economy.</p> <p>The economic strategy considers the role of planning is supporting good growth. This has three elements, each of which is specifically addressed in the NLPR.</p> <ul style="list-style-type: none"> • Prevent the loss of existing and promote the creation of new offices across the borough. • Provide a diverse mix of business premises • Allow new homes in the Employment Zones where these will help deliver new commercial floorspace.
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 Employment Land Study has identified a need for an additional 60,500 sq m of office (E(g)) floorspace over the lifetime of the plan.</p> <p>The ELS suggests a number of ways this need can be met.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Retention of existing office spaces. This is only possible through the A4D confirmed in August 2022. This will allow the Council to protect (should it choose to do so), 98% of all its office premises. Policy BC1 (A) is explicit in stating that, “<i>where planning permission is required, protect all offices and office floor space</i>”. (subject to some exceptions)</p> <p>Existing commitments These make up much of the future need. As of April 2021 there were 14,017 sq m of office floorspace approved as well as 50,000 sq m of extant permissions (up to 2019/20).</p> <p>In addition the pipeline would also include floorspace allocated, over and above extant permissions. This includes significant allocations for commercial floorspace on our two opportunity areas, or a minimum of 5,000 sq m of office floorspace in Kensal Canalside and a minimum of 20,000 sq m of E(g) floorspace on Earl’s Court OA. It should be noted that 11,632 sq m of office floorspace is already included as an “extant permission” on Earl’s Court. This cannot be added to the 20,000 sq m allocation.</p> <p>Intensification of existing sites. Policy BC1 (B) supports the provision of new offices less than 1,000 sq m across the borough, with (C) supporting new offices over 1,000 sq m “<i>within a town centre, other accessible area,</i></p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p><i>Opportunity Area or within an Employment Zones” and elsewhere where meet the requirements of the sequential test.</i></p> <p>BC1(J) encourages an intensification of commercial uses within our Employment Zones, whilst BC1(H) supports new and intensified industrial uses in appropriate parts of the borough.</p> <p>Filling of vacancies This is not something which forms part of the NLPR as does not require planning permission.</p> <p>The Council recognises that there is likely to be a modest shortfall of industrial floorspace , or 9,000 sq m. This rises to 11,400 sq m when existing commitments are included. The ELS notes that it is <i>“ambitious in market terms to expect increases in stock due to viability compared with other uses.... The industrial needs for RBKC will most realistically be met in the London wide FEMA.”</i></p> <p>This forms part of the Duty to Cooperate signed with neighbouring boroughs.</p> <p>The site allocations include the provision of E class commercial floorspace. It is not appropriate to require the provision of industrial floorspace, in the absence of a willing landowner or when the introduction of a low value use is unlikely to be viable.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			This is set out in the NPPG, “Housing and economic land availability assessment”. This notes that land should only be allocated for a particular use where satisfied of the <i>“suitability, availability and achievability of sites, including whether the site is economically viable.”</i>
30.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 82	<p>The Council is satisfied that it benefits from a high quality environment with the provision of a wide range of services needed by those living, and working within the borough.</p> <p>These are not barriers to investment. The principal barrier to seeing new business floorspace being provided is that of the differential in value between business and residential uses across much of the borough. This is addressed through the requirement to protect existing floorspace and support the provision of new floorspace in appropriate locations.</p> <p>The provision of adequate infrastructure is considered through the Infrastructure Development Plan. The need to provide adequate infrastructure is address in Policy IP1.</p>
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	Policy BC1 has been drafted so as to require the retention of existing floorspace, and support the provision of new, but not to prescribe how this must be done. It allows for each proposal to be assessed on its merits.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
32.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 83	<p>The ELS considers the nature of the borough’s business sector, and the importance of office-based industries. With this, it notes the important role of the creative sector. The NLPR seeks to provide the office premises sought by this sector. This includes small and medium sized offices across the borough as well as larger “HQ” type premises in town centres and other suitable locations.</p> <p>However, as noted above, it does not seek to be prescriptive, recognising the need for flexibility and for the development plan to allow for the changing nature of the borough’s commercial sector.</p> <p>It is this recognition of the nature of the borough’s commercial sector which shapes the nature of new premises sought - that is E class office premises rather than industrial units. The market is unlikely to deliver the latter, with the ELS noting that these are best provided in the wider London FEMA.</p> <p>This forms part of the Duty to Cooperate signed with neighbouring boroughs.</p>
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	NA. Kensington Chelsea is an entirely urban borough.
34.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 84	NA. Kensington Chelsea is an entirely urban borough.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
35.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 84	NA. Kensington Chelsea is an entirely urban borough.
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>A central strand of the NLPR is the “walkable neighbourhood”, or support for a place where all those living within the borough are within easy reach to the range of open spaces, education, sports and social and community facilities that will meet their local needs.</p> <p>This concept is translated into a suite of policies which seek to protect such uses (where planning permission is still required) and promote additional provision where possible. Policy PLV19 directly addresses support for the walkable neighbourhood, or to “keep life local”. This includes support for the neighbourhood centres, support for the provision of valued local facilities outside our town centres, initiatives to support increased access to our town centres and support for public realm improvements.</p> <p>Specific policies take this further, protecting specific uses. This includes TC3 (shops), TC5 (restaurants and pubs), SI1 (sports venues and other social and community uses) and saved policy TC7 (Arts and Cultural uses).</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	NA. Kensington Chelsea is an entirely urban borough.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
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	Chapter 5 sets out the network and hierarchy of the borough's town centres. The higher order centres are those within the London centre network as defined in the London Plan. The long term viability of our centres is supported by Policy TC1 which endorses the town centre first principle as well as the sequential approach for new town centre uses and an impact assessment where appropriate.
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 extent of town centres, and where appropriate the primary and secondary retail frontages is defined within the NLPR, with detailed boundaries available on through a searchable GIS layer, freely accessible on the Council's website.</p> <p>Policy TC3 notes that planning permission is no longer required for one change of use from one E class use to another. However, it does include "threshold polices" for those uses which will require planning permission and where an over representation of such uses will harm the vitality of a town centre or the amenity of those living nearby. This includes for betting shops, payday loan stores, pawn brokers, amusement arcades and hot food takeaways.</p>
41.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 86	Saved Policy TC6 seeks to retain and enhance existing markets, recognising the important role that they have in supporting the vitality of a centre and in meeting the day-to-day needs of our residents.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
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 Council has published a RLNA. This has concluded that there will be a modest over supply in comparison retail floorspace (1,100 sq m) to 2043. As such the Council does not need to identify any sites for this use.</p> <p>It also identifies a modest need of 8,900 sq m of convenience floorspace over the lifetime of the plan. As recommended by the RLNA, this floorspace will be directed to existing centres and to the two Opportunity Areas.</p> <p>It is expected that much of this floorspace can be accommodated in existing centres through the filling of vacant units. The 8,900 sq m needed is just 0.02% of the estimated 400,000 sqm of retail and other former A class floor space across the borough. This can easily be accommodated by bringing vacant units back into use.</p> <p>In addition the NLPR includes a number of sites within, or immediately adjoining our town centres, which includes additional retail floorspace. This includes:</p> <p>Chelsea Farmers Market (SA7): <i>“retail units at ground level facing 151 Sydney Street”</i>.</p> <p>Newcombe House (SA9): <i>“retail and leisure uses at ground and lower ground levels bringing active frontage to ground floor”</i>.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Harrington Road Car Park (SA10): <i>“class E commercial frontage to Harrington Road.”</i></p> <p>In terms of the opportunity areas:</p> <p>Allocation SA1 (Kensal Canalside) includes the provision of a <i>“minimum of 2,000 sq m of other non-residential floorspace, including social and community and local shopping facilities”</i>.</p> <p>Allocation SA2 (Earl’s Court Exhibition Centre) requires the provision of <i>“retail and other uses within Class E sufficient to serve the day-to-day needs of new development and supplement existing facilities in the immediate area...”</i></p> <p>The Leisure Needs Assessment forms part of the wider RLNA (Urban Shape 2022). This concludes that, (RBKC10) <i>“that there is no need to allocate sites outside down centres for ... leisure floorspace over the plan period.”</i></p>
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	As above.
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	The NLPR is explicit in recognising that housing can be a “town centre use”, with our “town centres being the places which have capacity to provide new homes”. Policy TC3 sets out the

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>criteria to be uses when assessing applications which include the provision of new homes within our town centres.</p> <p>The site allocations also include a number of sites within our town centres which include the provision of new homes. This includes the Chelsea Farmers Market (SA7), Newcombe House (SA9), Harrington Road car park (SA10) and Emmanuel Kaye Building (SA11).</p>
45.	<i>Healthy and safe communities</i>		
46.	<p>Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.</p>	<p>NPPF Para 92</p>	<p>There is a mix of policies that aim to achieving healthy, inclusive and safe places. These relate to design, social and community uses, and transport. The Council will also seek infrastructure and planning contributions to ensure that sufficient supporting infrastructure is provided.</p> <p>Policy CD2 sets out the requirements for all developments in the borough to be of good quality, attractive, inclusive and safe.</p> <p>Policy SI1 seeks to ensure that social and community uses are protected and enhanced throughout the Borough. Part C highlights the importance of co-location of different forms of social and community uses to promote social interaction. The policy also states that the new provision should be well-designed, inclusive and easily accessible by public transport, cycling and walking.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Chapter 10 is dedicated to Transport and sets out a multitude of policies that are aimed at creating inclusive, attractive environments (T3), making sure that new development is located in suitable areas where the transport requirements can be met in a sustainable manner (T5), as well as promoting active travel (T6).</p> <p>Policy IP1 deals with Infrastructure and Planning contributions and seeks to ensure that sufficient supporting infrastructure is delivered to support good growth. This might include, but not limited to, contributions to education, health facilities, libraries, open spaces and parks etc, which all promote creation of healthy sustainable places.</p>
47.	<p>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.</p>	<p>NPPF Para 93</p>	<p>This is addressed mainly through Policy SI1 Social and Community Infrastructure which seeks to protect the existing uses where possible and provide new infrastructure to address the needs of local community. Policy TC5 also seeks to protect individual shops outside of designated town centres and resist the loss of public houses throughout the Borough.</p> <p>In addition, the Council’s Article 4 Direction removed permitted development rights for changes of use from Class E (commercial, business and service uses) to C3 (dwelling houses) in some parts of the Borough – mainly in town centres but also places where nursery or GP practice were identified. This would prevent the</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>loss of those valued facilities to residential uses and will allow the Council to have more control over the changes proposed.</p> <p>Policy GB16 deals with protection, enhancement and provision of new parks and open spaces. Meanwhile, the IDP also identifies planned improvement works to the open spaces – information that will be used to negotiate any planning contributions towards parks and open spaces.</p>
48.	<p>Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.</p>	<p>NPPF Para 93</p>	<p>The Council has considered all existing and emerging strategies that are aimed to improve health, social and cultural well-being of the local community. The reports have served as a basis for Policy Formulation Reports as well as evidence base for the required infrastructure provision as outlined in the IDP.</p> <p>The Plan seeks to secure planning contributions for provision of community, social and health facilities; provision of transportation facilities; sports, leisure, recreational and visitor facilities; green infrastructure improvements; cultural facilities and play facilities.</p> <p>Policy T4 (I) requires all developments to contribute to delivering new arts and culture in line with the Council’s Culture Plan. This may either be on site or where such on-site provision is not appropriate, through planning contributions towards delivering the Council’s Culture Plan.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
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	Policy SI1 (D) protects against the unnecessary loss of valued social and community facilities where possible by implementing the sequential approach to the loss of such uses. Additionally, the Article 4 Direction issued by the SoS in August 2022 provides some protection against the loss of such facilities to residential uses, although it is noted that the change of use within Class E is still possible.
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	Local shopping facilities which support day-to-day needs are protected under the Policy TC5. The Council also recognises the importance of our town centres, their diversity and vitality. Policy TC3 supports the provision of a diverse range of town centre uses, including meanwhile use. Existing established shops are also protected from amalgamation where the retention of the existing units contributes to achieving the vision for the town centre (Policy TC2). Meanwhile, existing social and community uses are protected from loss under the Policy SI1 (D).
51.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 93	An integrated approach has been taken when considering the location of housing, economic uses and community facilities. Site allocations identify the locations for new development and the variety of suitable land uses, taking into account any areas of deficiencies and ensuring that new development addresses the need of local population. Where a lack of particular facilities was

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>identified in the vicinity, site allocation includes relevant uses within the site to address the deficiency.</p> <p>The Council will require that there is adequate infrastructure to serve developments, through the use of planning contributions, working with infrastructure providers and stakeholders to identify requirements.</p> <p>In order to support the vitality and viability of Kensington and Chelsea’s network of town centres, the Council will apply a town centre first approach to any proposal for a retail or other main town centre use which requires planning permission.</p>
52.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 94	<p>The Council has confirmed that it will not carry out any estate regeneration on Council owned estates.</p> <p>Any proposal for estate renewal will be assessed using all of the polices within the Development Plan. This includes consideration of the social, economic and environmental benefits of all development.</p> <p>Policy H07 specifically considers estate renewal for housing estates owned by registered providers. Part A considers the principles of the circular economy. Parts B, C, D, E, F, G and H also consider social benefits, such as the re-provision of social housing, the appropriate ix of home as well as the need to co-design and that the long term benefits of a proposal outweigh</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			the considerable uncertainty and disruption that such a scheme will cause.
53.	Plan positively to meet school place requirements and to encourage development which will widen choice in education.	NPPF Para 95	The IDP identifies future Primary and Secondary education needs in the borough. The report concludes that the level of development in the proposed NLPR does not give rise to significant additional educational infrastructure needs. Future need is required as and when Kensal Canalside Opportunity Area comes forward and this is reflected in the requirements set out in site allocation Policy SA1. An on-site early-years education facility was also identified necessary in Earl's Court OA, which is reflected in the Policy SA2.
54.	Work proactively and positively with promoters, delivery partners and statutory bodies to plan for public service infrastructure.	NPPF Para 96	<p>The Council has worked proactively with developers of Opportunity Areas to determine the nature and amount of public infrastructure required for those sites.</p> <p>Other statutory bodies, such as TfL, Thames Water and NHS were consulted throughout the whole duration of the plan making consultation. The Council received comments on a variety of issues provided by the consultees which were considered in depth when formulating policy.</p> <p>The LPA has also worked closely with other Council departments, such as Parks and Leisure, Education, Transport and Highways to plan positively for public service provision.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
55.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 97	<p>The NLPR Vision for the Borough seeks to support good growth and future development to be inclusive, green and liveable. The last aspiration seeks to set the highest quality and safety standards for new development. This is further supported by the Policy CD2, which requires developments to be secure by implementing designing out crime approach.</p> <p>The road safety is also considered under the Policy T6 (E), which requires new development <i>“to incorporate measures to improve road safety, and in particular the safety of pedestrians and cyclists and resist development that compromises road safety”</i>.</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 needs assessment for open spaces, sports and recreational facilities have been all undertaken as part of the NLPR. The Open Spaces Audit (2022) has identified areas of deficiency of publicly accessible open spaces, and new open spaces are planned to be delivered on two opportunity sites – Kensal Canalside and Earl’s Court. Due to the highly built-up nature of the borough there are very few opportunities to create new open spaces.</p> <p>A comprehensive programme of upgrading and improving the existing parks and open spaces was also designed by the Parks and Leisure department, which will serve as an evidence base when seeking for financial planning contributions from developments.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			Sports facilities assessment has identified some unmet demand in the borough; however this will be met by the future provision. 100/100A West Cromwell Road will deliver new community sports hall and public swimming pool, Barbly Road Site (part of the Council's New Homes Delivery Programme) will deliver new sporting facility. Edenham site allocation will deliver the reprovision of a sports court/area, while the Westway Sports Centre will provide additional outdoor sports pitches, an extension to Climbing Centre, a sports hall and an improved riding arena.
57.	Protect and enhance public rights of way and access.	NPPF Para 100	<p>The Royal Borough of Kensington and Chelsea is exempt from a requirement to maintain records of public rights of way under The Wildlife and Countryside Act 1981. Instead, the Council is required to keep an up to date list of streets which are highways maintainable at the public expense under Section 36 of the Highways Act 1980.</p> <p>NLRP Policy T1 required a well-connected, inclusive and legible network of streets to be maintained and enhanced. As part of the policy, the gating of existing streets and the development of new gated communities are resisted.</p> <p>In addition, Policy T6 (D) seeks to ensure that any development does not reduce access to, or the attractiveness of, existing footways and footpaths used by the public, or land over which the public have a right of way.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
58.	<i>Transport</i>		
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	The NLPR includes policy T5 on land use and transport that reflects Paragraph 105 of NPPF. Policies T6 and T7 on active travel and public transport respectively seek to improve accessibility to facilitate growth as widely as possible.
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	Policy TC5 provides for walkable mixed-use neighbourhoods. This policy is supported by the NLPR chapter on Streets and Transport. Policy T6 supports walking and cycling. Policies T1 and T4 seek improvements to the public domain to encourage active travel. Policy T3 requires opportunities to be taken within the street environment to create places that support outdoor life, inclusive to all, adding to their attractiveness and vitality. Together these policies aim to enable our residents and visitors to access the services they need conveniently and sustainably.
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	Policy T5D resists the loss of buildings and land used for public transport, active travel or related support functions (unless satisfactory alternative facilities are provided). Infrastructure required to accommodate growth is included in the infrastructure and delivery plan.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
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	Through Policies T1 on Street Network, T4 on Streetscape and T6 on Active Travel the Council aims to good quality environments for walking and cycling on all our streets. The Council's plans for designated cycle routes are presented at Paragraph
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	The lands safeguarded for the future delivery of Crossrail 2, a regional rail line that would cross London via a station on the King's Road, are included on the proposals map accompanying the Local Plan. There are no other large-scale transport facilities ear-marked for the borough in the London Plan.
64.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 106	N/A
65.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 109	There are no formal lorry parking facilities in the borough. Given the borough's accessible location in Inner London and partly within the Central Activities Zone alternative land uses are more appropriate to support growth.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
66.	<p>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 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>	<p>NPPF Para 110</p>	<p>The NLPR includes policy T5 on land use and transport that reflects Paragraph 110 of NPPF. Policies T6 and T7 on active travel and public transport respectively seek to promote sustainable parking modes. So does car parking restraint covered by Policy T8.</p> <p>Policy T1 on Street Network has been worded to ensure that safe and suitable access to the site can be achieved for all users.</p> <p>Policies T1 and T4 on Street Network and Streetscape respectively, supported by the Council’s streetscape guide, require outcome that can be considered to be consistent with current national guidance.</p>
67.	<p>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.</p>	<p>NPPF Para 111</p>	<p>Policy T8 (Parking) Part B states that “The Council will require it to be demonstrated that development will not result in any material increase in traffic congestion or on-street parking pressure”.</p> <p>A material increase in traffic congestion has the potential to be harmful given existing problems of traffic congestion and poor air quality. The Council’s policy objective is considered reasonable in the context of the borough and not in conflict with Paragraph 111. The application of this policy would be consistent with the NPPF.</p>
68.	<i>Communications</i>		

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
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	The London Plan is part of the development plan for the borough. Policy S16 Digital connectivity infrastructure includes a requirement to meet expected demand for mobile connectivity generated by the development. The NPLR has not repeated this policy. This supports the “requirement” within the NPPF that unnecessary duplication of policies is avoided. In addition reference to the provision of digital connectivity is included in chapter 11, infrastructure and planning contributions.
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	As noted elsewhere, the NLPR has the policies in place that ensures the Council will meet the objectively assessed need for housing, retail, leisure and business uses. It also has a suite of policies which ensure that the environment is safeguarded, and where appropriate is improved. Chapter 2 includes the polices relating to air quality, use of carbon, air quality, flooding, and biodiversity and similar. Chapter 4 is focused on the built environment, although clearly they ais some overlap. Furthermore the town centre first approach, and seeking to locate major trip generating uses in accessible areas are also integral to safeguarding the environment.
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	All land in RBKC is previously developed land. The NLPR has a clear strategy to accommodate good growth as shown in the key

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			diagram. The NLPR allocates land and sets out policy framework to meet objectively assessed needs.
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>RBKC does not have any rural land.</p> <p>The policies within the Green-Blue chapter of the NLPR encourage multiple benefits including opportunities to achieve net environmental gain. For example, policy GB15 and GB17 require major development to deliver on-site green infrastructure and a 10% biodiversity net gain. In addition, policy GB1 – GB5 seek to reduce carbon emissions and GB6 seeks to ensure development does not negatively impact air quality.</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	All land in RBKC is previously developed land. However, the NLPR recognises that much of the land which is not built upon may have a very useful function, and may be protected. In this regard Policy GB17 will protect land when it has a particular value for biodiversity. Policy GB16 seeks to protect parks gardens and open spaces, for the value it has for recreation, wildlife, and minimising noise and pollution.
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>All land in RBKC is previously developed land, and as such will meet all the borough's future needs.</p> <p>The NLPR (Policy GB20) recognises the value of developing contaminated land where satisfied that an appropriate risk assessment is carried out and, where necessary, appropriate remediation is carried out. We do recognise that this many have</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			an impact on the deliverability of a site and the upon its the viability.
76.	Promote and support the development of under-utilised land and buildings.	NPPF Para 120	In order to accommodate its OAN for a range of and uses the NLPR supports the development of land wherever possible. However, there will be circumstances where development will not be appropriate. This includes when the lands is value for its biodiversity, its recreations value, the contribution that it has to town scape etc. The allocations demonstrates that the Council has worked with land owners to identify “under-utilised land” for development where appropriate.
77.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 120	Saved policy CL8 is concerned with additional storeys. It sets out those circumstances where roof additions will not be appropriate. This recognises the need for roof alterations <i>“to be architectural sympathetic to the age and character of the building or group of buildings.”</i> <i>Policy HO2 supports “well designed upward extensions creating new homes that respond sensitively to the surrounding context”.</i>
78.	Reflect changes in the demand for land.	NPPF Para 122	The allocations within the NLPR reflect the changes in demand for land, and only allocated where satisfied that the land allocated can be delivered in a timely manner.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
79.	<p>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.</p>	<p>NPPF Para 124</p>	<p>NLPR Policy HO1 requires that development <i>“optimises the homes delivered using a design led approach”</i>.</p> <p>Policy HO3 supports the provision of community (affordable) housing, and policy HO5 supports the provision of different forms of specialist housing. This includes that for older people, and supported housing. Policy HO4 requires, <i>“all new housing to include a mix of types and sizes of homes to reflect the varying local needs of the borough, taking into account the characteristics of the site, and current evidence in relation to housing need.”</i></p> <p>The policies within chapter 4 are concerned with the creation of well designed and attractive places. Policy CD1 requires new development to consider the context and character of an area, requiring <i>“the density of development to be optimised in a manner sensitive to context”</i>. Policy CD2 requires, <i>“all development to meet the highest standards of urban design and architectural quality, taking opportunities to improve the local area, its character and the way it functions.”</i></p> <p>IP1 is concerned with infrastructure an planning contributions. This states that, <i>“account will be taken of the proposed development, individual characteristics of the site, the infrastructure needs of the site and the surrounding area.”</i></p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
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>RBKC has one of the densest built environments anywhere in the country. All new developments must be optimised using a design-led approach which takes its cues from the surrounding context. Therefore, we do achieve fairly high densities in new development. The approach is to optimise sites and is set out in NLPR Policy HO1 A. 4. and HO2.</p> <p>The London Plan 2021 has dispensed with the “density matrix”/ density standards which had been in use in some form or another since 2004. This was an approach endorsed in the <u>London Plan Panel of Inspectors’ Report</u> (see paras 280, 281, 282, 286 and 287).</p> <p>Further details are set out in the Policy Formulation Report for Policies HO1 – HO2, October 2022.</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 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.	NPPF Para 127, 128 & 129	<p>Section 4 of the NLPR sets out the overall expectations regarding design quality in the borough. Supplementary guidance has been prepared for the Earl’s Court Opportunity Area where a Placemaking Framework sets out the design priorities for the site.</p> <p>Policy CD2 in its supporting text refers to further design guidance contained within Conservation Area Management Plans and the borough’s Character Study. The latter also identifies areas which</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			offer opportunities for good growth, and further guidance will be prepared for those in due course.
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	This is set out in policies CD1 Context and character, CD2 Design quality, character and growth, CD3 Heritage Assets – Conservation Areas, and CD6 Registered Parks and Gardens, all of which set out the expectations on design responses and quality of development in the borough. These policies are supported by our Conservation Area Management Plans and other supplementary guidance for specific sites. Further guidance will be prepared for those parts of the borough which do not lie within a CA, an SPD or a site allocation.
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	The Council endorses the provision of new tree where properly integrated into new development. It also protects existing “trees of amenity, historic or ecological value. This is set out in Policy GB18.
85.	<i>Green Belt</i>		
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	N/A

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
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	N/A
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	N/A
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	N/A
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 pressing need to address climate change mitigation and adaptation is considered within the overall vision of the NLPR, which sets out that the new Local Plan will support good growth that is environmentally sustainable, placing the environment at the heart of all development.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Chapter 4 ‘Green-Blue Future’ of the NLPR goes on to contain a suite of policies that take a leading and proactive approach to climate change mitigation and adaptation. For example, policies require development to apply circular economy principles and submit a circular economy statement (GB2); prepare a whole life-cycle carbon (WLC) assessment and reduce WLC emissions (GB3); be net zero carbon and reduce carbon emissions through the framework of the London Plan energy hierarchy (GB4); undertake an overheating risk assessment and minimise overheating risk (GB5); incorporate sustainable drainage, minimise flood risk and address water supply (GB11, GB12 and GB13); meet London Plan Policy G5 urban greening factor requirements (GB15); and protect biodiversity and deliver a 10% biodiversity net gain in accordance with the Environment Act 2021 (GB17).</p>
92.	<p>Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.</p>	<p>NPPF Para 153</p>	<p>Chapter 2 ‘Green-Blue Future’ of the NLPR contains policies which will ensure communities and infrastructure in the borough are resilient to the impacts of climate change. For example, policy GB5 requires development to undertake overheating assessments and minimise overheating risk. This will ensure development is built to accommodate rising temperatures as a result of climate change. Policy GB11 requires development to implement measures to minimise flood risk and improve flood resilience, which will ensure their resilience in the face of rising sea level and increased risk of flooding and extreme weather. Policy GB12, GB15, GB16, GB17 and GB18 require development</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>to incorporate urban greening; protect existing parks; protect existing trees and take opportunities to plant additional trees; protect biodiversity and deliver biodiversity net gain. These ensure development contributes to the protection and enhancement of green spaces and biodiversity in the borough, which will help to reduce flood risk, overheating and the urban heat island effect. In addition, Policy GB13 requires development to contribute to the deliver of new water supply infrastructure as well as the continued maintenance and improvement of existing infrastructure, which will help ensure resilience in the face of dry weather and drought associated with climate change.</p>
93.	<p>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.</p>	<p>NPPF Para 155</p>	<p>Policy GB3 Energy and Net Zero Carbon requires all major development to maximise incorporation of renewable energy. In addition, Policy GB1 supports the sensitive installation of solar panels on buildings that are listed and located within conservation areas, subject to fulfilling the Council’s statutory duties.</p> <p>Major development is also required to deliver low-temperature communal distribution systems served by heat pumps, and design in the ability to connect to future or proposed heat networks. The entire borough is within a heat network priority area and large-scale development such as opportunity areas are required to explore opportunities to deliver heat networks. In addition, major development is required to submit a WLC assessment and reduce WLC emissions under policy GB3. This</p>

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			policy also encourages the incorporation of renewable technology as well as the use and supply of low carbon heat and energy.
94.	Manage flood risk from all sources and apply a sequential, risk based approach to the location of development.	NPPF Para 160 & 161	Policy GB11 requires flood risk to be managed from all sources. The Local Plan is supported by a Sequential Test assessment to provide a risk-based approach to the location of development allocated as part of the plan.
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	The Sequential Test assessment is supported by an Exception Test for sites allocated in areas with a residual risk of flooding from the River Thames and sites with a risk of flooding from other sources. The wider sustainability benefits of development at these sites are addressed in the Integrated Impact Assessment for the plan. In addition, the sites will require a Flood Risk Assessment and Exception Test assessment, as set out in Policy GB11, to demonstrate that the layout of the development is such that more vulnerable uses are directed to areas at lower risk of flooding and that the development will be safe for its lifetime without increasing flood risk elsewhere.
96.	Avoid inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 171	N/A
97.	<i>Natural environment</i>		
98.	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of	NPPF Para 174	Policy GB16 and GB17 protects the natural and local environment, including existing parks, gardens and open spaces,

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	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.		<p>and sites of particular importance for biodiversity, such as SINCs. The NLPR very clearly recognises the wider benefits of natural capital and ecosystem services within the overall vision of the NLPR, which sets out that the new Local Plan will support good growth that is environmentally sustainable, placing the environment at the heart of all development.</p> <p>There are no sites of geological value and soils in the borough and the borough does not contain countryside.</p>
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	<p>Designated sites are identified on the proposals map of the Plan.</p> <p>Policy GB15 and GB17 take are strategic, borough wide policies that require development to meet the urban green factor requirements of the London Plan and deliver a biodiversity net gain in accordance with the Environment Act 2021.</p> <p>Planning for the enhancement of natural capital at a catchment or landscape scale is not relevant in RBKC.</p>
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 designed to avoid or minimise adverse impacts on the designated areas.	NPPF Para 176	N/A

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101.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 178	N/A
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>Local wildlife-rich habitats and ecological networks such as SINCS are identified on the proposals map of the Plan.</p> <p>Policy GB17 safeguards local wildlife rich habitats such as SINCS and protects and requires development to contribute to the enhancement of wide ecological networks, priority species etc. such as green corridors and blue-ribbon networks.</p> <p>Policy GB17 also requires development to deliver a biodiversity net gain in accordance with the Environment Act 2021.</p> <p>In addition, Policy GB15 requires major development to provide new green infrastructure and meet the urban greening factor requirements of the London Plan.</p> <p>Furthermore, Policy GB16 protects and supports the enhancement of existing parks, gardens and open spaces. It also requires development to provide new high quality outdoor spaces.</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	Policy GB20 requires applicants to take action to investigate and if appropriate address land contamination.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
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	Policy GB6 requires development to contribute towards improving local air quality and takes into account the presence of AQMA, clean air zones and the cumulative impacts from individual sites in local areas.
105.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 187	The NLPR adopts the agent of change principle as defined by the London Plan and NPPF to ensure new development can be integrated effectively with existing businesses and community facilities. For example, policy GB8, GB9 and GB10 specifically reference the agent of change principle.
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	Chapter 4 Conservation and Design sets out in detail how the Council will protect and support improvements to the historic environment. Policy CD3 is specifically concerned the Conservation Areas; CD4, Listed Buildings and CD5 Schedules Ancient Monuments.
108.	<i>Minerals</i>		
109.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 210	N/A
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	N/A

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111.	Safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas.	NPPF Para 210	N/A
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	N/A
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	N/A
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	N/A
115.	Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction	NPPF Para 210	N/A
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	N/A