

SECTION 5. NON-TECHNICAL SUMMARY: CORE STRATEGY

LDF: CORE STRATEGY

**SUSTAINABILITY APPRAISAL REPORT
(including APPROPRIATE ASSESSMENT)**

NON-TECHNICAL SUMMARY

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5.1. INTRODUCTION

5.1.1 Purpose of this document

5.1.1.1 This document is a part of the council's consultation on its draft set of Preferred Options for the Core Strategy and Site Specific Allocations Development Planning Documents (DPD's) of the Local Development Framework (LDF). In accordance with the Planning & Compulsory Purchase Act 2004 the council is required to carry out a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of these Preferred Options. The council must publish for consultation a SA Report indicating its conclusions. The full Report must include a Non-Technical Summary (NTS). This is also published separately as well as forming part of this document.

5.1.1.2 This NTS provides an overview of the process, showing how it was carried out. The main conclusions and any changes made to the Core Strategy as a result of the Appraisal are summarised. This also includes the conclusions of the Appropriate Assessment for sites of nature conservation importance covered by the European Union Habitats Directive 1992.

5.1.2 How to comment or obtain further information

5.1.2.1 We are asking for your comments on the SA of the Core Spatial Strategy Preferred Options put forward within this document. Do you agree with our assessments? If you wish to refer to the full SAR this can be downloaded from the Council's website, or from the addresses below. Information on how to comment on the options themselves is contained in the Preferred Options document. This and other LDF documents are or will be made available in large copy print, audio cassette, Braille, or languages other than English on request. If you require the document in one of these formats, please see the contact details below.

5.1.2.2 Please make sure we receive your comments by **Friday 3 August 2007**

5.1.2.3 Please make your comments in writing, if possible, and make clear which section, issue or option you are commenting on. Please send your comments using the contact methods below.

By email to: LDF@lbhf.gov.uk

By using the form on the website: www.lbhf.gov.uk

By fax to: 020 8753 3036

(5/2) Minicom: 020 8753 5753
9JU

By post to:

Development Plans Team
Environment Department
King Street W6

5.1.2.4 We will publish all comments that we receive and make these available at the LDF information points, namely:

- Hammersmith Town Hall Extension, third floor, Environment Department
- Fulham Town Hall housing office
- Public Reference libraries – Hammersmith, Shepherds Bush and Fulham libraries
- Hammersmith Broadway Information Centre

Summaries, and where practicable, full representations will be made available on the Council's website. If you would like more information please phone on 020 8753 3317 or email, fax or write as above.

If you or someone you know cannot read this document or may have difficulty responding, or giving written comments, because of visual impairment or any other reason, please contact us.

5.1.3 The Planning Framework

5.1.3.1 The consultation on the draft Core Strategy Preferred Options is a key stage in the council's programme to prepare a LDF. This is published in the "Revised Local Development Scheme March 2007". The SAR is used to ensure the LDF contributes to the national plan for sustainable development, called "Securing the Future" and published by DEFRA in March 2005.

5.1.4 What do we mean by Sustainable Development?

5.1.4.1 The government has provided the following interpretation:

"The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations... that goal will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment; and a just society that promotes social inclusion, sustainable communities and personal wellbeing. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible [1]."

5.1.5 The role of planning in achieving sustainable development

5.1.5.1 Sustainable development is also central to the reformed planning system:

"Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development" [2]."

[1] From 'Our Common Future' – Report of the 1987 World Commission on Environment and Development. [The Brundtland Report]

[2] From Planning Policy Statement 1: Delivering Sustainable Development (paragraph 24)

5.2 THE SUSTAINABILITY APPRAISAL (SA) PROCESS

5.2.1 Purpose

5.2.1.1 The SA considers the proposals in the Core Strategy, from a social, economic and environmental perspective, in order to assess how far the preferred options in the Core Strategy are likely to:-

- achieve the council's sustainability objectives.
- have an impact on the Borough's local environment, and on the worldwide climate and other environmental resources.

5.2.2 Method

5.2.2.1 This generally follows government guidance which is designed to ensure the process also fulfils the European Union requirements on environmental assessment of relevant plans and programmes. The guidance was first published in November 2004, but has been changed during the SA process. A procedure was set out in the Draft Scoping Report in June 2005. The process in this SA has been simplified to make it more comprehensible. The key stages of the procedure that has been followed are set out in the following table. The publication of this SA Report completes Stage C. Stage D will be carried out at the same time as the consultation on the draft preferred options for the LDF and the revisions required to the submission Core Strategy.

5.2.3 The programme – completed stages

STAGE A - Setting the Context & Objectives

[This stage was completed in August 2005]

A1: Identifying other relevant plans, programmes and sustainability objectives, and the key objectives from each.

A2: Describing the social, economic & environmental Borough profile.

A3: Identifying sustainability issues.

A4: Developing the SA framework.

A5: Testing DPD objectives against the SA framework.

A6: Consulting on the scope of the SA.

STAGE B - Developing and Refining Options

[This stage was completed in August 2006]

B1: Developing and testing issues and options against the SA Framework.

B2: Consulting on the emerging Options in the SA.

STAGE C - Appraising the Effects of the Plan

[This stage was completed in April 2007]

C1: Predicting the effects of the Preferred Options.

C2: Assessing the effects of the Preferred Options.

C3: Mitigating adverse and maximising beneficial effects.

C4: Developing proposals for monitoring.

C5: Preparing the SA Report.

5.2.4 The programme – stages still to be completed

STAGE D - Consultation on Preferred Options and SA Report

D1: Consult on the SA Report and the Preferred Options.

D2: Re-appraise any changes to the Core Strategy following consultation

D3: Issue revised version of the SA Report.

Consultation (D1) will occur during the summer of 2007.

Following re-appraisal (D2) final submission is planned for March 2008 and an examination-in-public is likely in Sept-Oct 2008.

STAGE E – Monitoring and Implementation of the Core Strategy

E1: Monitoring the effects of the DPD and publishing a regular report.

E2: Implementing remedial action where necessary.

This will start when stage D3 is completed.

5.2.5 STAGE A – SETTING THE CONTEXT AND OBJECTIVES

5.2.5.1 Stage A1 - Relationship to other plans policies and programmes

Relevant policies, plans and programmes that may affect or influence the LDF were scrutinised, and the relevant objectives from these documents were included as sustainability objectives for the LDF. These included 6 international, and 27 national documents, plus 19 for all or part of London, and 9 other council strategies for the Borough. Additional documents relating to flood risk and biodiversity were added at the request of the Environment Agency. This list has been reviewed and an up to date list of documents and objectives is provided in the full SAR. The main change has been to increase the consideration of flood risk.

5.2.5.2 Stage A1 – Key objectives for the sustainability appraisal

The Draft Scoping Report identified around 60 objectives from national and local strategies. This was reduced to a more workable number for assessment in a re-iterative series of discussions with the in-house LDF team. There are 12 top level or headline objectives, which are used in the appraisal, each with 2-3 sub-objectives. These are set out in the following table, with the headline objectives in bold type.

5.2.5.3 Sustainability headline objectives and sub-objectives

1 Increase equity and social justice.

1.1 Make essential services affordable to all

1.2 Reduce differences in standards between different communities

1.3 Improve support to groups that are vulnerable and have special needs

2 Improve health of population overall

2.1 Increase expected years of healthy life

2.2 Enable healthy lifestyles - mode of travel and affordable healthy food

3 Improve the education and skills of young people and adults

3.1 Raise the standards of achievement at all ages

3.2 Improve awareness of sustainable development in education and training

- 4 Provide decent and affordable homes**
 - 4.1 Reduce homelessness
 - 4.2 Increase range & affordability of housing especially for vulnerable groups
 - 4.3 Reduce the number of unfit homes
- 5 Increase local residents 'sense of community and social cohesion**
 - 5.1 Increase participation and voluntary activity
 - 5.2 Reduce levels of crime and non-criminal anti-social disturbances
 - 5.3 Increase sense of security and safety at home and in the street
- 6 Increase the opportunities for satisfying and well-paid work**
 - 6.1 Reduce unemployment, especially long-term unemployment
 - 6.2 Improve earnings and reduce work-related stress to improve health
- 7 Improve the local environmental heritage**
 - 7.1 Conserve and enhance sites, features and areas of cultural, historical and archaeological value
 - 7.2 Maintain and enhance sites and species of nature conservation interest.
 - 7.3 Retain and enhance the character and use of the river.
- 8 Reduce the level of pollution**
 - 8.1 Improve local air and water quality, and reduce noise levels
 - 8.2 Reduce the amount of litter, derelict, degraded and underused land.
- 9 Reduce the effect of transport on the environment**
 - 9.1 Reduce the need for travel and therefore reduce traffic volumes
 - 9.2 Encourage use of more sustainable modes of transport
- 10 Responsible consumption of resources in the Borough**
 - 10.1 Increase efficiency in use of resources in future plans for the Borough
 - 10.2 Reuse, recover or recycle waste
- 11 Reduce climate change impact on the Borough**
 - 1.1 Reduce emissions of greenhouse gases and ozone depleting substances
 - 11.2 Reduce energy and water use, and increase use of renewable sources.
 - 11.3 Minimise the risk of flooding from storm events and overflow of watercourses
- 12 Improve the sustainability of the local economy**
 - 12.1 Improve the level of investment in community services and shopping facilities
 - 12.2 Improve access to key local services, shopping and other local facilities
 - 12.3 Encourage local investment and training of local workers

5.2.5.4 Stage A1 - Compatibility of Objectives

5.2.5.4.1 The draft planning objectives and sustainability objectives were compared to ensure they did not conflict. The table showing the results is reproduced as Appendix 1. Generally objectives were compatible, except for potential problems where housing and employment uses were incompatible on the same site.

5.2.5.5 Stage A2 – The Profile of the Borough

5.2.5.5.1 This information provides the basis for predicting and monitoring effects, and helps to identify sustainability problems and alternative ways of dealing with them. There is no State of the Environment Report for Hammersmith and Fulham, and when the SA started no centralised pool of data. Instead the detailed picture of the borough set out in the Community Strategy Mid-Term Review 2005 has been used. The key findings were:

- Hammersmith & Fulham is a small and densely populated West London borough with a population of 174,000 - a 12% increase over the past ten years. It is a part of London in high demand, with surveys showing 78% satisfaction levels with the area, making it a popular place to live and work.
- The borough also has a highly mobile population – the council's housing needs survey of 2004 estimates that over 35,000 households, almost half the total number of households in the borough, have moved in the last five years. In the private rented sector an estimated one in three tenants moves each year.
- Taking the 2001 Census as a snapshot in time, the borough has a relatively young, single and ethnically diverse population. Over half the population is aged between 20 and 44 years and 40% of households are single person households. Just over one in five residents are from non white ethnic backgrounds and 90 different languages are spoken in our schools. One in twenty residents was born in Ireland.
- There are extremes of wealth and poverty in the borough – house prices have risen by 180% since 1998 yet the area is also ranked as the 42nd most deprived local authority area in the country. Half of all households have an income of less than £19,500 per year but 15% have incomes in excess of £60,000 per year. The average annual household income in the borough is £30,266 but the average income for Black and Asian households is £14,577 and £14,424 respectively.
- The strategic location of the borough and its position in relation to London's transport network means a lot of congestion and busy roads. The borough has seen rapid growth in small businesses, particularly in new media, and it offers a range of cultural attractions in the three town centres of Hammersmith, Shepherds Bush and Fulham

5.2.5.6 Stage A3 - Identifying the sustainability issues

5.2.5.6.1 These characteristics of the Borough were compared with national, regional and local sustainable development plans to identify the key sustainability issues the LDF needed to tackle. These are:-

Population

5.2.5.6.2 Population projections suggest that the borough's population will continue to grow but at a slower rate than in previous years. By 2021 the borough's population is expected to have increased by 7% - lower than the

projected increase for Greater London of 12% over the same period. The population is also expected to become younger – with a higher proportional increase in the number of those under 19 years than for London as a whole and a decline in the numbers of people over 60 years.

Diversity

5.2.5.6.3 London's place as the world's most cosmopolitan city means that the borough will continue to be home for many diverse groups of people, of different nationality, ethnic origin, religion, and culture, finding the right balance to live together. Organisations that provide public services will need to find new ways of making the views of users, residents and other interested parties central to this process. As our population becomes increasingly diverse we must also ensure that the way in which we provide services brings different communities together and breaks down cultural and social barriers, whilst recognising and respecting different cultural and social identities.

Housing

5.2.5.6.4 The continuing population increase and the increase in single person households will place further demands on housing supply in an already overcrowded borough. There are currently 76,202 households in the borough, housing 174,240 people. Projections by the Greater London Authority suggest that in the 15 years from 2001 to 2016 there will be 5,700 new households in the borough, an increase of 7.6%.

Employment

5.2.5.6.5 The expected expansion of the e-economy could lead to a growth in employment and further economic prosperity for the borough, which has already seen a rapid expansion of new media businesses in recent years. In order to ensure that local people are given 'a fair chance' to benefit from the employment opportunities that will result from this growth we need to ensure that they are given access to the necessary training and development programmes that will fill any emerging skills gaps.

Leisure

5.2.5.6.6. Changing consumer and leisure-time trends mean that we need to consider new issues when planning and developing Hammersmith and Fulham for the future. Continuing growth in the evening and night-time economy, for example, will need to be carefully managed to ensure that the benefits of increasing economic activity are not outweighed by the potential negative effects, such as increased crime and disorder and anti-social behaviour.

Transport

5.2.5.6.7 The continuing increase in population could add to increased congestion on the roads and transport systems. Public transport provision in the borough will continue to improve, however, with a major interchange at Shepherds Bush and new railway stations at Imperial Wharf on the West London line and at White City on the Underground's Hammersmith and City Line. New buses are planned and there is the potential for new routes and the possibility of the West London Tram along the Uxbridge Road from Shepherds Bush Green. Locally, public bodies will work together to make provision for and promote more environmentally-friendly means of transport, such as cycling and walking, but the burden will still be on the road system to support the transport needs of the borough and those passing through it.

New

technologies, such as satellite-based tracking, will be developed in the future to manage demand, enhance safety and increase capacity.

Efficient Resource Management

5.2.5.6.8 In order to accommodate the extra residential and commercial properties required to provide for the expected growth in the Borough over the next ten years there will need to be better strategic and local management of resources. This is in addition to the need to contribute towards the achievement of national commitments and targets to reduce energy consumption and the production of greenhouse gases. There is a need for new initiatives particularly by the council and by developers. These will specifically need to include provision for

- the efficient management of waste, including the promotion of reuse of materials,
- further improvements in reuse, recycling collection and processing facilities;
- more efficient local procurement, production and use of goods, services and energy.
- the protection and enhancement of open spaces and the River Thames for both public use and local biodiversity.

5.2.5.7 Stage A4 – Developing a Sustainability Appraisal Framework

5.2.5.7.1 The Sustainability Appraisal Framework brings together objectives, indicators and local sources of data in order to provide a method for the sustainability effects of options for the LDF to be described, assessed and compared. Indicators are the key link between the description of the current situation (Stage A2) and a prediction of the expected future situation if a particular option is implemented in the LDF (stages C1 & C2). Indicators are used to predict:-

- the likely trends in the baseline position, if each option were to be implemented, allowing for interactions between different options
- the likely success of each option in meeting the chosen objectives

A prediction is needed as accurately as possible of how every option in the plan would change the value of every indicator.

5.2.5.7.2 Indicators were selected from those recommended by the various higher-level strategies with which the LDF is required to conform. This

resulted in more than 200 indicators being put forward in the Sustainability Appraisal Framework (as set out in the Draft Scoping Report). It soon became clear that with so many indicators the Appraisal procedure would take far too long, and any conclusions would be lost in a morass of tabulations. The number was reduced to twelve - one per headline objective, but some new ones had to be added subsequently to comply with government requirements for monitoring of council performance. The final list therefore includes 20 indicators;-

5.2.5.8 The selected indicators

Health, housing & neighbourhoods (headline objectives 1-5)

1. Standardised mortality ratios (all causes)
2. Volume of affordable housing completed
3. % homes meeting BRE "Eco-homes" excellent standard or similar.
4. Domestic burglaries per 1000 households
5. % of residents concerned by local safety and noise intrusion in their local area.

Work and education (headline objective 6)

6. Proportion of people of working age in work
7. % of residents reliant on Income Support
8. Young people at age 19 with Level 2 qualifications (5+ GCSEs at grades A*-C or NVQ equivalent)

Transport and air quality (headline objectives 8 & 9)

9. % of residents with easy access to key local services (i.e. < 500m 15 minutes walk to post office, food shop, GP, primary school)
10. Public transport, cycling and walking as % of all travel
11. Exceedences of guide limits for NO_x and PM₁₀

Design, conservation and open space (headline objective 7)

12. Number of schemes carried out following a Flood Risk Assessment to reduce risk and impact of floods
13. No. of sites or features with conservation or enhancement schemes
14. Proportion of residential development which is on previously developed land
15. No. of sites of national and local nature conservation importance

Resource efficiency (headline objectives 10-12)

16. No. of planning permissions with resource efficiency features e.g. reused materials in design, either as a planning condition or other agreement
17. CO₂ emissions per head (tonnes /yr.)
18. Energy use per household (gas and electricity)
19. No. of properties in Borough with installed renewable energy capacity (*proxy for on-site renewable sources*)
20. % of waste diverted re-used or recycled

5.2.6 STAGE B – DEVELOPING AND REFINING OPTIONS

5.2.6.1 STAGE B1 - PRELIMINARY APPRAISAL OF POSSIBLE OPTIONS

5.2.6.1.1 A requirement of the SA is to assess a reasonable number of alternative options. Around 300 options were the subject of public consultation at the Issues and Options stage in the autumn of 2005. These, termed "Possible Options" were all evaluated to see how far each contributed to the 12 sustainability headline objectives. The scores were positive, negative, zero or uncertain contribution to each objective. The evaluation includes suggestions to improve the contribution to these objectives of each option. Alternative options that were suggested during the consultation were also appraised. The full results of this evaluation are published in the full Report. The conclusions were used by the LDF team alongside planning criteria and the responses to consultation to select the final list of options, termed "Preferred Options". The results of this stage of the exercise are therefore a set of "Preferred Options" – 80 in the Core Strategy and 20 in the Sites Specific Allocations DPD.

5.2.6.2 STAGE B1 - FULL APPRAISAL OF PREFERRED OPTIONS

5.2.6.2.1 The Preferred Options were then re-appraised. This second appraisal was to predict the wider incidental consequences of the option, in addition to the results the option was intended to achieve. The nature of the preferred options meant precise quantitative forecasts were not feasible, and the opportunity was taken to simplify the extremely complex procedure. Even so the final results run to 70 pages. The full set of tables is included in the Full Report. A written summary of the conclusions for each Preferred Option is in this Report.

5.2.6.3 STAGE B2 – CONSULTING ON THE EMERGING OPTIONS

5.2.6.3.1 The recommended appraisal procedure includes public consultation. The council's Sustainable Development Corporate Working Group provided officer-level feedback. The Local Agenda 21 Forum – a partnership community group with a special interest in these issues – were consulted on the Draft Scoping Report, and on the proposed procedure at a special public consultation meeting on the Issues & Options Report. They were also consulted on presentation of the full results. On each occasion the Forum considered the procedure a technical exercise too complex and detailed to allow members of the public the time to consider the results properly, and was sceptical about the value of consultation. Both the Forum and the Working Group considered the detailed tables needed a simplified presentation, but at the same time a fuller explanation of the conclusions reached was needed. These changes are incorporated into the full SAR, which is available on request.

5.2.7 STAGE C – APPRAISING THE EFFECTS OF THE PLAN

5.2.7.1 The purpose of this stage is to predict the consequences of the plan, as measured by the changes to the selected indicators. Appraisal of the

potential effects of the emerging final version of the Draft Core Strategy Preferred Options was undertaken. The policies were 'scored' using a six point scale to indicate the likely potential significant effects (i.e. major positive effects, minor positive effects, neutral effects, minor negative effects, major negative effects, and uncertain or mixed effects). An important function of the Appraisal is to propose mitigation and enhancement measures and make recommendations as to how policies could be improved. The "scores" and recommendations are recorded in a series of tables, included in the full SA Report.

5.2.7.2 In this non-technical summary only the written conclusion and recommendations from the assessment of each option are included. These are set out for each option following a general summary of the package of preferred options

5.2.7.3 It should be noted that the SA of the site specific allocation preferred options follows on from that of the Core Strategy and therefore should be found to both support and conform to those findings of the SA of the Core Strategy DPD.

5.3 SUMMARY OF CONCLUSIONS FOR PREFERRED OPTIONS

5.3.1 General Conclusions

5.3.1.1 The majority of preferred options are written in broad terms which make it difficult to forecast their likely effects with certainty. Generally all the options are likely to have favourable impacts in at least one, and usually several of the social and economic indicators of sustainable development, but it is often not clear from each option which use will predominate. The options have improved during the process following iterative discussions with the LDF team, and so the text of the final "Preferred Options" may be different from the earlier "Possible Option" at the Issues & Options stage.

5.3.1.2 The options do not always allow for the analysis of the possible conflicts between different uses on the same or adjacent plots of land, or the consequences for climate change of total environmental resource consumption when all sites have been developed.

5.3.2 CONCLUSIONS FOR EACH PREFERRED OPTION

ISSUE 1 – SUSTAINABLE DEVELOPMENT

Comment

5.3.2.1 As sustainable development is a requirement for the LDF and a key sustainability objective it is not practicable to carry out an appraisal on this issue. Rather the need is to develop planning policies to adapt to climate

change through 'component' policies on Energy, Waste, Flooding and water management within the SA of the Generic Development Control Policies DPD.

ISSUE 2 - HOUSING SUPPLY

ISSUE 2.1 SHOULD SITES FOR THE CONSTRUCTION OF NEW HOUSING BE PROVIDED BY RELEASING EMPLOYMENT LAND

Option 2.1.1(b) Designate land for housing in the LDF in site specific proposals where this can be accommodated without compromising other objectives.

Comment

5.3.2.2 There is no reason to expect a significant difference in **overall** sustainability in this option. This is because a controlled amount of employment land is redeveloped for housing. The policy recognises that both new housing and new employment opportunities are planning objectives, and therefore the policy should not compromise other objectives. Housing is perhaps more likely to have adverse resource impacts because of the larger number of individuals making decisions on the use of resources. But in either case the impact can be reduced if suitable standards are required by generic development control policies. This preferred option is better than similar options because it provides for more precise regulation of changes of use from employment to housing use.

Option 2.1.4 Identify sites within the LDF Sites DPD with the potential for mixed use that enables the potential for increased housing provision whilst still retaining provision for economic activity

Comment

5.3.2.3 The difference between this option and option 2.1.1(b) is difficult to appraise. Both seem to propose a change-of-use of employment land to a mixed use – whether a whole site or just part of one is not clear. Mixed use sites are probably broadly more sustainable than rigid zoning because they enable several sustainability objectives to be achieved, and generally allow savings in transport use and expenditure. The impacts are more difficult to predict because neither option provides detail on the criteria to be used on choice of site, the balance of uses preferred, or the location.

Option 2.1.6 Use a balanced plan led approach to release land for housing identifying some sites in the LDF Sites DPD for housing, some for economic activity and some for mixed use intensification based on identified need for both uses

Comment

5.3.2.4 The meaning of this option, and the difference between it, and those already considered, is difficult to work out. In terms of sustainability the same verdict as for 2.1.4 seems appropriate.

Option 2.1.7 Continue to protect Strategic Employment Locations (SELs) in accordance with London Plan policy#

(# this is taken to mean a "no housing" option, as set out in paras. 3.129 – 3.130 of the Draft Further Alterations Sept 2006 document)

Comment

5.3.2.5 This option may result in little change to employment sites, depending on how much is considered surplus. It is therefore sustainable in that it is unlikely to require significant use of resources.

ISSUE 2.2 - WHAT SCOPE IS THERE FOR HIGHER DENSITY HOUSING DEVELOPMENTS?

Option 2.2.1 Specify higher densities in line with the London Plan and define areas of the borough where these densities will apply having regard, in particular, to public transport accessibility.

Comment

5.3.2.6 In principle this option favours higher densities, and could contribute to sustainability by more efficient use of land, i.e. bringing uses close together, so reducing the energy used in moving between uses, and the potential for co-operative services such as energy generation. However higher densities make it probable that some adverse impacts on quality of life will occur making it less sustainable, e.g. noise disturbance, loss of open character, impact on biodiversity. The areas of the Borough to which the higher densities are to apply are not specified, so it is difficult to make a full appraisal because the local impact will depend on the detailed design, and there may be scope for mitigation of the impacts.

ISSUE 2.3 SHOULD THERE BE MORE MIXED-USE DEVELOPMENTS TO INCREASE THE OPPORTUNITIES FOR NEW HOUSING? IF SO WHERE? SHOULD THESE BE LOCATED?

2.3.2 Encourage mixed use in town centres, if it can be demonstrated that this will add to the vibrancy and vitality of the centre

Comment

5.3.2.7 This issue is substantially the same as Issue 2.1 except that this option deals with town centres rather than employment land. The majority of

indicators point in a similar direction, and the option is more sustainable because it allows for a wider range of acceptable uses designed to increase the vitality of the town centre – not just only employment or housing. Nevertheless detailed

zoning and design briefs are needed to ensure the potential increase in sustainability is actually achieved.

Option 2.3.3. Allow existing business accommodation above shops to change to residential subject to there being no demonstrable impact on economic objectives

Comment

5.3.2.8 This is really just a more restrictive variation of option 2.3.2. If the loss of a business premise really does have no impact on local economic objectives then any other use is likely to increase the sustainability of the town centre

Option 2.3.7 Accept mixed use development where it would assist in the provision of a type of business accommodation for which there is an identified need and not prejudice other economic objectives

Comment

5.3.2.9 This option has substantially the same impacts as the previous option, except that mixed uses are replaced by only one alternative user-business accommodation. The option is therefore also not recommended on sustainability grounds.

ISSUE 2.4 SHOULD ESSENTIAL SERVICES BE PROVIDED WITH NEW HOUSING?

Option 2.4.1 Ensure that health facilities are provided in mixed-use schemes (see also Option 10.1.2)

Comment

5.3.2.10 This option will improve sustainability in terms of health-related lifestyles. It should also improve the sustainability score for other indicators, except where the housing site is so small that provision of health facilities will displace other social uses. The balance of sustainability advantage between such competitive uses may vary between sites, and location of nearest alternatives. New health facilities are likely to contribute to sustainability, but it is not clear why they have been singled out, and not alternative uses that may benefit the local community.

ISSUE 3 - HOUSING NEEDS AND AFFORDABILITY

ISSUE 3.1 THE DEFINITION OF AFFORDABLE HOUSING

Option 3.1.2 - Adopt a definition in line with London Plan

Comment

5.3.2.11 This option has been appraised for sustainability by the GLA for the London Plan. Further appraisal is unnecessary.

Option 3.1.4 Include sub-market housing within the definition of affordable housing. *It is assumed that the total of affordable housing is unchanged. So more sub-market housing means less socially rented housing*

Comment

5.3.2.12 This option will generally provide sustainability benefits, with a small improvement because of the increased variety in the types of affordable housing. A possible impact may be an increase in private car use as the residents of sub-market housing may be more likely to work unsocial hours, and use their car for work journeys.

ISSUE 3.4 THE OVERALL TARGET FOR AFFORDABLE HOUSING PROVISION

Option 3.4.2 Introduce a lower monitoring target.

Comment

5.3.2.13 This may reduce the volume of affordable housing for some of the more vulnerable groups, but it may not cause any significant change in environmental impacts. This could be monitored.

Option 3.4.4 - Measure affordable housing percentages by floorspace as opposed to units.

Comment

5.3.2.14 A different way of measuring the ratio of affordable housing can be expected to change the sustainability appraisal only marginally. It could benefit families, since an increase in the number of large affordable premises may be possible. Other impacts are unlikely to be varied by the size of the dwelling unit.

ISSUE 3.6 THE PROVISION OF AFFORDABLE HOUSING ON "EXCEPTIONS" SITES

Option 3.6.2 – Promote mixed use development, including residential in “windfall” schemes except where there are strategic or other overriding economic or environmental reasons why this should not be the case

Comment

5.3.2.15 The principle of mixed use development has been accepted as generally sustainable – see issues 2.1.4, 2.1.6 and 2.3.2., although this is

likely to increase the development of housing on former employment sites, which no longer have a presumption in favour of retaining the land for employment uses

ISSUE 4 - QUALITY OF HOUSING

5.3.2.16 There are no preferred options for these issues in the Core Strategy as they will be considered through the Generic Development Control Policies DPD process.

5.3.2.17 There is also a SPD on Sustainable Construction which itself will be subject of an SA and will be expected to be in conformity with LDF DPD's.

ISSUE 5 - ECONOMY AND JOBS

ISSUE 5.1 THE WHITE CITY OPPORTUNITY AREA

Option 5.1.2 – Designating and identifying the White City Opportunity Area for employment uses, but this will be subsidiary to the main objective of providing more housing.

Comment

5.3.2.18 This meaning of this option is not clear as to what kind of employment use is likely if the main objective option is to provide more housing. It is possible that despite the designation, no employment uses will occur, because the housing objective overrides the designation. A full sustainability appraisal of the detailed proposals should be carried out by the developer consortium.

Option 5.1.3 Develop as a showcase for sustainability

Comment

5.3.2.19 Obviously this option is sustainable by definition. However much will depend on how this aspiration is translated into on-the-ground development. As already noted a full sustainability appraisal is appropriate at the Master Plan stage

ISSUE 5.2 THE HYTHE ROAD EMPLOYMENT ZONE

Option 5.2.1(b) - Include the Mitre Way industrial estate

Option 5.2.1(c) - Include the Eurostar Depot

These two options are considered together as they are similar proposals – to confirm these sites as part of the Employment Zone. This means they would be

developed in accordance with the preferred options for the whole Employment Zone. Please see assessment below (option 5.2.2)

Option 5.2.2(a) - Continue to designate area for primarily industrial and distribution uses including the promotion and protection of waste management sites and the exclusion of residential.

Comment

5.3.2.20 The protection and enlargement of an employment zone is generally sustainable, and the extension of the zone could provide the impetus for further improvements e.g. in mutual facilities for generating renewable energy, waste recycling and securing improvements to public transport

Option 5.2.3 Prepare a comprehensive action plan for rail and canal to enable greater coordination of these two sustainable transport modes

Comment

5.3.2.21 This option does not provide any information about the nature of the proposals in the proposed plan, or which areas of the Borough it will apply to. Therefore detailed analysis is not possible, but in principle the option is likely to reduce environmental impacts, particularly of road transport.

ISSUE 5.3 OTHER EMPLOYMENT ZONES

Option 5.3.1 - Continue to designate the employment zones for business and industry with limited scope for change of use, but consider minor boundary changes to recognise changed circumstances. *It is assumed this option proposes to continue UDP policy E1, which allow most B class uses, and sometimes a small amount of retail, but with a limit on offices. This implies no increase in the scope for change of use, but some scope for adjusting boundary.*

Comment

5.3.2.22 Overall the changes in the sustainability impact are likely to be small because the proposed planning changes are minor. The precise impact is difficult to forecast because the nature and direction of the changes is not specified by the option. However minor changes to the boundary could provide scope for some tidying-up and improvements to the sustainability of the rest of the estate as a whole.

Option 5.3.2 - Designate some zones where a mix of uses including housing may be permitted provided the employment objectives are met.

Comment

5.3.2.23 This option would seem to have already been appraised as option 2.1.1(b) - q.v.

Option 5.3.3 - Designate new employment zones to protect those employment activities.

Comment

5.3.2.24 It is not considered this option provides enough detail to allow a full appraisal. Any impact is likely to vary with location.

ISSUE 5.5 PROTECTION OF BUSINESS PREMISES OUTSIDE EMPLOYMENT ZONES AND TOWN CENTRES

Option 5.5.2 - Maintain a high degree of protection of premises in the most favourable locations (e.g. in terms of accessibility, capacity and environment). This could include the designation of additional employment zones. Allow more flexibility elsewhere particularly to alternative employment generating uses or housing.

Comment

5.3.2.25 This option is difficult to assess because it is not clear what proportion of the total number of premises will gain the high degree of protection, or which premises are considered to be in the most favourable location. Additional employment zones are left as a possibility, and the scope of the flexibility for other uses is unspecified. However the impact is likely to be relatively small as the scale of any changes likely are also small. There is scope for improvement, but achievement of this potential is likely to need additional "preferred options" in related policy areas e.g. energy, waste and recycling.

ISSUE 6 - TRANSPORT AND ACCESSIBILITY

ISSUE 6.1 IMPROVING THE PUBLIC TRANSPORT INFRASTRUCTURE

Option 6.1.1 - Secure access improvements for people with disabilities as part of planning permissions.

Comment

5.3.2.26 This option can be supported in principle as sustainable. But an Access & Design Statement and/or an environmental impact assessment may be appropriate for significant proposals to ensure the details are also sustainable

Option 6.1.2 - Maintain the aspirations for a new station on the Central Line at Du Cane Road.

Comment

5.3.2.27 This aspiration can be supported as sustainable in principle. However it is not clear what actions, if any, might be taken to implement this aspiration. These may not be sustainable in other ways, e.g. more if more parking is provided.

Option 6.1.4. Achieve local improvements to public transport infrastructure through development.

Comment

5.3.2.28 This option can be supported as sustainable in principle. This does not mean that the development which "funds" the improvement is sustainable overall just because improvements to public transport are achieved.

Option 6.1.5 Identify rivers and canals for sustainable transport and movement of freight

Comment

5.3.2.29 This option may have an impact on the nature conservation value of the waterway, but this could be safeguarded. Otherwise it is sustainable, and should be supported

Option 6.1.7 Develop aspirations for a Cross Rail interchange at Willesden Junction

Comment

5.3.2.30 This option does not provide any details on how the aspirations will be developed. Therefore it is not possible to assess the impacts, although insofar as it should result in greater public transport accessibility the net impact is likely to be sustainable.

Option 6.1.8 Ensure that transport infrastructure necessary to support development is in place before the development opens

Comment

5.3.2.31 This option is necessary but not sufficient to ensure sustainability. Clearly if the infrastructure is NOT in place then the development is likely to cause unsustainable impacts. It is also necessary that the infrastructure is a sustainable mode. However just to provide basic transport infrastructure does not guarantee the development is sustainable on other grounds, and may not be adequate. Any development is likely to result in an unsustainable consumption of resources, and will need to be justified by achievement of a quality-of-life sustainability objective e.g. an improvement to transport infrastructure beyond the bare minimum to prevent a regression in transport quality.

Option 6.1.9 Promote the continued use of the West London Line

Comment

5.3.2.32 This option is ambiguous, in that the nature of the continued use being promoted is not specified. Through freight services are sustainable, but not in local terms. Local sustainability requires promotion of use for local passenger traffic, but it is possible that the long-distance freight would provide greater national sustainability effects.

ISSUE 6.3 PUBLIC TRANSPORT ACCESSIBILITY LEVELS AND PLOT RATIOS

Option 6.3.2 - Relate housing, shopping, leisure, education and other types of development to public transport accessibility.

Comment

5.3.2.33 This option is presumably designed to ensure accessibility is improved in line with development, but does not specify exactly how development will be related to public transport accessibility e.g. will development be limited and/or accessibility improved. It is therefore perhaps a necessary condition rather than a yes/no option.

Option 6.3.4 Allow greater flexibility in relation to plot ratio, based on factors such as type of employment, context, built environment, etc

Comment

5.3.2.34 This option does not indicate the nature of the flexibility to be allowed, or how the level of flexibility will be determined in relation to the factors listed. There are no specific characteristics of the option which can be assessed.

ISSUE 7 - TOWN CENTRES

ISSUE 7.1 GENERAL STRATEGIES FOR EACH TOWN CENTRE

Option 7.1.1 Consolidation

Option 7.1 .2 Encourage change and improvement in particular functions or aspects of centre

Comment

5.3.2.35 Both options seem very similar, and would continue current policies, but consider potential refinements and opportunities. Both are difficult to assess because it is unclear which improvements and changes would be encouraged and implemented.

Option 7.1.3 Positively seek opportunities for growth, regeneration and development through site proposals

Comment

5.3.2.36 No assessment is practicable because no details of proposals are given.

Option 7.1.6 New commercial developments outside town centres (over 2,500 sq.m.) for retail and leisure and possibly some smaller schemes to be subject to the sequential approach and provide impact assessments

Comment

5.3.2.37 No assessment is practicable because no details of proposals are given. The sequential approach does not guarantee sustainability or minimise

environmental impacts because it is based on satisfying the "need" (whose need?) for a development

ISSUE 7. 2 THE MIX OF USES IN TOWN CENTRE SHOPPING FRONTAGES

7.2.2 Allow more flexibility in some frontages.

Comment

5.3.2.38 This option should lead to a greater variety of uses in a town centre, so fulfils many sustainability targets. However it does not specify which new uses will be allowed, where and how many. It is therefore difficult to forecast the impacts. The option should indicate the criteria for determining whether an application falls within the new flexible limits, and degree of flexibility that will be allowed.

Option 7.2.3 - Take a different approach towards the acceptability of restaurants/cafes, take-always, public houses/bars.

Comment

5.3.2.39 This option cannot be assessed because the approach is not specified.

ISSUE 7.3 OFFICES (B1A USE CLASS)

Option 7.3.1 - Hammersmith Town Centre and White City Opportunity Area as preferred location for office development over 2,500sqm.

Comment

5.3.2.40 This option is likely to increase the amount of office floorspace because the proposed White City Opportunity Area is significantly larger than the area of the White City Centre (Site 36) which is predominantly retail, although large offices are allowed by the UDP. However if offices are to be built then clusters in a limited number of locations is likely to be the most sustainable option. Nevertheless mandatory requirements in sustainable construction policies are more likely to be effective than guidance. The types of shops near large offices may not be so suitable for local residents, so preferential policies for such uses may be appropriate in other parts of centre. Fulham may have fewer large offices, so policies to encourage other developments should be considered.

Option 7.3.2 - In Hammersmith Town Centre future development sites in some locations should provide a greater mix of uses in addition to offices where this would not impact on the centre as the Borough's preferred office location

Comment

5.3.2.41 This option is similar to option 7.2.2. It should lead to a greater variety of uses, so is in principle fulfilling many sustainability targets. However it does not specify which new uses will be allowed, where and how many. It is therefore difficult to forecast the impacts.

Option 7.3.3 - Office developments in Shepherd's Bush and Fulham centres should be small or medium scale and normally include a mix of uses that will assist in the regeneration of the centres and promote the visions for these centres.

Comment

5.3.2.42 This option is similar to option 7.3.2. Like that option it should lead to a greater variety of uses, so is in principle fulfilling many sustainability targets. However it does not specify which new uses will be allowed, where and how many. It is therefore difficult to forecast the impacts.

Option 7.3.4 - Consider office proposals favourably elsewhere if the sequential test may be satisfied

Comment

5.3.2.43 This option is interpreted to mean since no precise locations are made that the location of office proposals within the town centre will follow the sequential approach, as set out in PPS6. It is not interpreted to encourage development outside the three identified town centres, unless the need is clear. On this basis it is in principle sustainable because it is in accordance with national guidance. It is also normally sustainable in local terms because the more central locations have the better public transport accessibility. In the case of the three older town centres this is not wholly correct. The key transport links — the stations --- are off-centre. To maximise sustainability the option should be modified to give more weight to transport accessibility.

ISSUE 7.4 RESIDENTIAL IN TOWN CENTRES

Option 7.4.2 - Allow residential in schemes if other town centre objectives are met, such as for improved shopping and leisure and retention of business opportunities

Comment

5.3.2.44 It is difficult to assess this option. It may be sustainable if all objectives other than housing are met.

ISSUE 7.5 LEISURE & RECREATION IN TOWN CENTRES

Option 7.5.1 - Give high priority to retaining the major leisure venues in leisure or recreation use.

Comment

5.3.2.45 This option envisages little change from the status quo, so will cause few changes in the values of impact indicators. It is difficult to assess the impact of the option because it is not clear how to predict the effects of "giving high priority to retaining...."

Option 7.5.2 Encourage new leisure and recreation activities to locate in town centres, subject to criteria including location and hours of operation.

Comment

5.3.2.46 It is difficult to assess the scale of probable impacts because the option does not specify any of the criteria. The direct impacts from more leisure and recreational facilities are likely to be mixed. There should be benefits to health, but possible adverse effects relating to energy & CO₂ emissions, noise and greater use of private transport due to the hours of operation. There will also be opportunity costs in terms of the increase in shops and skilled jobs that will be foregone. However mitigation should be possible by the specification of these criteria in the option, preferably as firm quotas and design standards.

ISSUE 8 – SHOPPING

ISSUE 8.1 PLANNING FOR MORE SHOPPING DEVELOPMENT

Option 8.1.2 - Plan for greater increase in shopping floorspace and improvements in particular areas.

Comment

5.3.2.47 This option should stimulate regeneration, and impacts on employment etc are likely to be beneficial, but it is uncertain that this option is the most sustainable way of achieving this level of benefits, because it presupposes more developments, requiring more energy consumption. Some fields e.g. health may not show positive impact, and it is not possible to predict net balance of these sustainability impacts, because the nature of the improvements and their location are not specified. The policy could be more sustainable if mixed-uses are encouraged, and if locations are chosen to fulfil local needs and deficiencies in provision. This could be achieved by including criteria for location relating to shopping accessibility, areas of deprivation etc

ISSUE 8.2 THE LOCAL SHOPPING HIERARCHY

Option 8.2.2 - Adjust the hierarchy to designate and give greater importance to some centres or parades.

Comment

5.3.2.48 The impacts of this policy cannot be assessed as there is insufficient detail on the proposed changes

Option 8.2.3 - Extend or decrease the area of each centre that is protected.

The assessment is based on the assumption that the length of frontage either increases or increases, but the policy status and degree of protection does not vary.

Comment

5.3.2.49 There are possible problems if an already long parade is extended. However a reduction in centre size will reduce its value to potential users, and may lead to extra journeys being made to a different centre

Option 8.2.5 Acknowledge that Shepherd's Bush / White City will function as a shopping centre of metropolitan significance in the local retail hierarchy.

Comment

5.3.2.50 The Westfield development already permitted will effectively make it a centre of metropolitan significance, and therefore assessment is not necessary

ISSUE 9 - LEISURE AND RECREATION

ISSUE 9.1 THE LOCATION OF NEW LEISURE AND RECREATION FACILITIES AND THE PROTECTION OF EXISTING SITES

Option 9.1.2 - Maintain the town centre focus, but be more flexible over the use of sites where activities close down elsewhere.

Comment

5.3.2.51 This assessment assumes the option is to maintain leisure and recreation facilities, particularly in town centres, but not necessarily elsewhere. It is not clear what is meant by more flexibility over the use of sites. Closures of facilities are likely to have adverse effects on health. A full assessment of the availability and accessibility of alternative facilities to a specific standard is needed.

Option 9.1.3 Develop policies for arts, culture and tourism

Comment

5.3.2.52 This option needs further development of the policies before assessment is possible.

Option 9.1.6 Identify sites for sports and leisure and recreation (L&R) premises based on need

Comment

5.3.2.53 The main impact is likely to depend on the exact location chosen e.g. how close it is to other facilities such as shopping, and the spin-off effects on the use of transport. This is easier to assess when specific locations are

known, but in broad terms new facilities in or close to town centres or transport nodes are more likely to be sustainable, particularly if existing buildings can be re-used, rather than new ones constructed. Subsidiary issues are how need is to be assessed. This should include the need to minimise average travel distance to particular facilities, and the need to improve indicators of poor health.

Option 9.1.7 Maintain approach that seeks dual use of community facilities, including schools

Comment

5.3.2.54 This option could be more sustainable where it can make more efficient use of existing facilities. However plans for increasing sustainability in future developments may then be constrained by the character of the site and buildings.

Option 9.1.8 Ensure that developments provide for the leisure / recreation needs of their occupants

Comment

5.3.2.55 This option is clearly sustainable if it aims to ensure the needs of the occupants are met. It is however not possible to estimate the impacts because there is insufficient detail on how leisure needs will be assessed, and whether all leisure needs are met – this may not be a realistic option. Nor is it clear how the needs will be met – in other words how the option will be implemented. A final verdict on this option and its environmental impacts is therefore not yet possible.

ISSUE 10 - EDUCATION, HEALTH & COMMUNITY SERVICES

ISSUE 10.1 MAKING PROVISION FOR FUTURE HEALTH, EDUCATION AND COMMUNITY SERVICES NEEDS

Option 10.1.1 - Identify premises needs and safeguard sites, possibly as part of mixed use development.

Comment

5.3.2.56 The impacts of this option could make a positive contribution to sustainability. However the actions proposed are only a starting point, and need to be supplemented by action beyond safeguarding. These are not specified in this option and may have further impacts which cannot be assessed at present.

Option 10.1.2 - Ensure that developments contribute to the provision for healthcare needs of their occupants.

Option 10.1.4 Ensure that developments contribute to the provision of community service needs e.g. schools, health facilities, meeting places, offices

These two options are so similar that they can be assessed as one. The second deals with a wider range of facilities and users.

Comment

5.3.2.57 The impacts of both options are generally likely to improve sustainability, provided care is taken to ensure the correct location in relation to existing facilities and public transport, and to improve accessibility and levels of service. As with most options standard policies in the Plan are needed for full sustainability to ensure any use is built according to high eco-standards.

ISSUE 10.2 HOSPITALS

Option 10.2.2 - Establish strict planning criteria for any future proposals for major public service facilities, such as hospitals, prisons and schools.

Comment

5.3.2.58 There is no indication of the planning criteria that will be established, so no assessment is yet possible.

ISSUE 11 - OPEN SPACE AND BIODIVERSITY ISSUES

ISSUE 11.1 DESIGNATING OPEN SPACES OF METROPOLITAN IMPORTANCE

Option 11.1.2 - Review MOL boundaries and consider whether areas should be removed or new areas should be designated.

Comment

5.3.2.59 There is no indication of the planning criteria that will be used to review areas and their boundaries, so no assessment is yet possible.

ISSUE 11.2 PROVIDING AN APPROPRIATE LEVEL OF PROTECTION TO EXISTING OPEN SPACE OF LOCAL OR BOROUGH-WIDE IMPORTANCE

Option 11.2.1 - Two additional open spaces – Rowberry Mead and Imperial Wharf Park- are proposed to be designated as being of borough-wide importance. Retain the existing approach towards protection of other sites

Comment

5.3.2.60 The increase in protection provided by the change in designation will have a beneficial impact in terms of overall sustainability in the areas surrounding these open spaces.

Option 11.2.3 - Set out stronger criteria for the protection of local open spaces that are not designated.

Comment

5.3.2.61 Such spaces may come under pressure for housing development, so such a policy is needed. However there is no indication of the planning criteria that will be used to protect undesignated local open spaces, so a full assessment is yet possible.

Option 11.2.4 Prepare an SPD covering locally listed parks and gardens Conclusion of Assessment

Comment

5.3.2.62 There is a case for assessing and protecting any wildlife value of gardens, but no assessment is possible without any indication of the planning guidance that will be included in the SPD.

Option 11.2.7 Protect loss or “paving over” of front gardens

Comment

5.3.2.63 Although benefits are relatively small there is a clear increase in sustainability for neighbourhoods which outweigh the slight loss of convenience for the individual.

ISSUE 11.6 MAINTAINING, INCREASING OR REDUCING THE NUMBER OF NATURE CONSERVATION AREAS IN THE BOROUGH

Option 11.6.2 - Amend or add to the hierarchy, for example removal of White City woodlands.

Comment

5.3.2.64 This option does not provide a clear option because it does not specify how the hierarchy will be amended. The example cited has already been destroyed. It is not therefore practical to assess this option.

Option 11.6.3 - Require developers to show how their schemes will enhance biodiversity.

Comment

5.3.2.65 This option will clearly improve biodiversity in the Borough. However it will not be effective without criteria in the plan to assess the developer's claims, and mechanisms to ensure biodiversity proposals are implemented. The option does not set out requirements for developers' schemes, so cannot be further assessed.

Option 11.6.5 Ensure the protection and enhancement of biodiversity in all parks, gardens, cemeteries etc in the borough

Comment

5.3.2.66 This option will help to protect and enhance biodiversity, and also local character and amenity. No details are given on how this will be done. It really should not be considered as an option, but an essential requirement in the Plan. More important is to consider the sustainability impacts of proposals to extend the policy to private gardens.

ISSUE 11.7 TREE PLANTING

Option 11.7.2 - Ensure protection of existing trees, and provision of new trees, on development sites

Comment

5.3.2.67 This option will help to protect and enhance biodiversity, and also local character and amenity. No details are given on how this will be done. It really should not be considered as an option, but it should be an essential requirement in the Plan that existing trees are to be protected, replaced if necessary, and supplemented by new trees whenever possible.

ISSUE 12 – RIVER & CANAL ISSUES

ISSUE 12. 4 PROTECTION OF WHARVES

Option 12.4.1 - Maintain level of protection consistent with the London Plan and resist development that would prejudice the continuation of wharves (See Sites DPD).

Comment

5.3.2.68 This is a policy of the London Plan, and therefore there is no need to assess it for inclusion in the LDF

Option 12.4.3 - Ensure that development on adjacent sites does not prejudice wharves

Comment

5.3.2.69 This option is sustainable, but may need to be strengthened to avoid the impacts it seeks to avoid occurring in the future once development on the adjacent sites is completed, particularly if the development is for housing.

ISSUE 13 - URBAN DESIGN AND CONSERVATION

ISSUE 13.1 SECURING A HIGH QUALITY DESIGN AND AN INCLUSIVE ENVIRONMENT: THE GENERAL APPROACH

Option 13.1.1 - Maintain a strong emphasis on achieving quality design

Comment

5.3.2.70 This does not provide any indication on how it would be implemented, so is difficult to appraise. However present policies seem to emphasise prevention of "unsuitable" design, rather than stipulation of what is appropriate. This has to date tended to have a negative impact on the implementation of sustainable design features, so a more proactive approach to encouraging sustainability may be necessary for this option.

Option 13.1.2 - Introduce more supplementary planning guidance on design matters, such as light wells, shop fronts, public art, advertisements and inclusive design.

Comment

5.3.2.71 This does not provide any policy guidance to be offered in the guidance, so is difficult to appraise. However present policies seem to emphasise prevention of "unsuitable" design, rather than stipulation of what is appropriate. This has to date tended to have a negative impact on the implementation of sustainable design features, so a more proactive approach to encouraging sustainability may be necessary for this option.

Option 13.1.3 Require preparation of Access and Design Statements for all major developments.

Comment

5.3.2.72 This is now a mandatory requirement. The question arises how "major" is to be defined. In practice developer statements have not always included proposals for sustainability, and the final development does not always achieve the sustainability Plan's objectives. The option could consider taking a more proactive approach using checklists of the council's requirements, which the developer must state whether they have been met, and if not why not, and what s/he proposes in mitigation.

ISSUE 13.2 THE APPROACH TO DEALING WITH TALL BUILDINGS

Option 13.2.2 - Identify specific areas suitable for tall buildings, namely the White City Opportunity Area and the central area of Hammersmith town centre, and include criteria on acceptability.

Comment

5.3.2.73 The impact of this option is difficult to appraise because no indication is provided of what is a tall building, or the criteria on acceptability that will be included.

Option 13.2.3 - Identify areas of special character that would be sensitive to tall buildings, the areas not included in Option 13.2.2.

Comment

5.3.2.74 The impact of this option is difficult to appraise because no indication is provided of which areas of special character would be considered sensitive, or the criteria that are to be used in making this decision. Nor is it clear what the proposals would be for sensitive areas and non-sensitive areas. This option could be very restrictive or very relaxed in the attitude towards tall buildings, but needs to ensure areas on the north side of the tall buildings are not in the shade for most of the day.

ISSUE 13.9 FLOODING

Option 13.9.1 - Maintain existing UDP approach, mainly concerned that riverside developments minimise flood risks and maintain integrity of defences.

Comment

5.3.2.75 All options for this issue are likely to restrict opportunities for development, but will improve the impacts of the LDF overall. However LDF policies need to apply the strategy set out in PPS25 to appraise, manage and reduce risks from flooding

Option 13.9.2 - Develop policy that provides more details on measures, such as SUDS techniques, that can minimise flood risk across the borough and seek flood risk assessments.

Comment

5.3.2.76 This option is consistent with PPS25, but needs to provide requirements for development, rather than simply providing detail of possible measures.

Option 13.9.3 - Give priority in allocating or permitting sites for development, in descending order to the flood zones identified by the Environment Agency

Comment

5.3.2.77 This option needs to be revised to meet more accurately the requirements of PPS25 in a way that is appropriate for a fully developed part of London. In particular development is rarely likely to be refused because it falls within a higher flood risk zone. The plan needs a proactive approach to development proposals to minimise or mitigate flood risks. This should be achieved by firm design requirements both in the Core Strategy, and in the Generic Development Control policies, supplemented by Guidance documents if necessary.

ISSUE 14 - ENERGY CONSERVATION AND RENEWABLE ENERGY
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ISSUE 14.1 - ENCOURAGING ENERGY CONSERVATION IN NEW DEVELOPMENTS

ISSUE 14.2 - ENCOURAGING RENEWABLE ENERGY PRODUCTION

Comment

5.2.78 There may need to be additional policies requiring energy conservation and the use of renewable energy, following the adoption of the proposed supplementary sections of PPS1. These will need to be part of the Core Strategy. There may also need to be specific further options in the Core Strategy relating to climate change issues, as a result of the new PPS, and possibly the Climate Change Bill. These will need to be reviewed prior to the submission of the final version of the Core Strategy to the Secretary of State.

ISSUE 15 - WASTE AND RECYCLING

ISSUE 15.1 - THE NEED FOR SITES FOR PROCESSING OF RECYCLABLES

Option 15.1.1 - Identify specific sites or areas, e.g. within the Sites DPD, where the processing sites should be located.

Option 15.1.2 - Set out criteria for assessing the scope of any development site to provide a location for these facilities.

Comment

5.3.2.79 Both options should improve the sustainability impacts of the LDF, but neither of these options provides sufficient detail on possible sites or criteria for full sustainability appraisal.

ISSUE 15.2 - ENSURING THE DESIGN OF NEW DEVELOPMENTS INCLUDES PROVISION FOR THE OCCUPANTS' ABILITY TO RECYCLE, IN ORDER TO MEET TARGETS FOR DIVERTING MUNICIPAL WASTE FROM LANDFILL

Comment

5.3.2.80 There is a need for the criteria for this policy to be set out in the Core Strategy, and to be supplemented by generic development control policies, and supplementary guidance on all aspects of sustainable design and construction. The option should apply to all new buildings, and wherever reasonably possible to alterations to existing buildings.

5.4 APPROPRIATE ASSESSMENT

5.4.1 The council is of the opinion that there are no proposals in the LDF which will have a significant effect on any of the areas designated under the relevant European Union Habitat Directives.

5.5 IMPLEMENTATION AND MONITORING

5.5.1 Appropriate arrangements will need to be included in the general proposals for monitoring of the LDF through successive Annual Monitoring

Reports (AMR's). The process is described in more detail on pages 19/20 of the council's Revised Local Development Scheme (LBH&F March 2007).

5.6 THE DIFFERENCE THE PROCESS HAS MADE

5.6.1 The SA has been carried out by environmental policy officers as a separate team working in a collaborative exercise with the LDF team. This has enabled many changes to improve the sustainability of the LDF to be incorporated as the options were developed, and allowed the appraisal team to take account of policy proposals as they have been developed. Both teams have respected the other's functions and independence.

5.7 NEXT STEPS

5.7.1 Several major challenges remain, many due to the rapidly developing national and regional framework. The flexible nature of most of the core strategy preferred options will allow the detailed proposals that are developed to incorporate the most up-to-date sustainability requirements.

5.7.2 It will also be necessary to ensure that there are adequate generic development control policies, site briefs and supplementary guidance documents. In the new situation provided by the need to take measures to adapt to climate change, such additional policies and guidance is perhaps even more essential than guidance on traditional conservation and design issues.

SECTION 6. NON-TECHNICAL SUMMARY: SITE ALLOCATIONS

**LDF: SITE SPECIFIC ALLOCATIONS PREFERRED
OPTIONS**

SUSTAINABILITY APPRAISAL REPORT

NON-TECHNICAL SUMMARY

CONTENTS OF NON-TECHNICAL SUMMARY OF SA OF SITE SPECIFIC ALLOCATIONS

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6.1 INTRODUCTION

6.1.1 Purpose of this document

6.1.1.1 This document is a part of the council's consultation on its draft set of Preferred Options for the Site Allocations DPD of the Local Development Framework (LDF). In accordance with the Planning & Compulsory Purchase Act 2004 the Council is required to carry out a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Preferred Options. The council must publish for consultation a SA Report indicating its conclusions. The full Report must include a Non-Technical Summary. This is also published separately as well as forming part of this document.

6.1.1.2 This Non-Technical Summary provides an overview of the process, showing how it was carried out. The main conclusions are set out for each site. This Council has carried out an Appropriate Assessment for sites of nature conservation importance covered by the European Union Habitats Directive 1992. This has concluded that none of the proposals will have a significant impact on any of these sites.

6.1.2 How to comment or obtain further information

6.1.2.1 We are asking for your comments on the SA of the site options put forward within this document. Do you agree with our assessments? If you wish to refer to the full SAR this can be downloaded from the council's website, or from the addresses below. Information on how to comment on the options themselves is contained in the Preferred Options document

Please make sure we receive your comments by **Friday 3 August 2007**

Please make your comments in writing, if possible, and make clear which section, issue or option you are commenting on.

Please send your comments using the contact methods below.

By email to: LDF@lbhf.gov.uk

By using the form on the website: www.lbhf.gov.uk

Team

By fax to: 020 8753 3036

Department (5/2) Minicom: 020 8753 5753

King Street W6 9JU

By post to:

Development Plans

Environment

We will publish all comments that we receive and make these available at the LDF information points, namely:

- Hammersmith Town Hall Extension, third floor, Environment Department
- Fulham Town Hall housing office
- Public Reference libraries – Hammersmith, Shepherds Bush and Fulham libraries
- Hammersmith Broadway Information Centre

Summaries, and where practicable, full representations will be made available on the Council's website. If you would like more information please phone on 020 8753 3317 or email, fax or write as above.

If you or someone you know cannot read this document or may have difficulty responding, or giving written comments, because of visual impairment or any other reason, please contact us.

6.1.3 It should be noted that the SA of the site specific allocation preferred options follows on from that of the Core Strategy and therefore should be found to both support and conform to those findings of the SA of the Core Strategy DPD.

6.2 THE SITES

6.2.1 Site 1.Hammersmith & City Line Station Car Park (UDP Site 27)

Issue

6.2.1.1 This site has a highly central location in Hammersmith town centre and has excellent public transport accessibility. It is situated next to the railway station and opposite the Lyric Square. It is understood that Transport for London (TfL) has aspirations for station improvements/extension. This site has considerable significance to the wider regeneration of the town centre and there are opportunities for possibly enlarging the site, not only by including the station but also by linking it with development opportunities that adjoin the railway lines and have frontages on Shepherds Bush Road. The site is currently used as a car park and houses accommodation for voluntary groups.

Preferred option 1a

6.2.1.2 Offices and residential, together with some retail and significant leisure uses. Development should create an active frontage and be linked to Lyric Square. The site could be developed with the Hammersmith Palais site and a new link over the Hammersmith and City line.

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO.	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
1a	✓	✓	0	✓	✓	✓	?	✓	✓	✓	?	✓	
1b	✓	✓	0	0	✓	✓	0	✓	✓	✓	?	?	Less emphasis on low-cost housing
1c	✓	✓	0	0	✓	✓	0	✓	✓	X	?	✓	More emphasis on new shopping

NB in all these tables the preferred option is shown first, and highlighted in a grey tone

Planning Commentary

6.2.1.3 *Hammersmith town centre is the borough's premier office location and a mix of uses on this site, including offices, would help strengthen this position and allow it to maintain its status against competition from other schemes, for example at the White City Opportunity Area. However, because the site offers potential for other uses, for example residential, for which there is an identified need in the borough, a mixed use scheme that included a proportion of other uses would be appropriate. Retail at ground floor level would add to the vitality of this part of the centre and support the overall strategy for consolidating Hammersmith as a major town centre. Bridging over the railway would create a larger site that could provide a greater mix of uses and greater opportunities for town centre regeneration. However, there may be difficulties in reaching agreement for what would be a more complex development and consequent delays in developing the sites.*

Sustainability Commentary

6.2.1.4 *The preferred option should contribute to most sustainability objectives. There may be adverse health impacts if all types of B class uses are allowed in a town centre. The large scale amalgamation may require additional resources in building over rail and road, but will provide opportunities for combined heat and power schemes, and for more intensive use of under-used railway land. There may be a change in the character of area as a result of a large multi-site scheme*

Alternative options 1b and 1c not selected

6.2.1.5 These were:

- Carrying forward existing UDP policy, namely a mixed use development including shopping, B1 offices and community services (including arts or cultural or entertainment or recreation activities).
- More of an emphasis on retail-led mixed-use redevelopment. Shops at lower floor complemented by entertainment and cultural uses above e.g. cinema and restaurants

Planning Commentary

6.2.1.6 *These two options do not take the opportunity to identify residential as a possible use. Also they do not provide satisfactory emphasis towards office provision, which is important given that the town centre is the borough's premier office location. The options also fail to identify that the potential of the site could be enhanced by building over the station and linking with other sites. Failure to provide offices and residential could undermine the site's full potential.*

Sustainability Commentary

6.2.1.7 *Overall the preferred option fulfils more objectives, but the differences are small.*

6.2.2 Site 2. Hammersmith Palais, Shepherds Bush Road (UDP Site F)

Issue

2.2.1 The Palais is located in Hammersmith town centre and has recently closed down. It was included in the existing UDP because there was the possibility of redevelopment at that time. Redevelopment is now more certain and a site policy would help promote continued leisure use. There is the possibility of combining the site with the Hammersmith & City Line Station Car Park (UDP Site 27).

Preferred option 2a

2.2.2 A mixture of leisure with residential and other uses. An active street frontage should be provided

SUSTAINABILITY APPRAISAL OF PREFERRED OPTION													
SITE & OPTION NO.	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
2a	✓	✓	0	✓	✓	?	X	0	✓	✓	✓	?	Fewer jobs if leisure uses share site with residential. Loss of iconic heritage site.
2b	✓	✓	0	0	✓	✓	?	✓	✓	✓	✓	✓	

Planning Commentary

2.2.3 *The site is large enough and in a location where a mix of uses would be suitable and could most benefit the continued viability of the town centre. Bridging over the railway would create a larger site that could provide a greater mix of uses and greater opportunities for town centre regeneration. However, there may be difficulties in reaching agreement for what would be a more complex development and consequent delays in developing the sites.*

Sustainability Commentary

2.2.4 *The preferred option is for primarily residential and leisure uses. This accords with the SA for the Core Strategy (Options 2.3.2; 7.3.2; 7.5.4). However the option allows for other uses, which cannot be appraised without knowing what they are*

Alternative option 2b not selected

2.2.5 Carrying forward existing UDP policy, namely leisure uses with or without other appropriate town centre uses

Planning Commentary

2.2.6 *Failure to provide a mix of uses, including the possibility of residential, could undermine the site’s full potential.*

Sustainability Commentary

2.2.7 *The rejected option does not include a residential element, so would not meet so many sustainability objectives as the preferred option.*

6.2.3 Site 3. White City Opportunity Area Sites

Issue

6.2.3.1 Within the White City Opportunity Area there area number of sites with the potential for development. The council and Greater London Authority (GLA) have published a development framework for the area as the first stage towards securing the comprehensive regeneration of this land. The White City Landowners are preparing a master plan for the area that is based on this framework. At the “issues and options stage” they said that “a potential site to be allocated in the LDF is supported” and that the LDF should be “encouraging the regeneration of this area for mixed-use development”. Others stated that the area had potential for new public open spaces and that there should be coherent linkages with the adjoining Westfield development. In the London Plan, the GLA sets out indicative estimates of 11,000 new jobs and 1,200 new homes for the whole Opportunity Area, whilst in the Draft Further Alterations to the London Plan the figures are 24,400 jobs and 3,500 homes.

Preferred option 3a

6.2.3.2 This site is to be developed comprehensively, to provide a primarily residential scheme with associated supporting infrastructure and facilities, open space, a mix of employment uses and a waste management facility to meet the needs of the development. The new housing must provide for a mixed and balanced community, meet the housing needs of local residents and be integrated with the surrounding area, including the White City Estate. The development is to provide an accessible and a high quality environment and townscape. The development of this site will also need to improve access to the transport networks, particularly the public transport network open space, health and other community facilities

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
3a	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	impacts uncertain
3b	-	-	-	-	-	-	-	-	-	-	-	-	not required
3c	-	-	-	-	-	-	-	-	-	-	-	-	not required

Planning Commentary

6.2.3.3 *It is important that this land which is in a number of different ownerships is developed comprehensively for a mix of uses to achieve the vision and objectives*

of the Opportunity Area and secure full regeneration benefits. It is not appropriate to identify quanta of development because these will need to be subject to supporting background studies.

Sustainability Commentary

6.2.3.4 *The preferred option is consistent with the appraisal of Core Strategy Option 5.1.2(a) and 5.1.2(b), and with the SA carried out for the WCOA Development Framework. The preferred option fills a wide range of sustainability objectives, but careful design will be needed to ensure the detailed layout do not have serious impacts. However because the quantum of land uses is not specified a verdict on the impacts of the full proposal must be provisional.*

Alternative options 3b and 3c not selected

6.2.3.5 These were:

- Developing an SPD for the area
- Having individual proposals for each site within the WCOA

Planning Commentary

6.2.3.6 *A SPD is not considered appropriate because this would need to relate back to the saved UDP, and this document does not have appropriate policies to allow for a mix of uses suitable for this 18 ha site. An SPD cannot set out policy and it would not assist greatly in taking forward the development of this area. With regard to the possibility of developing separate site policies for the different land holdings within the WCOA, it is considered that this would not maximise the development potential of this important strategic opportunity area.*

Sustainability Commentary

6.2.3.7 *The rejected options raise issues of planning procedure, so a sustainability appraisal is not appropriate.*

2.4 Site 4. Hammersmith Embankment Phase 2

Issue

6.2.4.1 This site is within the Thames Policy Area (TPA). It is part of a former industrial estate which has been partly redeveloped as an office park following planning permission in 2000. A more recent planning application for a larger quantum of offices and other uses on the undeveloped part of the site received planning permission in March 2007. At the "issues and options stage" the owners questioned the value of a separate site policy, but it is the council's view that a policy could confirm the uses that the council would wish to see on this riverside site. If development commences before the LDF Sites DPD is adopted the site policy would be withdrawn. The existing UDP includes the site within an employment zone, but it is not intended to continue this designation in the LDF.

Preferred option 4a

6.2.4.2 Either B1 class office uses or a mix of uses including employment and residential use. Development should be of high quality and maximise access to the river, including the provision of the riverside walk.

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
4a	✓	✓	?	✓	✓	?	✓	✓	0	0	?	✓	Flood risk
4b	✓	✓	?	0	0	✓	✓	✓	0	0	?	✓	Flood risk

Planning Commentary

6.2.4.3 *A site policy could confirm the uses that the council wishes to see on this riverside site.*

Sustainability Commentary

6.2.4.4 *This proposal is broadly consistent with the preferred options relating to release of employment land for a mixture of uses. A wholly office use can encourage shared transport use by workers on the site*

Alternative option 4b not selected

6.2.3.5 Site policy based on existing UDP Employment Zone policy, namely redevelopment for B-class purposes.

Planning Commentary

6.2.4.6 *It is not appropriate to pursue such a policy because it is not proposed to continue with employment zone designation in the LDF. Also, an employment only scheme would fail to recognise the regeneration opportunities of this prominent riverside site.*

Sustainability commentary

6.2.4.7 *The alternative option is for only B-class uses, and therefore better for jobs.*

6.2.5 Site 5. Seagrave Road car park

Issue

6.2.5.1 The Seagrave Road car park is used primarily for parking and servicing in association with Earls Court. It has employment zone designation in the existing UDP, but it is not proposed to continue with this in the LDF. The council's Employment Land and premises Study carried out by Atkins suggests employment intensification would be beneficial. Immediate proximity to West Brompton station means additional scope for higher density development. In addition, Network Rail has identified the station and adjoining land as a possible development site for mixed use and station improvements. At the "issues and options stage" the Seagrave Road car park owners, Earls Court and Olympia Group, said that the site should be "covered by a new designation which encourages its development for a mixture of uses, including

private residential, employment and retained parking and marshalling for the Earls Court exhibition centre”. A site policy could promote positive change.

Preferred option 5a

6.2.5.2 Residential, with possibly some B class employment uses, providing that the servicing and essential car parking for Earls Court can be maintained satisfactorily, either on or off the site. Open space should be provided as part of any residential development.

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
5a	✓	?	?	✓	0	✓	?	X	0	?	?	?	Potential effect on W.Brompton Wildlife Garden.
5b	0	0	?	0	0	✓	0	?	?	0	?	✓	
5c	?	?	?	?	?	?	X	?	?	?	?	?	Effect on Wildlife Garden

Planning Commentary

6.2.5.3 *This large site has been integral to the operation of the Earls Court exhibition centre for many years. It is however underused and offers the opportunity for development for a mix of uses, including parking provision for Earls Court, for example in a ground floor car park, whilst introducing additional uses on upper floors. Its future should not be dependent on linking with the station site.*

Sustainability Commentary

6.2.5.4 *The preferred option improves upon previous proposals by including a residential element, but the car-parking use remains. It may cause uncertainty for the West Brompton Wildlife Garden, currently on the adjoining Network Rail land.*

Alternative options 5b and 5c not selected

6.2.5.5 5b: Existing UDP Employment Zone policy which seeks to retain and promote B class uses, together with car parking and servicing facilities for Earls Court.

5c: Including as a sub-option, extending the site by amalgamating it with the land around West Brompton station and pursuing either the preferred or alternative option that was not selected.

Planning Commentary

6.2.5.6 *It is not appropriate to pursue a policy based on the UDP because it is not proposed to continue with employment zone designation in the LDF. Also, an employment only scheme would fail to recognise the regeneration opportunities that this site offers.*

6.2.5.7 *In respect of the possibility of including West Brompton station in the development site, this would not be ruled out within the preferred option. However, because of the issues that this would raise, including decking over a railway line and joint working with a neighbouring borough it is not considered appropriate to insist that this happens.*

Sustainability Commentary

6.2.5.8 *Option 5b may make less contribution to reducing transport impacts if more car parking occurs. Option 5c will put the Wildlife Garden at risk*

6.5.6 Site 6. Network Grid Land, Imperial Road [formerly British Gas]

Issue

6.5.6.1 Site lies within an existing UDP employment zone. On site are gas holders and notifiable installations under the Planning (Hazardous Substances) Regulations 1992 which are operated by National Grid Gas. In addition, there is non-operational land owned by National Grid Property Ltd. The owners have made LDF Issues and Options representations calling for flexibility in the permitted uses and consider that “much of the non-operational land is suitably located for uses apart from employment”. Atkins labelled it as an opportunity site within an area for general mixed use or residential development. Although the area could be left to be dealt with under core strategy policies, it is considered more appropriate to promote development of this land in a way that meets a variety of borough needs. Any proposal will need to recognise that full development of the site may not be possible if National Grid Gas decide to maintain an operational presence on site.

Preferred option 6a

6.5.6.2 A mix of uses including residential and B class employment uses, a waste handling facility and open space

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
6a	✓	✓	0	✓	0	✓	?	✓	✓	✓	✓	✓	see comments re waste
6b	✓	?	0	0	0	✓	?	✓	?	?	?	✓	

Planning Commentary

6.5.6.3 *Notwithstanding development constraints that exist, such a big site offers the opportunity for a mix of uses. A mixed use site policy consisting of employment uses and a residential element would be in keeping with other developments in this part of the borough. The level of public transport accessibility may necessitate non-intensive business development unless there are significant improvements. A waste facility would also be suitable and could meet local needs. There are likely to be soil contamination costs which*

could impact on the mix of the scheme; the protected gas holders should be retained.

Sustainability Commentary

6.5.6.4 *The preferred option adds residential and waste management to the proposed uses for this site. These uses may not be compatible. The contamination problem suggests that this site is better suited to use for a waste management facility, or renewable energy facility, for which there is a need.*

Alternative option 6b not selected

6.5.6.5 Continue to promote use for B-class purposes in line with existing UDP Employment Zone policy.

Planning Commentary

6.5.6.6 *It is not appropriate to pursue a policy based on the UDP because it is not proposed to continue with employment zone designation in the LDF. Also, an employment only scheme would fail to recognise the regeneration opportunities that this site offers*

Sustainability Commentary

6.5.6.7 *The restricted mix of uses in the alternative option will not meet so many objectives.*

6.5.7 Site 7. Fulham Wharf

Issue

6.5.7.1 The site is within the TPA and is currently subject to a UDP site policy that also includes Comleys Wharf and Swedish Wharf (see Site 8 below) and allocates the site for employment use. Fulham Wharf is understood to have been acquired by Tesco Stores Ltd and is occupied by vacant warehousing. Tesco Stores Ltd has indicated that it would like a superstore plus residential on the site, and at the “issues and options” stage said that “alternative mixed use development could be appropriate alongside the safeguarded wharves, that would make a positive contribution to this locality”. The site also neighbours a Sainsbury store, which have recently been granted permission for an extension. The Employment Land and Premises Study carried out by Atkins envisages employment intensification in this area, but this raises issues because of limited transport accessibility.

Preferred option 7a

6.5.7.2 Mixed non-retail use with some residential if compatible with the adjoining safeguarded wharf. Development should be of high quality, include an active river frontage and incorporate a riverside walk.

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
7a	✓	✓	0	✓	✓	✓	✓	✓	✓	?	✓	✓	
7b	0	✓	0	0	✓	✓	✓	✓	✓	?	✓	✓	
7c	✓	✓	?	?	✓	?	?	?	?	?	?	?	

Planning Commentary

6.5.7.3 *This option would be part of an approach that splits the existing UDP site into three parts. It would promote development of Fulham Wharf whilst retaining clear safeguarding for the operational wharves. A mixed development on Fulham Wharf with possibly some residential, if this was compatible with the wharves, would allow for a buffer zone for the safeguarded wharves.*

Sustainability Commentary

6.5.7.4 *The preferred option would contribute to most sustainability objectives.*

Alternative options 7b and 7c not selected

6.5.7.5 These were:

- Carrying forward UDP site and policy, namely Fulham Wharf combined with Swedish, Comleys and Albert wharf sites. Allocate for B Class or similar use, with Swedish and Comleys' wharves safeguarded against development that could preclude their future use for the transshipment of freight, including waste and aggregates, and for freight related activities, in accordance with Strategic Guidance for the River Thames RPG3b/9b.
- Amending existing UDP site policy to permit a mix of uses on Fulham Wharf that would bring beneficial new uses to the locality and open up the riverside for public use whilst retaining the safeguarded wharves

Planning Commentary

6.5.7.6 *The UDP approach clearly seeks the continued safeguarding of the operational wharves, although the Strategic Guidance for the River Thames RPG3b/9b has now been superseded by the London Plan. It would not permit uses that would impact negatively on the riparian operations of these sites and specifically states that residential would not be appropriate to continued wharf use. The policy would be in conformity with the London Plan, although GLA policy guidance does not fully close the door on principle of residential.*

6.5.7.7 *However, although the UDP policy clearly promotes B class or similar uses, Fulham Wharf has remained vacant. The prescriptiveness of the*

policy may have led to the under use of Fulham Wharf, and if this is the case it is important that further consideration is given to how this important site can be brought back into use, namely a specific policy that refers to Fulham Wharf only.

Sustainability Commentary

6.5.7.8 *These options are less sustainable because they provide fewer specific mechanisms to secure continued use of some of the wharves*

6.5.8 Site 8. Comleys Wharf and Swedish wharf

Issue

6.5.8.1 The site is within the TPA. Comleys Wharf and Swedish Wharf are subject to wharf safeguarding for cargo handling uses and are in operational use. In the LDF Issues and Options consultation, Cemex Materials UK Ltd the owner of Comleys Wharf commented at the issues and options stage that “it is possible to make more efficient use of land, to incorporate a mix of employment and residential uses at this site, whilst maintaining its existing operational (plant/aggregate) activities and use of the riverside wharf”. The Port of London Authority stated in its representations that “if a wharf is viable or capable of being made viable for cargo handling, alternative development should be resisted”. The London Plan states that “the Mayor will, and boroughs should, protect safeguarded wharves” and adds that “redevelopment of safeguarded wharves should only be accepted if the wharf is no longer viable or capable of being made viable for cargo handling”.

Preferred option 8a

6.5.8.2 Wharves should be safeguarded for the transshipment of freight including waste and aggregates and freight related activities. Employment and residential uses may be appropriate where this can be provided without impacting on the safeguarded wharves. Development should be of high quality and maximise access to the river, including the provision of a riverside walk.

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
8a	✓	✓	0	0	✓	✓	?	✓	✓	0	✓	✓	
8b	-	-	-	-	-	-	-	-	-	-	-	-	Differences not significant
8c	-	-	-	-	-	-	-	-	-	-	-	-	Differences not significant

Planning Commentary

6.5.8.3 *This approach clearly seeks the continued safeguarding of the operational wharves. It would not permit uses that would impact negatively on the riparian operations of these sites and specifically states that residential would be appropriate only if it can be provided without impacting on the wharf.*

The policy would be in conformity with the London Plan. A riverside walk would be sought if this did not impact on the working wharves.

Sustainability Commentary

6.5.8.4 The preferred option meets an important strategic sustainability objective, to encourage river transport.

Alternative options 8b and 8c not selected

6.5.8.5 These were:

- Carry forward UDP site and policy, namely B Class or similar use suitable for Townmead EZ, with Swedish and Comleys' wharves safeguarded against development that could preclude their future use for the transshipment of freight, including waste and aggregates, and for freight related activities, in accordance with Strategic Guidance for the River Thames RPG3b/9b
- Amend existing UDP site policy to permit a mix of uses on Fulham Wharf that would bring beneficial new uses to the locality and open up the riverside for public use whilst retaining the safeguarded wharves

Planning Commentary

6.5.8.5 The UDP approach clearly seeks the continued safeguarding of the operational wharves, although the Strategic Guidance for the River Thames RPG3b/9b has now been superseded by the London Plan. It would not permit uses that would impact negatively on the riparian operations of these sites and specifically states that residential would not be appropriate to continued wharf use. The policy would be in conformity with the London Plan, although GLA policy guidance does not fully close the door on principle of residential.

6.5.8.6 However, linking the sites with Fulham Wharf is not considered the most appropriate way forward. Fulham Wharf has remained underused and to promote B class or similar uses for this site undermines potential for residential use. The prescriptiveness of the policy may have led to the underuse of Fulham Wharf, and by developing separate site policies it allows more opportunities for Fulham Wharf whilst still protecting the working wharves. It will also reduce any confusion about whether the sites, including Fulham Wharf, should be considered as a whole.

Sustainability Commentary

6.5.8.7 These options are less sustainable because they provide fewer specific mechanisms to secure continued use of some of the wharves

6.5.9 Site 9. Albert Wharf

Issue

6.5.9.1 Site is within the TPA, it is in a variety of uses and is currently subject to a UDP site policy that also includes Comleys Wharf and Swedish Wharf (see Site 8 above) and allocates the site for employment use. The council, whilst not necessarily wanting to promote development of this site,

considers that because of its proximity to working wharves it is appropriate to outline policy that would apply to the site if it became available for redevelopment.

Preferred option 9a

6.5.9.2 Mixed use with some residential if compatible with the adjoining safeguarded wharf. Development should be of high quality, include an active river frontage and incorporate a riverside walk

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
9a	✓	✓	?	✓	✓	X	✓	?	✓	?	✓	✓	
9b	-	-	-	-	-	-	-	-	-	-	-	-	Differences not significant

Planning Commentary

6.5.9.3 *Although this site is within a variety of active uses, redevelopment could assist in achieving a number of council objectives, such as access to the Thames and provision of another section of the riverside walk as well as provision of residential as part of a mixed use scheme.*

Sustainability Commentary

6.5.9.4 *The preferred option is compatible with most sustainability objectives. It is however likely to increase the pressure for redevelopment for non employment uses. Apart from this the difference between this and the rejected option is unlikely to be significant, but this is difficult to estimate because of the general nature of the preferred option.*

Alternative option 9b not selected

6.5.9.5 Carry forward UDP site and policy, namely B Class or similar use suitable for Townmead EZ, with Swedish and Comleys' wharves safeguarded against development that could preclude their future use for the transhipment of freight, including waste and aggregates, and for freight related activities, in accordance with Strategic Guidance for the River Thames RPG3b/9b

Planning Commentary

6.5.9.6 *The UDP approach clearly seeks the continued safeguarding of the adjoining operational wharves, although the Strategic Guidance for the River Thames RPG3b/9b has now been superseded by the London Plan. It would not permit uses that would impact negatively on the riparian operations of these sites and specifically states that residential would not be appropriate to continued wharf use. The policy would be in conformity with the London Plan, although GLA policy guidance does not fully close the door on principle of residential.*

6.5.9.7 However, linking Albert Wharf with the working wharves in one site policy is not considered the most appropriate way forward. It undermines potential for residential use, and by developing separate site policies it allows more opportunities for Albert Wharf whilst still protecting the working wharves. It will also reduce any confusion about whether the sites, including Albert Wharf, should be considered as a whole.

Sustainability Commentary

6.5.9.8 These options are less sustainable because they provide fewer specific mechanisms to secure continued use of some of the wharves

6.5.10 Site 10. Hurlingham wharf

Issue

6.5.10.1 Site is within the TPA. Hurlingham Wharf is covered by wharf safeguarding for cargo handling uses, but is currently in non-operational use as a car pound. Neighbouring Whiffen Wharf is also occupied by the car pound. The major issue is trying to get the safeguarded wharf back into operation for cargo handling use. Although there have been discussions with a cargo handling river based operation these have not, as yet, led to a planning application for a river based use. The Port of London Authority stated in its representations that “if a wharf is viable or capable of being made viable for cargo handling, alternative development should be resisted”. The London Plan states that “the Mayor will, and boroughs should, protect safeguarded wharves” and adds that “redevelopment of safeguarded wharves should only be accepted if the wharf is no longer viable or capable of being made viable for cargo handling”.

Preferred option 10a

6.5.10.2 Wharf should be safeguarded for the transshipment of freight including waste and aggregates and freight related activities. Employment and residential uses may be appropriate where this can be provided without impacting on the safeguarded wharf. Development should be of high quality and maximise access to the river, including the provision of a riverside walk

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
10a	✓	✓	?	X	✓	✓	?	✓	✓	✓	✓	✓	
10b	-	-	-	-	-	-	-	-	-	-	-	-	Differences not significant
10c	✓	✓	0	?	?	0	✓	0	0	0	0	0	Local not regional sustainability

Planning Commentary

6.5.10.3 This approach clearly seeks the continued safeguarding of the operational wharf. It would not permit uses that would impact negatively on the

riparian operations of this site and specifically states that residential would be appropriate only if it can be provided without impacting on the wharf. The policy would be in conformity with the London Plan.

Sustainability Commentary

6.5.10.4 This option is sustainable in meeting a strategic objective in that it seeks to safeguard a wharf use, and allow greater use of the river for transport

Alternative options 10b and 10c not selected

6.5.10.5 These were:

- Carry forward UDP policy which combines Hurlingham Wharf with Whiffen Wharf and allocates land for B Class or similar use suitable for Carnwath Road EZ, with Hurlingham wharf safeguarded against development that could preclude the future use for the transshipment of freight, including waste and aggregates, and for freight related activities, in accordance with Strategic Planning Guidance for the River Thames RPG3b/9b
- Amend existing UDP site policy to permit a mix of uses on Whiffen Wharf that would bring beneficial new uses to the locality and open up the riverside for public use whilst retaining the safeguarded Hurlingham wharf for the transshipment of freight, including waste and aggregates

Planning Commentary

6.5.10.6 The UDP approach clearly seeks the continued safeguarding of the operational wharf. It would not permit uses that would impact negatively on the riparian operations of this site and specifically states that residential would not be appropriate to continued wharf use. The policy would be in conformity with the London Plan, although GLA policy guidance does not fully close the door on principle of residential.

6.5.10.7 However, linking the site with Whiffen Wharf is not considered the most appropriate way forward. Both sites have remained underused and to promote B class or similar uses undermines potential for residential use. The prescriptiveness of the policy may have led to the underuse of Whiffen Wharf, and by developing separate site policies it allows more opportunities for Whiffen Wharf whilst still protecting the Hurlingham Wharf. It will also reduce any confusion about whether the sites should be considered as a whole

Sustainability Commentary

6.5.10.8 The rejected option 10b is not significantly different. Option 10c could bring a limited number of local sustainability benefits e.g. opening up the riverside, but would not contribute to efforts to encourage greater use of river transport

6.5.11 Site11.Whiffen Wharf

Issue

6.5.11.1 Site is within the TPA. Whiffen Wharf, together with neighbouring Hurlingham Wharf which is subject to wharf safeguarding for cargo handling uses, is occupied by a car pound. The major issue is trying to get the safeguarded wharf back into operation for cargo handling use, and any use of Whiffen Wharf must be designed to be compatible with the neighbouring site.

6.5.11.2 Residential lies to west of Whiffen Wharf and to the north in the Piper Building. The Employment Land and Premises Study carried out by Atkins highlights the site for “new high quality premises alongside reinstatement of wharf use”.

Preferred option 11a

6.5.11.3 Mixed use with some residential if compatible with the adjoining safeguarded wharf. Development should be of high quality, include an active river frontage and incorporate a riverside walk.

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
11a	✓	✓	?	✓	✓	✓	?	✓	✓	✓	✓	✓	
11b	-	-	-	-	-	-	-	-	-	-	-	-	Differences not significant

Planning Commentary

6.5.11.4 *This option would be part of an approach that splits the existing UDP site into two parts. It would promote development of Whiffen Wharf whilst retaining clear safeguarding for Hurlingham Wharf in the policy for Site 10. A mixed development on Whiffen Wharf with some residential, if this was compatible with the safeguarded wharf, would allow for a buffer zone for operational wharf uses.*

Sustainability Commentary

6.5.11.5 *This meets most sustainability objectives*

Alternative option 11b not selected

6.5.11.6 Carry forward UDP policy, namely B Class or similar use suitable for Carnwath Road EZ, with Hurlingham wharf safeguarded against development that could preclude the future use for the transshipment of freight, including waste and aggregates, and for freight related activities, in accordance with Strategic Planning Guidance for the River Thames RPG3b/9b

Planning Commentary

6.5.11.7 *Although the policy clearly safeguards Hurlingham Wharf, it has remained non-operational for many years, whilst a permanent development has also not come forward for Whiffen Wharf. The prescriptiveness of the policy may have led to the non-development of Whiffen Wharf, and by splitting the existing site policy into two it will allow more opportunities to bring this important site back into use. Also, this rejected option fails to acknowledge the possibility of some residential provision which would reflect the residential on the adjoining site.*

Sustainability Commentary

6.5.11.8 *No significant difference from preferred option*

6.5.12 Site 12. Riverside Studios

Issue

6.5.12.1 Site is within TPA. Riverside Studios is used for theatre and film show, and adjoins Queens Wharf which is an underused office building. The two sites are in close proximity to Hammersmith Bridge and at the gateway to Hammersmith town centre and close to the Hammersmith Embankment development site. Any development proposals for Riverside Studios should consider the opportunity of possibly linking with Queens Wharf, thereby creating a larger site that could secure improved accommodation for the theatre and film venue, revitalise this part of the riverside and take into account proposals at Hammersmith Embankment

Preferred option 12a

6.5.12.2 A mixture of arts, culture, entertainment and residential uses. The development should also incorporate a riverside walk

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
12a	0	✓	✓	✓	?	✓	✓	0	?	?	?	✓	
12b	-	-	-	-	-	-	-	-	-	-	-	-	Differences not significant
12c	-	-	-	-	-	-	-	-	-	-	-	-	Inadequate details of use mix

Planning Commentary

6.5.12.3 *A site policy that promotes the development of this site could benefit the riverside by securing part of the riverside walk and improving the appearance of the Riverside Studios site, as well as securing the future of the arts venue. However, the opportunity exists to consider a joint development with neighbouring Queens Wharf (see Site 13). This approach could provide a greater mix of uses, including employment uses. The riverside location and proximity to Hammersmith Bridge would be important design issues*

Sustainability Commentary

6.5.12.4 *This option will achieve many objectives, but the site is further from public transport than other major leisure sites in Hammersmith Town Centre.*

Alternative options 12b and 12c not selected

6.5.12.5 These were:

- Developing a site policy based on existing UDP policy that would seek retention of arts, culture and entertainment use at Riverside Studios and provision of riverside walk
- Developing a mixed use policy for a combined site of Queens Wharf and Riverside Studios

Planning Commentary

6.5.12.6 Seeking replacement arts, culture and entertainment use on Riverside without incorporating a mix of uses or including the possibility of linking the site with Studios Queens Wharf could be missing an opportunity to add to the vitality of the area. However, insisting on a comprehensive development for both sites could deter proposals coming forward

Sustainability Commentary

6.5.12.7 The alternative option for leisure use has the same transport disadvantage as the preferred option. The mixed use option is difficult to assess because of the lack of detail

6.5.13 Site 13. Queens Wharf

Issue

6.5.13.1 Site is within TPA. Queens Wharf is an underused office building and adjoins Riverside Studios (Site 12) which is used for theatre and film shows. The Queens Wharf site has been subject to a number of development enquiries for mixed use. The two sites are at the gateway to Hammersmith town centre and close to the Hammersmith Embankment development site. Any development proposals for Queens Wharf should consider the possible opportunity of linking with Riverside Studios, thereby creating a larger site that could secure improved accommodation for the theatre and film venue, revitalise this part of the riverside and take into account proposals at Hammersmith Embankment

Preferred option 13a

6.5.13.2 A mixture of offices, arts, culture, entertainment and residential uses. The development should also incorporate a riverside walk

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
13a	✓	✓	0	✓	✓	✓	✓	0	?	?	X	✓	See commentary
13b	✓	✓	0	0	0	✓	?	0	X	X	X	✓	See commentary
13c	?	?	?	?	?	?	?	?	?	?	?	?	See commentary

Planning Commentary

6.5.13.3 *A site policy that promotes the development of this site could benefit the riverside by securing part of the riverside walk and improving the appearance of the Riverside Studios site. However, the opportunity exists to consider a joint development with neighbouring Riverside Studios (see Site 12). This approach could provide a greater mix of uses, including arts, culture and entertainment uses. The riverside location and proximity to Hammersmith Bridge would be important design issues*

Sustainability Commentary

6.5.13.4 *This option will achieve many objectives, but the site is further from public transport than other major leisure sites in Hammersmith Town Centre.*

Alternative options 13b and 13c not selected

6.5.13.5 These were:

- Developing a site policy based on existing UDP policy that would seek retention of employment uses at Queens Wharf and provision of riverside walk
- Developing a mixed use policy for a combined site of Queens Wharf and Riverside Studios

Planning Commentary

6.5.13.6 *Seeking replacement offices on Queens Wharf without incorporating a mix of uses or including the possibility of linking the site with Riverside Studios could be missing an opportunity to add to the vitality of the area. However, insisting on a comprehensive development for both sites could deter proposals coming forward.*

Sustainability Commentary

6.5.13.7 *The first alternative option means replacing existing buildings that are still in use. The second alternative option is difficult to evaluate because the nature of the mix of uses are not specified.*

.5.14 Site 14. Hammersmith Island Phase 4

Issue

6.5.14.1 This site consists of land earmarked for the final phase of the Hammersmith Island development. It is located adjacent to the largest transport interchange in the borough, and in the heart of Hammersmith Town Centre. It holds considerable regeneration potential for the town centre.

Preferred option 14a

6.5.14.2 A mix of uses including offices, residential, retail, an extension to the bus station and possibly a hotel.

SUSTAINABILITY APPRAISAL													NOTES
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	
14a	✓	?	0	✓	✓	✓	✓	?	✓	✓	✓	✓	Health and pollution risk may increase from exhausts to rail platforms but not significant
14b	✓	?	0	✓	✓	✓	✓	?	✓	✓	✓	✓	

Planning Commentary

6.5.14.3 *A mix of uses would be acceptable in this location. These could include residential, if this did not detract from the provision of an office led scheme and the enhancement of public transport facilities, and ground floor uses that added vitality to this part of the Hammersmith Island. The site's location and the nature of surrounding buildings mean that a tall building could be suitable.*

Sustainability Commentary

6.5.14.4 *This meets most objectives. Slight but not significant pollution and health impacts.*

Alternative option 14b not selected

6.5.14.5 Introduce a site policy based on existing planning consent to enhance Hammersmith Island's function as a public transport hub and commercial centre.

Planning Commentary

6.5.14.6 *This approach would promote the improvement of bus station facilities and the provision of office floorspace to consolidate Hammersmith's town centre status. Replacement accommodation for the community use currently displaced would also be required. However, without the introduction of other uses in addition to those outlined in the existing planning permission there would be little justification for a site policy. There would also be a missed opportunity to provide for a greater mix of uses suitable for the town centre.*

Sustainability Commentary

6.5.14.7 *The sustainability impact is not significantly different from preferred option.*

6.5.15 Site 15. Hammersmith Town Hall extension

Issue

6.5.15.1 The redevelopment of the Town Hall extension is required as part of the rationalisation of civic buildings to provide more and improved office and associated accommodation. The opportunity also exists of linking the site to the car park in Nigel Playfair Avenue and the cinema fronting King Street, thereby creating a larger development site that could provide a mix of town centre uses. Redevelopment would also provide the opportunity to improve the setting of the listed main Town Hall building and provide active uses as ground floor level. It would be inappropriate not to have a policy for such a large development opportunity that could have a great impact on the regeneration of this part of the town centre.

Preferred option 15a

5.15.2 New civic accommodation and a mix of uses, which could include retail, offices and/or residential, together with a cinema if feasible.

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
15a	✓	0	✓	?	✓	✓	✓	0	?	?	✓	✓	
15b	✓	0	✓	0	✓	✓	✓	0	0	?	✓	✓	

Planning Commentary

6.5.15.3 *This would meet civic accommodation needs and provide additional uses that could help maximise the potential of the site and its contribution to the regeneration of Hammersmith town centre. These uses could include retail, leisure (for example replacement cinema) and residential and would assist in counter balancing development opportunities around Hammersmith Broadway. The possibility should also be explored of improving access to the riverside.*

Sustainability Commentary

6.5.15.4 *Redevelopment of the Town Hall extension could make a major environmental improvement both visually, and because the car park is closed and not replaced. Question over impact on affordable housing if existing housing is replaced, and on social cohesion if cinema is not replaced.*

Alternative option 15b not selected

6.5.15.5 Have a site policy for replacement of the Town Hall extension with an alternative civic building.

Planning Commentary

5.15.6 *This option would allow for a development that provided improved civic accommodation and an improved street frontage. However, the viability of such a scheme would depend in part on the inclusion of other uses. The King Street frontage provides an opportunity for retail uses, but without adjoining land, such as the car park in Nigel Playfair Avenue, included in a development site, there is a less opportunity for a mix of uses and for more floorspace to be dedicated to these uses.*

Sustainability Commentary

6.5.15.7 *This would not raise potential problems over future of existing housing, but does not improve transport because car park is not closed.*

6.5.16 Site 16. 84-88 Fulham High Street and adjoining land

Issue

6.5.16.1 The site is currently in a mix of uses and a number of ownerships. Firstly there is 84-88 Fulham High Street that has permission for mixed use consisting of 46 residential units (28 affordable), offices (1054 sq m), retail (295 sq m) and restaurant (403 sq m). Secondly, there is the Wharf Study Centre site which has been linked with 84-88 Fulham High Street as a possible enlarged scheme involving more residential.

Preferred option 16a

6.5.16.2 A mix of uses including retail at ground floor level to create an active street frontage and residential use on the upper floors

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
16A	✓	✓	?	✓	✓	?	✓	✓	✓	✓	?	✓	
16B	-	-	-	-	-	-	-	-	-	-	-	-	Insufficient detail

Planning Commentary

6.5.16.3 *A site policy could promote a coordinated development of the various land parcels and protect buildings of merit. A mix of uses, with significant residential, would be appropriate for this area which has commercial premises along Fulham High Street.*

Sustainability Commentary

6.5.16.4 *The preferred option meets the majority of sustainability objectives, providing any current uses of the Wharf Study centre can be replaced.*

Alternative option 16b not selected

6.5.16.5 No site policy

Planning Commentary

6.5.16.6 *Without a site policy, the future of the various land parcels will be considered in the context of the core strategy DPD. The possibility of maximising development options could be lost under this scenario.*

Sustainability Commentary

6.5.16.7 *Fewer sustainability benefits likely if no site policy e.g. retention of education facility.*

6.5.17 Site 17. Former Savoy Bingo Club, Westway

Issue

6.5.17.1 The site is part of existing UDP Site H. It remains vacant despite residential redevelopment of the adjoining Westway land. It is on a prominent entrance to the borough and would benefit from the promotion of redevelopment options. The alternative to a site policy would be to rely upon general core strategy policies to determine any planning application and handle issues such as its relationship with the A40

Preferred option 17a

6.5.17.2 A mix of uses to create an active street frontage at ground floor level and residential use on the upper floors

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
17a	?	?	0	?	?	?	?	?	?	?	?	✓	See commentary
17b	?	?	0	?	?	?	?	?	?	?	?	✓	See commentary

Planning Commentary

6.5.17.3 *This site has potential for a number of uses and would lend itself to a mixed use development featuring residential above active ground floor uses. This would need to relate to the existing East Acton local centre and address isolated pedestrian access, caused by major traffic issues. To be*

acceptable, the residential would need to satisfactorily address the environmental constraints posed by the A40.

Sustainability Commentary

6.5.17.4 The assessment is uncertain because it is not clear what kind of "active use" is proposed, or likely to be economically viable and well-used because it is isolated from the main part of the town centre. It may achieve more sustainability objectives if the site is wholly redeveloped for housing with

appropriate environmental safeguards, rather than a risk that the site may remain vacant, or be developed with a leisure use remote from the main shopping frontage.

Alternative option 17b not selected

6.5.17.5 Carry forward UDP policy, namely an appropriate 'ACE' facility or other community service use that could include local shopping.

Planning Commentary

6.5.17.6 The current UDP policy emphasises the need to provide replacement community service use, including local shopping, on this part of UDP Site H. This could relate well to the East Acton local shopping centre. However, given that the site has remained vacant, there is a question mark over whether such a use would be viable. A residential mixed use scheme, however, could attract developer interest. A high quality building is required for this gateway to the borough.

Sustainability Commentary

6.5.17.7 No significant differences from preferred option

5.18 Site 18. Former Odeon Cinema, shepherds Bush Green

Issue

6.5.18.1 The Odeon has remained unused since a bingo operator closed a number of years ago. The building is listed. It is within Shepherds Bush town centre and has been subject to a number of development enquiries. It has a prominent position opposite the Green and the council's priority is to get the building back into a use that preserves the building and adds to the vitality of the town centre. A site policy will help guide some of the uncertain issues, such as the complexities arising from its listed building status. Without a site policy promoting development, proposals to be dealt with in accordance with core strategy policies.

Preferred option 18a

6.5.18.2 Retaining the existing building and redeveloping it for a mix of uses including a hotel, with retail and leisure uses at ground floor level to create an active street frontage and possibly some residential use on the upper floors

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
18a	0	0	✓	0	0	?	✓	✓	✓	?	?	✓	
18b	-	-	-	-	-	-	-	-	-	-	-	-	see commentary

Planning Commentary

6.5.18.3 *This option would encourage the materialisation of the scheme that has been negotiated (or similar) for the site. A hotel-led proposal would help meet the projected future demand for visitor accommodation in the area. This site is in a suitable location for a hotel, and brings benefits for Shepherd's Bush through increased spending in the locality.*

Sustainability commentary

6.5.18.4 *The preferred option will introduce a new range of jobs. The re-use of existing premises for a hotel well-served by public transport will make a positive contribution to other objectives.*

Alternative option 18b not selected

6.5.18.5 Introduce a site policy for other uses.

Planning Commentary

6.5.18.6 *A mixed use scheme, such as residential units above an active ground floor use, may be acceptable and could also prove commercially suited to bringing the listed building back into use. However town centre benefits need to be maximised on this site in the context of Shepherd's Bush and White City as a whole. It is also preferable for the listed building to retain an element of its leisure/entertainment use*

Sustainability Commentary

6.5.18.7 *The alternative option does not provide enough detail for appraisal.*

6.5.19 Site 19. Old Oak Common Sidings Issue

6.5.19.1 The site comprises of an area of land primarily consisting of railway works and track. The Canal forms its northern boundary, alongside which are designated nature conservation areas. It also contains a significant area of land subject to Crossrail 1 safeguarding. Notwithstanding Crossrail, the land is subject in particular to continued requirements of railway operators and at the "issues and options" stage Network rail stated that the site is "currently on long lease for rail maintenance purposes and is unlikely to be available for development in the short, or even medium term". Existing UDP policy seeks to retain for B class activities. The site is within the Park Royal Strategic Industrial Location (SIL) as identified in the Draft Further Alterations to the

London Plan and the existing UDP (and proposed LDF) Hythe Road employment zone.

Preferred option 19a

6.5.19.2 A mix of uses, including safeguarding for Crossrail and protection of existing railway uses, B class employment and possibly some residential use. Biodiversity to be protected.

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
19a	0	?	0	?	0	✓	✓	X	X	X	X	?	
19b	0	?	0	?	0	✓	✓	X	X	X	X	?	

Planning Commentary

6.5.19.3 *This is a large area of land within a SIL that is held by a number of railway operators. A site policy would promote development opportunities in accordance with London wide and local priorities if and when land, or parts of it, became available. Residential may be a possibility subject to satisfactory environmental assessment, but would be secondary to SIL priorities.*

Sustainability Commentary

6.5.19.4 *The site fulfils a strategic objective by providing railway servicing facilities. Any development would benefit from increased transport accessibility.*

Alternative option 19b not selected

6.5.19.5 Uses that reflect existing UDP employment zone policy, namely B1c, B2 and B8 and similar *sui generis* uses, including provision of facilities to reduce, re-use or recycle/compost locally produced waste.

Planning Commentary

6.5.19.6 *Although the environment of this site is dominated by railway uses, it is not considered appropriate to preclude the possibility of some residential if this could be satisfactorily designed and integrated into the area.*

Sustainability Commentary

6.5.19.7 *To encourage the replacement of railway service areas needed for that purpose will prejudice the attainment of national and local sustainability objectives encouraging greater use of public transport*

6.5.20 Site 20. Old Oak Sidings

Issue

6.5.20.1 This site has been developed as a waste handling facility with servicing by rail and canal, including a purpose built wharf. The site is within the existing UDP Hythe Road employment zone which it is proposed to retain

in the LDF and which is identified as suitable for provision of facilities to reduce, re-use or recycle/compost locally produced waste. It is also in the

Park Royal Strategic Industrial Location (SIL) The London Plan states that boroughs should “protect existing waste sites and facilitate the maximum use of existing waste sites, particularly waste transfer facilities...”.

Preferred option 20a

6.5.20.2 To safeguard the use of the site for waste management purposes

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
20a	✓	✓	0	0	0	?	✓	✓	✓	✓	✓	✓	
20b	✓	✓	0	0	0	?	✓	✓	✓	?	✓	✓	See commentary

Planning Commentary

5.20.3 *This option would be in conformity with the London Plan.*

Sustainability Commentary

6.5.20.4 *This option may not advance local sustainability objectives but will advance Borough-wide objectives in a way that more than compensates.*

Alternative option 20b not selected

6.5.20.5 Having no site policy or allocating the site for an alternative use.

Planning Commentary

6.5.20.6 *No site policy would be contrary to the London Plan. Also, if the site was allocated for another use, the London Plan would require the council to find an alternative site for waste treatment.*

Sustainability Commentary

6.5.20.7 *This option cannot be assessed because of the lack of detail*

6.5.21 Site 21. EMR site, Hythe Road

Issue

6.5.21.1 This site has been developed as a waste handling facility with servicing by rail. The site is within the existing UDP Hythe Road employment zone which it is proposed to retain in the LDF and which is identified as suitable for provision of facilities to reduce, re-use or recycle/compost locally produced waste. It is also in the Park Royal Strategic Industrial Location (SIL). The London Plan states that boroughs should “protect existing waste sites and facilitate the maximum use of existing waste sites, particularly waste transfer facilities...”.

Preferred option 21a

6.5.21.2 To safeguard the use of the site for waste management

SUSTAINABILITY APPRAISAL													
SITE & OPTION NO	Social justice	Healthy population	Education and skills	Affordable homes	Increase social cohesion	Satisfying and well-paid work	Environmental heritage	Reduce pollution	Reduce effects of transport	Responsible consumption	Reduce climate change impact	Sustainable economy	NOTES
21a	✓	✓	0	0	0	?	✓	✓	✓	✓	✓	✓	
21b	-	-	-	-	-	-	-	-	-	-	-	-	Insufficient detail

Planning Commentary

6.5.21.3 *This option would be in conformity with the London Plan.*

Sustainability Commentary

6.5.21.4 *This option may not advance local sustainability objectives but will advance Borough-wide objectives in a way that more than compensates.*

Alternative option 21b not selected

6.5.21.5 Having no site policy or allocating the site for an alternative use.

Planning Commentary

6.5.21.6 *No site policy would be contrary to the London Plan. Also, if the site was allocated for another use, the London Plan would require the council to find an alternative site for waste treatment.*

Sustainability Commentary

6.5.21.7 *This option cannot be assessed because of the lack of detail.*

Alternative options not selected

6.5.21.8 Having no site policy or allocating the site for an alternative use.

Planning Commentary

6.5.21.9 *No site policy would be contrary to the London Plan. Also, if the site was allocated for another use, the London Plan would require the council to find an alternative site for waste treatment.*

Sustainability Commentary

6.5.21.10 *This option cannot be assessed because of the lack of detail.*